The Steadfast Security Group

Health and Safety Policy

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AMENDMENTS				
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INTRODUCTION

PURPOSE

1. The purpose of this Health and Safety Policy is to affirm The Steadfast Security Group's **commitment** to **providing** and **maintaining** a **safe and healthy working environment** for all employees, contractors, visitors, and others who may be affected by our operations. This policy outlines our approach to **identifying**, **managing**, and **mitigating** health and safety risks across all areas of the business, including Steadfast Security Solutions Ltd, Steadfast Security Systems Ltd, and Steadfast Secure Storage Ltd.

2. By fostering a **proactive safety culture** and **ensuring compliance** with all relevant health and safety legislation, we aim to prevent accidents, reduce risk, and promote the wellbeing of everyone at our headquarters in Peterlee and across all operational sites.

SCOPE

3. This Policy applies to all employees, contractors, and temporary staff across The Steadfast Security Group, including its subsidiary organisations:

   a. Steadfast Security Solutions Ltd

   b. Steadfast Security Systems Ltd

   c. Steadfast Secure Storage Ltd

STATEMENT OF INTENT

1. As Managing Director of The Steadfast Security Group, I accept full and personal responsibility for all matters relating to Safety, Health, Environment, and Fire (SHEF) across our organisation. This policy reflects the high priority I place on protecting the environment, promoting sustainability, and safeguarding the health, safety, and welfare of every employee within our group.

2. Our commitment to preventing injury, ill health, equipment damage, and environmental harm, including pollution, is underpinned by the regular identification and assessment of significant hazards and environmental impacts. These are addressed through robust risk assessments and strong, proactive management, both of which are essential to fulfilling our legal obligations.

3. All employees are required to comply with relevant statutory legislation, including but not limited to:

   a. The Health and Safety at Work etc. Act 1974

   b. The Environmental Protection Act 1990

   c. The Environment Act 1995

4. In addition, employees must adhere to all applicable company policies. Everyone has a duty to act responsibly, protect themselves and others, and safeguard the environment. Interference with or misuse of any health, safety, or fire protection measures is strictly prohibited.

5. Managers at all levels are expected to uphold and enforce this policy, ensuring that all activities are conducted in full compliance with legal and regulatory requirements. Part 3 of this policy outlines the organisational structure for health and safety, detailing specific responsibilities. Part 4 describes the arrangements in place to achieve compliance. Both sections must be communicated to all relevant personnel, including visitors and contractors where appropriate.

6. Risk assessments will be conducted and documented in all areas where hazards may exist. The findings will be made available to all affected employees to ensure transparency and awareness.

7. I have appointed the Health and Safety Compliance Manager as the Group's Safety Advisor. They will maintain close liaison with regulatory bodies and ensure that appropriate training and guidance are provided to meet our legal obligations. Health and safety initiatives will be communicated through formal meeting minutes, toolbox talks, training sessions, newsletters, and will be monitored through regular internal and external audits.

8. I am personally committed to the continuous improvement of health and safety performance across the Group.

9. The successful implementation of this policy relies on the full commitment of every individual within Steadfast. All employees are expected to:

   a. Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions.

   b. Cooperate fully with the company by following all rules, safe working practices, and instructions necessary to ensure legal compliance.

10. This Statement of Intent will be displayed on all Health and Safety notice boards and brought to the attention of all personnel. It will be reviewed annually to ensure it remains current and compliant with legislation.

Paul Harbord
Managing Director, The Steadfast Security Group
20 Nov 2025

ROLES AND RESPONSIBILITIES

THE MANAGING DIRECTOR(S)

1. The Managing Director(s) of The Steadfast Security Group hold ultimate accountability for the promotion and implementation of effective Health, Safety, Environment, and Fire (SHEF) practices across all group operations. Their responsibilities include:

a. **Leadership and Commitment**: Promote health and safety as a core management objective, equal in importance to other business functions.

b. **Policy Oversight**: Ensure the development, implementation, and maintenance of a comprehensive and effective Health, Safety, and Welfare Policy.

c. **Competent Person Appointment**: Appoint a suitably competent individual to coordinate all SHEF matters within the organisation.

d. **Policy Support and Review**: Provide full backing to the policy and those responsible for its implementation. Ensure the policy is reviewed regularly to maintain its relevance to Steadfast's evolving operations.

e. **Resource Allocation**: Ensure, so far as is reasonably practicable, the provision of adequate resources, facilities, and technical support to enable compliance with health, safety, and welfare responsibilities.

f. **Training and Development**: Establish and maintain an effective staff training and development programme to support SHEF awareness and competence.

g. **Policy Effectiveness**: Periodically evaluate the effectiveness of the Health and Safety Policy and implement necessary improvements.

h. **Premises Maintenance**: Ensure a robust system is in place for the maintenance of company premises, including prompt reporting and rectification of defects that may impact health and safety.

i. **Safe Operating Procedures**: Oversee the development and maintenance of Safe Operating Procedures for all high-risk activities.

j. **Risk Assessment and Control**: Ensure the implementation of a comprehensive risk assessment process across all business areas, with appropriate control measures established and maintained.

k. **Training Authorisation**: Approve and support all training identified as necessary to ensure tasks are carried out with minimal risk to health and safety.

HEALTH & SAFETY / COMPLIANCE MANAGER

2. The Health & Safety / Compliance Manager is responsible for supporting the Managing Director(s) in the development, implementation, and continuous improvement of the Group's Health, Safety, Environment, and Fire (SHEF) systems. Their key responsibilities include:

a. **System Development and Integration**: Assist in establishing and maintaining effective SHEF systems that are fully integrated into the operational management of all company undertakings.

b. **Training and Awareness**: In collaboration with the Managing Director(s) and Senior Management, design and maintain a comprehensive training programme to ensure all employees understand and fulfil their health and safety responsibilities.

c. **Regulatory Liaison**: Act as the primary liaison with enforcing authorities. Accompany inspectors during site visits and take appropriate action in response to their reports and recommendations.

d. **Authority to Intervene**: Possess the authority to halt any company activity deemed unsafe or posing a significant risk to health, safety, or the environment.

e. **Incident Investigation and Reporting**: Investigate all reportable incidents, including injuries, diseases, and dangerous occurrences. Ensure timely completion and submission of statutory reports and recommend measures to prevent recurrence.

f. **Legislative Compliance**: Ensure the organisation operates in accordance with all applicable legislation and codes of practice. Keep the company informed of changes to existing laws and the introduction of new legal requirements.

g. **Risk Assessment Management**: Oversee the implementation of a robust risk assessment system. Ensure all activities are assessed for hazards and risks, and that effective control measures are in place.

h. **Programme Coordination and Monitoring**: Coordinate and monitor the risk assessment programme, ensuring that all identified actions are documented, prioritised, and tracked to completion.

i. **Record Keeping**: Maintain accurate and up-to-date records relating to all aspects of health and safety. Ensure relevant stakeholders are informed as required.

j. **Regulatory Reference Maintenance**: Maintain a current log of all regulations and Approved Codes of Practice referenced in the Safety Policy.

k. **Use of External Resources**: Engage external consultants and resources as necessary to support the fulfilment of health and safety responsibilities.

THE SENIOR MANAGEMENT TEAM

3. The Senior Management Team plays a critical role in embedding a strong health, safety, and welfare culture across all areas of The Steadfast Security Group. Their responsibilities include:

a. **Leadership and Accountability**: Recognise health, safety, and welfare as core management responsibilities, equal in importance to all other business functions.

b. **Commitment to High Standards**: Commit to achieving the highest reasonably practicable standards of health, safety, and welfare for all employees and others who may be affected by Steadfast's operations.

c. **Policy Support**: Provide full backing to the Health and Safety Policy and actively support all personnel involved in its implementation.

d. **Employee Consultation**: Ensure effective consultation with employees on all matters affecting their health and safety within their areas of control.

e. **Policy Familiarisation and Compliance**: Fully understand the company's Health and Safety Policy and ensure, so far as is reasonably practicable, that all staff and non-company personnel under their supervision comply with relevant legislation and company policies.

f. **Training Needs Identification**: Identify and address health and safety training needs within their respective areas of responsibility.

g. **Delegation of Responsibilities**: Ensure that health and safety responsibilities are clearly assigned, understood, and accepted at all levels within their teams.

h. **Safe Working Practices**: Develop, implement, and maintain safe working practices specific to their operational areas, in collaboration with their teams.

i. **Policy and Practice Review**: Periodically review the effectiveness of the Health and Safety Policy and associated safe working practices. Ensure any updates or changes are communicated to relevant personnel.

j. **Housekeeping Standards**: Maintain high standards of housekeeping at all times to support a safe and orderly working environment.

k. **Risk Assessment Oversight**: Oversee the completion of risk assessments within their areas of control and ensure that appropriate resources are allocated to implement necessary control measures.

THE SUPERVISORY GROUP

4. This group includes all employees with responsibility for directing others in any company activity, such as **Team Leaders, Controllers, and Supervisors**. They play a vital role in ensuring that health and safety practices are implemented effectively at the operational level. Their responsibilities include:

a. **Policy Familiarisation and Application**: Fully understand Steadfast's Health and Safety Policy and departmental procedures. Ensure these are clearly communicated and consistently applied within their areas of responsibility.

b. **Information, Instruction, Training, and Supervision**: Ensure, so far as is reasonably practicable, that all personnel under their supervision—including non-Steadfast personnel—receive adequate information, instruction, training, and supervision to carry out their duties safely.

c. **Provision and Use of PPE**: Ensure that appropriate personal protective equipment (PPE) is provided, maintained, and used correctly within their areas of responsibility.

d. **Housekeeping Standards**: Maintain a high standard of housekeeping at all times to support a safe and efficient working environment.

e. **Issue Resolution**: Resolve health and safety issues promptly. Escalate unresolved matters to their line manager or the Health & Safety Compliance Manager without delay.

f. **Risk Assessment Support**: Assist in the completion of risk assessments for their areas of responsibility. Undertake any necessary training to ensure compliance with the **Management of Health and Safety at Work Regulations 1999**.

g. **Incident Investigation**: Investigate or assist in the investigation of all accidents and near misses within their areas of control, ensuring appropriate follow-up actions are taken.

h. **Employee Consultation and Communication**: Engage with team members on health and safety matters that may affect them. Ensure they are kept informed of relevant updates, procedures, and safety information.

ALL EMPLOYEES

5. All employees of The Steadfast Security Group have a personal and collective responsibility to uphold the highest standards of health, safety, and welfare. Their responsibilities include:

a. **Policy and Procedure Awareness**: Familiarise themselves with the company's Health and Safety Policy, relevant codes of practice, assignment instructions, systems of work, and safe operating procedures applicable to their role.

b. **Use of Protective Equipment**: Always use the protective clothing, equipment, and safety devices provided. Only operate machinery, equipment, or substances as instructed and authorised by the company.

c. **Housekeeping**: Maintain a high standard of housekeeping in all work areas to support a safe and efficient environment.

d. **Incident and Hazard Reporting**: Promptly report to their supervisor any accidents, near misses, unsafe practices, or hazardous conditions, regardless of whether injury or damage occurred.

e. **Personal Responsibility**: Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions.

f. **Cooperation and Compliance**: Cooperate fully with Steadfast by adhering to all company rules, safe working practices, and instructions necessary to ensure legal compliance and the safety of all.

g. **Prohibition on Misuse**: Do not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare, including fire safety equipment.

h. **Safe Task Execution**: Perform all tasks in accordance with documented risk assessments and control measures for which they have received appropriate instruction and training.

i. **Training Needs Communication**: Proactively highlight any gaps in training or request additional instruction where needed to carry out duties safely and competently.

TRAINEES

6. For the purposes of health and safety, **all trainees and individuals on work experience placements** are regarded as employees of The Steadfast Security Group. As such, they are afforded the same level of protection, access to facilities, and responsibilities as any other member of staff. Trainees must:

a. Familiarise themselves with the company's Health and Safety Policy, relevant procedures, and safe systems of work.

b. Use all personal protective equipment (PPE) and safety devices provided and follow instructions regarding the use of equipment and substances.

c. Maintain high standards of housekeeping in their work areas.

d. Report any accidents, near misses, or unsafe conditions to their supervisor immediately.

e. Take reasonable care for their own health and safety and that of others affected by their actions.

f. Cooperate with Steadfast by adhering to all safety rules, procedures, and instructions.

g. Avoid interfering with or misusing any equipment or systems provided for health, safety, or welfare.

h. Carry out tasks in accordance with documented risk assessments and control measures.

i. Communicate any training needs or concerns regarding their ability to work safely.

VISITORS AND CONTRACTORS

7. The Steadfast Security Group recognises its duty of care to all **visitors and contractors** who may be affected by its operations. As such, the company is committed to ensuring their health, safety, and welfare while on company premises or engaged in company-related activities.

Visitors

8. Will be provided with appropriate information and instructions to ensure their safety while on site.

9. Must not enter potentially hazardous areas unless:

    a. They are competent and authorised to do so, or

    b. They are accompanied by a competent member of Steadfast staff.

10. Are expected to take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions.

11. Must cooperate with Steadfast and its representatives to enable compliance with legal obligations.

12. Must not intentionally or recklessly interfere with or misuse any equipment or systems provided for health, safety, or welfare.

Contractors

13. Are required to comply with all relevant health and safety legislation and Steadfast's internal procedures while working on company premises.

14. Must adhere to the company's **Permit to Work** system where applicable.

15. Are responsible for ensuring that their employees are competent, adequately trained, and provided with appropriate personal protective equipment (PPE).

16. Must coordinate with the Health & Safety Compliance Manager or designated site contact to ensure safe working practices are always maintained.

PLANNING

SCOPE

1. The Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, has both a legal and moral responsibility to safeguard the health, safety, and welfare of all employees, as far as is reasonably practicable. Effective health and safety management relies on thorough planning, which involves setting clear, measurable objectives, identifying hazards, assessing risks, establishing performance standards, and fostering a positive safety culture. These outcomes require deliberate coordination, implementation, and clear communication to ensure they are understood and embraced by everyone across the organisation.

KEY LEGISLATION

2. This policy is shaped by several key legislative and regulatory frameworks

3. ISO 45001: An international standard for occupational health and safety (OH&S) management systems, providing a structured approach for organisations to manage risks and enhance OH&S performance.

4. Health and Safety at Work etc. Act 1974: A foundational piece of legislation that places a general duty on employers to protect the health, safety, and welfare of employees and others affected by their operations.

5. Management of Health and Safety at Work Regulations 1999: These regulations require employers to carry out risk assessments, implement necessary control measures, appoint competent personnel, and provide relevant information and training

6. Workplace (Health, Safety and Welfare) Regulations 1992: Covering a broad range of workplace conditions, these regulations address essential aspects such as ventilation, temperature, lighting, cleanliness, and welfare facilities.

'PLAN-DO-CHECK-ACT' CYCLE

7. ISO 45001 is built around the **'Plan-Do-Check-Act' (PDCA) cycle**, a continuous improvement model that underpins effective occupational health and safety management. Within Steadfast's **Occupational Health and Safety Management System (OHSMS),** planning is a critical and ongoing process, not just a one-time activity. It begins with setting clear objectives and identifying the actions required to achieve them.

8. **Planning** also involves recognising potential hazards, assessing associated risks, and establishing performance standards to mitigate those risks. This process must be revisited periodically to review and update objectives, especially in response to changes, whether planned (such as organisational restructuring or new equipment) or unplanned (such as incidents or emerging risks). The **'Do'** phase focuses on implementing the planned actions, while **'Check'** involves monitoring and measuring performance against objectives. Finally, the **'Act'** phase ensures that lessons learned are used to refine and improve the system, reinforcing a proactive and resilient safety culture across the organisation.

PLANNING PROCESS

9. Steadfast's planning process is a vital component of its Occupational Health and Safety Management System (OHSMS), designed to proactively manage risks and promote a safe working environment. This process includes:

a. **Risk-Based Action Planning**: Actions must be based on thorough risk assessments to effectively manage risks and opportunities, aiming to prevent work-related injuries or ill health.

b. **Ongoing Risk and Opportunity Management**: The organisation must continuously monitor and respond to events—both planned and unplanned—that may impact workers or the OHSMS, ensuring risks and opportunities are regularly reassessed.

c. **Objective Setting and Review**: Clear occupational health and safety objectives must be established, monitored, and reviewed periodically to drive continuous improvement.

d. **Change Management**: Any changes to the system—whether structural, procedural, or environmental—must be carefully planned, implemented, and re-evaluated to maintain system integrity and safety standards.

e. **Activity Interactions**: The planning process must consider how different activities interact and influence one another, ensuring a holistic approach to safety management.

f. **Hazard Identification Methodology**: A defined and consistent methodology for identifying hazards must be in place to support effective risk assessment and control measures.

10. Throughout the planning process, Steadfast is committed to complying with the most current legal and regulatory requirements, ensuring that all health and safety measures are both effective and legally sound.

HEALTH AND SAFETY MANAGEMENT STRATEGY

A successful Health and Safety Management Strategy at Steadfast is built on five key elements: **Policy**, **Organisation**, **Planning and Implementation**, **Measuring Performance**, and **Reviewing and Auditing**. These components work together to create a structured and proactive approach to managing workplace safety. All planning outcomes must be documented, and employees are expected to actively engage in monitoring and maintaining safety standards. Health and safety should never be reactive; waiting for incidents such as accidents or injuries before reviewing procedures is unacceptable. Instead, Steadfast is committed to fostering a proactive safety culture—anticipating risks, implementing preventative measures, and continuously improving systems to protect the wellbeing of all staff.

IDENTIFICATION, ASSESSMENT & CONTROL OF RISK

SCOPE

1. The Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to maintaining a safe working environment that reduces risks to all personnel to a level that is **As Low As Reasonably Practicable (ALARP)**. Effective risk management is central to this commitment and involves a structured five-stage process: identifying hazards, determining who may be at risk, assessing the risks involved, deciding on and implementing appropriate control measures, and recording and reviewing findings. Risk assessments must be regularly updated, especially in response to changes in operations or working conditions and must always comply with the latest applicable legal and regulatory requirements.

INTRODUCTION

2. Steadfast Security Group operates across three core areas: the provision of security services at client premises, the installation of security systems such as CCTV for both commercial and domestic clients, and administrative functions based at the Head Office in Peterlee. In all areas of operation, Steadfast is committed to reducing risks to a level that is As Low As Reasonably Practicable (ALARP). This does not necessarily mean ceasing activities but rather balancing the level of risk against the effort, cost, and practicality of implementing control measures.

3. In addition to achieving ALARP, the principle of *tolerability* must also be considered. Once a risk has been reduced to ALARP, a judgement must be made as to whether the remaining risk is acceptable to carry out the activity or achieve the desired outcome. Only when a risk is both ALARP and tolerable can it be deemed manageable.

4. All identified risks must be assessed using the methodology outlined in this arrangement, tailored to the specific hazard unless otherwise stated. However, the core principles of risk assessment remain consistent and follow the five-step process:

- Identify the hazards.
- Determine who might be harmed and how.
- Evaluate the risks and identify suitable control measures.
- Record and implement the findings.
- Review and update the risk assessment as necessary.

KEY LEGISLATION

5. Steadfast's Health and Safety Policy is shaped by several essential legislative frameworks that govern the identification, management, and control of workplace risks.

6. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on employers to ensure, as far as is reasonably practicable, the health, safety, and welfare of employees and others who may be affected by work activities. It also outlines responsibilities for employees, self-employed individuals, and those in control of premises. The Act provides the legal basis for enforcing health and safety standards and is supported by various regulations tailored to specific risks and industries.

7. Management of Health and Safety at Work Regulations 1999: These regulations build on the 1974 Act by setting out more detailed duties for employers. They require employers to carry out suitable and sufficient risk assessments, implement preventive and protective measures, appoint competent persons to oversee health and safety, and provide appropriate training and information. The regulations also emphasise cooperation between employers sharing a workplace and the need to consider vulnerable groups such as young workers and expectant mothers.

8. Workplace (Health, Safety and Welfare) Regulations 1992: These regulations cover a wide range of basic health, safety, and welfare requirements applicable to most workplaces. They include provisions for adequate ventilation, temperature control, lighting, cleanliness, workspace dimensions, safe traffic routes, and access to welfare facilities such as toilets and washing areas. These standards aim to ensure that the physical working environment supports employee wellbeing and safety.

RISK ASSESSMENTS

9. Steadfast is committed to conducting thorough and effective risk assessments in accordance with the Management of Health and Safety at Work Regulations 1999, ensuring that all risks are identified, evaluated, and controlled using the recognised **hierarchy of controls**. This structured approach ensures that the most effective control measures are considered first, rather than defaulting to the easiest or most convenient option. Often, a combination of controls may be necessary to reduce risks to a level that is **As Low As Reasonably Practicable (ALARP)** and tolerable.

10. The hierarchy of controls must be followed in this order:

    a. **Elimination** – Remove the hazard entirely by redesigning the task, process, or equipment (e.g. avoiding work at height where possible).

    b. **Substitution** – Replace the hazard with a safer alternative (e.g. using a mobile elevating work platform instead of ladders).

    c. **Engineering Controls** – Modify equipment or processes to isolate people from the hazard (e.g. installing guards or noise-reducing features).

    d. **Administrative Controls** – Implement safe working procedures, training, signage, and task rotation to reduce exposure.

    e. **Personal Protective Equipment (PPE)** – Use PPE only when other controls are insufficient. This relies on human behaviour and requires active supervision to ensure compliance.

11. The **accountable person** is responsible for ensuring that risk assessments are carried out and dynamically reviewed throughout the duration of any task or activity. While they may delegate the task to a competent person, they remain responsible for ensuring the assessment is suitable, sufficient, and formally approved.

