

HEALTH & SAFETY POLICY

STATEMENT OF INTENT

Direct Valeting Ltd. believes that excellence in the management of health and safety is an essential element within its overall business plan – a good health and safety record goes hand in hand with high productivity and quality standards.

People are the most important asset to this company, and therefore we are totally committed to ensuring their health, safety, and welfare at all times.

From an economic point of view, Direct Valeting Ltd. believes that prevention is not only better, but cheaper than cure. There is no necessary conflict between humanitarian and commercial consideration. Profits and safety are not in competition. On the contrary, safety is good business.

From a legal perspective, Direct Valeting Ltd. is committed to ensuring that it complies with all relevant health and safety legislation. Where it is reasonably practicable to do so, Direct Valeting Ltd. will strive to go beyond the requirements of legislation.

Direct Valeting Ltd. is committed to ongoing monitoring and review processes, so that continual improvement in the management of health and safety can be achieved.

Our general intentions are:

- To provide adequate control of the Health and Safety risks arising from our work activities.
- To consult with our employees on matters affecting their Health & Safety.
- To provide and maintain safe work equipment.
- To ensure safe handling and use of substances and provide personal protective equipment, free of charge.
- To provide information, instruction, and supervision for employees.
- To ensure all employees are competent in doing their tasks, and to give them adequate training.
- To ensure contractors and subcontractors are competent and informed about health and safety.
- To prevent accidents and cases of work-related ill health.
- To maintain safe and healthy working conditions.
- To review and revise this policy at regular intervals.

SIGNED:



MANAGING DIRECTOR

Direct Valeting

Last Review Date: Jan 03, 2024

ORGANIZATION

EMPLOYEE RESPONSIBILITIES

The overall and final responsibility for health and safety is that of the Managing Director, Jason Carpenter.

Day-to-day responsibility for ensuring this policy is put into practice is delegated to the competent person (and employee) Neil Outram, the Quality and Health and Safety Manager.

To ensure that health and safety standards are maintained and improved Direct Valeting adopts the following management structure:

NAME, POSITION	AREA OF RESPONSIBILITY
Jason Carpenter, Managing Director	All Company matters and staff
Neil Outram, Health & Safety Manager	Forming & coordinating Company Policy and strategy
Steve Brown, Operations Director	All Operational matters and staff
Lesley Murphy, Finance Director	Accounts and IT departments and associated office areas & staff
Michelle Sheldon, HR & Office Manager	Office staff, training records & maintenance contractors
Regional Managers	All operational matters & staff in geographic region
Area Managers	Sub-contractors & site operations in geographic area
Regional Support Managers	Responsible for individual sites and sub-contractors
Site Supervisors	Day-to-day responsibility for site activities

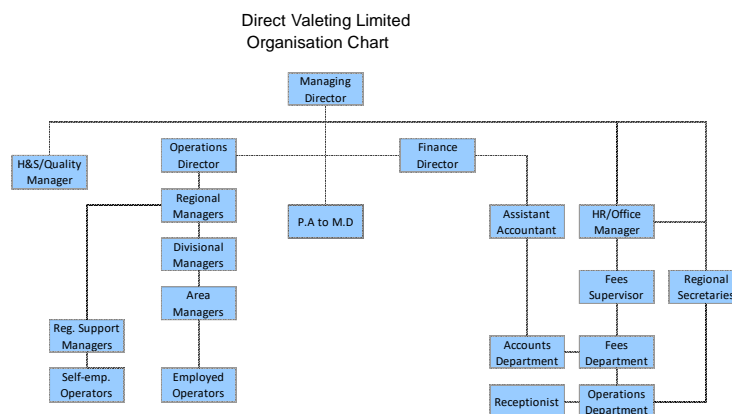
EMPLOYEES' DUTIES

All employees are required to:

- Co-operate with supervisors and managers on health and safety matters.
- Use machinery, equipment, substances, and personal protective equipment etc. safely following instructions.
- Not interfere with anything provided to safeguard their safety, and report any equipment faults, damage or maintenance requirements to the DV line manager on discovery.
- Take reasonable care of themselves and the health and safety of others who may be affected by their acts or omissions.
- Report all health and safety concerns to a responsible person on discovery.

