Introduction

The aim of this policy is to comply with the requirements of the Health and Safety at Work etc. Act 1974 and all other relevant statutory provisions.

The latest version of this policy will be made readily available on all sites Health and Safety boards, available on BISHOPSGATE's shared drive and on BISHOPSGATE's website – https://bishopsgate.co.uk/.

In compliance with the requirement of Section 2 (3) of the Health and Safety at Work etc. Act of 1974, BISHOPSGATE is effectively discharging its statutory duties by preparing a written health and safety policy.

In order for BISHOPSGATE to discharge its statutory duties, employees are required by law to cooperate with the management in all matters concerning the health, safety and welfare of themselves and any other person who may be affected by their acts or omissions whilst at work.

It is the responsibility of BISHOPSGATE's Competent Person to ensure that This Policy Statement and related guidelines, procedures and protocols will be reviewed as needed due to changes in legislation, standards, sector good practice, where a reorganisation changes ownership, responsibility or accountability and any significant updates to BISHOPSGATE's Health and Safety Management System (HSMS).

BISHOPSGATE encourages all employees to inform their manager of any areas of the health and safety policy that they feel are inadequate to ensure that the policy is maintained as a true working document.

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1. HEALTH AND SAFETY POLICY STATEMENT

Principle

BISHOPSGATE accepts its responsibilities under the Health and Safety at Work etc. Act 1974 and regards the promotion and management of health and safety as paramount for our employees, visitors, contractors, and others who may be affected by our activities.

BISHOPSGATE recognise that the effective management of health and safety is an integral part of our overall business performance and should be an integral everyday part of our employees' activities. We expect therefore, that all our employees and any others who visit a BISHOPSGATE site to share this commitment to health and safety, by the exercise of personal responsibility in complying with all company policies and procedures and to understand that they too, have both legal and moral obligations to themselves and to others who may be affected by their acts or omissions.

BISHOPSGATE's approach to successful management of health and safety at work is based upon five key principles, namely, a suitable and sufficient policy, organisation, planning & implementation, measuring performance and reviewing performance. These principles are contained in HS(G) 65 'Successful Health & Safety Management' as part of the Plan, Do, Check, Act (PDCA) approach and it is the Company's policy to adopt these principles in a practical manner to ensure that legal and moral obligations are met.

General statement of policy

- To provide adequate control of the health and safety risks arising from our work activities.
- To consult with, and promote the participation of, employees and, where they exist, workers' representatives, on matters affecting their health and safety.
- To provide and maintain safe plant and equipment.
- To provide safe access and egress to all workspaces.
- To ensure safe handling and use of substances.
- To provide information, instruction, and supervision for employees.
- To ensure all employees are competent to do their tasks and to give them adequate training.
- To prevent accidents / incidents and cases of work-related ill health and disease.
- To maintain safe and healthy working conditions.
- To eliminate hazards and reduce occupational health and safety risks through the application of the hierarchy of controls.
- To fulfil all applicable legal requirements and other requirements to which the organisation subscribes.
- To continually improve the occupational health and safety management system and its performance.
- To review and revise this policy as necessary at regular intervals.