12. Once approved, the risk assessment must be followed by all personnel involved in or affected by the activity. It must clearly outline the preventive and protective measures in place, and identify any further actions required to reduce risks to ALARP and tolerable levels.

13. The **Health & Safety / Compliance Manager** will coordinate all risk assessment activities and retain completed documentation. All individuals involved in the activity, including the responsible manager, must contribute relevant information to support the assessment and cooperate to ensure control measures are effectively implemented.

14. All risk assessments will be reviewed and verified by the **Health and Safety Manager** to ensure accuracy and compliance.

15. Generic risk assessments may seem convenient but often fail to account for specific environmental factors or overlapping activities. Therefore, each assessment must:

    a. Be reviewed prior to the start of the activity.

    b. Clearly describe the activity or process.

    c. Identify all foreseeable hazards.

    d. Determine how people may be harmed.

e. Consider who may be exposed, how, and for how long, including third parties.

f. Assess the potential severity of harm.

g. Evaluate residual risk after controls are applied.

h. Identify and communicate required control measures.

i. Consider findings from related assessments (e.g. fire safety).

SPECIFIC HAZARD ASSESSMENTS

16. In addition to general workplace risk assessments, Steadfast recognises that certain activities or circumstances may require more detailed, targeted assessments to ensure the safety and wellbeing of all personnel. These **specific hazard assessments** are triggered when broader risk evaluations identify areas needing closer scrutiny or when particular regulations apply. Examples include:

a. **Individual Capabilities** – Health assessments may be required to ensure that employees are physically and mentally fit to carry out their duties safely, especially in roles involving physical exertion or high-risk environments.

b. **Regulatory-Specific Assessments** – Certain hazards are governed by dedicated regulations and must be assessed accordingly. These include:

1) **Display Screen Equipment (DSE)** – Ensuring ergonomic workstation setups to prevent strain or injury.

2) **Manual Handling** – Evaluating lifting, carrying, or moving tasks to prevent musculoskeletal injuries.

3) **Hazardous Substances (COSHH)** – Assessing exposure risks and control measures for chemicals or biological agents.

4) **Noise** – Measuring exposure levels and implementing hearing protection where necessary.

c. **Young Persons** – Additional assessments are required for employees under 18, considering their inexperience and vulnerability to workplace hazards.

d. **New or Expectant Mothers** – Risk assessments must be adapted to account for pregnancy-related health and safety concerns, including exposure to harmful substances, physical strain, and working conditions.

e. **Lone Working** – Evaluating risks associated with working alone, including emergency response, communication, and personal safety.

f. **Heat and Cold Injury Prevention** – Assessing environmental conditions and implementing controls to prevent heat stress, hypothermia, or other temperature-related health issues.

17. These assessments must be carried out by competent individuals and reviewed regularly to ensure they remain relevant and effective. All findings must be documented, communicated, and integrated into the broader health and safety management system.

THE CHANGE PROCESS

18. Steadfast recognises that changes within the organisation, whether structural, procedural, technological, or environmental, can introduce new risks or alter existing ones. Therefore, all changes must be carefully assessed for health and safety implications during the early stages of planning and implementation. This includes changes to organisational structure, working practices, equipment, technology, accommodation, and procedures.

19. The manager authorising any change is responsible for ensuring that all associated health and safety risks are identified, assessed, and appropriately managed. This includes consulting relevant personnel, reviewing existing risk assessments, and implementing new control measures where necessary.

20. If a change affects the nature of a hazard or risk, or if there is reason to believe that an existing risk assessment is no longer valid, a new or updated risk assessment must be carried out. This ensures that safety standards remain effective and that risks continue to be managed to a level that is As Low As Reasonably Practicable (ALARP) and tolerable.

REVIEWS

21. Risk assessments must be reviewed not only at scheduled intervals but also whenever specific circumstances arise that may affect their validity or effectiveness. A review is required when:

a. There is reason to doubt the effectiveness of the current assessment.

b. An accident, injury, or near miss has occurred.

c. The activity, procedure, or responsible manager has changed.

d. Vulnerable individuals—such as those unfamiliar with the task or environment, or those with specific needs—become involved in the activity.

e. The assumptions or information underpinning the risk assessment or its control measures have changed.

f. Recommendations are made by trade unions, staff associations, safety representatives, regulators, or functional specialists.

g. The activity itself has changed, rendering the previous risk assessment invalid.

h. There has been a change in the substances used or equipment involved.

22. If, at any point before or during an activity, the control measures outlined in the risk assessment cannot be followed, or if an incident occurs, the **commander, manager, or accountable person** must immediately reassess the risk. Following reassessment, they must consider the following actions:

a. **Pausing or Stopping the Activity**: If the activity is halted, it must not resume until further control measures are identified and implemented, or the risk is escalated and a decision is made at the appropriate level within the chain of command.

b. **Introducing Additional Control Measures**: These may include alternative working methods or, as a last resort, the use of personal protective equipment (PPE).

c. **Elevating the Risk**: If the residual risk exceeds the level of risk the responsible person is authorised to accept, it must be escalated through Steadfast's formal risk elevation process.

23. This proactive approach ensures that risk assessments remain relevant, effective, and aligned with Steadfast's commitment to maintaining a safe working environment.

TRAINING

24. Steadfast is committed to ensuring that all personnel who may be exposed to workplace hazards receive appropriate training tailored to the risks associated with the processes, equipment, or substances they work with. This training is essential for understanding the control measures in place and for maintaining a safe working environment.

25. While it may not be practical to train members of the public, it is vital that they are clearly informed and warned of any potential hazards that could affect them. To ensure effective communication and safety, the following measures must be in place:

a. **Clear Communication of Risks and Controls**: All individuals involved in a task must be informed of the health and safety risks and the control measures designed to mitigate them.

b. **Completion and Recording of Training**: Any training required to safely carry out a task must be completed before work begins and properly documented.

c. **Work Instructions**: These must clearly specify the control measures to be followed during the activity.

d. **Emergency Procedures and Drills**: Emergency protocols must be established and regularly rehearsed, such as fire drills, to ensure readiness in case of an incident.

e. **Ongoing Assessment of Control Measures**: Control measures must be regularly reviewed and adjusted to prevent the introduction of new risks and to ensure that existing risks remain adequately controlled.

f. **Health Surveillance**: Where exposure to specific hazards warrants it, appropriate health surveillance must be implemented for affected personnel.

g. **Public Safety Signage**: Notices and warning signs must be prominently displayed in areas where there is a potential hazard to members of the public.

26. This structured approach to training ensures that all individuals are equipped with the knowledge and tools necessary to work safely and respond effectively to potential risks.

RETENTION

27. All risk assessments and related documentation must be retained for a minimum of three years after their expiry date. This ensures that records are available for reference, audit, and compliance purposes, and supports continuous improvement in health and safety management.

COMMUNICATIONS & SAFETY COMMITTEES

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to fostering a safe and healthy working environment across all areas of its operations. Central to this commitment is the establishment of clear, effective communication with all employees, which forms the foundation of a robust and proactive health and safety policy. This policy applies to all personnel and activities within the organisation, ensuring that health and safety responsibilities are understood, risks are managed, and safe working practices are consistently upheld.

KEY LEGISLATION

2. This policy is shaped by several important legislative frameworks that ensure employees are actively involved in health and safety matters.

3. The Safety Representatives and Safety Committees Regulations 1977: These regulations were introduced to give trade union-appointed safety representatives legal rights to represent employees on health and safety issues. Employers must consult with these representatives and, if requested, establish safety committees to facilitate regular discussions. Safety representatives have the right to inspect the workplace, investigate hazards, and raise concerns directly with management. The aim is to promote collaboration between employers and employees to improve workplace safety.

4. The Health and Safety (Consultation with Employees) Regulations 1996: In workplaces without recognised trade unions, these regulations require employers to consult directly with employees or their elected representatives on matters affecting health, safety, and welfare. Consultation must be meaningful and timely, covering topics such as risk assessments, safety procedures, training, and the introduction of new technologies. These regulations ensure that all employees, regardless of union representation, have a voice in shaping their working conditions

HEALTH AND SAFETY COMMITTEE

5. To support a proactive and inclusive approach to workplace safety, the Managing Directors of Steadfast will appoint a **Health and Safety Sub-Committee**. This committee will include representation from both management and staff, with the following objectives:

a. Maintain a broad overview of health and safety matters across the organisation.

b. Regularly review Steadfast's health and safety policies and procedures.

c. Conduct safety tours and inspections of all premises.

d. Ensure that comprehensive risk assessments are carried out, including those required under the Control of Substances Hazardous to Health (COSHH) Regulations.

e. Take necessary actions to fulfil Steadfast's legal and moral responsibilities for health and safety.

f. Report directly to the Managing Directors on the committee's activities and performance.

6. Steadfast views employee involvement as essential to creating and maintaining a safe working environment. To facilitate effective communication on health and safety matters, a **Health and Safety Committee** has been established. This committee is made up of volunteers from each major function within the company, ensuring broad representation.

7. The committee meets quarterly, with additional meetings held as needed. These meetings are organised and coordinated by the **Health & Safety Manager**. The committee's role is not only to respond to health and safety issues but also to proactively develop strategies that prevent accidents and promote a culture of safety.

8. Each committee member acts as a representative for a designated group of employees, serving as a two-way communicator to raise concerns and share updates related to health and safety. All employees will have access to their representative to ensure their voices are heard.

9. Importantly, the Health and Safety Committee does not replace direct consultation with employees on issues that affect them personally. Steadfast recognises that meaningful consultation involves listening to employee feedback and incorporating it into decision-making processes.

10. To support the committee in fulfilling its responsibilities, appropriate training will be provided, with external support from Steadfast's appointed health and safety consultant. Additionally, health and safety will be a standing agenda item in meetings held at all levels and across all departments, reinforcing its importance throughout the organisation.

HEALTH AND SAFETY POLICY COMMUNICATIONS

11. Effective communication is essential for promoting health and safety awareness and ensuring that all employees understand their responsibilities. Steadfast is committed to maintaining clear, accessible, and consistent communication channels to share health and safety information across the organisation. The following strategies will be used:

a. **Email Updates**: The Compliance Manager will regularly distribute email communications containing updates on health and safety policies, upcoming training sessions, procedural changes, and other relevant information. These messages will be clear, concise, and accessible to all staff.

b. **Notice Boards**: Notice boards will be placed in high-traffic areas such as break rooms, entrances, and near workstations. These will display key health and safety information, emergency procedures, contact details for safety representatives, and updates on safety initiatives.

c. **Intranet (SharePoint Site)**: Steadfast maintains a dedicated SharePoint site under "Steadfast Compliance" where all health and safety documents, policies, risk assessments, and training materials are stored. This site serves as a central hub for employees to access up-to-date information.

d. **Meetings and Briefings**: Regular health and safety meetings and briefings will be held to discuss current issues, review incidents, and share updates. These sessions will encourage open dialogue and feedback from employees to foster a collaborative safety culture.

e. **Regular Policy Updates**: Health and safety policies and procedures will be reviewed and updated regularly to reflect changes in legislation, operations, or identified risks. Updates will be communicated promptly to ensure all employees remain informed.

f. **Training and Induction**: All employees will receive comprehensive health and safety training during their induction, with ongoing refresher courses provided. Training will cover emergency procedures, hazard identification, safe working practices, and the use of control measures.

g. **Feedback Mechanisms**: Employees will be encouraged to provide feedback on health and safety matters through suggestion boxes, surveys, and regular team meetings. This feedback will be reviewed and considered in the decision-making process.

h. **Visual Aids**: Posters, signs, and other visual materials will be used throughout the workplace to reinforce key health and safety messages and remind employees of safe practices and procedures.

12. These communication methods are designed to ensure that health and safety remain a visible, accessible, and integral part of Steadfast's working environment.

ACCIDENT REPORTING AND INVESTIGATIONS

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, recognises the critical importance of accurately reporting and recording all work-related accidents, dangerous occurrences, and near misses. This process is essential for identifying root causes, supporting effective risk assessments, and preventing future incidents.

2. In line with statutory requirements, Steadfast is committed to reporting specified injuries, health conditions, and dangerous occurrences to the Health and Safety Executive (HSE) under the **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)**.

3. For clarity, the following definitions apply:

- **Accident**: An unplanned event that results in injury, ill health, or death to one or more individuals. For example, a fall from height resulting in a broken bone is considered an accident.
- **Dangerous Occurrence**: A specific, reportable event with a high potential to cause serious harm, even if no injury occurs. Examples include the collapse of lifting equipment or the failure of a pressure system.
- **Near Miss**: An unplanned event that had the potential to cause injury, illness, or damage but did not result in actual harm. For instance, a heavy object falling near a worker without making contact would be classified as a near miss.

4. Steadfast will ensure that all such events are properly documented, investigated, and used to inform ongoing improvements in health and safety practices.

KEY LEGISLATION

5. Steadfast's Health and Safety Policy is shaped by several core legislative frameworks that define employer responsibilities and guide safe working practices.

6. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others affected by work activities. It also outlines responsibilities for employees, self-employed individuals, and those in control of premises. The Act is principles-based, allowing flexibility in how safety is managed across different work environments.

7. Management of Health and Safety at Work Regulations 1999: These regulations build on the 1974 Act by requiring employers to carry out suitable and sufficient risk assessments, implement preventive and protective measures, appoint competent persons, and provide appropriate training and information. They also require coordination between employers sharing a workplace and consideration of vulnerable groups such as young workers and expectant mothers.

8. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR): RIDDOR requires employers, the self-employed, and those in control of work premises to report certain serious workplace incidents to the Health and Safety Executive (HSE). This includes work-related fatalities, specified injuries, occupational diseases, and dangerous occurrences (near misses). Reports must be made promptly and records retained for legal compliance and future risk analysis.

9. Control of Major Accident Hazards Regulations 2015 (COMAH): COMAH applies to establishments that store or handle significant quantities of dangerous substances. It aims to prevent and mitigate the effects of major accidents that could harm people or the environment. Operators are required to prepare safety reports, conduct risk assessments, and develop emergency plans. The regulations are enforced by a competent authority, typically the HSE in partnership with environmental agencies.

AIM

10. Steadfast is committed to ensuring that all incidents, including accidents, near misses, dangerous occurrences, and cases of occupational ill health, are promptly reported, accurately recorded, and thoroughly investigated to prevent recurrence and improve workplace safety. The organisation will take appropriate corrective actions following any incident and use the findings to inform future risk assessments and safety improvements.

11. All incidents arising from or connected to Steadfast activities must be reported using the designated **electronic reporting system** and recorded in the **Steadfast Accident Report Book** (Appendix A), maintained by the Health and Safety Manager. Employees are responsible for reporting and recording incidents under the following categories, as outlined in **Appendix B** of this policy:

a. **Minor Injury** – Injuries requiring minimal treatment and not resulting in time off work.

b. **Injury** – Injuries requiring medical attention or resulting in time off work.

c. **Occupational Ill Health** – Work-related illnesses or conditions, including those caused by exposure to hazardous substances or environments.

d. **Near Miss / Dangerous Occurrence** – Events that had the potential to cause harm but did not result in injury or damage.

e. **Road Traffic Incident** – Any vehicle-related incident occurring during work-related travel or duties.

f. **Verbal / Physical Assault** – Incidents involving threats, abuse, or physical harm to employees.

g. **Environmental Incident** – Events that may cause harm to the environment, such as spills or emissions.

12. All employees must be aware of their duty to report incidents and contribute to a culture of safety and accountability. Accurate reporting supports compliance with legal obligations and helps Steadfast maintain a safe and healthy working environment for all.

REPORTING OF INJURIES, DISEASES, AND DANGEROUS OCCURENCES REGULATIONS 2013 (RIDDOR)

13. Steadfast is legally required to report certain serious workplace incidents to the **Health and Safety Executive (HSE)** under RIDDOR. In the event of a **major injury**, **fatality**, or **death under suspicious circumstances** involving an employee or visitor, Steadfast must notify the HSE immediately using the quickest practical means. All incidents must be reported online via HSE's reporting portal within **10 days**, or by telephone for fatal or specified injuries via the **Incident Contact Centre** on **0345 300 9923** (Monday to Friday, 8:30 am to 5:00 pm).

TYPES OF REPORTABLE INCIDENTS

14. The following types of incidents must be reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations):

a. **Deaths:** All work-related deaths, including those resulting from acts of physical violence, must be reported. Suicides are not reportable under RIDDOR.

b. **Specified Injuries to Workers:** Must be reported within 10 days and include:

- Fractures (excluding fingers, thumbs, and toes)
- Amputations
- Permanent loss or reduction of sight

- Crush injuries causing internal organ damage
- Serious burns (covering >10% of body or affecting vital organs)
- Scalping requiring hospital treatment
- Unconsciousness due to head injury or asphyxia
- Injuries from enclosed spaces causing hypothermia, heat illness, or requiring resuscitation/hospitalisation >24 hours

c. **Over-Seven-Day Injuries:** Where an employee or self-employed person is unable to work for more than **seven consecutive days** (excluding the day of the incident). Must be reported within **15 days**.

d. **Injuries to Non-Workers:** Reportable if a member of the public is injured due to work-related activity and taken directly to hospital for treatment. Precautionary hospital visits without apparent injury are not reportable.

e. **Dangerous Occurrences:** These are specific near-miss events with high potential for harm. Steadfast must report relevant occurrences within 10 days. Applicable categories include:

- Lifting equipment failure
- Pressure system incidents
- Overhead electric line contact
- Electrical explosions or fires
- Explosives-related incidents
- Biological agent exposure
- Scaffold collapse
- Pipeline failures
- Structural collapse
- Release of flammable liquids/gases
- Hazardous substance escapes

f. **Reportable Occupational Diseases**: Must be reported upon diagnosis if likely caused or worsened by work. Includes:

- Carpal Tunnel Syndrome
- Severe hand/forearm cramp
- Occupational dermatitis
- Hand-Arm Vibration Syndrome
- Occupational asthma

- Tendonitis/Tenosynovitis of hand/forearm
- Occupational cancers
- Diseases from biological agent exposure

Note: Gas-related incidents are not applicable to Steadfast operations.

RIDDOR RECORDING AND INCIDENT REPORTING PROCEDURE

15. Steadfast is committed to maintaining accurate records and ensuring compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). The following outlines the organisation's approach to incident recording and reporting:

a. **RIDDOR Record-Keeping**: Steadfast must maintain records of:

- Any accident, occupational disease, or dangerous occurrence that is reportable under RIDDOR.
- Any other work-related injury that results in an employee being absent or incapacitated for more than three consecutive days (excluding the day of the incident but including weekends and rest days). These do not need to be reported under RIDDOR unless the absence exceeds seven days.

b. **Near Misses:** Near misses are treated with the same seriousness as accidents and dangerous occurrences. Steadfast will:

- Take immediate action to contain and eliminate any danger.
- Seek first aid or emergency medical treatment for any injury, regardless of severity.
- Record near misses in the Near Miss Book (held by the Health and Safety Manager) and enter details into the electronic register.

c. **Accident Book and Records:** In accordance with legislation, Steadfast maintains an accident book (Annex A), held by the Health and Safety Manager at Head Office. All incidents must be recorded as follows:

- **On Steadfast premises**: Entered directly into the accident book.
- **On client premises**: Logged on-site, forwarded to Head Office, and entered the central accident book. These must also be reported to the client.
- **Security Installation Engineers**: Must report incidents to Head Office promptly. Accidents on commercial premises must also be reported to the client.

d. **Review of Accident Records:** The Health & Safety Manager will regularly review the accident book to:

- Monitor incident types and locations.
- Identify patterns or trends.
- Present findings at Health & Safety Committee and management meetings.

e. **Record Control**

- **Hard copies**: Must be stored securely in a locked drawer or cabinet and classified as OFFICIAL-SENSITIVE.

- **Electronic records**: Must be password-protected with controlled access.

f. **Incident Reporting Procedure:** When a Steadfast employee is involved in an accident, incident, dangerous occurrence, or near miss, the following steps must be followed:

1) Administer first aid to anyone requiring treatment.

2) Ensure the area is safe and free from further danger.

3) Contact emergency services if necessary and inform the Control Room Supervisor on 07730 641 301, providing full details.

4) Control Room must notify the Health and Safety Manager, Steven Hope, as soon as possible.

5) Record the event in the relevant logbook with the Health and Safety Manager.

6) The Health and Safety Manager will lead a formal investigation to determine the cause, recommend preventative measures, and implement necessary controls.

7) Determine if the incident is reportable under RIDDOR and, if so, complete the online report within the required timeframe.

8) Review and update relevant risk assessments to reduce the likelihood of recurrence.

9) Update the electronic register with all incident details.

10) Retain all records for a minimum of three years.

INVESTIGATIONS

16. Under Regulation 5 of the Management of Health and Safety at Work Regulations 1999, Steadfast is required to plan, organise, control, monitor, and review its health and safety arrangements. A consistent and structured approach to incident investigations is essential across all departments to meet this obligation.

17. All departments must follow the standard investigation procedure outlined in this policy. Any deviation from this approach must be documented, with a clear rationale provided.

18. Investigations should be proportionate to the severity or potential severity of the incident and based on a risk assessment, not solely the outcome. Investigations may range from informal interviews to formal inquiries, depending on the circumstances.

19. When determining whether an incident warrants investigation, the following factors should be considered (this list is not exhaustive):

- Selection of the investigation team, including relevant experience and training.
- Nature and extent of any injuries sustained.
- Impact on operational capability or service delivery.
- Potential reputational damage to Steadfast.
- Likelihood of identifying significant lessons.
- Any incident involving severe harm or death must be reported and investigated.

