



Health and Safety Policy Statement

allpay Ltd recognises and accepts its responsibility to provide a safe and healthy working environment for all its colleagues, tenants, contractors and visitors who use its premises in order to prevent injury and ill health, in accordance with the Health and Safety at Work etc. Act 1974 and its associated regulations. The scope of this responsibility extends to visiting customers of the 'Carriages' restaurant and 'Four seasons' areas, in addition to staff out of hours, leisure-time activity within the allpay gymnasium facilities.

The **allpay Ltd** approach to Health and Safety is based on ISO 45001 whereby emphasis is placed on providing a safe and healthy workplace incorporating all of its facilities and their respective usages within the estate and the safety of those who use and travel through them.

allpay Ltd recognises the need to focus on continual improvement of its OH&S management and performance. Our aim is to encourage a positive health and safety culture. To ensure this is achieved occupational health and safety is actively promoted throughout the organisation through the provision of information, training, instruction and supervision.

allpay Ltd operates a 'low blame' culture whereby colleagues are openly encouraged to report hazards, including near misses, without fear of reprisal to ensure the root causes of accidents are identified thus enabling measures to be put in place to eliminate recurrence.

Emphasis is placed on effective management ensuring a systematic approach to the identification of risks and the allocation of financial and physical resources to control them. In order to deliver these responsibilities **allpay Ltd** undertakes to:

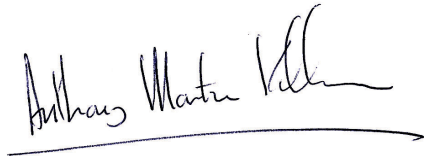
- Maintain a safe and healthy place of work with safe access and egress;
- Maintain a safe environment and facilities within them for visiting guests and customers.
- Provide adequate welfare facilities;
- Ensure that risk assessments are being carried out on an on-going basis with colleagues participating in the risk assessment process. Assessments will cover allpay Ltd undertakings and will assist in the identification of hazards and the setting of prioritised objectives for elimination and reduction of risk;
- Provide sufficient information, instruction, training and supervision to enable colleagues to avoid hazards and to contribute positively to the health and safety of themselves and others whilst at work;
- Consult with colleagues on issues relating to OH&S policy
- Ensure access to competent health and safety advice;
- Provide plant, equipment and systems of work which are safe and without risks to health;
- Ensure safe arrangements for the use, handling, storage and transport of articles and substances;
- Ensure compliance with all relevant safety legislation, regulations, codes of practice and other requirements associated with UK and overseas operations;
- Arrange for the effective planning, organisation, control, monitoring and review of preventative and protective measures; and
- Commit to reporting OH&S performance within its annual report.

The CEO and Managing Director takes overall responsibility for Health and Safety.

The Strategic HSE Committee, comprising Director of Compliance, Director of Operations and Head of Estates and Facilities (HSE Advisor) will take lead responsibility for the formulation, development and implementation of the Health and Safety policy within **allpay Ltd** and requires the co-operation and support of all managers, employees, contractors and visitors in its implementation.

The Policy will be reviewed periodically, at least every two years, to ensure that it remains relevant and appropriate to the organization from consultation within the Strategic HSE Committee .

This Policy will be communicated to all persons working under the control of the organisation and will be made available to interested parties on request.



Tony Killeen
CEO



Health and Safety Roles and Responsibilities

All colleagues have a responsibility for their own safety and that of others who may be affected by their actions on an operational level.

Specific responsibilities have been assigned to certain key individuals within the Organisation for ensuring that the Management System operates effectively.

The main Health and Safety responsibilities have been assigned as follows:-

Managing Director – Tony Killeen (or nominated Director)

CEO Tony Killeen

The CEO duly assisted on a day-to-day basis by the Managing Director, is responsible for the overall arrangements and for ensuring that the company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all colleagues and others who may be affected by its operations.