Signed 

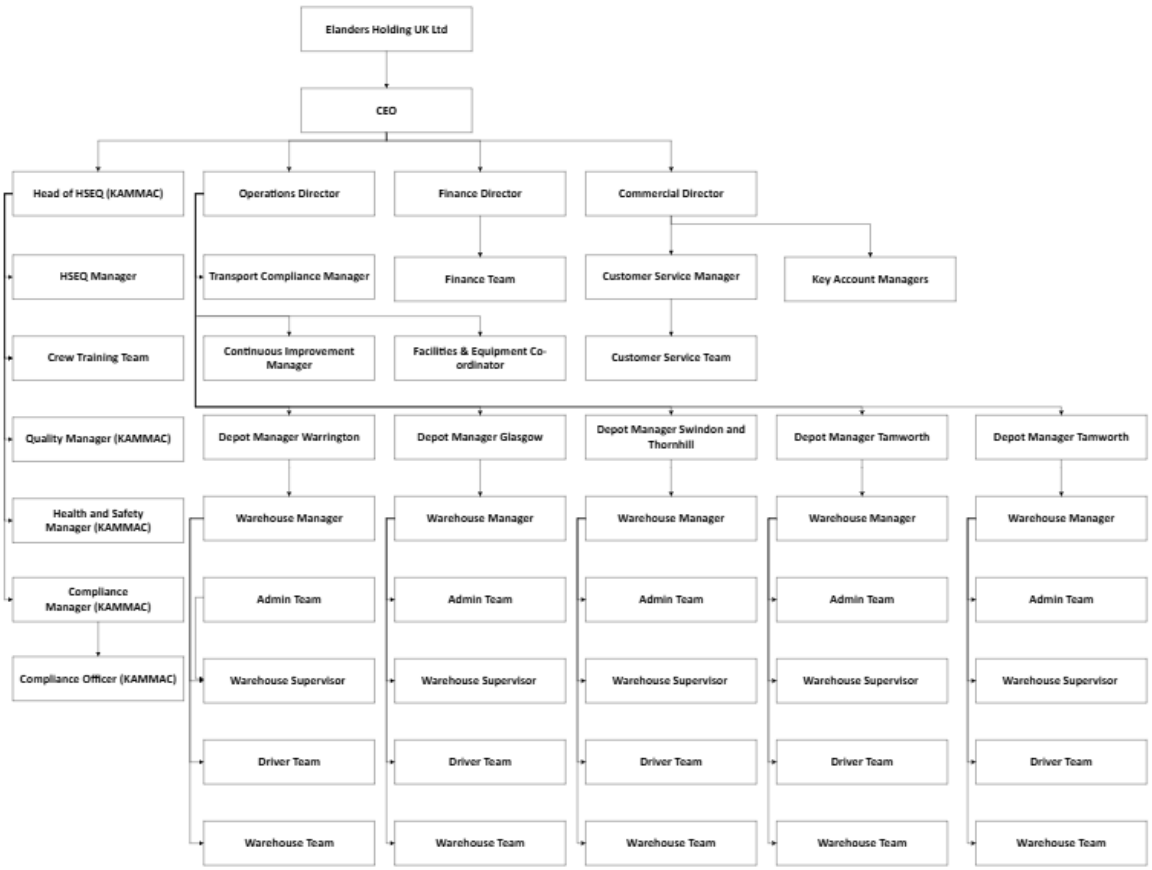
Patrick Delahunty

Chief Executive Officer

16/10/2026

2. ORGANISATION FOR HEALTH AND SAFETY

2.1 Health and Safety organogram



2.2 Responsibilities for health and safety

The Managing Director

Is ultimately responsible for:

- Compliance with the Health and Safety at Work etc. Act 1974 and other relevant statutory provisions.
- Ensuring that an up-to-date health and safety policy statement is prepared and brought to the attention of all staff.
- Ensuring the effective implementation and maintenance of this policy across the Company.
- Nominating a competent person to be responsible for health and safety throughout the Company (Health and Safety Manager).

The Health and Safety Manager – The Competent Person

The company's competent person for health and safety advice fulfilling the requirement of Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

- Has a good understanding of the main requirements of the Health and Safety at Work etc. Act. 1974.
- Will hold a Health and Safety qualification such as NEBOSH General Certificate (or equivalent).

- Details of safe systems of work, rules and procedures are communicated to all relevant persons with suitable records kept.
- All risk assessments and methods statements (RAMS) are suitable and sufficient for the tasks undertaken
- All COSHH registers are maintained
- Arrangements for fire safety are implemented and that all relevant checks are carried out as per site requirement.
- All accidents and dangerous occurrences are investigated and control measures implemented to prevent any reoccurrence.
- All company specific records, registers and certificates for statutory inspections, testing, or maintenance are available for inspection.
- All welfare facilities are adequate and arrangements are in place for the safe disposal of waste.
- Safe access and egress are provided and always maintained.
- Relevant statutory signs and notices are provided and displayed in prominent positions.
- Procedures are in place for contacting emergency services.

Managers

Include those with the positions of Director, Head of, Depot Manager, Warehouse Manager,
Will ensure that:

- They have a good understanding of the main requirements of the Health and Safety at Work etc. Act 1974 and any other relevant legislation that applies to their work area.
- To ensure any health and safety instructions, codes of practice etc, of the Company are understood and implemented
- Details of toolbox talks, safe systems of work, rules and procedures are communicated to all relevant persons with suitable records kept.
- All risk assessments and methods statements (RAMS) are suitable and sufficient for the tasks undertaken on their site / department.
- All COSHH registers are maintained with suitable records kept for their area of responsibility.
- All accidents and dangerous occurrences within their area of responsibility are investigated and control measures implemented to prevent any reoccurrence.
- All records, registers and certificates for statutory inspections, testing, or maintenance for equipment within their area of responsibility are available for inspection.
- Ensuring all relevant personal protection equipment (PPE) is provided, worn and in good order within their area of responsibility.
- Safe access and egress are provided and always maintained throughout their work areas.
- Relevant statutory signs and notices are provided and displayed in prominent positions.
- Daily safety monitoring is undertaken, recorded as required within their work areas.

