

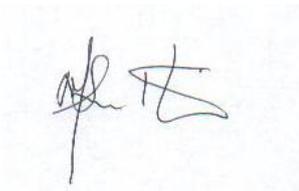
Health & Safety Statement

Ross & Roberts believes that its employees are its most valuable resource and that their health, safety and wellbeing is of paramount importance across all our operations.

We recognise that our activities relate to offices and sites where hazards may exist. We will at all times conduct our activities in a manner that prevents the injury and ill health of our employees and others who may be affected and aim to make health and safety an integral part of everything we do. Our health and safety management systems are designed to ensure continual improvement and are a cornerstone of our success. To be successful, we are committed to the following objectives and expectations:

- We strive to create a positive safety culture, involving all of our employees, contractors, suppliers and stakeholders.
- We will comply with all applicable current and future legal and other requirements to which we subscribe.
- We will seek to identify, share and implement best practices in health and safety management.
- We will consider health and safety in all business decisions, including change processes, to ensure that all risks are properly assessed and managed.
- Health and safety is a line management responsibility.
- Everyone who works for us is responsible for their own health and safety, and for their actions that may impact on others who may be affected.
- All employees are required and empowered to stop work when an unsafe condition arises.
- We will strive to reduce all risks as low as reasonably practicable taking into account all factors.
- We will provide a work environment that is safe for our people, contractors, customers and members of the public.
- Employees will be involved in the processes of hazard identification, risk assessment and their control and prevention.
- Group-wide standards are and will be developed and implemented in all businesses wherever they are located and irrespective of any local differences.
- Systematic reviews of our performance will be carried out regularly, at least annually, and communicated internally and externally.

Health and safety is and will remain a key component of good corporate governance for Ross & Roberts. Our policy will be subject to regular review by top management and will be made available to staff and interested parties.



Neil Smith - Managing Director

Health & Safety Policy

Ross & Roberts recognise the management of Health and Safety as an integral part of our business performance and consider the reduction of workplace injuries and ill health, protecting the environment and reducing unnecessary losses and liabilities to be a key management objective.



We operate a comprehensive integrated management system based around a Plan – Do – Check – Act model. Our integrated management system is focused on environmental stewardship and a commitment at all levels to the continual improvement of health and safety standards. At all levels we will ensure that risks are dealt with sensibly, proportionately and responsibly.

Doing the right thing

We have delivered significant improvements in managing health and safety over the last 10 years and this has inspired us to push even harder to further embed a culture of safe behaviour across our business. These 10 principles below define what doing the right thing means to us and are central to how we conduct our business.

1. **Champion it** – *The management team (from the most senior down) exhibit visible leadership commitment to a safe workplace. Directors and managers must look at their own behaviours when it comes to managing health and safety. When effective leadership is present, employees not only feel responsible for their own health and safety, they feel responsible for their colleagues' health and safety, and managers support them acting on that responsibility. In short we want to make it personal - all employees are to be responsible and demonstrate their commitment*
2. **Resource it** – *Every Ross & Roberts' site has a clearly accountable Site Manager or Director in place for overseeing the management of safety, health*

and environment. They are supported by other members of the management team and Site H&S Advisors, First Aiders and Fire Wardens as appropriate for the site. At all levels we ensure that they are provided with the time, training, human and financial resources to fulfil all their safety, health and environment responsibilities. Where the risks justify it they are empowered to appoint their own local resource to provide competent advice.

3. **Integrate it** – Managers integrate health and safety into Ross & Roberts' expenditure (CAPEX) projects, business planning budgets; and staffing (headcount) planning decisions. Safety reviews and considerations are to be factored into the business timelines of new product, process and equipment purchases, installations and new location start-ups.
4. **Assess it** – A risk assessment is a fundamental step in protecting our employees and our business, as well as complying with the law. It helps us focus on the risks that really matter in our workplaces – the ones with the greatest potential to cause harm. Managers are the primary champion of risk management at strategic and operational levels, helping us build a risk aware culture across Ross & Roberts.
5. **Control it** – At strategic and operational levels once managers and employees have identified the risks, they are responsible for deciding how to control them and put the appropriate measures in place. We believe risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible, proportionate measures to control the risks. The law does not expect us to remove all risk completely, but to protect people by putting in place measures to control those risks to an acceptable level.
6. **Train it** – We provide instruction and training for employees at all levels including senior directors and is vital in helping us to achieve competent, safety, health and environmental performance. Ross & Roberts' local management is responsible for the approval and allocation of training resources. Training means helping employees to learn how to do something, telling employees what they should or should not do, or simply giving them information. Training isn't just about formal 'classroom' courses - there are lots of alternatives some of which, for example, toolbox talks, can cost virtually nothing to prepare and deliver.
7. **Communicate it** – We will go further than what is strictly required by law and actively encourage and support consultation and communication in different ways as appropriate. Communication will be delivered by both formal and informal means. What does this mean? – well in short, management will lead by example and demonstrate good positive safety leadership behaviours and back this up by the use of the written word. All such initiatives are supported by management and there is access to advice from the Group H&S Team.
8. **Report it** – We understand that a combination of rewards and sanctions is required to motivate all employees. Our emphasis is on the reinforcement of