20. Steadfast encourages the use of guidance from the Health and Safety Executive (HSE) HSG 245 – Investigating Accidents and Incidents and recommends seeking support from subject matter experts where appropriate.

21. The decision to investigate should always consider the potential for organisational learning. Even minor incidents may warrant deeper analysis if they form part of a recurring pattern. Identifying systemic issues or chains of failure is key to preventing future occurrences.

22. The primary aim of any investigation is to establish the facts and recommend actions to prevent recurrence. Investigations should explore:

a. **Immediate Cause** – The direct factor that led to the incident, often the final barrier that failed.

b. **Causal Factors** – Underlying conditions that contributed to the incident, including:

1) **Contributing Factors** – Elements that increased the likelihood of the incident.

2) **Aggravating Factors** – Elements that worsened the outcome.

3) **Other Factors** – Relevant but non-contributory elements.

c. **Root Cause** – The fundamental failure from which other issues stem, often remote in time or location (e.g. inadequate training, poor risk prioritisation).

23. This structured approach ensures that investigations are meaningful, consistent, and focused on continuous improvement in health and safety performance.

POST OCCURENCE

24. Following any incident, Steadfast will take prompt and appropriate action to manage the situation, minimise harm, and prevent recurrence. The organisation is committed to a structured response that includes:

a. **Timely Reaction** – Immediate steps will be taken to control the situation, correct any issues, and manage the consequences of the occurrence.

b. **Evaluation of Corrective Actions** – An assessment will be conducted to determine what corrective actions are necessary to reduce the likelihood of recurrence to a level that is As Low As Reasonably Practicable (ALARP). This includes reviewing similar past incidents for patterns or lessons learned.

c. **Review of Existing Risk Assessments** – Current safety risk assessments will be revisited to ensure they remain valid and effective in light of the incident.

d. **Implementation and Review of Actions** – Any required actions will be implemented and their effectiveness monitored to ensure risks are properly controlled.

e. **Assessment of New or Changed Hazards** – If the incident introduces new risks or alters existing ones, these will be assessed before any further action is taken.

25. Corrective actions must be proportionate to the severity and potential impact of the incident or nonconformity. Steadfast will retain documented evidence of:

a. The nature of the incident or nonconformity and the actions taken in response.

b. The results and effectiveness of any corrective actions implemented.

c. Communication of relevant information to all affected personnel and stakeholders.

SAFE SYSTEMS OF WORK (SSOW)

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to maintaining a safe and secure working environment through the development and implementation of robust Safe Systems of Work (SSOW). This commitment includes establishing clear, practical procedures and protocols that align with current industry standards and legal requirements. SSOWs are designed to ensure that all tasks are carried out safely, with risks effectively managed and employees fully informed and equipped to work without unnecessary danger.

KEY LEGISLATIONS

2. Steadfast's **Safe Systems of Work (SSOW) Policy** is shaped by several core legislative frameworks that define employer responsibilities and guide safe working practices.

3. Health and Safety at Work etc. Act 1974 (HSWA): This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others affected by work activities. It requires the provision and maintenance of safe systems of work, safe equipment, and adequate training.

4. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations build on the HSWA by requiring employers to carry out suitable and sufficient risk assessments, implement preventive and protective measures, appoint competent persons, and provide appropriate health and safety training. They also emphasise planning, monitoring, and reviewing safety arrangements.

5. Workplace (Health, Safety and Welfare) Regulations 1992: These regulations cover a wide range of basic workplace conditions, including ventilation, temperature, lighting, cleanliness, workspace dimensions, and welfare facilities such as toilets and rest areas. They ensure that the physical working environment supports employee wellbeing and safety.

6. Provision and Use of Work Equipment Regulations 1998 (PUWER): PUWER requires that any equipment provided for use at work is suitable for its intended purpose, safe to use, properly maintained, and regularly inspected. It also mandates that only trained personnel operate work equipment and that appropriate safety measures, such as guards and emergency stops, are in place.

DEVELOPING A SAFE SYSTEM OF WORK

7. When creating a Safe System of Work (SSOW), Steadfast employees must follow a structured five-step process to ensure tasks are carried out safely and risks are effectively managed:

a. **Conduct a Risk Assessment**: Identify potential hazards associated with the task and evaluate the risks to determine appropriate control measures.

b. **Research and Consult**: Gather information on best practices and consult with employees who perform the task to understand practical challenges and safe working methods.

c. **Document the SSOW**: Clearly outline the step-by-step procedure, including safety controls, equipment requirements, and emergency actions. Ensure the document is accessible and easy to understand.

d. **Communicate the SSOW**: Share the documented system with all relevant personnel. Provide training where necessary to ensure everyone understands and can follow the procedure.

e. **Review and Monitor**: Regularly assess the effectiveness of the SSOW. Update it as needed based on feedback, changes in the task, or new risks identified.

RISK ASSESSMENTS

8. Steadfast will conduct regular and thorough risk assessments to identify potential hazards associated with all work activities. Each assessment will be carefully documented, detailing the nature of the hazard, the level of risk, and the control measures implemented to mitigate those risks. This ensures that risks are managed in a structured and transparent manner.

9. To maintain their relevance and effectiveness, all risk assessments will be reviewed periodically and updated whenever changes occur in the work environment, processes, or equipment. This proactive approach supports continuous improvement in health and safety management and helps ensure that the working environment remains safe for employees, contractors, and other stakeholders.

CONTROL MEASURES

10. To effectively manage risks identified during the risk assessment process, Steadfast will implement appropriate control measures in accordance with the **Hierarchy of Control**, which prioritises actions based on their effectiveness in reducing or eliminating hazards:

a. **Elimination**: Remove the hazard entirely from the workplace. This is the most effective control method and should always be considered first (e.g. redesigning a task to avoid working at height).

b. **Substitution**: Replace the hazardous process, substance, or equipment with a safer alternative (e.g. using a less toxic chemical or a safer tool).

c. **Engineering Controls**: Introduce physical modifications to the workplace or equipment to reduce exposure to hazards (e.g. installing machine guards, noise-reduction systems, or improved ventilation).

d. **Administrative Controls**: Change the way work is organised or performed through policies, procedures, and training. This includes scheduling tasks to limit exposure, rotating staff, and providing clear instructions and signage.

e. **Personal Protective Equipment (PPE)**: Provide suitable PPE such as gloves, safety goggles, helmets, or respirators to protect employees from residual risks. PPE is considered the last line of defence and must be used in conjunction with other control measures. Its effectiveness relies on proper use, maintenance, and supervision.

11. By following this structured approach, Steadfast ensures that risks are managed systematically and that the most effective measures are prioritised to maintain a safe working environment.

TRAINING AND COMPETENCE

12. Steadfast is committed to ensuring that all employees are fully trained and competent to carry out their duties safely and effectively. Comprehensive training will be provided on safe working procedures, hazard identification, the implementation of control measures, and the correct use of personal protective equipment (PPE).

13. To maintain high standards of competence, training will be refreshed regularly and updated to reflect changes in safety protocols, equipment, legislation, and industry best practices. This ensures that employees remain informed and capable of responding to evolving risks.

14. Periodic assessments will be conducted to verify employees' understanding and adherence to safety procedures. These assessments help reinforce a culture of continuous improvement, accountability, and vigilance in health and safety practices across the organisation.

MONITORING AND REVIEW

15. Steadfast will continuously monitor the effectiveness of its Safe Systems of Work (SSOW) through regular inspections, audits, and performance evaluations. These activities ensure that safety protocols are being followed correctly and that control measures remain effective in managing workplace risks.

16. Any incidents, near misses, or non-conformities will be thoroughly investigated to identify root causes and contributing factors. The insights gained from these investigations will be used to refine existing procedures, introduce new control measures where necessary, and prevent similar occurrences in the future.

17. This ongoing cycle of monitoring, review, and improvement is essential for maintaining a safe working environment and promoting a strong safety culture throughout the organisation. It ensures that Steadfast remains proactive in its approach to health and safety, adapting to changes and continuously striving for excellence.

DOCUMENTATION

18. Steadfast will maintain thorough and accurate documentation of all safety procedures, risk assessments, and training activities. This includes detailed records of identified hazards, implemented control measures, and evidence of employee participation in training sessions. Proper documentation ensures accountability, supports compliance with legal and regulatory requirements, and provides a clear audit trail for internal and external review.

19. To promote transparency and accessibility, all safety-related documents will be readily available to employees via designated platforms such as the company's SharePoint site. This allows staff to reference safety protocols, review risk assessments, and confirm training requirements as needed.

20. Maintaining comprehensive documentation also reinforces Steadfast's commitment to continuous improvement and safety awareness, helping to embed a strong health and safety culture throughout the organisation.

ALCOHOL & SUBSTANCE MISUSE

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to maintaining a safe, healthy, and productive working environment across all operational sites and departments. This commitment includes the proactive management of risks associated with the use and misuse of alcohol and drugs in the workplace.

2. This policy applies to all employees, contractors, agency workers, and visitors engaged in activities on behalf of any Steadfast entity. It outlines the Group's approach to preventing substance misuse, supporting affected individuals, and ensuring compliance with relevant legal and regulatory obligations. The policy also supports Steadfast's broader goals of safeguarding employee wellbeing, protecting public safety, and upholding the integrity and reputation of the organisation.

KEY LEGISLATION

3. This policy is shaped by several core legislative frameworks that govern workplace safety, substance control, and the lawful use of medicines. These laws provide the legal foundation for Steadfast Security Group's approach to managing alcohol and drug-related risks in the workplace.

4. Health and Safety at Work etc. Act 1974: This is the principal legislation governing occupational health and safety in Great Britain. It places a legal duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others who may be affected by work activities. It also outlines responsibilities for employees, the self-employed, and those in control of premises. The Act is enforced by the Health and Safety Executive (HSE) and underpins all other health and safety regulations.

5. Management of Health and Safety at Work Regulations 1999: These regulations build upon the 1974 Act by setting out specific duties for employers to manage health and safety proactively. Key requirements include conducting suitable and sufficient risk assessments, implementing preventive and protective measures, appointing competent persons to oversee health and safety, and providing appropriate training and information. The regulations also require coordination between employers sharing premises and consideration of vulnerable groups such as young workers and expectant mothers.

6. Misuse of Drugs Act 1971: This Act regulates the possession, supply, manufacture, import, and export of controlled substances. It classifies drugs into three categories, Class A, B, and C, based on their potential for harm. The Act makes it an offence to possess or supply controlled drugs unlawfully and empowers law enforcement agencies to take action against drug-related offences. It also allows for certain exemptions under licence for legitimate medical, scientific, or industrial use.

7. Medicines Act 1968: This legislation governs the regulation of medicinal products for both human and veterinary use. It establishes a framework for the licensing, manufacture, distribution, and sale of medicines, ensuring they meet standards of safety, quality, and efficacy. The Act categorises medicines into Prescription Only Medicines (POM), Pharmacy Medicines (P), and General Sales List (GSL) products. It also outlines exemptions for healthcare professionals and sets out controls to prevent misuse of medicinal substances.

DEFINITIONS

8. To ensure clarity and consistency in the application of this policy, the following definitions are provided:

   a. Alcohol: Any substance containing ethanol, including but not limited to beverages (e.g., beer, wine, spirits), food products, condiments, or additives. This definition encompasses all forms of alcohol that may be consumed, inhaled, or absorbed, whether intentionally or unintentionally.

b. Alcohol Misuse: The inappropriate or excessive consumption of alcohol—whether occasional or habitual—that adversely affects an individual's physical or mental health, job performance, behaviour, or safety. Alcohol misuse may impair judgment, reduce productivity, and pose risks to the individual and others in the workplace.

c. Drugs: Any substance, whether legal or illegal, that alters mood, cognition, perception, or behaviour. This includes:

- Controlled substances as defined under the Misuse of Drugs Act 1971
- Medicinal products regulated under the Medicines Act 1968
- Over-the-counter medications
- Prescription drugs
- Novel Psychoactive Substances (NPS)
- Solvents and other chemical agents capable of producing psychoactive effects

d. Substance Misuse: The use of any drug or chemical substance in a manner that is harmful, unlawful, or inconsistent with its intended purpose. This includes:

- The use of illegal drugs
- The misuse of prescription or over-the-counter medications
- The consumption of Novel Psychoactive Substances
- The deliberate inhalation or ingestion of solvents and other non-medical substances

STEADFAST DUTY OF CARE AND RESPONSIBILITY

9. Steadfast Security Group recognises its legal and ethical duty to provide a safe and healthy working environment for all employees, contractors, and visitors. In accordance with the Health and Safety at Work etc. Act 1974, the organisation is committed to taking all reasonably practicable steps to safeguard the health, safety, and welfare of individuals affected by its operations. This includes actively addressing issues related to the misuse of alcohol, drugs (whether illegal, prescription, or recreational), and other substances within the workplace.

10. The Group's responsibilities and approach include the following:

a. **Commitment to Service Excellence and Reputation**: Steadfast is dedicated to delivering high-quality, reliable services to its clients. To uphold this standard, the organisation must ensure that all personnel are fit for duty and capable of performing their roles without impairment. Any compromise in service delivery due to substance misuse is unacceptable and undermines the Group's reputation and operational integrity.

b. **Zero Tolerance Policy on Substance Misuse During Duty**: Steadfast maintains a strict policy prohibiting the use, possession, or supply of alcohol, drugs, or other substances by employees while on duty. Employees must not report to work or continue working if they are under the influence of any substance or if there is reasonable suspicion, such as the smell of alcohol, that they may be impaired. This policy is enforced to protect the safety of all personnel and the public.

c. **Temporary Reassignment or Suspension of Duties**: Where an employee is taking prescribed medication that may impair their ability to perform their duties safely, Steadfast may, at its discretion and where operationally feasible, reassign the individual to alternative duties that pose less risk. If no suitable duties are available, the employee may be required to remain off work until the course of medication is completed and they are deemed fit to return.

d. **Support for Substance Dependency and Confidentiality**: Steadfast acknowledges that substance dependency is a medical condition that requires appropriate support and intervention. The organisation encourages early disclosure and will help employees seeking help for drug, alcohol, or substance misuse issues. Support may include referral to occupational health services or external treatment providers. All disclosures will be handled with the utmost confidentiality, within the bounds of legal and operational requirements.

EMPLOYEE RESPONSIBILITY

11. All employees within the Steadfast Security Group share a collective responsibility to maintain a safe, healthy, and productive working environment. This includes being vigilant and proactive in identifying and addressing potential risks associated with alcohol or drug misuse in the workplace.

12. Employees are expected to ensure that both they and their colleagues are fit to perform their duties safely and effectively. If an employee suspects that a colleague may be under the influence of alcohol, drugs, or any other substance that could impair their performance or pose a safety risk, it is their duty to report this concern immediately to their supervisor or line manager. This action is essential not only for the wellbeing of the individual concerned but also for the safety of others who may be affected by their behaviour or decisions.

13. In addition, any employee who has been prescribed medication that may cause side effects, such as drowsiness, impaired coordination, or reduced alertness, must inform their supervisor prior to commencing work. This ensures that appropriate adjustments or precautions can be taken to safeguard both the individual and their colleagues.

14. Failure to disclose such information or to report concerns may be considered a breach of this policy and could result in disciplinary action, depending on the circumstances.

IDENTIFYING THE PROBLEM

15. Recognising alcohol, drug, or substance misuse in the workplace can be challenging. There is no single behaviour or characteristic that definitively indicates a problem, and it is important to acknowledge that reduced job performance may result from a variety of personal or professional factors, not solely substance misuse.

16. While some employees may voluntarily seek help, others may be reluctant or unaware of the impact their behaviour is having. In such cases, it is essential for Steadfast management to remain vigilant and consider patterns of behaviour that may suggest an underlying issue related to alcohol or drugs.

17. The following indicators, especially when observed in combination or over a sustained period, may signal a potential substance misuse concern:

a. **Absenteeism**: Frequent, unexplained, or patterned absences (e.g., Mondays, post-payday, or following weekends) may suggest misuse. This includes lateness, leaving work early, or extended breaks.

b. **Reporting to Work Under the Influence**: Visible signs of intoxication, such as slurred speech, impaired coordination, unusual behaviour, or the smell of alcohol or drugs, may indicate that an individual is under the influence while at work.

c. **Deteriorating Job Efficiency**: A noticeable decline in the quality or quantity of work, missed deadlines, poor concentration, or increased errors may reflect the impact of substance misuse on performance.

d. **Poor Relationships at Work**: Conflict with colleagues, supervisors, or clients; withdrawal from team activities; or inappropriate behaviour may be symptomatic of underlying issues.

e. **Dishonesty and Theft**: Instances of deception, missing company property, or financial irregularities may be linked to substance misuse, particularly where individuals are attempting to fund a habit.

EMPLOYEE ASSISTANCE

18. Steadfast Security Group is committed to supporting the health and wellbeing of its employees. Any individual who recognises they may have a problem with alcohol, drugs, or substance misuse is encouraged to seek help. The organisation will treat such matters sensitively and confidentially and will make every reasonable effort to assist employees in accessing appropriate support.

a. **Available Support Services**: Employees can access a range of external support services, including:

1) **General Practitioner (GP)** – A GP can provide medical advice and refer individuals to local specialist substance misuse treatment services or counselling programmes.

2) **Self-Help Groups** – Peer-led support groups offer a confidential and non-judgmental environment for individuals seeking recovery.

3) **Talk to Frank**
- Helpline: 0300 123 6600
- Website: www.talktofrank.com
- Offers confidential advice and information on drugs and substance misuse.

4) **UK Narcotics Anonymous**
- Helpline: 0300 999 1212
- Website: www.ukna.org
- Provides support for individuals recovering from drug addiction.

5) **Alcoholics Anonymous (AA)**
- Helpline: 0800 9177 650
- Website: www.alcoholics-anonymous.org.uk
- Offers group support and recovery programmes for individuals affected by alcohol misuse.

6) **Drinkaware**
- Helpline: 0300 123 1110
- Website: www.drinkaware.co.uk
- Provides information, tools, and resources to help individuals make informed decisions about alcohol.

b. **Support and Rehabilitation**: Employees who proactively seek help will be supported throughout their treatment and recovery process. Steadfast will make every effort to facilitate a return to good health and restore job performance, recognising rehabilitation as a shared responsibility between the employee and the organisation.

c. **Workplace Adjustments**: Where an employee's current role or responsibilities are identified as a barrier to recovery, Steadfast may consider temporary or permanent redeployment to a more suitable position. This will be assessed on a case-by-case basis, in consultation with the employee and relevant health professionals, to support their rehabilitation while maintaining operational effectiveness.

TRAINING

19. Steadfast Security Group recognises the vital role that management plays in identifying and addressing substance misuse in the workplace. To support this, all managers will receive appropriate training designed to equip them with the knowledge and skills necessary to:

a. Recognise the signs and symptoms of alcohol, drug, and substance misuse.

b. Understand the potential impact of substance misuse on health, safety, and job performance.

c. Respond appropriately and sensitively to concerns raised by or about employees.

d. Follow internal procedures for reporting, intervention, and referral.

e. Support affected employees in accessing help and rehabilitation services.

20. Training will be delivered through a combination of workshops, briefings, and access to guidance materials. It will also include scenario-based learning to help managers build confidence in handling real-world situations effectively and in line with company policy and legal obligations.

21. Ongoing refresher training will be provided to ensure that managers remain up to date with best practices, legislative changes, and emerging trends in substance misuse.

TESTING & COMPLIANCE

22. Steadfast Security Group reserves the right to require an employee to undergo alcohol or substance testing where there is reasonable suspicion that the individual may be under the influence and that their condition poses a risk to health, safety, or operational integrity.

a. **Grounds for Testing**: Testing may be initiated when there are reasonable grounds to believe that an employee is unfit for duty due to the influence of alcohol, drugs, or other substances. Reasonable grounds may include, but are not limited to:

- Observable signs of intoxication or impairment
- Unsafe behaviour or conduct that compromises safety
- Involvement in a workplace incident or near-miss
- Reports or concerns raised by colleagues or supervisors

23. All testing will be conducted in a fair, respectful, and confidential manner, in accordance with applicable laws and internal procedures.

b. **Professional Drivers**: Employees who operate vehicles as part of their duties, including those driving Steadfast fleet vehicles, are classified as professional drivers. The company maintains a zero-tolerance policy for driving under the influence of alcohol or drugs. Any breach of this policy will be treated as a serious misconduct and may result in disciplinary action, up to and including dismissal.

c. **Refusal to Comply**: Any employee who refuses to participate in a required alcohol or substance test without valid justification will be subject to disciplinary procedures. Refusal may be treated as a breach of company policy and could result in suspension or termination of employment, depending on the circumstances.

DISCIPLINARY

24. Steadfast Security Group maintains a zero-tolerance approach to alcohol and substance misuse in the workplace. Any employee found to be under the influence of alcohol, drugs, or other substances during working hours or while on company premises will be subject to immediate suspension pending a formal investigation.

a. **Suspension and Investigation**: Where there is reasonable belief that an employee is impaired due to substance misuse, they will be suspended from duty with immediate effect. A thorough inquiry will be conducted to establish the facts, during which the employee will have the opportunity to respond to any concerns raised.

b. **Potential Outcomes**: Following the investigation, disciplinary action may be taken in accordance with Steadfast's disciplinary procedures. This may include:

- Formal warnings
- Mandatory referral to support services
- Redeployment or reassignment
- Termination of employment in cases of gross misconduct

c. **Prohibited Conduct**: The consumption, possession, or distribution of alcohol, non-prescribed drugs, or non-medical inhalants on company premises or during working hours is strictly prohibited. Any breach of this policy will be treated as a serious disciplinary matter and may result in dismissal.