Non-compliance with health and safety rules and procedures may result in disciplinary action which could include immediate dismissal if appropriate.

ORGANIZATIONAL CHART



ARRANGEMENTS FOR IMPLEMENTATION

SUBCONTRACTOR RESPONSIBILITIES

The services of subcontractors (self-employed suppliers) are used to carry out the valeting work at most of our customer accounts. Our Regional Managers and Area Managers are responsible for selecting suitable subcontractors and ensuring they are competent and have the necessary skills and knowledge to carry out the work to the required standards without putting themselves or others at risk.

SUBCONTRACTORS' DUTIES

All subcontractors are required to:

- Comply with all contractual obligations and their duties under relevant statutory health and safety provisions, including the general duties placed on them under section 3 Health and Safety at Work etc. Act 1974.
- To use machinery, equipment, substances and personal protective equipment etc. safely following instructions.
- Not interfere with anything provided in the pursuance of health and safety and report any equipment faults, damage or maintenance requirements to the DV line manager on discovery.
- Provide proof of competence and ability to carry out the contract to the required standards without risks to health and safety.
- Provide information on how they will do the work and how they will meet their responsibilities under health and safety legislation regarding special hazards, e.g., the Control of Substances Hazardous to Health Regulations 2002.
- Co-operate and communicate with Direct Valeting and our clients on matters of health and safety.
- Report any work-related injuries, diseases, near misses and cases of ill health to the facility and Direct Valeting line management.

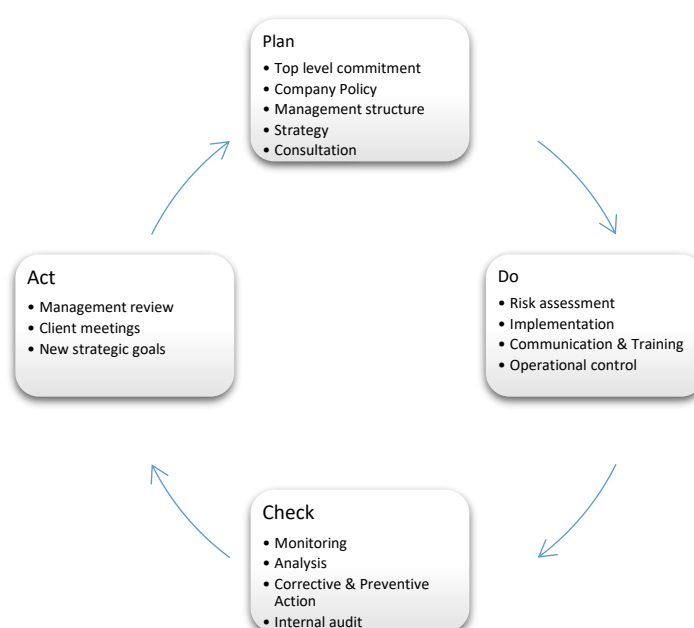
Failure to comply with health and safety rules and procedures may result in termination of contract.

MANAGEMENT OF HEALTH AND SAFETY

Direct Valeting manages its health and safety obligations via numerous systems and procedures relevant to the operations carried out at our customer account sites, and at our head office. The primary systems and procedures for health and safety are integrated into our Quality Management System procedures but may also be viewed as separate processes. The systems adopted to implement our H&S related processes include the use of professional devices, tools and apps, and our own bespoke web application, along with the usual email and paper documents, as required. Our web application and user interface is under continual development, and will eventually enable us, and our employees and subcontractors, to achieve new levels of performance and compliance with much greater ease and efficiency.

The co-ordination of these systems and procedures are the responsibility of the Quality and Health & Safety Manager. Operationally, the application of these systems and procedures is primarily the responsibility of the Regional Managers and Area Managers.

All our systems and procedures are designed and implemented with the Plan-Do-Check-Act cycle in mind, and are applied in accordance with the PDCA cycle pictured in the diagram below:



CONSULTATION WITH EMPLOYEES

Direct Valeting Ltd will consult with its employees in accordance with the Safety Representative and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996.

Consultation with employees will be provided by monthly management meetings where Health and Safety is prioritized on every agenda. Any Health and Safety issues can be reported through line management in these meetings.