positive behaviour which contributes to the reduction of risk and the promotion of a positive culture. It is positive to report all incidents, near misses and unsafe situations and people. We strive to avoid having a blame culture.

9. **Monitor it** – *We use a combination of qualitative and quantitative measures both active and reactive, appropriate to Ross & Roberts’ activities and services to measure our performance. Managers locally will play an active part in monitoring the extent to which Business Unit and Group safety, health and environmental objectives have been met.*

10. **Improve it** – *We will learn from our mistakes through an open and cooperative approach. Performance review is the final step in our cycle. Review constitutes the "feedback" loop, which enables us to reinforce, maintain and improve our ability to reduce risks to the fullest extent to ensure the continued effectiveness of our management system.*

Organisational Responsibilities

To ensure that health and safety is successfully managed within Ross & Roberts, responsibilities have been allocated to directors, managers and employees. In addition, competent persons have been appointed to assist Ross & Roberts in meeting its health and safety obligations.

Ultimate responsibility for health, safety and welfare rests with the Ross & Roberts’ Board of Directors with responsibilities further delegated to Managers, the Group Health and Safety Manager, Ross & Roberts’ Health and Safety Officer and employees. The Board of Directors ensures that adequate funds, materials, equipment and human resources are provided to meet with all statutory health and safety requirements.

Board of Directors

The Board of Directors will:

- Ensure that there is an effective Health and Safety Policy
- Review and assess the Health and Safety Policy on a regular basis
- Delegate responsibility for health and safety and appoint a company Health and Safety Officer
- Form a Health and Safety Committee to discuss pertinent issues

Group Health & Safety Manager

Ross & Roberts has appointed a Group Health and Safety Manager with responsibility for advising all group locations with regard to health, safety and welfare issues. The Group Health and Safety Manager will:

- Ensure that the Group complies with Health and Safety statutory requirements relevant to its activities
- Ensure the effective implementation of the Group Health and Safety Management System
- Develop, control, issue and maintain the Health and Safety documentation including the Group Health and Safety Policy and Employee Guide
- Provide training to Health and Safety Officers
- Hold quarterly consultation meetings with the Health and Safety Officers
- Undertake office/site audits and active and reactive monitoring

The Health and Safety Manager will bring to the prompt attention of senior management any health and safety issues that require attention.

Health & Safety Officer

The Board of Directors will appoint a senior manager as the company Health and Safety Officer who will have the following qualifications:

- Member of the Institute of Occupational Safety and Health (IOSH)
- NEBOSH (Health & Safety)

Once appointed, the Health and Safety Officer will be provided with training from the Group Health and Safety Manager and will:

- Implement Ross & Roberts' Health and Safety Policy and monitor its effectiveness
- Act as Safety Officer
- Carry out such risk assessments as are necessary under the Management of Health and Safety at Work Regulations 1992 and any subsequent legislation that may come into effect
- Develop any relevant action plans and review them on a regular basis
- Highlight the actions required in order to fulfil Ross & Roberts' responsibilities as an employer following changes in legislation or the implementation of new legislation
- Carry out regular inspections to ensure that the safety programme is being complied with, and make recommendations to managers and employees on matters concerning health and safety

- Evaluate all risks relating to accidents at work, health and safety risks, loss or damage to company property and risks to the public through any company activity
- Maintain accident records and notify reportable occurrences to the appropriate body
- Investigate and assess accidents, dangerous occurrences and hazards
- Investigate with at least two other members of the Health and Safety Committee all accidents and damage to company property and recommend corrective action
- Appoint and monitor competent persons as Fire Wardens and First Aiders
- Ensure adequate First Aid facilities are available at all times
- Ensure all employees receive induction training as soon as possible after commencement of employment, and any additional training as and when required
- Ensure all employees observe safety rules and that protective clothing/equipment is worn or used where considered appropriate
- Inspect new work systems for potential hazards
- Ensure all employees are aware of the Fire Procedure and display this procedure on staff notice boards
- Carry out fire evacuation practices and ensure fire equipment is regularly inspected and services
- Call meetings of the Health and Safety Committee