25. Steadfast is committed to ensuring a fair and consistent approach to disciplinary matters, while prioritising the safety, wellbeing, and operational integrity of the organisation.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to safeguarding the health and safety of its workforce by adhering to the Control of Substances Hazardous to Health (COSHH) Regulations 2002.

2. Steadfast recognises that certain substances used both on its own premises and on client sites may pose risks depending on their chemical composition, method of use, and environmental exposure. Although the use of hazardous substances within Steadfast operations is limited, the organisation remains fully compliant with COSHH requirements and associated guidance to ensure that any potential risks are properly assessed, controlled, and communicated.

KEY LEGISLATION

3. This policy is underpinned by several key legislative frameworks that govern the safe use, handling, and management of hazardous substances in the workplace. These laws establish the legal duties of Steadfast Security Group and its employees to ensure health and safety across all operational environments.

4. Health and Safety at Work etc. Act 1974 (HSWA): The HSWA is the primary legislation governing workplace health and safety in the UK. It places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others who may be affected by work activities. This includes the safe use and control of hazardous substances, and it empowers the Health and Safety Executive (HSE) to enforce compliance.

5. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations build upon the HSWA by requiring employers to carry out suitable and sufficient risk assessments, including those related to hazardous substances. Employers must implement preventive and protective measures, appoint competent persons, and provide relevant information, instruction, and training. The regulations also mandate health surveillance where risks to health are identified.

6. Workplace (Health, Safety and Welfare) Regulations 1992: These regulations set out minimum standards for the working environment, including ventilation, temperature, lighting, cleanliness, and welfare facilities. They ensure that workplaces are maintained in a condition that does not pose health risks to employees, particularly where hazardous substances may be present.

7. Control of Substances Hazardous to Health Regulations 2002 (COSHH): COSHH is the central regulation governing the use of hazardous substances in the workplace. It requires employers to assess the risks posed by hazardous substances, implement control measures to prevent or reduce exposure, and provide health surveillance where necessary. COSHH applies to a wide range of substances including chemicals, fumes, dusts, vapours, and biological agents. Breaches of COSHH can result in enforcement action, including fines and prosecution.

COSHH CO-ORDINATION

8. Effective coordination under the Control of Substances Hazardous to Health (COSHH) Regulations 2002 is essential to ensuring the safe management of hazardous substances across all Steadfast Security Group operations. Steadfast will carry out thorough risk assessments to identify potential health hazards arising from substances used or generated in the workplace and will implement appropriate control measures to minimise exposure—such as substituting less hazardous materials, ensuring proper ventilation, and enforcing safe storage and handling procedures. This coordination also includes maintaining and testing control systems, monitoring exposure levels, and providing health surveillance where required.

9. Steadfast is responsible for ensuring that all employees receive adequate information, instruction, and training regarding the risks and safe use of hazardous substances. Regular reviews and updates of COSHH assessments and control measures will be conducted to reflect changes in work practices or the introduction of new substances, thereby supporting a safe and healthy working environment for all staff and others who may be affected.

CONTROL OF COSHH PRODUCTS

10. Under the Control of Substances Hazardous to Health (COSHH) Regulations 2002, Steadfast Security Group is required to manage the risks associated with hazardous substances in the workplace. Effective control involves a series of coordinated steps designed to protect employee health and maintain a safe working environment.

a. **Risk Assessment**: Steadfast will identify all hazardous substances used or generated in the workplace and assess the associated health risks. This includes evaluating potential exposure routes such as inhalation, skin contact, or ingestion. Understanding how employees may be exposed enables the implementation of targeted control measures to mitigate risks and ensure all hazards are effectively managed.

b. **Control Measures**: Control measures will be applied in accordance with the Hierarchy of Control:

1) **Elimination**: Remove the hazardous substance entirely where possible, such as redesigning processes to avoid its use.

2) **Substitution**: Replace hazardous substances with safer alternatives, e.g., using water-based solvents instead of toxic chemicals.

3) **Engineering Controls**: Modify the physical work environment to reduce exposure, including:

- Local Exhaust Ventilation (LEV) to capture airborne contaminants
- Enclosures to isolate hazardous processes
- Automation to minimise manual handling of substances

4) **Administrative Controls**: Adjust work practices to reduce exposure, such as:

- Rotating tasks to limit exposure time
- Providing training on safe handling
- Using clear signage and labelling for hazardous areas and substances

5) **Personal Protective Equipment (PPE)**: As a final line of defence, PPE will be provided where necessary, including:

- Gloves for skin protection
- Respirators for inhalation hazards
- Protective clothing to prevent contamination

c. **Maintenance and Testing**: All control measures will be subject to regular inspection, maintenance, and performance testing to ensure ongoing effectiveness. This includes servicing ventilation systems, checking PPE condition and fit, and auditing administrative controls. Maintenance logs and inspection records will be kept to monitor reliability and identify recurring issues.

d. **Monitoring Exposure**: Exposure levels will be monitored using appropriate methods such as air sampling, biological monitoring (e.g., blood or urine tests), and surface contamination checks. This ensures that exposure remains within safe limits and allows for timely corrective action if thresholds are exceeded.

e. **Health Surveillance**: Where employees are exposed to specific hazardous substances, Steadfast will implement health surveillance programmes. These may include medical assessments, biological monitoring, and health questionnaires to detect early signs of work-related ill health and ensure control measures are effective.

f. **Training and Information**: Employees will receive comprehensive training on the risks associated with hazardous substances and the control measures in place. Training will cover safe handling procedures, emergency response, PPE usage, and the importance of following safety protocols. Refresher training and updates will be provided as needed.

g. **Documentation and Review**: Steadfast will maintain detailed records of all COSHH-related activities, including risk assessments, control measures, exposure monitoring, and health surveillance. These records will be reviewed regularly, particularly when work processes change or new substances are introduced, to ensure continued compliance and effectiveness.

COSHH ASSESSMENTS

11. As part of its commitment to health and safety under the Control of Substances Hazardous to Health (COSHH) Regulations 2002, Steadfast Security Group will carry out detailed assessments for each hazardous substance used or produced in the workplace, using structured assessment forms (SSG.I.0019(a)). These assessments will evaluate how employees may be exposed, whether through inhalation, skin contact, or ingestion, and consider the potential health effects alongside the adequacy of existing control measures.

12. By identifying and analysing these risks, Steadfast can implement appropriate safeguards to protect employees and others on site. To ensure continued relevance and effectiveness, COSHH assessments will be reviewed and updated regularly, particularly when work processes change or new substances are introduced. This proactive approach helps maintain a safe working environment and ensures compliance with regulatory requirements.

MATERIEL SAFETY DATA SHEET (SDS)

13. Obtaining and maintaining Material Safety Data Sheets (SDS) for all potentially hazardous substances is a fundamental requirement under COSHH and a critical component of Steadfast Security Group's commitment to workplace safety. SDS documents provide comprehensive information about each substance, including its physical and chemical properties, associated health risks, recommended handling procedures, storage requirements, and emergency response actions in the event of accidental exposure or spillage.

14. By ensuring that SDS are readily accessible, Steadfast enables employees to make informed decisions and take appropriate precautions when working with hazardous materials. These documents also support effective risk assessments and training initiatives.

15. To remain compliant and ensure ongoing safety, SDS must be reviewed and updated regularly, particularly when new substances are introduced or when regulatory guidance changes, ensuring that all safety protocols reflect the most current and accurate information available.

NEW PRODUCTS

16. When employees require new substances that are not currently in use within Steadfast Security Group, it is essential that the Health & Safety Manager is notified at the earliest opportunity. This allows for a thorough review of the substance's safety data and an assessment of any potential health risks or control requirements before the product is introduced into the workplace.

17. Once approved, the new substance will be formally added to the organisation's Hazardous Substance Register, ensuring that all relevant safety documentation, including risk assessments and SDS, are in place.

18. This process helps maintain an accurate and up-to-date record of all hazardous substances used across Steadfast operations, enabling the implementation of appropriate safety measures and ensuring that employees are fully informed of any new risks associated with their work environment.

ASBESTOS

19. If asbestos is discovered during any project or work activity, it must be reported immediately to the Health & Safety Manager. Asbestos is a highly hazardous material, and its disturbance can release airborne fibres that pose serious long-term health risks, including mesothelioma, lung cancer, and asbestosis.

20. Prompt reporting ensures that appropriate safety protocols are activated without delay. The Health & Safety Manager will coordinate the necessary response, which may include halting work, conducting a risk assessment, isolating the affected area, and arranging for licensed professionals to carry out safe removal and disposal in compliance with the Control of Asbestos Regulations 2012.

21. If asbestos fibres are accidentally released into the air, the incident may also be reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013, as a “dangerous occurrence”. Steadfast will ensure that all employees are aware of the procedures for asbestos discovery and that only trained and authorised personnel handle any suspected asbestos-containing materials.

TRAFFIC MANAGEMENT

SCOPE

1. The Steadfast Security Group (Steadfast), which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is firmly dedicated to maintaining high standards of safety, compliance, and operational efficiency in all aspects of traffic management across its diverse business activities. This commitment reflects our proactive approach to risk mitigation, regulatory adherence, and the continuous improvement of procedures that support the safe movement of vehicles, personnel, and equipment within and around our operational sites.

2. Through coordinated efforts across all subsidiaries, Steadfast aims to uphold best practices in traffic control, reduce potential hazards, and ensure a secure environment for employees, contractors, and visitors alike.

KEY LEGISLATION

12. This policy is shaped by several important legislative frameworks that ensure employees are actively involved in health and safety matters.

13. Health and Safety at Work etc. Act 1974 (HSW Act): This cornerstone of UK health and safety law places a legal duty on Steadfast to safeguard, as far as is reasonably practicable, the health, safety, and welfare of its employees and others who may be affected by its operations. It establishes the foundation for all subsequent regulations and is enforced by the Health and Safety Executive (HSE).

14. Management of Health and Safety at Work Regulations 1999: These regulations require Steadfast to carry out suitable and sufficient risk assessments for all work activities, including traffic management. Based on these assessments, the company must implement proportionate control measures and safe systems of work to eliminate or reduce risks to an acceptable level.

15. Provision and Use of Work Equipment Regulations 1998 (PUWER): PUWER mandates that all work equipment, including vehicles used in the workplace, must be appropriate for the task, properly maintained, and operated safely. It also requires that employees using such equipment receive adequate training and supervision.

16. Workplace (Health, Safety and Welfare) Regulations 1992: Specifically, under Regulation 17, Steadfast must ensure that traffic routes within the workplace are designed and maintained to allow safe movement of pedestrians and vehicles. Routes must be sufficient in number, appropriately located, and clearly marked to prevent collisions and congestion.

17. Construction (Design and Management) Regulations 2015 (CDM Regulations): These regulations apply to all construction-related activities and require Steadfast to plan, manage, and monitor construction work to ensure health and safety. This includes the safe coordination of site traffic, vehicle access, and pedestrian routes during construction projects.

COMPREHENSIVE PLANNING

3. At Steadfast, we place the highest priority on health and safety in all aspects of traffic management by adopting a proactive and structured approach to planning. This begins with detailed risk assessments that identify potential hazards associated with vehicle and pedestrian movement across our sites. Based on these assessments, we design clearly defined traffic flow routes that minimise conflict points and promote safe navigation. Speed limits and physical control measures such as barriers, signage, and designated crossing points are implemented to regulate movement and reduce the risk of accidents.

4. Emergency access routes are strategically planned and kept unobstructed to always ensure rapid response capabilities. We also deliver comprehensive training to all relevant personnel, ensuring they understand traffic protocols, site-specific risks, and safe operating procedures.

5. Ongoing monitoring and audits are conducted to ensure compliance with internal standards and legal requirements, and we maintain open communication with local authorities to align our practices with broader public safety initiatives. These integrated measures work together to minimise operational disruption, enhance safety for workers and visitors, and foster a secure, efficient, and legally compliant working environment.

TRAINING AND CERTIFICATION

6. At Steadfast, we are committed to ensuring that all personnel involved in traffic management are fully trained, competent, and appropriately certified to carry out their duties safely and effectively. Our training programmes are designed to cover all critical aspects of traffic management, including hazard identification, risk assessment procedures, the correct use and positioning of traffic control devices, and emergency response protocols.

7. We place particular emphasis on practical, scenario-based learning to ensure that staff can confidently apply their knowledge in real-world situations. In addition to initial training, we provide regular refresher courses and updates to reflect changes in legislation, site conditions, and best practices. Certification is issued only upon successful completion of training and assessment, ensuring that every individual meets the required standards of competence.

8. By investing in robust training and certification processes, Steadfast ensures that our traffic management teams are well-equipped to protect the health, safety, and welfare of both our workforce and the public, while maintaining operational efficiency and legal compliance.

REGULAR AUDITS AND REVIEWS

9. At Steadfast, we uphold a culture of continuous improvement by conducting regular, structured audits and reviews of our traffic management systems and procedures. These evaluations are designed to ensure that our practices not only comply with current legislation but also reflect the latest industry standards and best practices.

10. Each audit involves a comprehensive assessment of traffic control measures, including signage, route layout, speed restrictions, and physical barriers, to verify their effectiveness and suitability. We also analyse incident and near-miss reports to identify trends, root causes, and opportunities for improvement.

11. Where necessary, procedures are updated to address emerging risks or changes in operational requirements. These reviews are carried out by competent personnel and may include input from external specialists or regulatory bodies to ensure objectivity and thoroughness.

12. By embedding regular audits into our operational framework, Steadfast reinforces its commitment to maintaining a safe, efficient, and legally compliant working environment for employees, contractors, and the public.

VEHICLE INSURANCE, TAX, AND MOT

13. At Steadfast, we enforce strict compliance with UK road safety legislation by requiring that all vehicles entering, operating, or parking on our premises possess valid insurance, road tax, and MOT certification. These legal requirements, as outlined by the UK government, ensure that every vehicle is roadworthy, properly maintained, and covered for liability in the event of an incident.

14. Insurance must meet at least the minimum third-party coverage standard, and MOT certificates must be current for vehicles over three years old. Road tax must also be up to date and verifiable. To uphold these standards, Steadfast conducts regular checks on all vehicles accessing our sites.

15. Any vehicle found to be lacking valid documentation will be denied entry or removed from the premises to maintain safety and legal compliance. This policy helps protect our workforce, visitors, and the public, while also reducing the risk of liability and operational disruption.

ACCESS CONTROL MEASURES

16. Steadfast's Traffic Management Policy incorporates a comprehensive suite of vehicle access control measures designed to safeguard our premises, protect personnel, and maintain operational integrity. These measures are strategically implemented to prevent unauthorised entry, manage traffic flow, and ensure that only approved vehicles and individuals gain access to designated areas.

a. **Barriers and Gates:** Physical access points are secured using robust barriers and gates, which may be manually operated or automated. These systems serve as the first line of defence against unauthorised vehicle entry and are positioned to control access at key perimeter and internal locations.

b. **Automatic Number Plate Recognition (ANPR):** High-resolution cameras equipped with ANPR technology scan and verify vehicle registration plates against a secure database of authorised vehicles. This automated system allows seamless access for approved users while flagging unauthorised or unknown vehicles for further inspection.

c. **Mobile Access Applications:** Authorised personnel can use secure mobile apps to operate gates and barriers via Bluetooth or other wireless protocols. This technology enhances convenience while maintaining strict access control and audit trails.

d. **Visitor Management System:** Temporary access credentials are issued to visitors, contractors, or delivery personnel through a controlled registration process. These credentials are time-limited and monitored to ensure that access is granted only for the duration and scope of the visit.

e. **Security Personnel:** Trained security staff are stationed at key access points to manually verify credentials, respond to access anomalies, and provide an additional layer of oversight. Their presence ensures flexibility and rapid response in dynamic or high-risk situations.

f. **CCTV and Surveillance:** All entry and exit points are monitored using closed-circuit television systems, which provide real-time surveillance and recorded footage for incident investigation and security audits.

g. **System Integration:** Vehicle access control systems are fully integrated with Steadfast's broader security infrastructure, including alarm systems, personnel access controls, and emergency response protocols. This integration enhances situational awareness and enables coordinated responses to potential threats or breaches.

TRANSPORT MANAGER

17. The Transport Manager at Steadfast plays a pivotal role in ensuring the safe, efficient, and compliant operation of all transport-related activities across the organisation. This position carries a broad range of responsibilities that are essential to maintaining high standards of safety, reliability, and regulatory adherence.

a. **Vehicle Maintenance Oversight:** The Transport Manager ensures that all vehicles within the fleet are regularly inspected, serviced, and maintained in accordance with manufacturer guidelines and legal requirements, helping to prevent breakdowns and safety incidents.

b. **Repairs and Routine Servicing:** They coordinate timely repairs and routine maintenance schedules, working closely with approved service providers to minimise vehicle downtime and ensure operational continuity.

c. **Driver and Operator Qualifications:** The Transport Manager verifies that all drivers and equipment operators hold valid, up-to-date licences and certifications, and ensures that training records are maintained and refreshed as needed.

d. **Logistics and Route Planning:** They manage the logistics of transporting goods and services, optimising routes and schedules to improve efficiency, reduce fuel consumption, and meet delivery deadlines.

e. **Scheduling and Coordination:** The Transport Manager oversees the scheduling of transport activities, ensuring that resources are allocated effectively and that operations run smoothly across all departments.

f. **Regulatory Compliance:** They are responsible for ensuring full compliance with transport-related legislation, including vehicle weight limits, tachograph regulations, and environmental standards, helping Steadfast avoid penalties and maintain its reputation.

g. **Risk Management:** The role includes identifying and mitigating risks such as vehicle overloading, unsafe driving practices, and mechanical failures, contributing to a safer working environment.

h. **Record Keeping and Documentation:** Accurate records of vehicle usage, maintenance, inspections, and incidents are maintained under the Transport Manager's supervision, supporting audits and continuous improvement efforts.

i. **Team Leadership and Coordination:** The Transport Manager leads and coordinates the transport team, fostering collaboration, accountability, and a strong safety culture.

j. **Policy Implementation:** They ensure that all transport policies and procedures are effectively implemented and adhered to, aligning operations with Steadfast's broader safety and compliance objectives.

18. By fulfilling these responsibilities, the Transport Manager plays a critical role in supporting Steadfast's commitment to safe, reliable, and legally compliant transport operations.

ELECTRICAL SAFETY & TESTING

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is fully committed to ensuring the safety, integrity, and legal compliance of all electrical installations and equipment used across its operations. This commitment is guided by key UK legislation.

KEY LEGISLATION

2. The following legislative frameworks form the foundation of Steadfast's Electrical Safety Policy, ensuring that all electrical installations and equipment are safe, compliant, and maintained to the highest standards.

3. Health and Safety at Work etc. Act 1974 (HASAWA): This primary piece of UK health and safety legislation places a general duty on employers to protect the health, safety, and welfare of employees and others affected by their operations. It includes provisions relevant to the safe use and management of electrical equipment and systems.

4. Management of Health and Safety at Work Regulations 1999: These regulations require employers to carry out suitable and sufficient risk assessments, including those related to electrical hazards, and to implement appropriate control measures to mitigate identified risks.

5. Electricity at Work Regulations 1989 (EWR): Specifically focused on electrical safety, these regulations mandate that electrical systems must be constructed, maintained, and operated to prevent danger. They apply to all work activities involving electrical equipment and installations, and are supported by the HSE's Approved Code of Practice (HSR25).

6. Provision and Use of Work Equipment Regulations 1998 (PUWER): PUWER requires that all work equipment, including electrical devices, is suitable for its intended use, maintained in a safe condition, and subject to regular inspection to ensure ongoing safety.

7. Electrical Equipment (Safety) Regulations 2016: These regulations apply to manufacturers, importers, and distributors, ensuring that electrical equipment placed on the market meets essential safety requirements. They include provisions for CE marking, conformity assessment, and technical documentation.

8. Building Regulations 2010 (Part P): Part P of the Building Regulations applies to electrical installations in dwellings and certain other buildings. It requires that electrical work is carried out safely and that installations are tested and certified by competent persons.

9. The Health and Safety (Safety Signs and Signals) Regulations 1996: These regulations require the use of appropriate safety signage to warn of electrical hazards and guide safe practices in the workplace.

10. BS 7671 – Requirements for Electrical Installations (IET Wiring Regulations): Although not a statutory law, BS 7671 is the UK national standard for electrical installations. It sets out the technical requirements for design, installation, inspection, testing, and maintenance, and is widely recognised as the benchmark for electrical safety compliance.

RESPONSIBILITIES

11. **Management Responsibilities:** Steadfast's management team holds the overarching responsibility for ensuring that all electrical installations and equipment across the organisation comply with relevant safety standards and legal regulations. This includes actively enforcing the Electrical Safety Policy and integrating it into daily operations. Management must allocate sufficient resources to support safety initiatives, including staff training, routine inspections, equipment testing, and maintenance. By fostering a safety-first culture and ensuring that systems are in place to monitor compliance, management plays a critical role in protecting employees, contractors, and visitors from electrical hazards.

12. **Employee Responsibilities:** All employees are expected to follow safe working practices when operating or working near electrical equipment. This includes the correct use of personal protective equipment (PPE), adherence to site-specific safety procedures, and maintaining awareness of potential electrical risks. Employees must promptly report any electrical hazards, incidents, or near-misses to their supervisor or designated safety personnel. Active participation in safety training sessions and staying informed about updates to procedures are essential to maintaining a safe working environment.

