

deNovo – Health and Safety Policy

It is the Policy of deNovo Associates Ltd to comply with the terms and conditions of the Health and Safety at Work etc. Act 1974 and any subsequent legislation and to provide and maintain a healthy and safe working environment, so far as is reasonably practicable.

All employees, contractors, visitors and clients, will be provided with such equipment, information, training and supervision as is necessary to implement the policy.

Signed: *A Cullin*

Title: Director

Date: Jan 2009

deNovo – Health and Safety Policy

General Statement of Policy

It is the policy of deNovo Ltd ("the Company") to comply with the terms of the Health and Safety at Work etc. Act 1974 and any subsequent legislation and to provide and maintain a healthy and safe working environment, so far as is reasonably practicable. The Company's health and safety objective is to minimise the number of instances of occupational accidents and illnesses and ultimately to achieve an accident-free workplace.

All employees will be provided with such equipment, information, training and supervision as is necessary to implement the policy and achieve the stated objective. We will take steps to ensure that our statutory duties are met at all times.

deNovo Ltd recognise and accept their duty to protect the health and safety of all visitors to the company including contractors and temporary workers, as well as any members of the public who might be affected by our operations.

While the management of the Company will do all that is within its powers to ensure the health and safety of its employees, it is recognised that health and safety at work is the responsibility of each and every individual associated with the company. It is the duty of each employee to take reasonable care of their own and other people's welfare and to report any situation which may pose a threat to the well being of any other person. The management of the Company will provide every employee with the training necessary to carry out their tasks safely. However if an employee is unsure how to perform a certain task or feels it would be dangerous to perform a specific job then it is the employee's duty to report this to his or her supervisor or any member of the Safety Committee. An effective health and safety programme requires continuous communication between workers at all levels. It is therefore every worker's responsibility to report immediately any situation, which could jeopardise the well being of himself or herself or any other person.

All injuries, however small, sustained by a person at work must be reported to the first Aid Officer or any other member of the Management Team. Accident records are crucial to the effective monitoring and revision of the policy and must therefore be accurate and comprehensive.

deNovo Ltd Health and Safety Policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur. The policy will be updated at least every 12 months.

The specific arrangement for the implementation of the policy and the personnel responsible are detailed below.

Signed

A Cullin

Title: Director

Company: deNovo Associates Ltd

deNovo – Health and Safety Policy

Safety Personnel

The person with overall and final responsibility for health and safety in deNovo Ltd is the MANAGING DIRECTOR

The person responsible for overseeing, implementing and monitoring the policy is the Managing Director who will be supported by all Managers and Supervisors and members of the Safety Committee.

Communication

The management of deNovo Ltd will endeavour to communicate with all employees via both oral and written directives and statements - and also by their example - their commitment to Health and Safety

Co-Operation & Care

Communication between all employees of deNovo Ltd is considered to be an essential part of effective health and safety management and co-operation between employees throughout the Company is essential if a healthy and safe working environment is to be achieved and maintained.

All employees are expected to accept their responsibilities and duties under this policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform his or her duties under this policy.

Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all other people affected by the operations of the company.

Safety Training

Safety training is regarded as an indispensable ingredient of an effective health and safety programme. It is essential that every worker in the organisation is trained to perform his or her job effectively and safely. It is the opinion of the management of deNovo Ltd that if a job is not done safely then it is not done effectively.

All workers will be trained in safe working practices and procedures prior to being allocated any new role. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned and the formulation of emergency contingency plans.

Responsibility for maintenance and formulation of training plans lies with the MANAGING DIRECTOR

Workplace Inspections and Risk Assessments

It is the policy of deNovo Ltd to comply with the Workplace (Health, Safety & Welfare) Regulations 1992.

Members of the Safety Committee will conduct inspections of the workplace including risk assessments. In addition, inspections will be conducted whenever significant changes to working practices are introduced.

Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and to identify areas where revision of the policy may be necessary. Risk assessments will be carried out by Members of the Safety Committee in accordance with accepted practice for assessing risks.

deNovo – Health and Safety Policy

Work Equipment

It is the policy of deNovo Ltd to comply with the law as set out in the Provision and Use of Work equipment Regulations 1992.

The Company will endeavour to ensure that all equipment used in the workplace is safe and suitable for the purpose for which it is used.

All workers will be provided with adequate information and training to enable them to use work equipment safely.