Managers and Supervisors

Managers and Supervisors are responsible for ensuring that the Health and Safety Policy is implemented within their own areas of responsibility and will:

- Ensure that they are knowledgeable with regard to the Company's Health and Safety Policy and any subsequent modification
- Maintain safe practices in their department in order to achieve maximum safety for all employees and the public
- Ensure that all employees in their department are provided with adequate training, information, instruction and supervision, and are made aware of any potential hazards
- Ensure that all employees in their department know what to do in the case of fire and know the location of the fire fighting equipment provided and how to use it
- Ensure all employees in their section know the whereabouts of First Aid facilities and the accident reporting procedures
- Ensure all safety rules are obeyed and that protective equipment and clothing is used where necessary
- Ensure that all equipment used is suitable for the task and that it is in good working order and regularly maintained and service
- Ensure that only authorised employees undertake activities for which there is a need for specific training and qualification

Employees

While the Company will take all reasonable steps to ensure the health and safety of its employees; health and safety at work is also the responsibility of the employees themselves. It is the duty of each employee to take reasonable care of their own and other people's health, safety and welfare and to report any situation which may pose a threat to the wellbeing of themselves or of any other person. If an employee is unsure how to perform a certain task or feels it would be dangerous to perform a particular job or use specific equipment, it is the employee's duty to report this as soon as possible to their line manager, their health and safety representative or the Health & Safety Officer. Alternatively, an employee may, if they consider it more appropriate, invoke the Company's formal grievance procedure or they may make a formal complaint under the Company's provisions on Disclosures in the Public Interest.

Action under the Company's disciplinary procedures may be taken against any employee who violates health and safety rules and procedures or who fails to perform their duties under health and safety legislation. Depending upon the seriousness of the offence, it may amount to gross misconduct; rendering the employee liable to summary dismissal.

All employees will:

- Ensure they are familiar with the Company's Health and Safety Policy and comply with the relevant procedures
- Take reasonable care for their own health and safety and consider the safety of other persons who may be affected by their acts or omissions
- Not undertake any work activities for which authorisation and training has not been provided
- Use safety equipment where appropriate and wear any safety clothing provided for their protection
- Refrain from intentionally misusing or recklessly interfering with anything that has been provided for a health and safety reason
- Report to their Manager and the Health and Safety Officer all accidents and damage to people and equipment
- Suggest safer methods of working
- Ensure that all contractors working at company premises or visitors are made aware of relevant Health and Safety issues (.e.g. fire evacuation procedures, location of first aid facilities, location of toilets, etc)

Fire Wardens

The Board of Directors and the Health and Safety Officer will ensure that an appropriate number of Fire Wardens are appointed at each Ross & Roberts' location. Fire Wardens receive comprehensive instruction and training to ensure effectiveness. Fire Wardens will:

- Check that fire extinguishers are of the correct type, are located in the best position and are available in adequate quantities to meet any potential hazard
- Ensure that fire alarms and fire fighting equipment are regularly checked and tested
- Ensure regular fire drills
- In the event of an emergency evacuation, ensure that their designated area is vacated in a safe manner
- Ensure that adequate information is available to employees on the extinguishing of fires and safe access and egress

First Aiders

The Board of Directors and the Health and Safety Officer ensure that an appropriate number of First Aiders are appointed at each Ross & Roberts' location to deal with minor accidents and emergencies within the workplace. These employees are provided with the relevant training and qualifications in accordance with statutory requirements. First Aiders will:

- Provide first aid as necessary
- Ensure that first aid boxes are regularly inspected and stock is maintained
- Ensure that first aid stock does not become out of date

Contractors and Visitors

All contractors and visitors must adhere to Ross & Roberts' Health and Safety Policy at all times.

Specialist Advice

Ross & Roberts' Health and Safety Officer and Group Health and Safety Advisor are always available to provide advice on health and safety issues. Their contact details will be found in your Employee Guide to Health and Safety and on the notice boards provided. We recognise that there may be occasions when specialist advice may be necessary and, in such an event, would obtain the services of a competent external adviser.

Health & Safety Committee

The Health and Safety Committee, under the chairmanship of the Health and Safety Officer, comprises of a Director, a Fire Warden, a First Aider and representatives from individual departments. The Committee convenes on a regular basis to discuss health and safety issues and identify appropriate action. Minutes of the meetings are

retained for record purposes and a copy is forwarded to the Group Health and Safety Manager. Employees are encouraged to report any hazardous situations.