Supervisors

Include those with the positions of Supervisor, Facilities & Equipment Co-ordinator
Will be ensure that:

- They have a good understanding of the main requirements of the Health and Safety at Work etc. Act 1974.
- Delivery of toolbox talks.
- Ensuring that team members are working according to a relevant Safe Systems of Work & Risk Assessment.

- Making dynamic alterations to Safe Working Procedures & Risk Assessments according to site specific risks.
- Communicating all relevant company Health and Safety procedures to their team members with suitable records kept.
- Ensuring all team members are applying company procedures appropriately.
- All risk assessments and methods statements (RAMS) are suitable and sufficient for the tasks undertaken.
- A suitable COSHH assessment is made/in place for all hazardous substances to be used.
- All accidents and dangerous occurrences within their team are investigated and control measures implemented to prevent any reoccurrence.
- Ensuring all relevant personal protection equipment (PPE) is worn and in good order within their team.
- Work areas remain safe throughout the work process.
- Relevant statutory signs and notices are displayed in prominent positions.
- Safety monitoring is undertaken throughout the work process and recorded as required.

All Employees will:

- Take reasonable care for the health and safety of themselves and of others who may be affected by their acts or omissions at work.
- Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare.
- Co-operate with any relevant person and comply with all relevant health and safety policies and procedures and risk control measures.
- Use any equipment, machinery, hazardous substance, transport equipment, safety device, or system of work in accordance with any training or instruction provided to ensure safe use.
- Wear the appropriate safety equipment and use appropriate safety devices where applicable.
- Report to their line manager and / or Health and Safety Manager, all hazards which they believe the management team are currently unaware of.
- Report immediately to their line manager or the Health and Safety Manager, any accidents, incidents, near misses or dangerous occurrences.

Sub-contractors/self-employed and agency personnel

Will:

- Be made aware of BISHOPSGATE health and safety policy and safety rules.
- Themselves be fully aware of the responsibilities and requirements placed upon them by the Health and Safety at Work etc. Act 1974 and other relevant legislation.
- Comply with all instructions given by the management of BISHOPSGATE
- Co-operate with BISHOPSGATE in ensuring a high standard of health and safety on all contracts with which they are involved. If the standards stipulated by BISHOPSGATE are higher than basic requirements, then they shall comply with the higher standard.
- Carry out risk assessments, where appropriate, in relation to their activities, ensure that appropriate health and safety arrangements are implemented and by adequate liaison inform and cooperate as necessary with BISHOPSGATE.
- Ensure that all activities, where appropriate, are detailed in comprehensive method statements, and that everything possible will be done to ensure full compliance with the statements produced.

- Ensure that they sign into the sites, prior to undertaking any work at the premises. This excludes emergency services.
- Follow all approved risk assessments provided.
- Co-operate with any relevant person and comply with all relevant health and safety policies and procedures and risk control measures on site.

3. ARRANGEMENTS FOR THE MANAGEMENT OF HEALTH AND SAFETY

3.1 Accident / incident reporting and investigation

The priority when an accident occurs is to make the area safe for all parties and then obtain first aid treatment for any injured parties, if the incident is serious enough to warrant medical intervention the senior person present will dial 999 and request an ambulance or paramedic to attend.

The accident must also be reported to a member of Management at the time of event. When the casualty has received suitable medical or first aid treatment details of the accident should be recorded on the Health and Safety System (My Compliance Management).

All accidents and incidents are to be logged on My Compliance Management within 3 hours of any incident occurring. All Incidents must be investigated and completed no more than 7 days from the date of the incident.

Near misses are to be investigated depending on severity or those which are frequent.

All accidents and incidents must be signed off by the Health and Safety Manager or HSEQ Lead and Department Manager

All RIDDOR reportable accidents will be investigated and reported in line with current legislation.

All investigations will be stored within our system for a minimum of 4 years.

More specific details are contained in policies HSMS 0200 – Accident and Incident Reporting Policy and HSMS 0300 – Accident and Incident Investigation Policy.

3.2 First aid

BISHOPSGATE will ensure that adequate provision is made, via site based First aids needs assessment process, to enable:

- Immediate assistance is given to employees suffering from injuries or illness associated with our undertakings.
- Rapid summoning of medical assistance. The level of provision provided will be appropriate to the risks identified in each workplace risk assessment.