RISK ASSESSMENT

In accordance with the Management of Health and Safety at Work Regulations 1999, Direct Valeting Ltd. will carry out risk assessments of all activities that present a risk to employees or others. These risk assessments will be carried out in line with Health & Safety Executive guidance, and the procedure for doing so is as follows:

1. Identifying and prioritizing the significant hazards involved in our activities.
2. Deciding who might be harmed and how.
3. Evaluating the level of risk and deciding if existing precautions are sufficient, or if more needs to be done.
4. Recording the significant findings of the assessment.
5. Reviewing the assessment when things change or there is reason to believe that it is no longer valid.

Risk assessments will be undertaken by the Health & Safety Manager and the findings disseminated to the Regional Managers and Area Managers directly, and by safe working procedures.

Where necessary, approval for the required action to remove or control risks will be given by the Regional Managers, in consultation with the Health and Safety Manager. External advice will be sought on specialist health & safety issues if necessary.

MANUAL HANDLING

Direct Valeting will ensure that all manual handling tasks are identified by assessment and suitable controls put in place. Staff who are based at head office are required to report handling activities to the HS Manager prior to carrying out the task. The majority of manual handling tasks are carried out by the HS Manager personally, including transfer of archiving boxes to and from the cellar, and movement of office furniture, large waste bins, and general maintenance requirements.

The Area Managers are primarily responsible for making sure handling activities on site and in the field are appropriately controlled in-line with the risk assessment and safety guidance, and for reporting any unusual handling tasks to the HS Manager prior to carrying them out.

EQUIPMENT

Direct Valeting will ensure that all plant and equipment is suitable and without risks to health and safety, in accordance with legislation such as the Provision and Use of Work Equipment Regulations 1998 and the Electricity at Work Regulations 1989.

Responsibility to ensure that all repairs and maintenance is completed in accordance with our agreement with the service provider, Nilfisk, is that of the Area and Regional Managers.

Nilfisk are employed as the approved contract company for supplying, repairing, and maintaining all operational cleaning equipment, either in response to call-out requests from us, or in accordance with our agreed terms or their own routine schedules and findings. Portable Appliance Testing is carried out at least annually, or on request.

Valeting subcontractors and employees are required to report to their Area Manager any equipment faults, damage or maintenance requirements on discovery, and remove any unsafe equipment from use.

Area Managers are required to carry out frequent visual and operating inspections.

HAZARDOUS SUBSTANCES

Direct Valeting will undertake assessment of the risks posed by any substances used on site in accordance with the Control of Substances Hazardous to Health Regulations (COSHH) 2002.

All valeting chemical substances are provided by just one or two approved suppliers. COSHH assessments and/or Material Safety Data Sheets for all products are available at each customer site, and information/instruction about their hazardous properties and safe use is communicated additionally through safe working procedures, container and dispenser labels, and wall signage/guidance.

INFORMATION, INDUCTION AND SUPERVISION

The responsibility for providing appropriate information, induction and supervision is that of the Area Manager and supporting management/supervisory team. The information from the HSE's 'Health and Safety Law What you need to know' leaflet is included in the Valet Bay folder kept at each site and communicated during induction. (The Health and Safety Law poster will be appropriately displayed at each account by our client, including contact details for the local enforcing authority.) All other relevant health and safety information provided by Direct Valeting is included in their H&S pocketbook manual, the contents of the valet bay folder (which includes risk assessments and safety data sheets), and in demonstrations and toolbox talks given by the operations management team.

DIRECT VALETING EMPLOY A DEDICATED AND COMPETENT HEALTH AND SAFETY MANAGER. NEIL OUTRAM CAN BE CONTACTED AT ANY TIME DURING OFFICE HOURS VIA OUR HEAD OFFICE, BUT IN THE FIRST INSTANCE WHEREVER POSSIBLE AND APPROPRIATE PLEASE CONTACT OUR AREA OR REGIONAL MANAGER.

TRAINING AND COMPETENCE

Job training will include safe working practices and procedures and is the responsibility of the relevant line manager. In the case of the valeting operators (employed and self-employed alike) it is the Regional and Area Managers who are responsible for determining and providing appropriate training. Training will be provided by a mixture of verbal, practical, and written instruction, and to a level of competence necessary to ensure their safety and the safety of others, whilst achieving the required quality specifications.