Induction Training

Health and safety training for all new employees is incorporated within their induction training on the first day of employment, and each employee is issued with a copy of Ross & Roberts' Employee Health and Safety Guide.

Training Includes:

- Health and Safety Documentation - an explanation of our Health and Safety Policy, organisation and safety arrangements. A copy of our Employee Health and Safety Guide is issued to each new employee
- Responsibilities - the employee is made aware of the legal responsibilities of both Ross & Roberts as their employer and their own responsibilities under current legislation
- Accident Reporting Procedures and First Aid - an explanation of First Aid arrangements and procedures for accident reporting
- Fire and Emergency Procedures and Precautions - instructions and procedures for fire and emergency situations. Fire exits and assembly points are identified, and employees are informed of the name of the responsible person to whom they must report
- Specific Procedures - Any procedures/precautions relating to the employee's specific role are explained

The new employee's Manager or Supervisor completes an induction checklist form, which is passed to the Health and Safety Officer. This form is filed in the personnel file.

Welfare Facilities

In accordance with the Workplace (Health, Safety and Welfare) Regulations 1992, the Health and Safety Officer ensures that all offices have the following facilities to promote a healthy and safe environment for all employees and visitors:

General

- Floors, passages and stairs are kept free from obstruction and properly maintained
- Files and boxes are not stored in hazardous places
- All windows and glass areas in doors, cabinets and walls are made of safety material and suitably protected

Working Space

- Sufficient space is available in each office, taking into account furniture, fittings and equipment
- Each employee is provided with a suitable workstation

Temperature and Ventilation

- Room temperature maintained at a minimum of 16°C with either fresh or purified air ventilation
- Regular servicing of air conditioning and heating systems

Lighting

- Suitable lighting is provided - natural light wherever possible. Blinds are provided where necessary

Toilets and Washing Facilities

- Clean bathroom facilities with hot and cold running water, soap and towels (or other means of drying)

Drinking Water

- Fresh drinking water is provided at each location

Fire Precautions

The probability of fire is minimised as far as is reasonably possible via a process of risk assessment and regular monitoring of systems. Fire evacuation drills, inspection of escape routes and maintenance of fire warning systems and fire-fighting equipment are undertaken on a regular basis.

Training

Employees receive instruction in basic fire prevention measures. Those involved in processes or activities that give rise to potential fire hazards receive additional training. Employees are encouraged to report to their Manager and the Health and Safety Officer any concerns they may have with regard to fire hazards and appropriate measures are taken to eliminate the problem.

Office Arrangements

Fire precautions are provided and maintained in accordance with relevant legislation. Regular inspections are conducted to identify potential fire risks and the implementation of appropriate precautions. Housekeeping standards are maintained to minimise the risk and development of fire, and effective security precautions are taken to minimise the risk of arson both within buildings and on the grounds of every site.

Fire doors and fire escape routes are clearly marked and accessible at all times. The names of essential personnel, locations and the actions to be taken in the event of a fire are posted at strategic points throughout the workplace. Employees receive instruction in the safe and effective use of fire extinguishers, which are located at strategic points throughout all premises. Fire extinguishers are inspected and maintained on a regular basis.

Discovering a Fire

- On discovering a fire, the alarm is to be raised by operating the nearest alarm point. Dial 999 (for an outside line dial 9 where appropriate) and inform the Fire Brigade of the location and nature of the fire
- If the risk is minimal, employees may attempt to attack the fire with the appropriate extinguisher BUT without taking any personal risk
- Fire Wardens will co-ordinate an orderly evacuation
- Employees are to assemble at the nearest fire assembly point where the Fire Wardens will take a roll call
- Employees are advised not to return to the building for any reason until a senior manager, or other authorised person, has received assurance from the Fire Brigade that it is safe to do so

Hearing the Fire Alarm

- Employees are to leave by the nearest fire exit, to close all doors behind them and to proceed directly to the appointed fire assembly point
- Employees are not to stop to collect personal belongings or to switch off computer terminals or other equipment
- The evacuation procedure is to occur in an orderly and organised manner as shouting and running may cause panic
- All visitors and deaf and disabled employees are to be escorted out of the building and provided with any necessary assistance
- Employees and visitors are to assemble at the nearest fire assembly point where the Fire Wardens will take roll call
- Employees are advised not to return to the building for any reason until a senior manager, or other authorised person, has received assurance from the Fire Brigade that it is safe to do so

If Trapped Inside your Office Area

- Close as many doors as possible between you and the fire
- Wedge cloth material along the bottom of all doors to keep the smoke out
- Telephone 999 “Fire Service” and notify them of your situation
- Hang a sheet, coat or flag out of the window and then re-close the window
- Break windows only as last resort, as they cannot then be closed if necessary
- If necessary, signal through the window to let safety personnel know your location, otherwise stay close to the floor