The use of any work equipment, which could pose a risk to the well being of persons in or around the workplace, will be restricted to authorised persons.

All work equipment will be maintained in good working order and repair.

All workers will be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment.

All work equipment will be clearly marked with health and safety warnings where appropriate.

Personal Protective Equipment

It is the policy of deNovo Ltd to comply with the law as set out in the Personal Protective Equipment at Work Regulations 1992.

All workers who may be exposed to a risk to their health and safety while at work will be provided with suitable, properly fitting and effective personal protective equipment.

All personal protective equipment provided by the Company will be properly assessed prior to its provision.

All personal protective equipment provided by the Company will be maintained in good working order.

All workers provided with personal protective equipment by the Company will receive comprehensive training and information on the use, maintenance and purpose of the equipment.

The Company will endeavour to ensure that all personal protective equipment provided is used and used properly by its employees.

The Company will also when necessary provide dedicated eye-protection which has been fitted with prescription lenses for those employees who are required to wear eye-protection at all times during their working day.

Manual Handling Operations

It is the policy of deNovo Ltd to comply with the law as set out in the Manual Handling Operations Regulations 1992.

Manual handling operations will be avoided as far as is reasonably practicable where there is a risk of injury. Where it is not possible to avoid manual handling operations, an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned. An assessment will be reviewed if there is any reason to suspect that it is no longer valid.

deNovo – Health and Safety Policy

All possible steps will be taken to reduce the risk of injury to the lowest level possible.

Display Screen Equipment

It is the policy of deNovo Ltd to comply with the law as set out in the Health and Safety (Display Screen Equipment) Regulations 1992.

The Company will ensure that systems of work on display screen equipment will be safe, so far as is reasonably practicable.

The Company will carry out analyses of workstations for the purpose of assessing risks in particular those of muscular-skeletal discomfort, visual disturbance and mental stress. It will be ensured that all workstations meet the above regulations.

Display screen users will be allowed periodic breaks in their continuous DSE work and employees who are specifically users of DSE are entitled to eyesight tests which will be provided free of charge on request. Where necessary, display screen users will be provided with the basic necessary corrective equipment such as glasses or contact lenses.

All display screen users will be given appropriate and adequate training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

Control of Hazardous Substances

It is the policy of deNovo Ltd to comply with the law as set out in the Control of Substances Hazardous to Health Regulations 1999 (COSHH).

A risk assessment will be conducted of all work involving exposure to hazardous substances. The assessment will be based on manufacturers' and suppliers' health and safety guidance and our own knowledge of the work process.

The Company will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases.

All workers who will come into contact with hazardous substances will receive comprehensive and adequate training and information on the health and safety issues relating to that type of work.

Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

New, Lactating or Expectant Mothers

It is the policy of deNovo Ltd to comply with the European Directive on Pregnant Workers.

Where a risk to new, lactating or expectant mothers is identified, working conditions and/or working hours will be adjusted so as to avoid the risk. Where this is not reasonable the employee(s) concerned will be suspended from work on full pay.

deNovo – Health and Safety Policy

Fire Safety

deNovo Ltd fire safety policy and procedures, under the Fire Precautions (Workplace) Regulations 1997, take account

of special fire hazards in specific areas of the workplace and, where appropriate, have been compiled with the assistance of the local fire service.

The local fire service inspection staff are responsible for ensuring compliance with fire safety and prevention codes, for reviewing company practices and procedures, inspecting and testing fire fighting, prevention and protection equipment and for advising on safe practices and procedures.

The person with responsibility for the maintenance and testing of fire alarms and fire fighting equipment is the MANAGING DIRECTOR

All employees have a duty to report immediately any fire, smoke or potential fire hazards to their immediate supervisor and to the fire service (dial 9-999).

All employees have a duty to conduct their operations in such a way as to minimise the risk of fire.

The MANAGING DIRECTOR is responsible for the provision and maintenance of fire prevention and detection equipment.

Operators are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

The Company will have a Fire Marshall for each floor and they will ensure the building is evacuated and will report this to a nominated person responsible for registering departmental evacuation. The names of the Fire Marshalls are given in Appendix D.

The Safe System of Work on Discovery of a fire is posted on notice boards and around the building and is listed in Appendix E.

Fire Detection Equipment

Smoke detectors are located at strategic points throughout the workplace.