Self-employed Subcontractors are responsible for making sure any 'substitutes' they employ satisfy our pre-approved list of criteria, and for arranging for them to meet our Area Manager prior to commencing work, who will need to verify the following criteria and inform the substitute about safety and security rules, and introduce them to co-workers and customer management, etc.:

- Substitutes must be suitably qualified and skilled to carry out the work they are being employed to complete and be able to prove/demonstrate this.
- They must have and bring proof of their right to work in the UK.
- They must have and bring a valid driving license for the types of vehicles they will be required to work on.
- They must have and bring contact details of another person who can serve as a reference.
- They must be able to communicate in English or the first language spoken by our team leader/supervisor.
- They must wear suitable clothing and work boots which meet work, safety and security requirements.
- They must adhere to COSHH and Personal Protective Equipment (PPE) procedures. (PPE can be provided if they do not possess their own but the subcontractor will need to inform the Area Manager prior to the substitute commencing work if PPE is needed.)
- They must adhere to all other health and safety and quality standard requirements.

Health and safety training requirements for operational managers and head office employees is determined by the Health and Safety Manager. Training records are kept at head office.

ACCIDENTS, FIRST AID AND WORK-RELATED ILL HEALTH

First aid equipment is available at each site. For accidents at head office a first aid box is held on the notice board. Emergency first aid is provided by certified first aiders.

Qualified First Aiders are employed by our customers at our customer account sites and will attend to any such needs of our staff and any subcontractors working on their premises, in accordance with their duty of care. Direct Valeting's own First Aid arrangements are assessed at each customer account site by the Area Manager, in consultation with their H&S Manager as necessary. The Area Manager is responsible for ensuring first aid arrangements (including the first aid location and identity of the first aiders) are communicated to all Direct Valeting employees and sub-contractors during induction.

All personal injuries, diseases and work-related ill health are recorded in the accident book kept by the H&S Manager at head office. Staff are responsible for ensuring all incidents, including dangerous occurrences and near misses, are reported to the Health and Safety Manager. The Area Manager is also responsible for checking, monitoring, and reporting on any health concerns with their workforce.

Responsibility for reporting and investigating all 'on-site' incidents is that of the Area and Regional Managers, in close consultation with/assistance from the Health and Safety Manager.

Responsibility for investigating occupational health concerns and work-related causes of sickness absence is that of the Area and Regional Managers, in consultation with HR and the Health and Safety Manager, as necessary.

Responsibility for acting on investigation findings to prevent accident and ill-health recurrences is that of the Regional Managers and Area Managers, again, in consultation with the Health & Safety Manager.

MONITORING

Ongoing monitoring of H&S at our customer sites is primarily the responsibility of the Area and Regional Managers. This is achieved through formal routine monthly inspections of our work areas and working practices by the Area Managers. Regional Managers also undertake regular site visits where health and safety aspects are included. Additionally, the Health & Safety Manager will conduct some routine and random site audits and manage the schedule and findings of any appointed auditors.

An open-door policy allows head office employees to consult or alert the H&S Manager to any related matters as and when they occur. Routine inspections and scheduled reviews with the HR Manager and key representatives ensure workplace health and safety, including occupational and mental health concerns, is monitored appropriately.

EMERGENCY PROCEDURES – FIRE AND EVACUATION

Responsibility for completing the fire risk assessment for our head office is that of Neil Outram, who also carries out the generic fire risk assessment for the valeting operations at our customer sites which is reviewed by the Area Managers.

Fire-related safety arrangements is the responsibility of our customers, where we are working on their premises or premises under their control. Responsibility for communicating these arrangements to DV employees and subcontractors is primarily the responsibility of our customer, however, our management team are also assigned this duty to avoid it being omitted. Area Managers will communicate these arrangements and provide any training (including fire causes and prevention, and use of fire extinguishers) during training and induction and through toolbox talks.

Employees and subcontractors are responsible for the safety and safe evacuation of each other, raising the alarm as necessary, and adhering to any site and company rules, e.g., regarding fire drills and smoking rules, etc.

Where we are responsible for fire safety arrangements on site, fire-fighting equipment and alarm maintenance is contracted out and controlled via head office.

Head Office emergency evacuation will be tested annually, as a minimum. Fire Extinguishing and detection devices at head office are tested routinely and maintained by local contractors.