Roll Call

- The Fire Warden for each department will take the roll call and report staff numbers/missing personnel to a senior manager or other authorised person
- The receptionist will roll call all visitors and report names/missing persons to a senior manager or other authorised person
- A senior manager, or other authorised person, will authorise the return to work once the building is declared safe

Emergency Procedures

It is Ross & Roberts’ intention to ensure that risks arising from work activities are eliminated or minimised. However, we are aware that in spite of these measures it cannot be assumed that a major incident will never occur e.g. suspicious object, bomb threat, etc. Ross & Roberts has devised certain emergency procedures to ensure injury and damage limitation in the event of a major incident.

Responsibilities

The Health and Safety Officer plus a senior manager at each office will plan for reasonably foreseeable incidents at their office location. In consultation with employees they will:

- Carry out a risk assessment to identify foreseeable major incidents for which emergency procedures may be required. Managers in high risk locations regularly monitor the situation to ensure that the current procedures are appropriate to the circumstances
- If appropriate, procedures will be established for employees in the event of an emergency situation including raising the alarm, means of escape, assembly points and ‘safe havens’, summoning the emergency services, evacuation of disabled persons
- Training will be provided for all employees, with additional training for those employees with special responsibilities

COSHH

The Control of Substances Hazardous to Health (COSHH) regulations requires employers to assess all work activities where employees may be exposed to hazardous substances. We have developed a procedure to ensure that we comply with the relevant legislation and provide appropriate safety precautions for our employees.

Procedure

Data sheets are obtained from the manufacturer for all substances used to ensure that any hazards associated with the substance are fully understood and any necessary precautions are taken.

At regular intervals, Managers/Supervisors carry out a COSHH assessment of all substances used in the area under their management and document this on the COSHH assessment form. The points to be recorded when conducting an assessment are:

- What substances are present and in what form?
- Where and how substances are used, handled and how frequently?
- What are the possible harmful effects? (Refer to the manufacturer's data sheets and the container label)
- Which employees are likely to be affected, to what extent and for how long?

This form is passed to the Health and Safety Officer who assesses the risks and any precautions required when using the substance. Should the assessment highlight a risk to health, further actions will be implemented.

The Health and Safety Officer will seek professional advice and ensure all safety arrangements contain control measures. The control measures signal whether the hazardous substances are being effectively controlled or whether further measures are required.

Any employee working with potential hazardous substances will be trained to work in a safe manner.

Accident and Incident Reporting

All accidents (including near misses), dangerous occurrences and cases of reportable diseases involving any employee, contractor or visitor, which arise out of the activities carried on within the Company's premises, must be recorded on the official accident and incident report form under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 as failure to comply may lead to prosecution by the Health and Safety Executive. These forms should also be used to record any incidents arising elsewhere which involved an employee who was

undertaking official duties away from the offices at the time. This would cover the enforcement agents, enforcement officers and process servers.

Accident and Incident Procedures

- It is the responsibility of all employees to inform their manager/supervisor immediately in the event of an accident, incident or dangerous occurrence, regardless of how trivial the accident/hazard appears to be. The manager/supervisor will document the accident, incident or dangerous occurrence and take appropriate witness statements.
- Reporting of accidents, incidents and dangerous occurrences also applies to members of the public and visitors.
- The Health and Safety Officer and Group Health and Safety Advisor will be notified within twenty-four hours to enable notification of the relevant enforcing body, if appropriate. If the injury is classified as reportable under RIDDOR 1995, the Health and Safety Officer will inform the relevant Environmental Health Officer.
- The Health and Safety Officer and two members of the Health and Safety Committee will investigate all accidents, incidents or dangerous occurrences. The results and conclusions of their investigation will be recorded on the appropriate investigation form. Remedial action will be initiated in accordance with legal requirements.
- Accidents are recorded in the accident book and a copy of the accident form is placed in the employee's file.
- The appropriate authorities will be notified immediately in the event of a fatal accident.

Noise

Exposure to high levels of noise may cause incurable damage to hearing. Ross & Roberts recognises its legal duty under current Noise at Work Regulations to minimise and prevent hearing damage to its personnel.

The Health and Safety Officer, in conjunction with Managers/Supervisors, undertakes regular noise assessments to establish the levels and frequencies of noise, and appropriate measures are implemented if necessary.

Manual Handling

Ross & Roberts works in full compliance with the Manual Handling Operations Regulations 1992, which seek to reduce the health and safety risks to employees from handling and lifting loads.