Fire Fighting Equipment

Fire extinguishers are located at strategic points throughout the workplace. Employees are expected to tackle a fire themselves only if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should inform the Fire Marshall immediately

Fire Doors

Any door marked and identified as a Fire Door is to remain closed at all times when not in use in order to slow the spread of fire and smoke throughout the workplace.

Fire Exits

Fire exits are located at strategic points throughout the workplace. Exit doors and corridors must never be locked, blocked or used as storage space.

deNovo – Health and Safety Policy

Smoking

Smoking is prohibited in all areas of the workplace except those areas, which have been specifically designated as smoking areas. Namely outside the front door. Smoking areas should at all times be kept fire safe. Combustible materials must never be stored or allowed to accumulate in areas where smoking is permitted.

Emergency Evacuation Procedure

In the event of a fire, or in any other emergency situation (such as a bomb scare), all employees must leave the building by the nearest available exit and assemble at the designated assembly point. The designated assembly point for all employees is the car park at the front of the building.

Practice fire drills will be conducted regularly to ensure employee familiarity with emergency evacuation procedures.

Supervisors are entirely responsible for carrying out a roll call of all employees reporting to them and advising their immediate supervisor of the names of missing employees. Any employee who has a visitor at the time of the evacuation has total responsibility for that visitor and must regard the visitor as an employee.

Accident Investigation & Reporting

It is the policy of deNovo Ltd to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 95).

The Company sees accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury a report will be drawn up by the MANAGING DIRECTOR, detailing:

- The circumstances of the accident including photographs and diagrams if considered necessary,
- The nature and severity of the injury sustained
- The identity of any eyewitnesses

- The time, date and location of the incident
- The date of the report

All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. Any person required to give an official statement has the right to have a lawyer or trade union representative present at the company's expense.

The completed report will then be made available to the MANAGING DIRECTOR for discussion and future avoidance.

A follow up report will be completed after a reasonable period of time examining the effectiveness of any new measures adopted. All reports will be submitted via the MANAGING DIRECTOR to any external bodies for advice etc.

Accident Procedure

First aid stations are located in areas where personnel are concentrated around the workplace. All first aid stations are clearly marked and are easily accessible by all employees during all working hours. Qualified and certificated First Aiders are collectively responsible for the proper use and maintenance of the First Aid stations.

deNovo – Health and Safety Policy

A list of equipment held at each First Aid Station is given in Appendix c.

First Aiders

A list of qualified and certificated First Aiders is given in Appendix C:

The responsibility of the First Aider is to ensure that the appropriate first aid treatment is administered and in the event that further i.e. hospital treatment is deemed necessary to ensure this is arranged. The Accident Report Record is to be completed by the First Aider and the accident brought to the attention of the H R Officer and supervisor. It is the aim of the Company to ensure that a minimum of three employees will always be so qualified. The MANAGING DIRECTOR is responsible for formally reporting all cases of accident and disease to the Managing Director and to the appropriate external bodies. Completed accident records are to be retained by the MANAGING DIRECTOR

Note that First Aid training will be offered free of charge to any employee who expresses an interest in becoming a qualified and certificated First Aider.

Working Environment – Housekeeping

1. Work sites must be kept clean and tidy AT ALL TIMES.
2. Any spillage must be cleaned up immediately.
3. Waste materials and rubbish must be removed routinely.
4. All combustible waste materials must be discarded in sealed metal containers.
5. All pits and holes must be covered when not in use and clearly marked with warning signs when in use.

Walkways

1. Walkways and passageways must be kept clear from obstructions at all times.
2. If a walkway or passageway becomes wet it should be clearly marked with warning signs and / or covered with non-slip material.
3. Trailing cables are a trip hazard and should not be left in any passageway.
4. Any change in the floor elevation of any walkway or passageway must be clearly marked.
5. Where objects are stored in or around a passageway, care must be taken to ensure that no long or sharp edges jut out into the passageway in such a way as to constitute a safety hazard.
6. Where a passageway is being used by any vehicles or other moving machinery, an alternative route should be used by pedestrians wherever possible. If no alternative route is possible the area should be clearly marked with warning signs.

Tool and Equipment Maintenance

1. Company machinery and tools are only to be used by qualified and authorised personnel. It is the responsibility of the supervisor to determine who is authorised to use specific tools and equipment.
2. It is the responsibility of all employees to ensure that any tools or equipment they use are in a good and safe condition. Any tools or equipment, which are in any way defective, must be repaired or replaced.
3. All tools must be properly and safely stored when not in use.
4. No tool should be used without the manufacturers recommended shields, guards or attachments.

deNovo – Health and Safety Policy

5. Approved personal protective equipment must be properly used where appropriate.
6. Employees may not wear clothing, jewellery or long hair in such a way as might pose a risk to their safety, or anyone else's safety.
7. Employees are prohibited from using any tool or piece of equipment for any purpose other than its intended purpose.