13. **Qualified Personnel Responsibilities:** Only authorised and properly trained personnel are permitted to carry out electrical work within Steadfast's operations. These individuals must strictly follow all procedures related to testing, maintenance, and repair as outlined in the Electrical Safety Policy. In addition to meeting qualification requirements, they are expected to engage in continuous professional development to stay current with evolving safety standards, technological advancements, and best practices. Their expertise is vital to ensuring that electrical systems remain safe, reliable, and compliant.

PORTABLE APPLIANCES

14. Steadfast is committed to maintaining the safety and functionality of all portable electrical appliances used across its operations. To achieve this, formal inspection and testing, commonly referred to as Portable Appliance Testing (PAT), must be carried out at appropriate intervals. The frequency of these tests is determined through a risk-based approach, considering the type of appliance, how frequently it is used, and the environment in which it operates. For example, equipment used in high-risk settings such as construction sites may require more frequent testing than those in low-risk environments like office spaces.

15. Before any new appliance is put into service, it must undergo a thorough visual inspection to check for visible defects such as damaged cables, loose connections, or signs of wear. If deemed safe, the appliance should be labelled to indicate it has passed inspection and is ready for use. While there is no legal requirement to label appliances or keep records, doing so is considered best practice and supports effective safety management.

16. Following formal testing, each appliance should display a durable and clearly visible test label. This label must include the date of the test, the next scheduled test date, and the initials or signature of the person who performed the inspection. These labels help users quickly verify the safety status of equipment before use.

17. Steadfast also maintains detailed records of all inspections and tests. These records should include the date of testing, results, any defects identified, and corrective actions taken. This documentation supports internal audits, regulatory compliance, and continuous improvement in electrical safety practices.

18. All inspection and testing procedures must be carried out by competent individuals and in accordance with relevant safety standards, including the Electricity at Work Regulations 1989, Health and Safety at Work Act 1974, and Provision and Use of Work Equipment Regulations 1998 (PUWER).

TESTING

19. Steadfast is committed to ensuring the safety and compliance of all portable electrical appliances and fixed installations through a structured and risk-based testing regime. The frequency of portable appliance testing (PAT) is determined by conducting a thorough risk assessment, considering the class of equipment, its usage, and the environment in which it operates. This approach aligns with the recommendations outlined in Table 1 of the Code of Practice for In-Service Inspection and Testing of Electrical Equipment, as well as HSE guidance documents HSG107 and INDG236.

20. In high-risk environments such as construction sites, testing may be required as frequently as every three months, whereas in low-risk settings like offices, visual inspections and less frequent formal testing may suffice. Regardless of the setting, all portable appliances must be inspected and tested by competent individuals, either approved contractors or staff who have completed recognised PAT training.

21. Any appliance that fails a visual inspection or formal test must be immediately disconnected from the power supply, clearly marked as **"Unsafe – Not to be used"**, and withdrawn from service. The appliance should then be either repaired by a qualified electrician or disposed of in accordance with Steadfast's waste management procedures.

22. All fixed electrical distribution systems at Steadfast are designed, installed, and maintained in accordance with BS 7671:2018 – Requirements for Electrical Installations (IET Wiring Regulations). These regulations set the national standard for electrical safety and include provisions for inspection, testing, and protection against electric shock, fire, and transient overvoltage's.

23. Testing schedules and records are maintained by the **Steadfast Systems Manager**, who is responsible for ensuring that all inspections are documented accurately. These records include the date of testing, results, any faults identified, and corrective actions taken. Only qualified electricians and engineers are permitted to work on wiring installations, and all plant and machinery must be equipped with local isolators as specified in the Wiring Regulations.

PERSONAL ELECTRICAL EQUIPMENT ON STEADFAST SITES

24. Steadfast recognises that employees may bring personal electronic devices, such as laptops, tablets, and mobile phone chargers, into the workplace for convenience and productivity. While the company supports the responsible use of such items, it is essential that all personal electrical equipment complies with relevant safety standards to prevent risks to individuals and the wider electrical infrastructure.

25. To ensure safety, all personal devices must meet **EU or UKCA safety standards** and be compatible with the UK's electrical supply of **230V at 50Hz**. Devices that do not meet these requirements may pose fire, shock, or interference risks and must not be used on-site. Employees are encouraged to check for CE or UKCA markings and ensure that plugs, cables, and adaptors are in good condition and suitable for UK sockets.

26. Before using personal electrical items on Steadfast premises, employees should visually inspect them for signs of damage, such as frayed wires, cracked casings, or loose connections. Any equipment showing signs of wear or damage must not be used until repaired or replaced.

27. By following these guidelines, Steadfast maintains a safe and efficient working environment while accommodating the practical needs of its workforce. The company reserves the right to inspect personal electrical equipment and prohibit its use if it is deemed unsafe or non-compliant with site policies.

ELECTRICAL EQUIPMENT IN HAZARDOUS AREAS

28. Steadfast recognises the critical importance of managing electrical safety in hazardous areas, locations where explosive atmospheres may be present due to flammable gases, vapours, or volatile liquids. These areas are classified in accordance with BS EN 60079-10-1:2015, which defines zones based on the frequency and duration of the presence of explosive atmospheres:

- **Zone 0**: An area where an explosive atmosphere is present continuously or for long periods.
- **Zone 1**: An area where an explosive atmosphere is likely to occur during normal operations.
- **Zone 2**: An area where an explosive atmosphere is not likely to occur in normal operation, and if it does, it will exist only for a short time.

29. Electrical equipment used in these zones must meet stringent safety standards to prevent ignition. These include:

- **Ex i (Intrinsically Safe)**: Designed to prevent sparks and excessive heat by limiting electrical and thermal energy.
- **Ex d (Flameproof)**: Constructed to contain any internal explosion and prevent it from igniting the surrounding atmosphere.

- **Ex n (Non-sparking or Reduced Risk)**: Designed to minimise the likelihood of ignition under normal operating conditions.

30. All installations within hazardous areas must be approved and signed off by a **competent electrical engineer** with appropriate qualifications and experience in explosive atmospheres. Equipment must also be marked with the appropriate **'Ex' symbol**, and carry **UKCA or CE certification**, confirming its suitability for use in such environments under the Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016.

31. By adhering to these standards and ensuring proper classification, installation, and maintenance, Steadfast safeguards its personnel, assets, and operations from the risks associated with electrical systems in hazardous environments.

MAINTENANCE

32. All electrical equipment across Steadfast sites, including building systems, high and low voltage distribution networks, plant machinery, lighting, power outlets, and domestic appliances, is maintained by Steadfast Systems in accordance with a structured planned preventative maintenance (PPM) programme. This programme defines the frequency of inspections, testing routines, and servicing schedules based on equipment type, usage, and risk level.

33. Any equipment found to be damaged or defective must be promptly repaired or replaced to prevent safety hazards or operational disruptions. Additionally, older or obsolete equipment is subject to planned replacement, determined by its age, condition, and performance, as assessed by a competent electrical engineer. All fixed wiring installations are designed, installed, and maintained in compliance with BS 7671:2018 (IET Wiring Regulations), and plant and machinery are fitted with local isolators as required to ensure safe operation and maintenance access.

DISPOSAL

34. Steadfast ensures that the disposal of electrical and electronic equipment is carried out in full compliance with the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013, which implement the EU WEEE Directive in the UK. These regulations mandate the responsible collection, recycling, and recovery of electrical waste to reduce landfill use and environmental harm.

35. All equipment classified as WEEE, including items with plugs, batteries, or circuit boards, must be separated from general waste and processed through authorised recycling channels. In cases where equipment contains hazardous components, such as batteries, capacitors, or substances harmful to human health, disposal must also comply with the Hazardous Waste Regulations, ensuring safe handling, containment, and treatment.

36. Steadfast works with licensed waste carriers and recycling partners to ensure traceability and legal compliance throughout the disposal process. By adhering to both WEEE and hazardous waste directives, Steadfast promotes environmental sustainability, protects public health, and meets its legal obligations for responsible waste management.

ELECTRICAL HAZARDS

37. Electrical hazards can arise from a range of factors including poor design, substandard construction, improper installation, inadequate protection measures, lack of maintenance, or the misuse and incorrect operation of equipment. At Steadfast, we are committed to minimising these risks through the implementation of robust safety protocols and safe systems of work.

38. This includes the use of approved materials and equipment, adherence to recognised procedures such as lockout/tagout systems to prevent accidental energisation, and the scheduling of regular inspections and maintenance by qualified personnel. By proactively managing electrical risks, Steadfast ensures a safer working environment for all employees, contractors, and visitors.

PERMIT TO WORK (PTW)

39. At Steadfast, live working on electrical equipment is strongly discouraged due to the significant risks it poses to personnel and infrastructure. However, in exceptional circumstances where live work is necessary and cannot be avoided, a rigorous **Permit to Work (PTW)** system must be followed without exception. This system ensures that only authorised internal or contract electricians, who have undergone appropriate training and risk assessment, are permitted to carry out such tasks. The PTW process involves comprehensive documentation detailing the scope of work, specific safety precautions to be implemented, and formal approval from a competent authority. It also includes confirmation that all necessary protective equipment, isolation procedures, and emergency protocols are in place.

40. By enforcing this structured approach, Steadfast ensures that live electrical work is conducted under tightly controlled conditions, minimising risk and maintaining a safe working environment for all involved.

ELECTRICAL REGISTER

41. Steadfast maintains a comprehensive Electrical Register that logs all portable and fixed electrical appliances used across its sites. This register is managed by the Health & Safety Manager and serves as a central record for tracking equipment status, location, and testing history.

42. Any changes to appliance details, such as relocation, removal from service, or replacement, must be promptly reported to ensure the register remains accurate and up to date. This enables the responsible personnel to plan and carry out inspections, testing, and maintenance effectively. Keeping the register current is essential for maintaining compliance with safety regulations, supporting audit readiness, and ensuring that all electrical equipment remains safe for use.

FIRE SAFETY POLICY

SCOPE

1. This policy applies to all personnel employed directly or indirectly by Steadfast Security Group, including those working under Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited. It outlines the management of fire safety across all premises occupied by Steadfast, emphasising that all staff have a responsibility to understand and follow fire safety procedures. For individuals in management roles, this responsibility is especially critical, as they are expected to lead by example and ensure compliance throughout their teams.

INTRODUCTION

2. Steadfast Security Group (Steadfast) is committed to taking all reasonably practicable steps to prevent or reduce the risk of fire by conducting thorough fire risk assessments.

3. Fire poses a potential hazard across all Steadfast premises. Its consequences can be particularly severe due to the challenges and risks involved in safely evacuating employees and visitors during an emergency.

4. Steadfast aims to prevent fire outbreaks wherever possible. If a fire does occur, it must be swiftly detected, effectively contained, and promptly extinguished, ensuring the safety of all personnel and visitors through robust fire protection measures and well-practised evacuation procedures.

KEY LEGISLATION

5. Steadfast's Fire Safety Policy is shaped by several key legislative frameworks that define employer responsibilities and guide safe practices across all premises. These laws ensure that fire safety measures are effectively implemented, maintained, and adhered to by all personnel, supporting a safe working environment and regulatory compliance.

6. Regulatory Reform (Fire Safety) Order 2005 (FSO): The Regulatory Reform (Fire Safety) Order 2005 is the primary legislation governing fire safety in non-domestic premises across England and Wales. It places legal duties on the "Responsible Person", typically the employer, building owner, or facilities manager, to carry out and regularly review fire risk assessments, implement and maintain appropriate fire safety measures such as alarms, extinguishers, and signage, ensure safe escape routes and emergency lighting, provide fire safety training to staff, and maintain records of assessments and actions taken, particularly in workplaces with five or more employees.

7. The Fire Safety Act 2021 clarifies and extends the scope of the Regulatory Reform (Fire Safety) Order 2005, particularly in response to the Grenfell Tower tragedy. It requires fire risk assessments for multi-occupied residential buildings—regardless of height—to include external walls (such as cladding, balconies, and windows) and flat entrance doors that open into communal areas. The Act strengthens the legal duties of Responsible Persons and empowers fire and rescue authorities with enhanced enforcement capabilities to ensure compliance and improve fire safety standards across residential premises.

8. The Health and Safety (Safety Signs and Signals) Regulations 1996 require employers to use safety signage where significant risks remain after all other control measures have been applied. In relation to fire safety, this includes clear and legible signs for emergency exits, fire extinguisher locations, and emergency instructions. These signs must comply with recognised standards such as BS EN ISO 7010, ensuring consistency and easy recognition. The regulations aim to harmonise signage across workplaces, helping employees respond quickly and appropriately in emergencies.

OBJECTIVES

9. The objectives of this policy are to ensure that:

   a. Effective fire safety measures are in place to maintain a safe environment for all personnel.

b. All Steadfast employees receive appropriate fire safety training and take ownership of fire safety within their respective work areas.

c. Everyone working in or visiting Steadfast-owned or occupied buildings is fully informed of the correct actions to take in the event of a fire, suspected fire, or evacuation.

d. All new developments and major refurbishment projects fully comply with current fire safety legislation and recognised codes of practice.

e. Where necessary, a programme of works is implemented to meet fire safety standards in line with applicable legislation and guidance.

f. Steadfast remains fully compliant with all relevant fire safety laws and approved codes of practice.

RESPONSIBILITIES

10. Under the Regulatory Reform (Fire Safety) Order 2005, the Responsible Person is legally required to implement fire safety measures and ensure compliance with the Order. The Fire and Rescue Service is the principal enforcing authority and has the power to inspect premises, review records, issue enforcement notices, and initiate legal proceedings where necessary. In cases of ambiguity, the Fire Authority will determine who qualifies as the Responsible Person.

a. **Board of Directors (Responsible Persons)**. The Board holds ultimate accountability for the organisation's operations. It must ensure that appropriate assurances are in place to confirm compliance with current fire safety legislation and that Steadfast's fire safety objectives are being met.

b. **Compliance Manager / Fire Safety Advisor (Responsible Person)**. This role is responsible for ensuring that Steadfast complies with all applicable fire safety legislation across its owned and occupied premises. Key responsibilities include:

1) Maintaining an effective Fire Safety Management System, including a planned programme of fire safety improvements integrated into business planning.

2) Implementing a fire precautions audit and reporting system to inform senior management of the current fire safety status across all sites.

3) Ensuring third-party service agreements include contractual obligations that align with Steadfast's fire safety policy.

4) Delivering induction fire safety training to all new personnel, including volunteers, part-time, and agency staff.

5) Coordinating and recording annual fire evacuation drills for each site.

6) Maintaining accurate records of fire alarm, emergency lighting, and firefighting equipment testing and maintenance.

7) Promoting awareness of fire safety defect reporting procedures among all employees.

8) Updating written records within the fire risk assessment action plan as required.

c. **Fire Marshals**. Fire Marshals must be appointed across all departments and buildings to provide local leadership on fire safety matters. While not enforcement officers, they report directly to the Compliance Manager and should refresh their training every three years. Their responsibilities include:

1) Acting as a point of contact for fire safety concerns within their area.

2) Supporting and organising local fire safety procedures and checks.

3) Raising fire safety issues with local management.

4) Assisting in the coordination of emergency responses in their vicinity.

5) Conducting roll calls during evacuations.

6) Being trained to use first aid firefighting equipment where safe and appropriate.

7) Supporting routine fire safety inspections with local managers.

8) Participating in regular fire warden training and applying the knowledge in their workplace.

d. **Employees**. All employees of Steadfast have a responsibility to adhere to the fire safety procedures and arrangements in place at their workplace. They must avoid any actions or behaviours that could potentially cause a fire. Under the Health and Safety at Work Act 1974 (HSWA), every employee is legally obliged to take reasonable care of their own health and safety, as well as that of others who may be affected by their actions or omissions.

e. All Steadfast employees must complete fire safety training and ensure they are familiar with the fire procedures specific to their premises.

f. Employees must take particular care to notify the Fire Safety Advisor of any work activities or behaviours, whether their own or others', that could compromise the fire safety integrity of the premises. The Fire Safety Advisor should be actively involved in assessing and managing such risks.

HOT WORKS PERMITS

11. Any planned hot works carried out on Steadfast-owned or controlled premises must not commence until the Health and Safety Manager has reviewed and approved the contractor's safety precautions. This approval must be formally documented through a Permit to Work.

12. Hot works include activities such as hot roof repairs or installations, welding, and gas flame metal cutting.

13. In the case of emergency repairs or urgent maintenance, contractors and maintenance personnel must consult with the Health and Safety Manager to confirm and agree upon appropriate hot work safety measures before proceeding.

PERSONAL ELECTRONIC DEVICES AND EQUIPMENT

14. Personal electrical devices belonging to employees, visitors, or contractors must not be charged within Steadfast-owned or controlled premises without prior written approval from management. All such devices must be inspected and tested by a certified professional to ensure safety compliance.

15. Medium to large electrical equipment not issued by Steadfast must not be stored, used, or charged within Steadfast premises unless authorised in advance by management. This includes items such as e-bikes, scooters, and high-powered tools, which pose increased fire risks due to lithium-ion batteries.

TOASTERS AND MICROWAVES

16. **Toasters**. Toasters generate intense heat and are prone to causing false fire alarms. Their safety mechanisms can be easily bypassed, increasing the risk of fire. Fire authorities now have the power to issue fines for unjustified false alarms. All toasters must be PAT tested and regularly inspected by a certified technician. They should be placed on stable surfaces, away from overhead shelves, and never left unattended during use.

17. **Microwaves**. Microwave ovens heat food by exciting water molecules. If moisture is absent, other materials may absorb the radiation and overheat, potentially igniting. All microwaves must be PAT tested and routinely inspected. Users

should avoid placing metal objects or unsuitable containers inside, and ensure the appliance is kept clean to prevent fire hazards.

EXTENSION CABLES AND MULTI-SOCKET PLUGS

18. The use of extension leads, and multi-socket adapters should be minimised wherever possible. Overloading these devices can prevent safety mechanisms from functioning correctly, increasing the risk of fire.

19. Multi-socket plug adapters are prohibited within Steadfast premises due to their tendency to become dislodged, which can result in arcing and sparks.

20. Extension cables should only be used when necessary. Employees must arrange desks and equipment to utilise fixed wall sockets. Cables should not be stretched across walkways or placed under furniture where they may be damaged.

21. Reel-type extension cables must not be used for static office setups, as they can overheat when coiled. Additionally, daisy-chaining, connecting multiple extension leads together, is strictly forbidden, as it poses a serious fire risk.

PORTABLE HEATERS

22. Portable heaters present a significant fire risk if not used correctly. They must be positioned at least one metre away from any flammable materials. The following types of heaters are commonly used and require specific precautions:

a. **Halogen Heaters**. These produce intense, directional heat and must be placed well away from furniture, fabrics, and people. Their positioning is critical to avoid injury or fire.

b. **Fan Heaters**. These emit concentrated hot air and can easily ignite nearby items. They should be kept clear of any objects and never left unattended while in use.

c. **Oil-Filled Radiators**. These are generally safer due to the absence of exposed heating elements. However, they continue to emit heat after being switched off and should still be used with caution.

d. **Gas Heaters**. These carry higher risks due to the use of gas cylinders. Spare cylinders must be stored outside, away from direct sunlight and frost. Adequate clearance must be maintained around the heater to prevent ignition of nearby materials.

REPORTING OF FIRE AND FALSE ALARMS

23. Accurate reporting and investigation of fire incidents and false alarms are essential for learning and improving fire safety across Steadfast premises.

24. Any fire-related incident, false alarm, or evacuation must be reported to the Compliance Manager / Fire Safety Advisor by the designated lead person or department manager. Reports should be sent to steven.hope@steadfastsecurity.co.uk.

FIRE ALARM ACTIONS AND CONTACTING THE FIRE SERVICE

25. In accordance with government guidance, staff in non-domestic premises must conduct a search of the building following a fire alarm activation to determine whether a fire is present before contacting the Fire Service.

26. If a fire cannot be confirmed or reasonably suspected, and a search has not been completed, the Fire and Rescue Service may issue a ‘call challenge’, instructing staff to search before dispatching emergency responders.

27. False alarms must not be reported to the Fire Service. These incidents should be managed internally by the Compliance Manager.

28. A qualified Systems Engineer must inspect the fire panel to identify the zone and location of the activation.

29. Staff must never place themselves at risk during a search. If signs of fire, such as smoke, heat, unusual sounds, or smells, are detected, the search must be stopped immediately. Evacuate the premises and report the situation to the Fire Service as an emergency.

INSPECTIONS AND MAINTENANCE

30. All fire safety equipment is subject to regular inspection and maintenance in accordance with UK legislation. For detailed procedures, refer to the Fire Safety Logbook.

31. A weekly fire alarm test will be conducted every Wednesday at 10:00 AM. Any alarm sounding outside this scheduled time must be treated as a real activation, and the evacuation procedure must be followed.

FIRST AID

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, will ensure the provision and maintenance of appropriate first aid facilities and trained personnel to respond to foreseeable incidents. The Group is committed to full compliance with all applicable legislation relating to first aid and health and safety.

KEY LEGISLATION

2. This policy is shaped by several core legislative frameworks and standards that define employer responsibilities and guide safe working practices.

3. Health and Safety at Work etc. Act 1974 (HASAWA): This Act places a general duty on Steadfast Security Group to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others affected by its operations. It includes provisions relevant to the safe use of equipment and the working environment.

4. Health and Safety (First Aid) Regulations 1981 – Guidance L74: These regulations require employers to provide adequate and appropriate first aid equipment, facilities, and trained personnel to ensure that employees receive immediate attention in the event of injury or illness at work. The guidance also outlines the importance of conducting a first aid needs assessment to determine appropriate provision.

5. British Standard BS 8599-1:2019: This standard specifies the minimum contents and specifications for workplace first aid kits. It ensures that kits are appropriately stocked based on the size and risk level of the workplace, and includes guidance for small, medium, and large kits, as well as travel and critical injury packs.