Employees are advised on safe performance of manual handling operations via our Employee Health and Safety Guide and Health and Safety notice board. Assessments are undertaken prior to any handling operation to ensure safe lifting/handling of the load. Specialist training and mechanical aid would be provided for employees required to lift loads on a regular basis.

Display Screen Equipment

All reasonable steps are taken to secure the health and safety of employees who work with display screen equipment in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992. It is accepted that the use of Display Screen Equipment may be undertaken without undue risks to health, however it is our intention to ensure that any residual risks are reduced to a minimum and this is achieved through a process of risk assessment and risk reduction.

If a work related health problem arises in the use of DSE, the employee should:

- Inform their Manager and the Health and Safety Officer immediately
- In the case of an adverse health condition, inform his/her general practitioner

If an issue is raised relating to health and safety in the use of DSE, we will:

- Take all necessary steps to investigate and document the circumstances
- Take corrective measures where appropriate
- Advise the employee of any action taken.

Eyesight

In accordance with the Health and Safety (Display Screen Equipment) Regulations 1992, Ross & Roberts has made provisions to meet the cost of eye/eyesight tests for all DSE users. Ross & Roberts contributes to the cost of any corrective appliance that may be required specifically for DSE use.

Electricity at Work

Ross & Roberts fully comply with all legislation governing electricity at work.

The Health and Safety Officer arranges regular testing of all electrical equipment. No employee may carry out any electrical repair work unless he/she is suitably qualified. Electricity related problems are directed to Managers and the Health and Safety Officer to enable investigative and remedial work to be undertaken.

Lone Working and Field Activities

As an employer we have a duty to assess the risk to our lone workers, i.e. Enforcement Agents, and we have taken steps to avoid or control risk where necessary.

Although there is no legal prohibition on lone working, the broad duties of the Health and Safety at Work Act and the Management Health and Safety at Work Regulations still apply. These require identifying hazards of the work, assessing the risks involved, and putting measures in place to avoid or control the risks.

Employers have a legal duty to assess all risks to health and safety, including the risk of lone working. If the risk assessment shows that it is not possible for the work to be done safely by a lone worker, then other arrangements must be put in place.

The following general duties of Employers also apply to lone workers:

- Facilities for First Aid under the Health and Safety (First Aid) Regulations
- Facilities for welfare under the Workplace (Health, Safety and Welfare) Regulations
- Suitable equipment and training in their use under the Provision and Use of Work Equipment Regulations and the Lifting Operations and Lifting Equipment Regulations
- Employers must also report certain accidents suffered by employees, including violent incidents, under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

All necessary provisions have been made to ensure the health, safety and welfare of field staff, including the identification of hazards, assessment of risks and the implementation of corrective measures.

The Health and Safety Officer regularly assesses the activities of Ross & Roberts' field employees to ensure that relevant health and safety issues are taken into consideration with the following measures in place to avoid or control the risks:

- Training to understand the risk associated with their role, and the ways to identify possible difficult situations
- Training on how to deal with difficult and aggressive situations
- Training on emergency procedures and how to contact the emergency services
- All lone workers to carry a "Nomad" - Safety Communication Support with SOS speed dialling
- Keeping in regular contact, approx every 2 hours, between lone worker and manager

- Lone workers should leave the property if they feel uncomfortable or threatened in any way. The police should be called if a breach of the peace is taking place or may take place
- Banking daily of any money collected over £400
- Tracking device on all vans
- Reporting of all incidents or accidents
- Signing off telephone call at the end of shift from a lone worker
- If working outside of normal working hours the lone worker has contact details for their manager and other appropriate staff to contact

Comprehensive training is provided to assist with identification of potentially hazardous situations and employees are advised to:

- Check the nature of the area (in relation to crime and/or racial or social sensitivity)
- Check the communication coverage of mobile phones
- Consider the proximity to potentially violent individuals (i.e. narrow corridors or walkways) and escape routes
- Consider the risk from above (from windows or balconies)
- Consider the risk from groups of people in the vicinity
- Consider the risk from dogs or other animals
- Consider risks of slippery surfaces and/or stairs
- Consider the risk of being taken hostage
- Consider the risk of damage to cars; violence or assault
- Consider the risk of theft of property or cash
- Consider whether assistance is required from colleagues or tracking from the support team, so their exact location throughout the visit is known
- Consider whether joint visits with the Police are appropriate

Employees should only attend areas they consider might be 'sensitive' or 'risky' when accompanied by another member of staff. Employees in these cases should either be experienced in handling such situations or should attend the "Danger in Violent Situations" training where they will be advised that:

- You are encouraged to remain impartial and objective
- You should always try to avoid confrontation
- If someone becomes aggressive, you are trained to keep at a safe distance and stand sideways, so as to appear less threatening
- If threatened with violence or attacked, employees should always back away, leave the address, use their mobile phones for assistance and call the police
- Where locations are out of mobile phone coverage, employees should ensure that journeys are scheduled and, where possible, tracked via the vehicle tracking system. Employees should advise the support team both before and after entering a potentially dangerous situation
- Employees should always maintain a 'safe-distance' (approximately 2 arm lengths) from any debtor or potentially hostile individual

- Employees should ensure there is a safe means of escape (e.g. parking their car facing outwards from a cul-de-sac, or leaving gates ajar)
- When collecting cash, employees should keep vehicles locked at all times (even during transit) and should generally drive straight to a bank or to the office to deposit the cash. Employees should take care that they are not being followed when carrying or collecting cash
- Withdraw immediately from the premises if they believe there is a risk to their personal safety
- Remain calm and collected and refrain from attempting to reason with any individual threatening attack or violence
- Inform the office as soon as possible and, in the event of actual violence, contact the Police immediately

All field employees attend communication workshops. Organised on a regular basis, these workshops promote negotiation skills to disarm potentially dangerous situations.

Company Vehicles

Subject to holding a current, full driving licence, some employees are provided with a vehicle for use in the performance of their duties.

The employee is responsible for ensuring the vehicle is properly looked after at all times and is responsible for its equipment and fittings. The employee must ensure that it is kept in a roadworthy condition, that regular checks are made of tyre tread, tyre pressure, lights, brakes, seat belts, head restraints, oil, water coolant, fuel, screen wash and battery and that it conforms with current road traffic legislation and that the provisions and conditions of the policy of insurance relating thereto are observed and that such policy is not rendered void or voidable.

The employee must drive within the law and abide by all requirements of road traffic law and the Highway Code.

Risk Assessment Procedure

Objective

Risk assessments are required under the Management of Health and Safety at Work Regulations 1992; specifically regulation 3, where there is a legal requirement to carry out suitable and sufficient assessments of all significant hazards within the work place. The purpose of carrying out assessments is to identify potential problems; consider the likelihood of them occurring; and then to put in place appropriate measures to prevent such occurrences. The goal is therefore to manage risks in the work place.

It is the policy of the Company to comply at all times with the Management of Health and Safety at Work Regulations, 1992.

Scope

Risk Assessments are:

- Carried out for all activities in the workplace, both routine and non-routine (e.g. maintenance and repairs, refurbishment etc)
- Employees consider all people having access to the workplace (including contractors and visitors) or who might reasonably be affected by activities carried out in the workplace (e.g. neighbours, members of the public)
- Employees consider all facilities and equipment in the workplace whether provided by Ross & Roberts or others

Process

The aim of risk assessments is to reduce the risks arising from work related activities and to eliminate or minimise injury or damage to people, equipment, plants, property and the environment. We ensure that suitable arrangements are in place for the ongoing identification of hazards, the assessment of risk, and the implementation of necessary control measures.

Ross & Roberts has an appointed Compliance Manager with direct operational responsibility for all Health and Safety Matters including risk assessments who is responsible for ensuring all relevant risk assessments are undertaken and that all risk reduction measures are carried out and maintained.

Risk assessments should be completed by following the Health and Safety guide "INDG163 - 5 Steps to Risk Assessment" as follows:

- Step 1 – Look for hazards
- Step 2 – Decide who might be harmed and how
- Step 3 – Evaluate the risks and decide whether the existing precautions are adequate or whether more should be done
- Step 4 – Record your findings
- Step 5 – Review your assessment and revise it if necessary

Risk assessments that are carried out across Ross & Roberts include:

- Office & Call Centre
- Drivers risk assessment for Enforcement Agents
- Drivers risk assessment Investigations Officers
- Display Screen Equipment (DSE)
- Manual Handling
- IT Services
- Post Room activities

- Employees working from home
- General (task/workplace based)
- Fire
- COSHH
- New or Expectant Mothers
- Young persons
- Stress

Please note all employees carry out risk assessments for each department they work in on an annual basis.

Communication

The conclusions of the risk assessment(s) is communicated to all staff potentially affected particularly any staff that are required to adhere to specific safety instructions. General safety instructions are covered during new staff induction. Where there is a significant risk and control is reliant on staff following specific safety instructions these are put into a written procedure, staff instructed/trained in their use, their understanding evaluated and a record kept.