In particular the **CEO** will:

- Ensure there is an effective company policy for health and safety and that all colleagues, contractors and temporary colleagues are made aware of their individual responsibility.

- To understand and ensure, through the appointment of competent persons, that the company's responsibilities as employers under the Health and Safety at Work etc. Act 1974 and any relevant Acts of Parliament and Statutory Instruments are met.
- To appoint Director(s) responsible for safety in the form of a Strategic HSE Committee.
- To ensure that all Directors and Managers understand and fulfil their responsibilities with regard to health and safety.
- Arrange for funds and facilities to meet the requirements of company policy and legislation.
- Make provision for adequate and appropriate training to be given to all colleagues.
- To ensure that notification and reporting procedures to the relevant statutory authorities are carried out.

Director(s) Responsible for Health and Safety (HSE Strategic Committee)

The Director(s) responsible for Health and Safety, namely Operations and Compliance Director's, supported by Head of Estates and facilities (HSE advisor) are accountable to the CEO and Managing Director for all matters relating to health, safety and welfare of colleagues and those affected by the company's operations.

In particular the Director(s) responsible for Health and Safety will:

- Understand and ensure that the implications and duties imposed by new Acts of Parliament, Statutory Instruments, H.S.E. Guidance Notes and Codes of Practice are brought to the attention of the Board of Directors.
- To bring company related health and safety matters to the attention of the Board of Directors at regular intervals.
- To ensure that good communications exist between employer and colleagues and are maintained.
- Liaise with the person appointed in the role of Health and Safety Adviser (Head of Estates and FM) over the full range of their duties and responsibilities, with respect to inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.
- Ensure adequate means of distributing and communicating health, safety and welfare information obtained from the Health and Safety Executive, Safety organisations and Trade associations regarding new techniques of accident prevention, new legislation requirements and codes of practice etc.
- Ensure that an adequate programme of training for health and safety is established and that the safety culture is encouraged amongst colleagues.

Directors Responsibility (HSE Strategic Committee)

Directors have the responsibility to:

- Provide Quality Health & Safety direction and focus as applicable to the company's business
- Ensure that adequate resources of personnel and equipment are provided in a safe and secure working environment, to achieve quality objectives whilst minimising the impact on the environment
- Ensure periodical internal audits of the Health and Safety requirements of their areas of responsibility are carried out.
- Conduct management reviews of Health and Safety in line with requirements set out in the BMS system and identify any required remedial actions or actions to improve the performance of the system
- Review colleagues roles and responsibilities and personal development needs in respect of Health and Safety.

All Colleagues with Managerial or Team Leader responsibilities

allpay Managers are responsible for their personal safety and that of all colleagues under their authority, including others who may be affected by the company's activities.

In particular they will:

- Understand and implement the company safety policy.
- Ensure that all colleagues under their control are fully aware of their requirements and responsibilities under allpay's HSE Policies.
- Ensure Risk Assessments on activities within their department are carried out and reviewed, ensuring that the methods and systems of work are safe. Also that the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
- Undertake HSE Inspections, therefore ensuring that all necessary preventive and/or corrective measures are being implemented.
- Ensure that all colleagues under their control are trained and competent to carry out their work in a safe manner; are fully aware of known hazards and risks to health, safety and the environment, and that the necessary precautions in place.
- Ensure that any instructions given to colleagues take full account of the employee(s) individual capabilities and their Health & Safety.
- Ensure that any unsafe tool or machine is removed from use or immobilised and is made safe/repared or replaced before use.
- Ensure all colleagues under their control are aware of the procedures to be followed in the event of fire/emergency or accident and the action to be taken.
- Ensure that adequate supervision is provided/maintained at all times, particularly where young or inexperienced colleagues are being employed.
- Will liaise with the Health and Safety Adviser on all matters related to Health, Safety and Welfare for guidance on the laws governing Health and Safety prior to the purchase of new equipment (where applicable) to ensure it meets required legal standards
- Managers will also consult with the Health and Safety Adviser on new work processes or procedures to ensure they comply with HS standards.