Personal Protective Equipment

1. Employees must use all personal protective equipment provided to them in accordance with the training and instruction given to them regarding its use.
2. Employees who have been provided with personal protective equipment must immediately report any loss of or obvious defect in any equipment provided to their supervisor.

Manual Lifting and Moving

1. Lifting and moving of objects should always be done by mechanical devices rather than manual handling wherever reasonably practicable. The equipment used should be appropriate for the task at hand.
2. The load to be lifted or moved must be inspected for sharp edges, splinters and wet or greasy patches.
3. When lifting or moving a load with sharp or splintered edges gloves must be worn. Gloves should be free from oil, grease or other agents, which might impair grip.
4. The route over which the load is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage, which could cause tripping or spillage.
5. Employees should not attempt to lift or move a load, which is too heavy to manage comfortably.
6. Where team lifting or moving is necessary one person should act as co-ordinator, giving commands to lift, lower etc.
7. When lifting an object off the ground employees should assume a squatting position, keeping the back straight. The load should be lifted by straightening the knees, not the back. These steps should be reversed for lowering an object to the ground.

General

1. All employees should be aware of, respect and adhere to the rules and procedures contained in this policy statement.
2. All employees shall immediately report any unsafe practices or conditions to the relevant authority.
3. Any employee or visitor under the influence of alcohol or any other intoxicating drug, which might impair motor skills or judgement, whether prescribed or otherwise, shall not be allowed on the job.
4. Horseplay practical joking or any other acts, which might jeopardise the health and safety of any other person is forbidden.
5. Any person whose levels of alertness and or ability are reduced due to illness or fatigue will not be allowed on the job if this might jeopardise the health and safety of that person or any other person.
6. Employees shall not adjust, move or otherwise tamper with any electrical equipment, machinery or air or water lines in a manner not within the scope of their duties, unless instructed to do so by a senior member of staff.
7. All waste materials must be disposed of carefully and in such a way that they do not constitute a hazard to other workers.
8. No worker should undertake a job, which appears to be unsafe.

deNovo – Health and Safety Policy

9. No worker should undertake a job until he or she has received adequate safety instruction and is authorised to carry out the task.
10. Employees should take care to ensure that all protective guards and other safety devices are properly fitted and in good working order and shall immediately report any deficiencies to the supervisor or the Operations Manager.
11. Work shall be well planned and supervised to avoid injuries in the handling of heavy materials and while using equipment.
12. No employees should use chemicals without the knowledge required to work with those chemicals safely.
13. Suitable clothing and footwear will be worn at all times. Personal protective equipment shall be worn wherever appropriate.
14. All employees are expected to attend departmental safety meetings. APPENDIX A

deNovo – Health and Safety Policy

Safety Council Terms of Reference

The main functions of the Members may be defined as:-

- To bring to the attention of the Council any matter which may affect the safety of themselves and others.
- To keep abreast of safety legislation as it affects the Business.
- To disseminate information on safety issues to others through verbal communication and publication of the minutes of the Safety committee meetings
- To promote safe working practices and raise safety awareness via poster and other publicity campaigns
- To carry out regular informal safety inspections of the whole work environment.
- To undertake risk assessments for new processes and capital equipment.
- To make recommendation as to training needs.
- To review accident and other statistics

Notes:-

The Council has the full support and endorsement of the MANAGING DIRECTOR

Meetings will be convened on a regular monthly basis

Extra meetings may be called by the MANAGING DIRECTOR

A member of the Management Team will be present at all meetings.

Minutes of each meeting will be posted on Notice Boards.

deNovo – Health and Safety Policy

APPENDIX B

MEMBERS OF THE SAFETY COUNCIL

Ashley Cullin

Operations Director

David Jones

Senior Consultant

Melanie Whitehouse

Marketing Assistant

deNovo – Health and Safety Policy

APPENDIX C

Qualified and Certificated First Aiders

Melanie Whitehouse

deNovo – Health and Safety Policy

APPENDIX D

The Company's Fire Marshalls are as follows:

Mr David Jones
Miss Amanda Kilgallen