A copy of the full completed risk assessment(s) are made available for all employees, but this does not replace the need to brief or train staff. The Compliance Manager will also keep a copy on file on site for review and audit purposes.

Monitor and Review

The Compliance Manager monitors and reviews risk assessments periodically taking into account feedback from employees and line management for possible areas for improvement. The Compliance Manager reviews risk assessments every 12 months, or if any of the following conditions apply:

- An accident
- A complaint
- A change of system, equipment or material
- Change in Legislation
- New information from a Manufacturer or Supplier
- New Guidance published

Risk assessments and their progress are discussed at the site health & safety meetings held at site to ensure they are still relevant and control measures are still effective.

Installations of new processes, activities or equipment are subject to a risk assessment and are completed prior to commencement.

Activity

Making a risk assessment typically starts with identifying the tasks, activities or situations.

Identifying the Hazards

A Hazard is defined as a condition with the potential to cause harm.

The risk assessor(s) will identify and record all the hazards in and around their area by visual inspections, discussions with employees, and past incidents or accidents etc and can be:

- Physical
- Chemical
- Biological
- Ergonomic
- Psychological

When seeking out and identifying hazards, adequate information is necessary and reference is made to relevant sources such as:

- Legislation and supporting approved codes of practice which give practical guidance and include basic minimum requirements
- Health and Safety Executive guidance documents and approved codes of practice
- Product information
- British and international standards
- Industry or trade association guidance
- Personal knowledge and experience of managers and employees
- Accident, ill health and incident data from within the organisation
- Expert advice and opinion

In the simplest cases, hazards can be spotted by observation and comparing with the relevant information.

Identifying those at Risk

In most cases this will be the persons actually carrying out the work. It is however important to remember third parties including other staff, cleaners, security staff, maintenance staff, contractors and members of the public who could be affected by the hazard.

Particular attention is paid to new staff or staff with special needs such as with disabilities, visitors, contractors, lone workers, expectant mothers and young or inexperienced employees as they may be more vulnerable to the identified hazard.

Evaluating the Risk

Risk is the likelihood that some harm from the hazard will occur.

Evaluating the Risk involves judging the likelihood of harm from the hazard and the severity of harm that may be involved.

Some risks will be insignificant either because the likelihood of harm is very low or because the severity of any injury is very low, or both.

The Risk Assessment approach Ross & Roberts adopt is a quantitative method. In its simplest form:

$$\text{Risk} = \text{Hazard Severity} \times \text{Likelihood}$$

The following scoring system is used to quantify the risk:

Severity

Fatality	5
Major injury, disabling illness, major damage	4
Lost time injury, illness, damage	3
Minor injury, minor damage	2
Delay only	1

Likelihood

Certain or imminent	5
Very likely to happen	4
Likely to happen	3
Unlikely	2
Very unlikely	1

Risk Rating

The resulting risk scores are rated into three broad risk bands as shown below:

Very High Risk	20-25	Immediate action required to stop the activity or reduce the risk
High Risk	12-19	Urgent action required as soon as practicable and within two weeks at the latest
Medium Risk	8-11	Keep under regular review and investigate further measures to reduce the risk
Low Risk	1-7	Acceptable risk

Decide on Measures

The measures which will be required to remove or minimise the risk need to be considered by applying the following hierarchy of risk control measures:

- Elimination
- Substitution
- Reduction of exposure/quantity
- Isolate / Enclose
- Other Engineering Control
- Safe System of Work
- Training/Briefing/Awareness
- PPE
- Discipline/Enforcement

When recommending suitable further control measures the Risk Assessor(s) must take into account the legal requirements, as far as practicable (i.e. if the technology exists and is in use it must be done), and so far as is reasonably practicable (i.e. what is common practice while taking into account a balance between cost and risk).

Assessment Record

The risk assessment record will normally be in writing but can be recorded electronically providing it is easily retrievable.

The records form part of the company's overall approach to Health and Safety and be linked to other records and documents such as arrangements in the Health and Safety Policy document.

The significant findings include as a minimum:

- The significant hazards identified in the assessment. That is, those hazards which might pose serious risk to workers or others who might be affected by the work activity if they were not properly controlled.
- The existing control measures in place and the extent to which they control the risks (this need not replicate details of measures more fully described in procedure manuals etc but should refer to them)
- The people who may be affected by these significant risks or hazards, including any groups of employees who are especially at risk

Once the information has been completed and recorded the Compliance Manager will be responsible for developing an action plan to eliminate or reduce the risk by prioritising the identified risks, devising remedial actions, establishing time scales and assigning resources.

Recommendations from previous assessments/audits will also be considered when developing a Safety Action Plan.

Risk Assessment Procedure