- Ensure accident and near-miss reporting procedures are understood and complied with, and assist with accident investigations where appropriate.
- Ensuring that individuals clean as they go and good housekeeping is maintained at all times.
- Ensure that any defects concerning HSE are rectified without delay.
- Appraise, assess, discuss and action HSE matters with relevant personnel.
- Ensure that any dangerous or potentially dangerous situations are immediately rectified or, if this is beyond their scope of responsibility, the matter is reported immediately to the Manager.
- Ensure that colleagues for whom they are responsible immediately report any “accident”, “incident” or “near miss” occurring whilst at work.
- Ensure effective liaison with all departments on the operation and development of HSE management and control within Allpay.
- Ensure that only contractors that are contained within the Approved Contractors List, shall be considered for selection to complete any scheduled works on site.
- identify any hazards and implement remedial action as necessary.
- Ensure all sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate.
- Ensure that all new colleagues in the company are provided with a copy of the policy statement, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and their personal responsibilities as set out in this manual.

Head of Estates and Facilities

In addition to the general allpay Managers responsibilities, the Head of Estates and Facilities, supported by FM Management has the additional responsibility to:

- Prepare and maintain a scheme which identifies work equipment requiring inspection by competent persons and ensuring that the equipment is easily identifiable and available for inspection on the date required.
- Prepare and maintain suitable records of all inspections. These records to identify precisely

what was inspected, how, who by, when, any defects found, remedial action taken and the date/time of the next inspection.

- Ensure that all Building/Engineering construction and maintenance work under their control complies with all relevant construction statutory instruments and Building regulation.
- Ensure the Statutory Notices, the Safety Policy, Insurance Certificate and the names of Appointed First-Aiders are displayed and maintained in prominent locations.
- Ensure existing and new processes/procedures are developed in line with ISO 9001/14001/27001/45001 & company requirements via the management review meetings

Health, Safety and Environmental (HSE) Adviser and Trainer (also Head of Estates and Facilities)

The primary role of the Health and Safety Adviser is to advise the Directors and Managers on all safety, health, welfare and Environment matters to ensure the Company complies with its statutory obligations.

The Health and Safety Adviser is designated responsibility by the Director(s) responsible for health and safety to control and update the Safety Manual and to ensure that all Departments operate to the procedures and instructions contained there:-

In particular the Health and Safety Adviser will:

- Understand the application of the Health and Safety at Work, etc. Act 1974 and other legislation relevant to the Companies business.
- Has overall responsibility for ensuring that the records and record management system used within Allpay are included in the HS management system and that the procedures are followed at all times.
- Has overall responsibility for ensuring that the HS Management System is regularly audited and that any non-conformances are reviewed by senior management and that corrective actions are taken.
- Keep up to date with changes in current legislation and to bring to the attention of the Director(s) responsible for Health and Safety any relevant new legislation.
- Attend such courses/seminars run by external sources to enable accurate interpretation of

legislation to enable implementation within the organisation.

- Ensure that the Risk Assessment Process as required by legislation is conducted and reviewed at relevant intervals and to maintain records of the same.
- Work in conjunction with Managers recommend control measures and advise on Health and Safety standards e.g. P.P.E. issued to employees.
- Ensuring that any non-routine work is effectively controlled through the inspection of method statements, risk assessments and aspect identification where appropriate, or by other measures that are from time to time implemented.
- Conduct health and safety inspections and prepare reports of all the company's operations.
- Immediately contact the Facilities Management or Director(s) responsible for Health and Safety if situations are found, that in the opinion of the Health and Safety Adviser require immediate rectification or the stopping of any operation.
- To notify the Facilities Management if the corrective action agreed after any workplace inspection is not implemented by the arranged date.
- To carry out investigations into all accidents and near-miss incidents and to record the findings on the relevant forms.
- To complete all R.I.D.D.O.R reports and advise the Director(s) responsible for Health and Safety of all incidents reported under R.I.D.D.O.R.
- To highlight areas where training/certification is required to meet the standards imposed by Legislation, Approved Codes of Practice, or Health and Safety Executive guidance.
- Is responsible for identifying training needs and for ensuring that training is sourced or provided internally to satisfy the training needs.
- To bring new techniques for improving health, safety and welfare to the attention of the Director responsible for health and safety.
- Developing and Maintaining the Legal Register and advising management on any changes that affect the information contained therein.