All First Aiders will be competent in either (FAW/EFAW) and hold a valid certificate of training and their names and locations will be prominently displayed in each workplace. Details of first aid provision required are detailed in each sites First aid needs assessment

More specific details are contained in policy HSMS 1800 – First Aid Policy.

3.3 Fire safety

BISHOPSGATE has a range of measures in place to manage the risks associated with fire. These include:

- Comprehensive detection and alarm systems
- A weekly testing regime
- Regular fire drills
- Trained Fire Wardens (sufficient number based on the fire risk assessment)

- Periodic fire risk assessments for each site.

More specific details are contained in policy HSMS 1900 – Fire Policy.

3.4 Risk assessment and safe systems of work

Risk assessment is the key to effective and sensible health and safety management.

The findings from risk assessments will be used to identify prioritise and control risks at all levels in the company.

Managers will ensure that:

- All significant hazards in their workplace / work activities under their control have been suitably risk assessed and that any subsequent risks are adequately controlled.

The Health and Safety Manager will ensure that:

- That these assessments are reviewed annually.
- Risk assessments will also be reviewed should there be:
    - Any changes in legislation which effects the assessment.
    - Any changes to working practices or environmental conditions that could affect employee safety.
    - An accident, near-miss or Serious Incident.
    - An indication that the assessment is no longer valid.

Safe systems of work will be prepared on top of risk assessments to provide more in-depth training for each task.

Risk assessments and safe systems of work will be available on BISHOPSGATE's shared drive and on the Learning Management System.

More specific details are contained in policies HSMS 3900 – Risk Assessment Policy and HSMS 4000 – Safe System of Work Policy.

3.5 Control of substances harmful to health (COSHH)

BISHOPSGATE will have a COSHH Register readily available on each site which will contain data sheets and assessments for COSHH on site.

The COSHH Register will be regularly reviewed by the Site Management team. The Site Manager will be responsible for ensuring this is kept up to date and that any new COSHH is reported to the Health and Safety Manager.

More specific details are contained in policies HSMS 0900 – Control of Substances Hazardous to Health Policy.

3.6 Training

BISHOPSGATE will ensure that all staff full time and temporary are adequately trained for their task and use of equipment, tools, machinery, and manual handling including any certificates and licenses required.

Training will include:

- Induction training upon starting with the business.
- Risk assessments and safe system of works.
- Manual handling;
- Display screen equipment and assessment
- Publications such as policy documents, manuals, leaflets, and factsheets.

To facilitate training, BISHOPSGATE have a dedicated Learning Management System for all employees.

More specific details are contained in policies HSMS 5700 – General Health and Safety Training Policy.

3.7 Communicating health and safety information

BISHOPSGATE uses a variety of methods to ensure suitable and sufficient health and safety information is disseminated to all staff; these are:

- Health and safety law poster and local contact notices e.g. first aiders, fire marshals.
- The Learning Management System.
- Team briefings which may contain occasional health and safety information.
- Consultation between management and employees is provided via monthly meetings at site level which involve the site management and the Health and Safety Representative.
- Ad-hoc emails to the Health and Safety Management email group (All management are included).
- Regular Toolbox Talks with employees.

More specific details are contained in policies HSMS 0800 – Consultation with Colleagues Policy.

4. AUDIT AND MONITORING

4.1 Pro-active monitoring

A workplace safety inspection is an effective way of identifying faults, hazards, and unsafe working practices. Operations Managers must ensure that their site carry out a workplace inspection of the premises under their control using the most current Workplace Inspection template.

The frequency of inspection should be determined by the risk presented by individual workplaces, but as a minimum, it should be completed at least weekly. If any unsafe conditions are found, the site management must take effective action to remove those conditions from the workplace. The Operations Manager is ultimately responsible for ensuring that all issues arising from inspections, wherever possible, are resolved to a satisfactory standard.

4.2 Re-active monitoring

The monitoring of injuries, ill-health, accidents, and incidents complement active monitoring and can be used effectively to identify causation, lesson learning and positively, a reduction in future incidents

4.3 Site health and safety audit

The Health and Safety Manager and Head of Compliance will complete a Site Health and Safety Audit for each site at a minimum of once every three months.

The audits will give recommendations for improvement and site management will be responsible for corrective and preventative action taken (CAPA)

The audit results will be shared with the Site Manager and the Health and Safety Management email group & logged on My Compliance Manager (Actions) for completion.

5. CONTRACTORS AND VISITORS

5.1 Contractors

BISHOPSGATE will have a variety of different contractors working on site from time to time. This can be for anything such as routine servicing, ad-hoc repairs or install of new equipment etc.