6. Data Protection Act 1998: This Act governs the lawful processing of personal data, including sensitive health information. It requires that personal data be processed fairly, lawfully, and securely, and only for specified purposes. It also mandates that data be accurate, relevant, and not retained longer than necessary, with appropriate safeguards against unauthorised access or disclosure.

DEFINITION

7. First aid refers to the immediate care and assistance provided to an individual who is experiencing a sudden illness or injury. Its primary objectives are to preserve life, prevent the condition from deteriorating, and promote recovery until professional medical support is available. First aid may involve a variety of actions, such as cleaning and dressing minor wounds, administering CPR, or offering support during medical emergencies. It is typically delivered by individuals with basic medical training or first response skills.

FIRST AID NEEDS ASSESSMENT

8. To ensure that Steadfast Security Group provides adequate and appropriate first aid provision across all its operations, a **comprehensive assessment of first aid needs** must be undertaken. This assessment should consider a variety of factors that influence the level and type of first aid support required.

9. Firstly, **the nature of the work carried out** by each division within the Group must be considered. **Different roles and activities** carry varying levels of risk, and some may involve **specific hazards that require tailored first aid arrangements**. For example, work involving electrical systems, manual handling, or hazardous substances may necessitate specialised equipment or training.

10. **The size and structure of the workforce** is another critical factor. Larger teams or those spread across multiple sites may require a greater number of trained first aiders and more extensive facilities. Additionally, **the working patterns of staff**, such as those working late shifts, weekends, or alone, must be considered to ensure that first aid cover is always available, including during periods of reduced staffing.

11. **Absences** due to holidays, sickness, or other leave must also be factored into the assessment. It is essential to maintain sufficient first aid provision even when designated first aiders or appointed persons are unavailable.

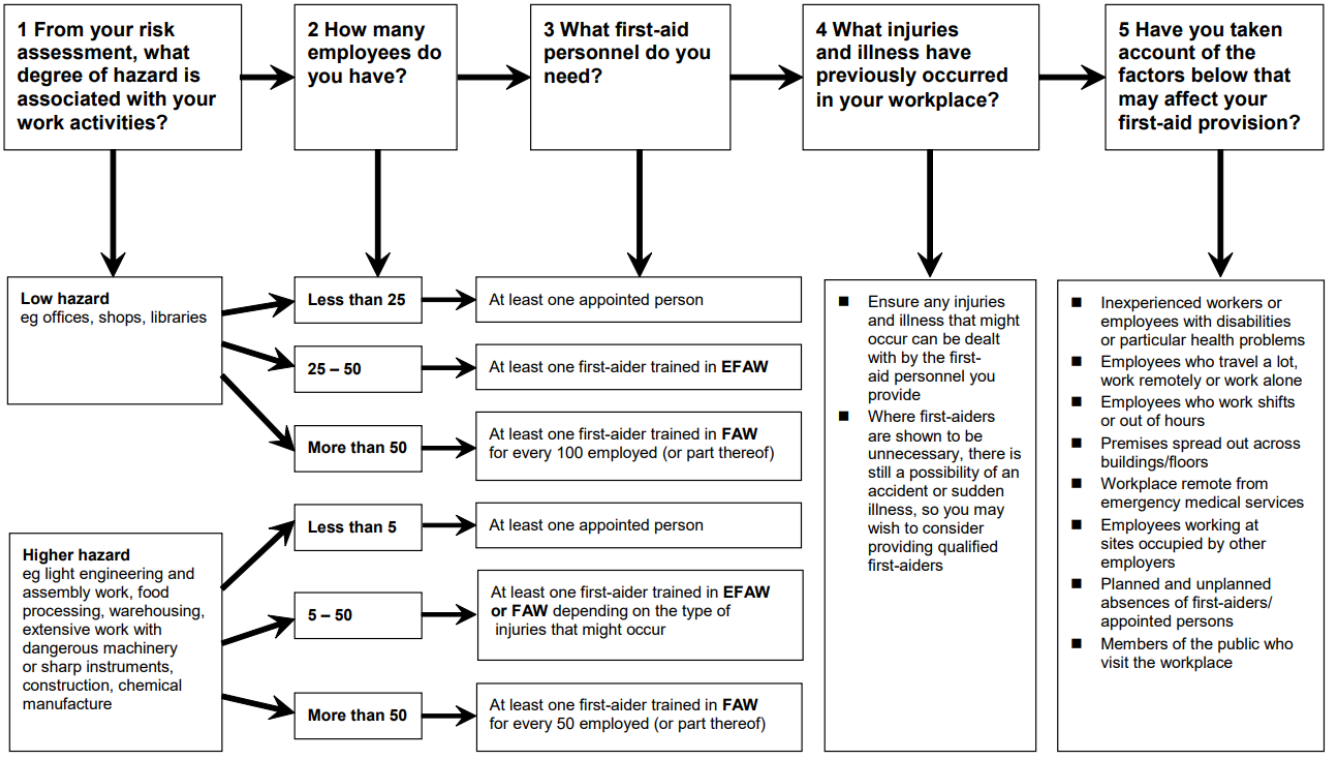
12. **Historical data on workplace accidents and incidents** should be reviewed to identify trends and inform the level of provision required. This helps ensure that the first aid arrangements are responsive to actual risks and not just theoretical ones.

13. Special consideration must be given to **employees who work remotely, travel frequently, or operate alone**. These individuals may not have immediate access to first aid support, so alternative arrangements, such as portable kits or remote training, may be necessary.

14. The **geographical distribution of staff** and the remoteness of certain sites from emergency medical services also play a role. Sites located far from hospitals or ambulance services may require enhanced first aid capabilities to bridge the gap until professional help arrives.

15. Where Steadfast operates on shared or multi-occupancy premises, **coordination with other organisations** may be required to ensure adequate first aid coverage across the site. Additionally, the needs of non-employees, such as visitors, contractors, or members of the public, should be considered when planning first aid provision.

16. As a general guideline, the suggested number of first aid personnel available always should be based on the outcome of the needs assessment and aligned with HSE recommendations. This ensures that the provision is proportionate, effective, and compliant with legal obligations.



FIRST AID EQUIPMENT

17. There is no legally mandated list of items that must be included in a workplace first aid kit. Instead, the contents should be determined by the outcome of a thorough first aid needs assessment. This assessment should consider the nature of the work, associated risks, the number of employees, and other relevant factors. Employers are encouraged to refer to British Standard BS 8599-1:2019, which provides detailed specifications for workplace first aid kits based on risk levels and workforce size.

18. For workplaces with **low-risk activities**, such as office-based environments, the HSE recommends a minimum stock of first aid items, which may include:

- A leaflet offering general guidance on first aid (e.g. HSE's *Basic Advice on First Aid at Work*).
- 20 individually wrapped sterile plasters (assorted sizes), suitable for the type of work. Hypoallergenic options should be available if needed.
- 2 sterile eye pads.
- 2 individually wrapped triangular bandages, preferably sterile.
- 6 safety pins.
- 2 large sterile, individually wrapped, unmedicated wound dressings.
- 6 medium-sized sterile, individually wrapped, unmedicated wound dressings.
- At least 3 pairs of disposable gloves (nitrile gloves are recommended for allergy prevention).

19. These items serve as a basic guide and should be supplemented or adjusted based on the specific risks identified in the workplace. For example, environments with higher risks, such as construction, warehousing, or manufacturing, may require additional items such as burn dressings, resuscitation face shields, foil blankets, and trauma shears.

20. The BS 8599-1:2019 standard outlines recommended contents for small, medium, and large kits, as well as travel and critical injury packs. It also provides guidance on the appropriate number of kits based on workforce size and risk level. While compliance with BS 8599 is not a legal requirement, it is considered best practice and is endorsed by the HSE as a reliable benchmark for modern workplace needs.

21. Employers should regularly inspect first aid kits to ensure all items are in date, sterile where required, and replenished after use. Expired or damaged items must be replaced promptly to maintain readiness in case of emergencies.

RECORDING

22. Accurate and timely documentation of any incident requiring first aid is essential for maintaining high standards of health and safety within Steadfast Security Group. Following any such event, a detailed record must be completed by the attending First Aider or the individual responsible for managing the incident. This record should be maintained in accordance with the principles of the Data Protection Act 1998, ensuring that all personal and medical information is handled lawfully, securely, and with respect for individual privacy.

23. These records serve multiple important purposes. Firstly, they enable management to identify patterns or trends in workplace accidents, which can inform future risk assessments and lead to improvements in health and safety controls. Secondly, they provide a valuable reference point when reviewing or updating the organisation's first aid needs assessment. Additionally, these records may be required for insurance claims or internal/external investigations, making accuracy and completeness critical.

24. It is important to note that the first aid record book is distinct from the statutory accident book, although in some cases the two may be combined for convenience. Regardless of format, all entries must be made within **72 hours** of the incident occurring. Furthermore, any **serious incidents** must be reported directly to the **Health and Safety Manager** using the quickest available method, whether by phone, email, or in person, to ensure prompt action and appropriate follow-up.

25. Maintaining a robust and confidential system for recording first aid incidents not only supports legal compliance but also reinforces Steadfast's commitment to the welfare of its employees and the continuous improvement of its safety practices.

EMERGENCIES AND WHEN TO CALL AN AMBULANCE

26. In any situation where a person is seriously ill or injured and their life may be at risk; it is essential to call **999 immediately** and request emergency medical assistance. Prompt action can be critical in preserving life and preventing further harm.

27. Medical emergencies can present in various forms. While this list is not exhaustive, common examples include:

- **Chest pain** – which may indicate a heart attack or other cardiac condition.
- **Difficulty breathing** – including asthma attacks, allergic reactions, or respiratory distress.
- **Unconsciousness** – whether brief or prolonged, especially if the person cannot be roused.
- **Severe loss of blood** – from deep cuts, wounds, or internal bleeding.
- **Severe burns or scalds** – particularly those affecting large areas or sensitive parts of the body.
- **Choking** – where the airway is blocked and the person cannot breathe or speak.
- **Fitting or seizures** – including those caused by epilepsy or head trauma.
- **Concussion** – especially following a blow to the head, with symptoms such as confusion, vomiting, or loss of consciousness.
- **Drowning** – where the person has inhaled water and may be unconscious or struggling to breathe.
- **Severe allergic reactions (anaphylaxis)** – which may cause swelling, breathing difficulties, or collapse.

28. In all such cases, the priority is to ensure the safety of the individual and others nearby, administer appropriate first aid where possible, and contact emergency services without delay. First aiders should remain calm, provide reassurance, and follow their training until professional help arrives.

FIRST AID PERSONNEL

29. Steadfast Security Group is committed to ensuring that an adequate and appropriate number of trained individuals are available to administer first aid across all operational areas. The provision of first aid personnel must be based on the outcomes of the first aid needs assessment and aligned with the nature of work, associated risks, and staffing patterns.

30. Each site or department must have access to designated first aiders or appointed persons during all working hours, including evenings, weekends, and periods of lone working. These individuals should hold valid first aid qualifications and be capable of responding promptly and effectively to incidents.

31. Areas within Steadfast that are likely to require dedicated first aid personnel include, but are not limited to:

- **Control Room** – A central operational hub where staff may work long hours or alone, requiring consistent first aid coverage.
- **Steadfast HQ Offices** – Office-based staff may face low-risk hazards, but first aid provision must still be maintained.
- **Warehouse 1 & Warehouse 2** – These environments typically involve manual handling, machinery, and vehicle movement, increasing the risk of injury.

- **Fabrication Workshop** – Activities involving tools, welding, and fabrication carry specific risks that require trained first aiders on-site.

- **Steadfast Systems (All Engineers)** – Field engineers working remotely or on client sites must have access to portable first aid kits and may require additional training for lone working scenarios.

- **Complete Security (Europe) Limited** – Staff operating across various locations, including high-risk environments, must be supported by appropriate first aid arrangements.

32. The number of first aiders required at each location should be determined by the level of risk and the number of employees present. Regular reviews should be conducted to ensure coverage remains adequate, especially during staff absences or changes in operational activity.

THE APPROVED CODE OF PRACTICE WITHIN THE HEALTH AND SAFETY (FIRST AID) REGULATIONS 1981, L74

33. Steadfast Security Group will apply the principles outlined in the Approved Code of Practice (ACOP) L74, as far as is reasonably practicable, when determining the number and distribution of first aid personnel across its operations. This guidance, issued by the **Health and Safety Executive (HSE)**, provides practical advice on how to comply with the legal requirements of the Health and Safety (First-Aid) Regulations 1981.

34. In line with ACOP L74, the number of first aiders must be based on a thorough assessment of workplace risks, the nature of activities undertaken, and the availability of staff across different shift patterns. This includes ensuring that suitable individuals are present and capable of delivering first aid during all working hours, including evenings, weekends, and periods of lone working.

35. The ACOP also emphasises the importance of considering factors such as:

- The size and layout of the workplace.

- The history of accidents and incidents.

- The presence of remote or isolated workers.

- The potential for life-threatening injuries (e.g. severe bleeding).

- The mental health needs of employees, which must now be factored into first aid assessments following the 2024 update to the guidance.

36. While following the ACOP is not legally mandatory, it carries **special legal status**. If an employer is prosecuted for failing to meet health and safety obligations, and it is shown that they did not follow the ACOP, they must demonstrate that they complied with the law in another way. Therefore, adherence to L74 is considered best practice and a reliable benchmark for ensuring legal compliance and employee welfare.

TRAINING REQUIREMENTS

37. To be recognised as a certified First Aider within Steadfast Security Group, individuals must successfully complete a **First Aid at Work (FAW)** course. This training is typically delivered over **three consecutive days** and covers a comprehensive range of first aid skills, including how to respond to emergencies, administer CPR, and treat injuries and illnesses in the workplace. Upon successful completion, participants will receive a certificate that remains valid for **three years**. It is essential that this certification is renewed **within 30 days of its expiry** to maintain continuous first aid coverage.

38. All records of completed training must be forwarded to both the **HR Manager** and the **Compliance Manager** to ensure accurate tracking and compliance with regulatory requirements.

39. As Steadfast does not currently offer internal FAW training, suitable external training providers must be sourced. The **Compliance Manager** or **HR Manager** can assist in identifying approved local providers. It is important to note that all FAW courses must be **HSE-approved** or delivered by a recognised training organisation that meets the standards set out in the Health and Safety (First-Aid) Regulations 1981.

40. All new employees, whether **permanent or temporary**, will be introduced to Steadfast's first aid arrangements as part of their **local induction process**. This ensures that staff are aware of the location of first aid kits, the identity of trained personnel, and the procedures to follow in the event of an emergency.

41. Additionally, it is the responsibility of all Steadfast employees, including **Security Guards** and **Installation Engineers**, to familiarise themselves with the first aid facilities and designated personnel at **client sites**. This is particularly important for those working remotely or in environments where Steadfast does not directly control the premises.

GAS SAFETY

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to maintaining the highest standards of gas safety across all its operations. This commitment extends to the regular inspection, servicing, and maintenance of all gas appliances, fittings, and flues to prevent leaks, carbon monoxide exposure, and other gas-related hazards.

2. By implementing robust safety protocols and adhering to relevant legislation and industry best practices, Steadfast aims to ensure a safe working environment for employees, contractors, and clients. Routine checks and preventative measures are carried out to minimise the risk of gas incidents and to promote a culture of safety and compliance throughout the organisation.

KEY LEGISLATION

3. The gas safety policy at Steadfast Security Group is shaped by the following core legislative frameworks.

4. Health and Safety at Work etc. Act 1974 (HASAWA): This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others who may be affected by their work activities. In the context of gas safety, this includes ensuring that gas systems, appliances, and fittings are installed, maintained, and operated safely. Employers must take proactive steps to prevent risks such as gas leaks, fire, explosion, and carbon monoxide poisoning by implementing safe systems of work and using competent personnel.

5. The Gas Safety (Installation and Use) Regulations 1998: These regulations provide specific requirements for the safe installation, maintenance, and use of gas systems, including appliances, fittings, and flues. They mandate that all gas work must be carried out by a **Gas Safe registered engineer** or a **competent person**. Employers are responsible for ensuring that gas appliances are regularly inspected, properly ventilated, and maintained in good working order. The regulations also cover emergency controls, flue safety, and the qualifications required for those working on gas systems.

6. Together, these legislative frameworks ensure that Steadfast maintains a safe working environment and complies with its legal obligations regarding gas safety. Regular audits, staff training, and the use of certified professionals are essential components of this compliance.

RESPONSIBILITY FOR GAS SAFETY

7. Under the Gas Safety (Installation and Use) Regulations 1998, the **Managing Directors of Steadfast Security Group** hold ultimate responsibility for ensuring compliance with all duties related to gas and carbon monoxide safety across the organisation. This responsibility is **non-delegable**, meaning that while operational tasks may be assigned to competent personnel, the legal and strategic accountability remains with the Managing Directors.

8. Their responsibilities include ensuring that all **gas appliances, fittings, and flues** are installed, maintained, and operated in a safe condition to prevent gas leaks, explosions, and exposure to carbon monoxide. This involves overseeing:

- Regular inspections and servicing of gas systems.
- Compliance with all relevant safety standards and statutory regulations.
- The use of **Gas Safe-registered engineers** for any installation, maintenance, or repair work.
- The implementation of emergency procedures and controls to manage gas-related incidents.

9. This commitment to safety is essential for protecting the health and wellbeing of employees, contractors, and clients, and forms a critical part of Steadfast's overall health and safety strategy. Failure to comply with these responsibilities may result in legal consequences under the Health and Safety at Work etc. Act 1974 and associated regulations.

EMPLOYEE RESPONSIBILITY

10. All employees of Steadfast Security Group play a vital role in maintaining a safe working environment and are expected to remain vigilant for any signs of gas-related hazards as part of their daily routine. This proactive approach is essential in identifying potential issues before they escalate into serious incidents.

11. Employees should be alert to the following warning signs that may indicate a problem with gas appliances or systems:

- **Unusual smells**, particularly the distinctive odour of gas.
- **Discolouration of flames**, such as yellow or orange flames instead of the normal blue.
- **Soot or scorch marks** around appliances, vents, or flues.
- **Pilot lights that frequently go out** or fail to stay lit.
- **Unusual sounds** from gas appliances, such as hissing or popping.

12. If any of these signs are observed, or if there is any suspicion of a gas leak or malfunction, it must be reported **immediately** to the appropriate supervisor or manager. Prompt reporting allows for swift investigation and corrective action, helping to prevent accidents and protect the health and safety of everyone on site.

13. Employees are also encouraged to familiarise themselves with the location of gas shut-off valves and emergency procedures relevant to their work area. Regular awareness and engagement with gas safety protocols contribute to a culture of safety and accountability throughout the organisation.

ESCAPE OF GAS PROCEDURE

14. In the event that any employee, contractor, or visitor on Steadfast or client premises detects or suspects a gas leak, immediate action must be taken to ensure the safety of all individuals and prevent further hazards.

a. **Initial Reporting**: Any suspicion of a gas leak, such as the smell of gas or unusual appliance behaviour, must be reported **immediately** to a member of the **Maintenance Department**. Prompt reporting is critical to initiating a safe and effective response.

b. **Initial Response**: If it is safe to do so, the **Engineering Department** will take all reasonable steps to **shut off the gas supply** at the appropriate isolation point to prevent further escape of gas. No one should attempt to operate electrical switches (e.g. turning lights on or off) in the vicinity of the suspected leak, as this could ignite the gas.

c. **Ventilation**: All **doors and windows** should be opened to ventilate the area and disperse any accumulated gas. If mechanical ventilation is available and safe to use, it may also be employed.

d. **External Notification**: If the smell of gas persists after the supply has been shut off, or if gas continues to escape, **British Gas or Transco** must be contacted immediately via the **Emergency Gas Line: 0800 111 999**. This ensures that qualified emergency personnel can attend and assess the situation.

e. **Repairs and Reinstatement**: The Engineering Department will arrange for any necessary repairs to be carried out by **Gas Safe-registered engineers** or other suitably qualified personnel. Under no circumstances

should the gas supply be reinstated until all required safety checks and repairs have been completed and it is confirmed that the system is safe to use.

15. **Safety Assurance**: These procedures are essential to protect life, prevent injury, and minimise the risk of fire or explosion. All staff must be familiar with this protocol and act swiftly and responsibly in the event of a suspected gas escape.

SECURITY OPERATIVE SAFETY

SCOPE

1. Steadfast Security Group, which includes **Steadfast Security Solutions Limited** and **Complete Security (Europe) Limited**, places the highest priority on the **health, safety, and welfare** of its security operatives. This policy applies to all operational environments, whether personnel are deployed on **company premises** or **client sites**, and reflects the Group's commitment to maintaining safe working conditions across diverse and potentially high-risk settings.

2. The Group recognises the **unique challenges** faced by security personnel, including exposure to physical risks, lone working, and unpredictable environments. In response, Steadfast is dedicated to:

- Implementing **robust safety measures** tailored to the nature of security work.
- Providing **comprehensive training** to ensure operatives are equipped to manage risks effectively.
- Ensuring access to **appropriate resources**, including PPE, communication tools, and support systems.
- Promoting a culture of **proactive risk management** and continuous improvement.
- Complying with all relevant **health and safety legislation**, including the Health and Safety at Work etc. Act 1974.

3. This policy is **not applicable** to **Steadfast Security Systems Ltd** or **Steadfast Secure Storage Ltd**, whose operational activities fall outside the scope of this specific framework.

KEY LEGISLATION

4. The health and safety policy for security operatives at Steadfast Security Solutions Limited and Complete Security (Europe) Limited is underpinned by several key legislative frameworks that define employer responsibilities and set standards for workplace safety.