Colleagues Responsibilities

The Management of Health and Safety at Work Regulations 1992 (M.H.S.W.R.) re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and colleagues alike. In this connection,

- The Company reminds colleagues of their duties under Section 7 of the act: to take care for their own health and safety and that of others who may be affected by their acts or omissions.
- Colleagues must also co-operate with the company to enable it to discharge its own responsibilities successfully.

In accordance with allpay's HSE Policy, all colleagues have an individual responsibility and duty for the following:-

- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice.
- Making themselves familiar with, and conforming with, allpay's Health and Safety policies at all times.
- Conform to the Safety Rules and Safe Systems of Work Procedures at all times, including permit to work systems, inspection and testing etc.
- Not to operate any plant or equipment unless authorised.
- Wear appropriate safety or protective equipment, personal footwear or clothing and use appropriate safety devices, as specified, at all times.
- Make suggestions to improve Health and Safety within the Company to the Manager or via the Colleague HS forum
- Report without any delay all risks or hazards, including defects to machinery, unsafe practices, and "near miss" situations directly to his / her Manager.
- Report all incidents, accidents and near misses via the incident reporting procedure.
- To avoid improvised arrangements and suggest safe ways of eliminating hazards.
- Report without any delay any injury suffered as the result of any accident during the course of their work to their immediate supervisor or First Aider as appropriate.
- Ensure that a good level of housekeeping at and around their workstation is maintained at all times

- Take reasonable care of themselves and other persons who may be affected by their acts or omissions whilst at work.

HSE Forum Responsibilities

- Review the status of the Company's environmental, health and safety policies and performance, including processes to ensure compliance with applicable laws and regulations.
- Review and provide input to the Company on the management of current and emerging environmental, health and safety issues.
- Reporting periodically to the Board of Directors on environmental, health and safety matters affecting the Company.
- Review the status of the Company's health and well-being initiatives.
- Review the Company's progress on sustainable development.
- Monitor the adequacy of health, safety and environmental communication, publicity and training and development in support of company health, safety and environmental policy.
- Receive and review reports on accidents, dangerous occurrences and notifiable diseases, and to consider and propose risk reduction strategies as appropriate.
- Monitor the effectiveness of health, safety and environmental management and compliance with Company health, safety and environmental policy through consideration of reports and statistics relating to health, safety and environmental concerns.

Note 1: Persons perform work-or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently or seasonally, casually or on a part time basis.

Note 2: Workers include Top management, managerial and non-managerial persons.

Note 3: The work or work-related activities performed under the control of the company maybe performed by workers employed by company, workers of external providers, contractors, individuals, agency workers, and by other persons to the extent the company shares control over their work or work-related activities, according to the context of the company.

Note 1, Extract from BMS section 2 Scope

Terms and Definitions required by ISO 45001

Worker

ISO 45001 requires the use of certain terms and definitions particularly in relation to the term 'Worker'.

This term does not correlate with the ethos of allpay Ltd where we recognise that we are all Workers, but in the spirit of involvement and community we prefer the use of the terms staff or colleague(s) where possible. This does not mean that we do not recognise the definition 'Worker' (as detailed in ISO 45001) and its meaning which we have reproduced below;-

Worker - Person performing work- or work-related activities that are under the control of the company.