Each Contractor will be required to present risk assessments and method states prior to starting any works and must work to them. Checks will be in place by site management.

Each Contractor must undergo a BISHOPSGATE Contractor Health and Safety Induction before being allowed to work on site.

Contractors will be required to follow any BISHOPSGATE rules and guidance on site and are required to report any accidents or incidents immediately to a member of the BISHOPSGATE Management team.

More specific details are contained in policies HSMS 0700 – Contractors Policy.

5.2 Visitors

BISHOPSGATE will have a variety of different visitors on site from time to time. This can be customers, external auditors, or government officials etc.

Visitors must wear personal protective equipment when on sites such as hi-vis vests.

Visitors are not permitted to freely move around a BISHOPSGATE site and must be always escorted.
BISHOPSGATE staff are trained to challenge unaccompanied visitors and escort back to the reception area.

Visitors will be required to follow any BISHOPSGATE rules and guidance on site and are required to report any accidents or incidents immediately to a member of the BISHOPSGATE Management team.

More specific details are contained in policies HSMS 5605 – Visitor Information.

6. THE WORKING TIME REGULATIONS

Working time is any period during which a worker is working, at the employer's disposal and carrying out his activity or duties, any period when the worker is receiving relevant training and any additional periods that the employer and workers agree by relevant agreement.

Except for exempt workers, employees will not be required to work more than an average of 48 hours in a seven-day period. The average is normally calculated over a 17-week rolling reference period but this can be successive 17-week periods if this is specified in a relevant agreement.

The average is calculated using the formula $\frac{(A) + (B)}{(C)}$ where: -

(A) The total number of hours worked during the reference period,

(B) The total number of hours worked immediately after the reference period to compensate for any 'excluded days' and

(C) The number of weeks in the reference period.

'Excluded days' are non-working days that occur because of holidays, sickness, etc. Where there are excluded days during the reference period, hours worked on an equivalent number of days immediately after the reference period must be added in to the calculation as (B).

For the first 17 weeks of employment, workers should not have an average more than 48 hours a week, their average is calculated by dividing the total number of hours worked by the total number of weeks worked.

There is a general requirement on our company to take reasonable steps to ensure that workers do not work more than the 48-hour average, which includes asking whether the worker has more than one job.

There is no requirement to keep specific records of hours worked, but if required we will show an officer of the HSE or local authority that workers have not exceeded the 48-hour average.

Employees can opt-out of the maximum 48-hour week by means of an individual agreement. This agreement must be in writing and may either be for a fixed period or for an indefinite period. Unless a period of notice to terminate the agreement (which cannot exceed three months), is specified, it can be terminated with seven days' notice by the employee.

Employees cannot be forced to opt-out of the 48-hour week and it is unlawful to act against them for refusing. If an employee does opt-out of the 48-hour week, we must keep a copy of the individual opt-out agreement but do not have to keep any records in relation to the hours worked.

7. REST

Employees are entitled to a minimum uninterrupted rest break away from the workplace of 20 minutes in any work period that exceeds six hours, unless different periods are agreed in a collective or workforce agreement.

For young workers (16- to 18-year-olds) the rest break is 30 minutes in any work period that exceeds four-and a-half hours and no agreement can alter this.

The break must be continuous unless a situation arises which is unforeseen and unavoidable, in which case compensatory rest breaks must be given within three weeks.

Employees are entitled to a daily rest of at least 11 consecutive hours (12 hours for young workers) in each 24-hour period.

Employees are entitled to a weekly rest of at least 24 consecutive hours in a seven-day reference period. The seven-day period starts at midnight between Sunday and Monday unless a relevant agreement state otherwise. The weekly rest should start immediately after an 11-hour daily rest unless there are objective, technical, or organisational (OTO) reasons why the weekly rest cannot follow the daily rest. Derogations on weekly rests can be made by local, collective or workforce agreements.

For adult workers, the 24-hour weekly rest can be averaged over a 14-day reference period by giving two rest periods of at least 24 consecutive hours or one rest period of at least 48 consecutive hours in each 14-day period. Where this is not possible, equivalent compensatory rest or appropriate protection must be given to you. On average, all workers should receive 90 hours rest per week. This does not include breaks during working time, which are additional.

Young workers should have two 24-hour rest periods in each seven-day reference period, preferably consecutive. This can be reduced to 36 continuous hours (12 hours daily rest followed by 24 hours weekly rest) if this can be justified for OTO reasons.

As with the 48-hour average working week, it is unlawful to take any action against workers for taking or attempting to take their entitlement to rest breaks or daily/weekly rests