5. The Health and Safety at Work etc. Act 1974: This serves as the cornerstone of UK health and safety law. It places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others who may be affected by their work activities. This includes providing a safe working environment, appropriate equipment, and adequate training to manage risks effectively.

6. The Management of Health and Safety at Work Regulations 1999: This requires employers to take a proactive approach to risk management. These regulations mandate that employers carry out suitable and sufficient risk assessments, implement necessary control measures, appoint competent individuals to oversee health and safety, and provide employees with relevant information, instruction, and training. These duties are especially important in dynamic and potentially high-risk environments such as security operations.

7. The Workplace (Health, Safety and Welfare) Regulations 1992: This sets out minimum standards for the physical conditions of workplaces. These regulations cover essential aspects such as ventilation, temperature control, lighting, cleanliness, and the provision of welfare facilities including toilets, washing areas, and rest spaces. Ensuring compliance with these standards helps maintain a safe and comfortable working environment for all staff.

8. Together, these legislative frameworks guide Steadfast's approach to health and safety, ensuring that security operatives are protected and supported in every aspect of their work.

RISK ASSESSMENT AND MANAGEMENT

9. Effective risk assessment is a fundamental component of Steadfast Security Group's commitment to health and safety. It involves a systematic process of identifying potential hazards in the workplace, evaluating the likelihood and

severity of associated risks, and implementing appropriate control measures to eliminate or reduce those risks as far as is reasonably practicable.

10. This process begins with a thorough inspection of the working environment, tasks, and equipment used by security operatives. Hazards may include physical threats, environmental conditions, lone working scenarios, or interactions with the public. Each identified risk is assessed based on its potential impact and the probability of occurrence.

11. Once risks are evaluated, control measures must be applied using a structured hierarchy. This includes:

- **Elimination** – removing the hazard entirely.
- **Substitution** – replacing the hazard with a safer alternative.
- **Engineering controls** – isolating people from the hazard through physical means.
- **Administrative controls** – changing the way people work, such as implementing procedures or training.
- **Personal Protective Equipment (PPE)** – providing equipment to protect individuals when other controls are insufficient.

12. All findings from the risk assessment must be documented clearly and reviewed regularly, especially when there are changes in operations, equipment, or staffing. This ensures that safety measures remain effective and relevant.

13. By maintaining a proactive approach to risk management, Steadfast aims to minimise workplace incidents and foster a culture of safety and accountability across all operational environments.

TRAINING AND COMPETENCY

14. Steadfast Security Group is committed to ensuring that all security operatives are fully trained and competent to carry out their duties safely, effectively, and professionally. This involves delivering comprehensive training programmes that cover the full scope of their responsibilities and the challenges they may encounter in the field.

15. Training includes modules on **conflict management and dealing with aggression**, equipping operatives with the skills to de-escalate confrontational situations and protect themselves and others. Operatives also receive instruction on **emergency procedures**, ensuring they can respond swiftly and appropriately in critical situations such as fire, medical emergencies, or security breaches. In addition, **first aid training** is provided to enable operatives to offer immediate assistance in the event of injury or illness, contributing to a safer working environment.

16. To maintain high standards of competency, **regular refresher courses and assessments** are conducted. These ensure that operatives remain up to date with current legislation, best practices, and any changes in operational procedures or client requirements. Training records are monitored and reviewed by the Compliance and HR departments to ensure ongoing compliance and readiness.

17. This structured approach to training not only supports legal obligations but also reinforces Steadfast's commitment to the safety, professionalism, and development of its security personnel.

WORK ENVIRONMENT

18. Creating and maintaining a safe, healthy, and supportive work environment is essential for the wellbeing and performance of Steadfast's security operatives. This includes ensuring that all personnel have access to basic amenities such as **clean drinking water**, **toilet facilities**, and **designated rest areas**. These provisions are vital for promoting comfort, reducing fatigue, and supporting mental and physical health during long or demanding shifts.

19. In addition to welfare facilities, it is important to provide **ergonomic workstations** and **suitable equipment** that meet the specific needs of security roles. This includes items such as adjustable seating, appropriate footwear,

communication devices, and protective clothing. Properly designed and maintained equipment helps prevent musculoskeletal injuries and enhances operational efficiency.

20. To uphold these standards, Steadfast conducts **regular inspections and maintenance** of all facilities and equipment. This ensures that everything remains in good working order and continues to meet relevant **health and safety regulations**. Any issues identified during routine checks must be addressed promptly to prevent disruption and safeguard employee welfare.

21. By prioritising the quality of the work environment, Steadfast reinforces its commitment to the safety, comfort, and effectiveness of its security operatives across all sites.

INCIDENT REPORTING AND RESPONSE

22. Steadfast Security Group is committed to maintaining a safe and responsive working environment for all security operatives. A key part of this commitment is the establishment of clear and effective procedures for reporting and responding to incidents and accidents.

23. Security operatives must be able to report any incident promptly and easily. This includes accidents, near misses, or any situation that poses a risk to health and safety. A straightforward reporting process should be in place, supported by clear guidance on who to notify and how to escalate concerns. Immediate response actions may include securing the area to prevent further harm, administering first aid where necessary, and notifying relevant personnel such as supervisors or the Health and Safety Manager.

24. All incidents must be thoroughly documented. Reports should include a detailed account of what occurred, the actions taken in response, the individuals involved, and any witnesses. This documentation is essential not only for compliance and accountability but also for identifying underlying causes and preventing recurrence.

25. Incident reports should be reviewed regularly by management to identify patterns, recurring issues, or areas of concern. These reviews support continuous improvement by informing updates to risk assessments, training programmes, and operational procedures. By taking a systematic approach to incident reporting and response, Steadfast ensures that lessons are learned, risks are mitigated, and the safety of all personnel is prioritised.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

26. Steadfast Security Group is committed to ensuring the safety of its security operatives by providing **Personal Protective Equipment (PPE)** free of charge. PPE is a critical component of workplace safety, particularly in environments where operatives may be exposed to physical risks, hazardous substances, or unpredictable situations.

27. All employees will receive **training** on the correct use of PPE. This includes guidance on how to properly wear, remove, and dispose of equipment to prevent contamination or injury. Training will also cover the importance of using PPE consistently and correctly in accordance with operational procedures and risk assessments.

28. To maintain high safety standards, **regular inspections and maintenance** of PPE will be carried out. This includes checking for signs of damage, wear, or deterioration. Any equipment found to be defective or no longer fit for purpose will be replaced promptly.

29. Employees are encouraged to report any concerns about the condition or suitability of their PPE to their supervisor or the Compliance Manager.

30. By ensuring that PPE is available, properly maintained, and used effectively, Steadfast aims to minimise risk and protect the health and wellbeing of all security operatives across its operational sites.

CONSULTATION AND COMMUNICATION

31. Steadfast Security Group recognises the importance of actively engaging with employees on health and safety matters. Consultation involves seeking input from staff through regular meetings, feedback sessions, surveys, and open

forums. This collaborative approach not only helps identify potential risks and areas for improvement but also fosters a culture of shared responsibility and continuous safety enhancement.

32. Effective communication is equally vital. Health and safety policies, procedures, and updates must be clearly conveyed to all employees using accessible channels such as email bulletins, notice boards, team briefings, and structured training sessions. Ensuring that information is easy to understand and readily available helps reinforce safe working practices and supports compliance with legal obligations.

33. By maintaining open lines of communication and encouraging active participation, Steadfast ensures that all employees are informed, involved, and empowered to contribute to a safer working environment.

EMERGENCY PROCEDURES

34. Steadfast Security Group is committed to ensuring the safety of its security operatives through the development and communication of robust emergency procedures. These procedures are designed to provide clear guidance on how to respond effectively in the event of an emergency, whether on company premises or client sites.

35. A key component of this approach is the creation of detailed **fire safety and evacuation plans**. These plans outline the steps to be taken during an emergency, including the identification of **designated escape routes**, **emergency exits**, and **assembly points**. All employees must be familiar with these routes and understand the procedures for safely evacuating the premises.

36. To support this, all staff are required to undergo **regular training** on emergency protocols. This includes instruction on the location and proper use of emergency equipment such as **fire extinguishers**, **first aid kits**, and **alarm systems**. Training sessions should be tailored to the specific risks associated with each site and role.

37. In addition, **evacuation drills** must be conducted at regular intervals to reinforce these procedures and ensure that all personnel are confident in their ability to respond quickly and safely. These drills help identify any gaps in the process and provide opportunities for continuous improvement.

38. By maintaining clear, well-communicated emergency procedures and ensuring all operatives are trained and prepared, Steadfast aims to minimise risk and protect the wellbeing of everyone on site.

HEALTH MONITORING

39. Steadfast Security Group recognises that monitoring the health of employees and workplace conditions is essential to preventing illness and injury, particularly in roles that may involve physical exertion, lone working, or exposure to challenging environments. Regular health checks and assessments of working conditions help identify potential risks early and allow for timely intervention to protect employee wellbeing.

40. In addition to physical health monitoring, Steadfast is committed to supporting the **mental health** of its security operatives. The Group promotes a holistic approach to wellbeing through the provision of **wellness programmes**, which may include fitness initiatives, access to mental health resources, stress management workshops, and confidential counselling services. These programmes are designed to help employees manage work-related pressures and maintain a healthy work-life balance.

41. By fostering a supportive and proactive environment, Steadfast aims to ensure that all operatives feel valued, safe, and empowered to perform their roles effectively. Ongoing health monitoring not only contributes to individual wellbeing but also enhances overall operational resilience and safety.

LONE WORKING

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, recognises its legal and moral responsibility to effectively manage the risks associated with lone working. Steadfast is committed to taking all reasonable steps to ensure the safety and wellbeing of staff who are required to work alone while carrying out their duties on behalf of the organisation.

AIM

2. As part of its risk assessment process, Steadfast Security Group aims to raise awareness among all staff regarding the systems, procedures, and equipment that must be used to minimise the risks associated with lone working. By ensuring that employees are informed and equipped with the necessary tools and knowledge, Steadfast seeks to reduce the likelihood of incidents and promote a safe working environment for those carrying out duties alone.

KEY LEGISLATION

3. This policy is shaped by several key legislative and regulatory frameworks

4. Health and Safety at Work etc. Act 1974: This is the UK's primary legislation for workplace health and safety, placing a legal duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees, **including those working alone**. It requires employers to provide a safe working environment, suitable equipment, adequate training, and supervision, while also obligating employees to take reasonable care of their own safety and cooperate with health and safety measures.

5. Management of Health and Safety at Work Regulations 1999: This builds upon the Health and Safety at Work etc. Act 1974 by requiring employers to carry out suitable and sufficient risk assessments to identify potential hazards, including **those specific to lone working**.

6. Workplace (Health, Safety and Welfare) Regulations 1992: These set out minimum standards for working conditions in most UK workplaces, aiming to ensure the health, safety, and welfare of employees, **including those working alone**.

7. Provision and Use of Work Equipment Regulations 1998 (PUWER): These require all work equipment provided for use at work is suitable for its intended purpose, maintained in a safe condition, and used only by individuals who have received appropriate training. These regulations apply to all equipment, **including that used by lone workers**.

8. Personal Protective Equipment at Work Regulations 1992: These require employers to provide suitable personal protective equipment (PPE) to employees, **including lone workers**, where risks to health and safety cannot be adequately controlled by other means.

9. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR): These legally require employers, the self-employed, and those in control of work premises to report and record specific work-related incidents, including serious injuries, diagnosed industrial diseases, and dangerous occurrences such as near misses. **For lone workers**, this ensures that any significant incidents are properly documented and investigated, helping to identify risks, prevent recurrence, and improve workplace safety overall.

10. Employers' Liability (Compulsory Insurance) Act 1969: These require most UK employers to hold insurance that covers liability for bodily injury or disease sustained by employees during their employment. **This includes lone workers**, ensuring they are financially protected if harmed at work.

11. Equality Act 2010: The Equality Act 2010 protects individuals from discrimination based on nine protected characteristics. In the context of lone working, employers must ensure that arrangements do not disadvantage or exclude employees based on these characteristics.

DEFINITION OF LONE WORKING

12. The Health and Safety Executive (HSE) define lone workers as individuals who work by themselves without close or direct supervision. Lone working can generally be categorised into two main groups: **those based at fixed locations**, such as site agents or **homeworkers, and remote workers** who operate away from a fixed base, including drivers, healthcare professionals, social workers, and those involved in public protection. These roles may involve varying levels of risk, and as such, require appropriate measures to ensure the safety and wellbeing of the individuals involved.

POLICY STATEMENT

13. Steadfast Security Group is committed to protecting the health, safety, and wellbeing of all operatives and employees who are required to work alone or without direct supervision for extended periods. As far as is reasonably practicable, Steadfast will implement appropriate measures to minimise the risks associated with lone working. This commitment also extends to ensuring that any other individuals who may be affected by such work are adequately protected.

IMPLEMENTATION

14. The safety of all staff is of paramount importance to Steadfast Security Group. To support this commitment, the organisation will ensure that appropriate measures are in place to manage the risks associated with lone working.

15. Risk assessments will be conducted to identify potential hazards related to lone working. These assessments will help prioritise actions and allocate resources effectively to minimise identified risks. Based on the outcomes, Steadfast will develop procedures and introduce safe systems of work that incorporate appropriate support mechanisms for lone workers.

16. All staff will be provided with guidance materials covering personal safety and security considerations specific to lone working. In addition, suitable equipment, such as mobile phones and personal attack alarms, will be made available to enable staff to carry out their duties safely while working alone.

17. Training will also be provided to ensure staff are fully prepared to manage the risks associated with lone working. This training will cover key areas including emergency response procedures, managing violence and aggression, personal safety and security, and the use of support systems.

STEADFAST RESPONSIBILITIES

18. The **Managing Directors** of Steadfast Security Group are responsible for ensuring the consistent application of this lone working policy across the organisation. They are also accountable for monitoring its effectiveness and ensuring that sufficient resources are allocated to support the implementation and maintenance of lone worker systems throughout the Group.

19. **Managers with operational responsibilities**, reporting to Senior Managers, Professional Heads, or Department Heads, are expected to ensure that all staff are familiar with this policy and any supporting procedures or guidelines. They must confirm that staff understand their responsibilities and that risk assessments are carried out to identify and mitigate hazards associated with lone working. The findings of these assessments must be shared with staff, and appropriate control measures must be implemented and followed.

20. Managers are also responsible for ensuring that staff receive training on agreed procedures and safe systems of work, and that adequate resources are available to provide the necessary equipment to support lone working arrangements. These procedures and systems must be tested regularly to ensure they remain effective and are being followed correctly.

21. In addition, managers must ensure that relevant information is shared with other agencies when clients are jointly managed, and that all records of monitoring and incidents involving lone working are reported. This enables the organisation to review and, where necessary, revise its lone working systems to maintain a high standard of safety and compliance.

22. **All staff** have a duty to take personal responsibility for their safety while working alone. This includes reading and understanding the lone working policy and any supporting documentation, reviewing and retaining copies of relevant risk assessments, and raising any concerns or shortcomings in lone working arrangements with their manager. Staff must adhere to all procedures and systems developed for their protection, ensure their whereabouts are known when working alone, and report any incidents or concerns related to lone working to enable continuous improvement of safety measures.

RISK ASSESSMENT

23. Before any lone working activity is undertaken, a thorough risk assessment must be completed and the findings formally recorded. This assessment is essential to identify potential hazards and determine the necessary control measures to ensure the safety of staff working alone.

24. The assessment must consider a range of factors, including hazards present in the area to be visited or the workplace, and the methods of communication available. Where mobile phones are deemed necessary for lone workers, they must be provided to all relevant staff, regardless of their role or grade.

25. Additional considerations include the use of a "**buddy**" system in situations where risks are heightened or where the full history of a client is unknown. The potential for violence, the background of the client or employee, and whether it is safe to attend alone must also be evaluated. Specific risks to men, women, and young people working alone should be assessed, along with the individual's medical fitness and the possibility of illness or accidents, particularly when tasks involve physical activity such as using ladders or steps.

26. The assessment should also determine whether first aid training is required, how supervision or advice can be accessed, and what methods are in place for raising the alarm if contact is not made within an agreed timeframe. Risk assessments must be reviewed before each visit or whenever there is a known change in circumstances to ensure they remain current and effective.

AUDITS

27. To ensure the ongoing effectiveness of this policy and its implementation, Steadfast Security Group will conduct regular audits using a combination of internal audit processes and health and safety oversight. These audits will include a review of control measures identified through the risk assessment process, analysis of data from lone worker support systems, and evaluation of adverse incident reports and investigations to confirm that appropriate actions have been taken. The findings from these audits will inform any necessary updates or improvements to lone working procedures.

KEY PERFORMANCE INDICATORS

28. To measure the effectiveness of Steadfast's lone working policy, the following key performance indicators (KPIs) will be monitored: **completion of risk assessments** for all situations where staff are required to work alone; **maintenance of accurate records** of all training undertaken in relation to lone working; and the **provision and appropriate use of equipment** designed to support the lone worker system. These indicators will support continuous improvement and ensure compliance with safety standards.

GENERAL PROCEDURE ACTION

29. All staff must be integrated into the general lone working procedures to ensure their safety and accountability. Each operational area **must maintain a movement board** or have **access to an appointment diary** that clearly records key details, including the time of departure, expected time of return, the address and contact details of the visit location, and any relevant contingency plans. Where a staff member does not intend to return to a Steadfast site following their final visit of the day, they must notify the control room to confirm they have left their last location and to report that they are safe and well.

PROCEDURES

30. If a staff member fails to make contact with a designated colleague or prearranged unit **within 30 minutes of the expected time**, the following response procedure must be initiated.

a. The Control Room will first attempt to contact the employee via their mobile phone.

b. If unsuccessful, a call will be made to the employee's home number, highlighting the importance of maintaining up-to-date personal contact information.

c. If contact is still not established, the Control Room will begin contacting clients in reverse order of scheduled visits, starting from the most recent.

d. Finally, the line manager or duty manager must be informed to escalate the situation and take any further necessary action.

HOW TO RAISE THE ALARM

31. If a staff member fails to make contact within the agreed timeframe (**typically 30 minutes**), the following procedure must be initiated to ensure their safety and wellbeing.

32. The first step is to attempt to contact the staff member via their mobile phone or landline. If contact is successfully made, the following scripted protocol should be followed to assess the situation. If the staff member is able to answer but indicates they are in distress or facing an emergency, the designated emergency response procedure must be activated immediately.

Controller	**Lone Worker (Employee)**
"Are you okay?"	
	"Yes, can I have extension 1234?"
Extension 1234? – right away"	

End Call

Control Room / Buddy must dial 999 giving Police as much information as possible.

Alert their manager if they are in difficulty and not able to speak freely.

33. If the employee can answer and they are not in trouble, follow the procedure below:

Controller	**Lone Worker (Employee)**
"Are you okay?"	
	"Yes, all Okay"
Provide further instructions	

End Call

34. If **no** contact can be established / confirmed:

a. Control Room Operator / Buddy is to call the employee at home (up to date personal information is vital).

b. If visiting multiple locations, Control Room Operator / Buddy to contact clients in reverse order (last known backwards).

c. Control Room Operator / Buddy to contact pre-arranged POC.

d. Control Room Operator / Buddy to contact Duty Manager.

e. Control Room Operator / Buddy to call Police, providing as much information as possible.

HOUSEKEEPING

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, recognises that effective housekeeping is a fundamental component of maintaining a safe, healthy, and efficient workplace. This policy applies across all operational areas and sites managed by the Group.

2. Good housekeeping practices are essential for preventing accidents, reducing fire risks, improving hygiene, and ensuring that workspaces remain organised and hazard-free. These practices include the proper storage and disposal of materials, regular cleaning schedules, prompt spill management, and the clear marking of walkways and emergency exits.

3. By embedding housekeeping into daily routines and operational standards, Steadfast aims to promote a culture of safety and responsibility, ensuring that all employees contribute to maintaining a clean and orderly environment.

KEY LEGISLATION

4. The health and safety policy for housekeeping at Steadfast Security Group is guided by several core legislative frameworks that establish the legal responsibilities of employers and support the creation of safe, clean, and well-maintained workplaces.

5. The Health and Safety at Work etc. Act 1974 is the primary piece of legislation governing workplace health and safety in the UK. It places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others who may be affected by their activities.

6. The Management of Health and Safety at Work Regulations 1999 require employers to take a proactive approach to risk management. These regulations mandate that employers conduct suitable and sufficient risk assessments, implement appropriate control measures, appoint competent individuals to oversee health and safety, and provide relevant training and information to employees.

7. The Workplace (Health, Safety and Welfare) Regulations 1992 provide specific requirements for the physical conditions of workplaces. These regulations cover a wide range of issues including ventilation, temperature, lighting, cleanliness, waste disposal, and the provision of welfare facilities such as toilets and washing areas. Employers must ensure that workplaces are kept clean and free from hazards, with adequate space, safe flooring, and clearly marked traffic routes to prevent slips, trips, and falls.

ROLES AND RESPONSIBILITIES

8. **Managing Directors:** As the strategic leaders of Steadfast Security Group, Managing Directors hold ultimate accountability for ensuring that effective housekeeping standards are embedded across all operations. Their responsibilities include, however are not limited to:

- Setting the strategic direction for workplace housekeeping standards.
- Ensuring compliance with relevant health and safety legislation.
- Allocating appropriate resources to support effective housekeeping.
- Endorsing regular audits, training, and staff engagement initiatives.
- Promoting a culture of accountability and continuous improvement.

9. **Management:** Managers are responsible for implementing housekeeping policies and ensuring they are consistently applied across all departments and sites. Their responsibilities include, however are not limited to:

- Developing and implement clear housekeeping procedures.
- Communicating standards effectively to all employees.
- Monitoring compliance and take corrective action when necessary.
- Providing necessary resources such as cleaning supplies and equipment.
- Organising and deliver regular training sessions on housekeeping practices.

10. **Employees:** Employees play a key role in maintaining a clean and safe working environment through daily housekeeping practices and adherence to procedures. Their responsibilities include, however are not limited to:

- Maintaining cleanliness and organisation in individual work areas.
- Storing tools and materials properly and safely.
- Reporting any housekeeping-related hazards or issues promptly.
- Following established procedures for waste disposal and material handling.
- Attending and actively participate in housekeeping training sessions.

11. **Visitors:** Visitors, including contractors and clients, must cooperate with housekeeping and safety protocols while on Steadfast premises. Their responsibilities include, however are not limited to:

- Complying with all housekeeping and safety instructions provided during visits.
- Following designated routes and avoid restricted areas.
- Reporting any observed hazards to a member of staff.
- Cooperating with site rules to support a safe and orderly environment.

EFFECTIVE HOUSEKEEPING

12. Effective housekeeping is a critical component of workplace safety and operational efficiency. It involves maintaining a clean, organised, and hazard-free environment, which not only supports productivity but also significantly reduces the risk of accidents and injuries. When housekeeping is prioritised, tasks can be completed more safely and efficiently, contributing to a more professional and functional workspace.

13. In contrast, poor housekeeping can conceal hazards and contribute to unsafe conditions. The presence of clutter, debris, spills, or disorganised materials can lead to slips, trips, and falls, and may cause more serious health and safety risks to be overlooked. When untidiness becomes normalised, it can foster complacency and reduce awareness of potential dangers.

14. Implementing effective housekeeping practices yields numerous benefits. These include reduced manual handling due to improved material flow, fewer tripping and slipping incidents, and a significant decrease in fire hazards. It also helps lower exposure to hazardous substances, improves control over tools and equipment, and enhances the efficiency of cleaning and maintenance routines.

15. Additionally, good housekeeping contributes to better hygiene, which supports employee health and wellbeing. It allows for more effective use of space, reduces property damage through improved preventive maintenance, and lessens the burden on janitorial services. Importantly, a clean and orderly environment can also boost morale, creating a more positive and respectful workplace culture.

HOUSEKEEPING INSPECTIONS

16. To maintain high standards of cleanliness and safety across all Steadfast Security Group sites, management will conduct a formal **housekeeping inspection on the first Friday of each month**. These inspections will be carried out using the standard **Housekeeping Inspection Form** and assessed using the **Red, Amber, Green (RAG) marking guide**, which helps categorise findings based on severity and urgency.

- A **Red** rating indicates a serious hazard requiring immediate attention. All work in the affected area must cease until the issue is resolved. Repeated Red notices within a department may be considered non-compliance and could lead to disciplinary action.
- An **Amber** rating identifies a hazard that does not pose an immediate danger to people, property, or assets but must be rectified within **five working days**.
- A **Green** rating reflects good practice. Areas marked green demonstrate compliance and should maintain these standards consistently.

17. During inspections, particular attention will be given to key areas that impact safety and operational efficiency. These include:

- Ensuring **entrances, exits, pedestrian walkways, and roads** are clearly marked with signage and provide safe access and egress.
- Keeping **workbenches and worktops** free from unnecessary clutter and ensuring hand tools are not left near operating machinery.
- Identifying and eliminating any hazards that could cause **slips, trips, or falls**.
- Ensuring **firefighting equipment and fire exits** are unobstructed and easily accessible.
- Verifying that **staircases, landings, and floor openings** are properly guarded to prevent falls.
- Maintaining **storerooms** in a tidy condition, with shelving packed within safe working limits and clear access routes.
- Ensuring **flammable, toxic, and corrosive chemicals** are stored in accordance with legislation, such as within **COSHH-compliant lockers and registers**.

18. These inspections are a vital part of Steadfast's commitment to workplace safety and continuous improvement. They help identify risks early, reinforce accountability, and promote a culture of cleanliness and hazard awareness.

WASTE MANAGEMENT

19. Effective waste management is essential for maintaining a safe, clean, and compliant working environment across all Steadfast Security Group sites. All employees are responsible for ensuring that waste materials, including general waste, flammable substances, and combustible materials, are disposed of in accordance with relevant health, safety, and environmental regulations. Proper disposal practices help prevent workplace accidents, reduce fire risks, and minimise environmental contamination.

20. To support safe waste handling, Steadfast utilises covered, fire-resistant containers for the storage of waste. These containers are specifically designed to contain potential fire hazards and prevent the spread of flames, offering an added layer of protection in areas where flammable materials may be present. It is important that these containers are used correctly and always kept in good condition.

21. Regular disposal of waste is a key part of maintaining a hazard-free environment. Allowing waste to accumulate can lead to blocked walkways, increased fire risk, and the attraction of pests, all of which compromise safety and

hygiene. By ensuring waste is removed frequently and systematically, Steadfast promotes a clean and orderly workplace that supports both operational efficiency and employee wellbeing.

CONTINUOUS IMPROVEMENT

22. Steadfast Security Group is committed to the ongoing review and enhancement of its housekeeping policies and procedures. This commitment ensures that practices remain aligned with current industry standards, legal requirements, and operational needs. Regular updates will be made to reflect the latest best practices and to incorporate feedback from employees, helping to maintain consistently high standards of cleanliness, safety, and efficiency across all sites.

23. Employee involvement is a key part of this process. Steadfast actively encourages all staff to participate in identifying areas for improvement. Employees' firsthand experience and daily interaction with the workplace environment make their insights invaluable for spotting potential issues and suggesting practical, effective solutions. This collaborative approach not only strengthens the quality of housekeeping practices but also empowers staff to take ownership of workplace safety.

24. To support this, Steadfast will facilitate and implement employee-suggested improvements wherever feasible. By recognising and acting on staff contributions, the organisation fosters a culture of openness, accountability, and continuous improvement. This approach ensures that housekeeping standards evolve in line with operational demands and that all employees feel valued in shaping a safer, cleaner working environment.

WORKING AT HEIGHT

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is fully committed to safeguarding the health and safety of all employees who undertake work at height. The organisation recognises the inherent risks associated with such activities and adheres strictly to the requirements set out in the Work at Height Regulations 2005.

2. These regulations place specific duties on employers and individuals who control work at height operations, such as facilities managers or building owners who may engage contractors. In compliance with these duties, Steadfast ensures that all work at height is thoroughly planned and organised, and that those involved are competent and adequately trained. Risk assessments are conducted to identify hazards, and appropriate equipment is selected and used to mitigate those risks. Additionally, the company takes measures to manage the dangers posed by fragile surfaces and ensures that all equipment used for work at height is properly inspected and maintained.

3. Steadfast acknowledges that even relatively low heights, such as two metres above ground level, can result in serious injuries or fatalities. As such, it is company policy to implement specific precautions wherever there is a risk of falling. The organisation is aware that falls from height represent a significant proportion of accidents within the construction and related industries. To address this, Steadfast follows a hierarchy of controls aimed at eliminating or reducing these risks.

4. Where possible, work at height is avoided altogether. If avoidance is not feasible, the company employs suitable equipment or measures to prevent falls. In situations where the risk of falling cannot be eliminated, additional equipment or procedures are used to minimise both the distance and impact of any potential fall. Managers are responsible for continuously assessing work at height activities, particularly around leading edges or voids, and must ensure that appropriate edge protection is in place throughout the duration of the work.

KEY LEGISLATION

5. This policy is shaped by several core legislative frameworks that govern health and safety in the workplace, particularly in relation to working at height.

6. The Health and Safety at Work etc. Act 1974 serves as the foundation of workplace safety law in the UK. It places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others who may be affected by their work activities. This includes taking appropriate steps to prevent accidents and injuries resulting from work at height.

7. The Management of Health and Safety at Work Regulations 1999 build upon the 1974 Act by requiring employers to carry out suitable and sufficient risk assessments. These regulations also mandate the implementation of necessary control measures, the appointment of competent individuals to oversee safety, and the provision of relevant information, instruction, and training to employees.

8. The Workplace (Health, Safety and Welfare) Regulations 1992 address a broad range of basic health and welfare requirements in the workplace. These include provisions for adequate ventilation, lighting, cleanliness, and access to suitable welfare facilities—all of which contribute to a safe working environment, including when working at height.

9. The Work at Height Regulations 2005 are specifically designed to prevent death and injury caused by falls from height. These regulations apply to all employers and anyone who controls work at height activities, such as facilities managers or building owners. They require that all work at height is properly planned, supervised, and carried out by competent individuals. Employers must assess risks, select appropriate equipment, and implement measures to prevent or mitigate falls.

SCAFFOLDING

10. Scaffolding serves as a vital working platform for various site activities and must be erected, maintained, and used in accordance with strict safety standards. It is essential that all scaffolding is safe, regularly inspected, and complies with the regulations governing its construction and use. Platforms must be fully boarded, with guardrails and toe-boards securely installed around the entire working area. Where necessary, safety nets with appropriate fireproof ratings should be fitted to provide additional protection.

11. Under no circumstances should operatives alter or remove any part of the scaffold. Brick guardrails must be in place before any materials are loaded above the height of the toe-board. Operatives must use ladders or integrated staircases for access and must never climb the scaffold structure itself. Additionally, tools or materials must not be dropped or thrown from height to prevent injury to others below.

12. Scaffolding must be erected by trained and competent personnel. All accessible platforms **must be fitted with handrails at a minimum height of 950mm**, including an intermediate rail to ensure **no gap exceeds 470mm**. Toe-boards are required wherever tools, equipment, or materials are used or stored. Only qualified scaffolders are permitted to erect, alter, dismantle, or otherwise interfere with scaffolding structures.

13. All materials used in scaffolding must be properly stored and maintained on site. When scaffolding is erected by a specialist contractor, it must be formally approved, and a handover certificate must be issued and retained on site. Access must be provided via ladders or integrated staircases, and the scaffold must be adequately braced and securely tied to the structure to ensure stability.

14. Scaffolding must be inspected by a competent person before first use, after any incident that could affect its integrity, and at intervals not exceeding seven days. To prevent unauthorised access, particularly by children, scaffolds must be secured at the end of each working day. Where appropriate, a scaffold alarm system may be installed to enhance site security.

MOBILE TOWER SCAFFOLDS

15. Mobile tower scaffolds offer a versatile solution for providing elevated work platforms on site. To ensure their safe use, strict precautions must be followed during both erection and operation. All mobile towers must be assembled in accordance with the manufacturer's instructions to maintain structural integrity and safety.

16. Only trained operatives are permitted to erect mobile tower scaffolds. In cases where operatives are not fully trained, they may carry out the task only under the direct supervision of a competent person. Ideally, individuals involved in erecting, altering, or dismantling mobile towers should hold **PASMA (Prefabricated Access Suppliers' and Manufacturers' Association)** certification to demonstrate competence.

17. No person is allowed to erect, modify, or dismantle a mobile tower scaffold unless they are deemed competent to do so. Furthermore, all operatives working on or around the base of a mobile tower must always wear safety helmets to protect against falling objects and other hazards.

LADDERS AND STEPLADDERS

18. On Steadfast sites, ladders and stepladders are permitted only for access or for tasks that are light in nature and of short duration, **typically less than 30 minutes**. For any work beyond this scope, alternative access equipment must be provided to ensure safety and compliance.

19. Before using a ladder or stepladder, a risk assessment must be conducted to confirm that it is the most suitable option, based on the low-risk nature and brief duration of the task. Ladders must be inspected prior to each use, and any defects must be reported immediately to site management. Faulty equipment must be removed from service without delay.

20. Only trained and competent operatives are permitted to use ladders and stepladders. Competence includes understanding how to use the equipment safely and having received appropriate instruction or supervision.

21. For further guidance, operatives and managers should refer to the LA455 – Safe Use of Ladders and Stepladders, jointly produced by the Ladder Association and the Health and Safety Executive (HSE). This document replaces the previous INDG455 leaflet and provides practical advice on ladder selection, inspection, and safe usage practices. The guidance can be accessed directly via the HSE website or through the Ladder Association.

HOP UPS AND TRESTLES

22. Hop ups and trestles, often referred to as band stands, are not considered a preferred method of access for working at height on Steadfast sites. Their use must be justified through a formal risk assessment and will only be approved for light, straightforward tasks of short duration, where no other safer or more practical access method is reasonably available.

23. Where their use is deemed necessary, the preferred system is one that incorporates an integrated guardrail as part of the base stand, such as the 'Safe Stand' system. This ensures a higher level of protection for operatives and helps maintain compliance with site safety standards.

ROOF WORK

24. All roof work carried out on Steadfast sites will be carefully planned and executed to minimise risks to health and safety. A suitable and sufficient risk assessment must be completed prior to any activity, and appropriate control measures must be implemented. Only competent operatives, trained and experienced in roof work, will be permitted to undertake such tasks.

25. Roof work will only proceed where adequate edge protection is in place. This includes either a permanent parapet or guardrail system with a **minimum height of 950mm**, or a temporary external scaffold platform or guardrail system that meets regulatory standards. These measures are essential to prevent falls from roof edges, which remain one of the leading causes of fatalities in construction.

26. The use of personal fall protection systems, such as '**man-safe' systems**, **harnesses**, or **lanyards**, will not be permitted without prior consultation with the Health & Safety department. This ensures that such systems are only used when collective protection is not feasible and that they are properly assessed, installed, and maintained in line with the hierarchy of control outlined in the Work at Height Regulations 2005.

FALL PROTECTION EQUIPMENT

27. Personal fall protection equipment, such as harnesses and lanyards, will only be used by individuals who have received appropriate training and are deemed competent. This ensures that equipment is used correctly and safely, reducing the risk of injury during work at height.

28. All fall protection equipment, including harnesses, lanyards, anchor points, span sets, or similar systems, must be suitable for the specific task and thoroughly inspected before each use. If any defects or signs of damage are identified, the equipment must be reported to site management and immediately withdrawn from service.

29. Where practicable, fall restraint systems will be used in preference to fall arrest systems. Fall restraint prevents the user from reaching a position where a fall could occur, whereas fall arrest is designed to stop a fall once it has begun. Prioritising restraint systems aligns with the hierarchy of control and promotes safer working practices.

PERMIT TO WORK (PTW)

30. While there is no legal requirement to issue a Permit to Work (PTW), Steadfast has implemented this system as part of its commitment to maintaining a safe working environment. The PTW process ensures that all hazardous work, particularly work at height, is properly controlled and authorised before commencement.

31. A Work at Height PTW is required when external contractors are undertaking work at height on any Steadfast site or when Steadfast employees are performing tasks at height that fall outside their usual daily work activities.

32. The Health and Safety Manager is responsible for issuing all PTWs and maintaining accurate records of each permit issued. This system provides an additional layer of oversight and ensures that all necessary safety measures are in place before high-risk work begins.

MANUAL HANDLING

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to protecting the health, safety, and well-being of all employees, especially in relation to manual handling tasks.

2. Manual handling refers to activities such as lifting, carrying, holding, pushing, or pulling any object or load. These tasks are common across many roles and can pose risks if not performed correctly.

3. It's important to note that manual handling isn't limited to the workplace. Many of us carry out similar tasks at home, and safe handling techniques apply in all environments.

4. By promoting awareness and providing training, Steadfast aims to reduce the risk of injury and ensure that manual handling is carried out safely and responsibly across all sites.

KEY LEGISLATION

5. This policy is shaped by several key legislative frameworks that govern health and safety in the workplace, particularly in relation to manual handling.

6. The Health and Safety at Work etc. Act 1974 places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others affected by their work activities.

7. The Management of Health and Safety at Work Regulations 1999 require employers to carry out risk assessments, implement necessary control measures, appoint competent individuals, and provide appropriate information and training to employees.

8. The Workplace (Health, Safety and Welfare) Regulations 1992 cover a broad range of basic health and welfare requirements, including ventilation, lighting, cleanliness, and access to suitable facilities—all of which support safe manual handling practices.

9. The Manual Handling Operations Regulations 1992 are specifically designed to protect workers from injuries related to manual handling tasks such as lifting, carrying, pushing, and pulling. These regulations require employers to avoid hazardous manual handling where possible, assess unavoidable tasks, and reduce risks as far as reasonably practicable.

10. The HSE's guidance document INDG143 (rev4) provides practical advice on identifying hazardous manual handling activities. It includes simple risk filters for lifting, lowering, carrying, pushing, and pulling tasks, helping employers determine when a detailed assessment is needed and how to apply safe handling techniques effectively.

STEPS TO REDUCE THE RISK

11. Steadfast employees should follow three key steps to minimise the risk of injury during manual handling tasks: **Avoid**, **Assess**, and **Reduce**.

- **Avoid**: First, consider whether the object needs to be moved at all. Can the task be completed without relocating the item? If it must be moved, could it be done later with additional help or using mechanical assistance?

- **Assess**: Before starting the task, assess the risks involved. Look at the **load**, is it heavy, bulky, or awkward to grip? Consider the **task** itself, what movements are required, and how far will the item need to be carried or lifted? Finally, evaluate the **environment**, is the area clear, well-lit, and free from obstacles?

- **Reduce**: Once the risks are identified, take steps to reduce them. This might include using lifting aids or equipment, asking a colleague to assist, or adjusting the route to avoid hazards. Always choose the safest method available.

STEADFAST OBLIGATIONS

12. Under the Manual Handling Operations Regulations 1992, Steadfast is responsible for providing employees with relevant training, ensuring safe systems of work are in place, and making suitable manual handling equipment available. These measures are designed to reduce the risk of injury and promote a safer working environment.

13. However, employees also have responsibilities under these regulations. You must follow safe working procedures, use manual handling equipment correctly, and cooperate with your employer on all health and safety matters. If you identify any hazards, it's essential to report them promptly. Additionally, ensure your actions do not pose a risk to others on site.

14. Steadfast is committed to conducting thorough risk assessments in line with the regulations. Where significant risks are identified, a full review will be carried out to reduce the likelihood of injury. The findings of these assessments will be shared with all affected employees.

15. Each Head of Department or Supervisor is responsible for identifying items that may pose a manual handling risk. Where possible, changes to systems, workplace layout, or the use of mechanical aids will be introduced to reduce or eliminate manual handling. If these options are not feasible, support will be provided, including training in safe manual handling techniques.

16. It is company policy to train employees who are exposed to manual handling risks, whether from lifting heavy loads or repetitive movements, in correct techniques to minimise injury. All employees are encouraged to inform their supervisor of any manual handling-related issues, especially those affecting their health or wellbeing.

TRAINING

17. Where employees are exposed to risks from manual handling tasks, Steadfast will ensure they receive appropriate training. This training is designed to help staff understand the potential hazards and their responsibilities under health and safety regulations.

18. Training will cover the key risk factors associated with manual handling and explain how injuries can occur. Employees will learn how to identify and avoid unsafe practices.

19. Safe manual handling techniques will be taught, including correct lifting, carrying, and posture methods. Refresher training will be provided regularly to reinforce good habits and keep safety knowledge up to date.

20. Instruction will also include the correct systems of work for specific tasks and environments, ensuring employees understand how to apply safe practices in their day-to-day roles.

21. Where mechanical aids are available, training will include how to use them safely and effectively to reduce physical strain and injury risk.

22. Practical sessions will be included to allow trainers to observe employees and correct any unsafe techniques. This hands-on approach helps ensure that training is understood and applied correctly on site.

MANUAL HANDLING TOOLS

23. To support safe manual handling practices, the Health and Safety Executive (HSE) has developed a range of assessment tools that help employers identify and manage risks effectively.

24. The **MAC Tool (Manual Handling Assessment Charts)** is designed to highlight high-risk manual handling activities such as lifting, carrying, and team handling. It uses a colour-coded and numerical scoring system to indicate the level of risk and guide decision-making.

25. The **V-MAC Tool (Variable Manual Handling Assessment Charts)** complements the MAC tool and is used for tasks involving loads of varying weights, such as parcel sorting or order picking. It helps assess the cumulative impact of handling different items over time.

26. The **ART Tool (Assessment of Repetitive Tasks)** focuses on repetitive upper limb movements. It helps identify risks associated with tasks that involve frequent reaching, twisting, or gripping, and supports the development of safer work methods.

27. The **RAPP Tool (Risk Assessment of Pushing and Pulling)** is used to evaluate the risks involved in tasks such as moving trolleys, carts, or other wheeled equipment. It considers factors like force, posture, and distance to help reduce strain and injury.

28. These tools are freely available from the HSE and are valuable resources for improving manual handling safety across all work environments.

MANUAL HANDLING RISK ASSESSMENTS

29. A manual handling risk assessment is a structured process used to identify and evaluate the risks associated with tasks such as lifting, carrying, pushing, or pulling. Its purpose is to reduce the likelihood of injury by introducing effective control measures. These assessments must be carried out by a competent person or advisor.

30. An initial **generic assessment** should be completed to cover all manual handling activities across the workplace. This type of assessment applies to multiple employees, sites, or job types, and is suitable only when there are no individual or local factors, such as differences in physical capability or experience, that need to be considered.

31. If an employee routinely performs manual handling tasks, or if a specific task is flagged as medium or high risk in the generic assessment, a **task-specific assessment** must be conducted. This should consider the actual working environment and the individuals involved in the task.

32. By tailoring assessments to the nature of the work and the people performing it, Steadfast ensures that manual handling risks are properly managed and that employees are protected from avoidable harm.

MAKING AN ASSESSMENT

33. When carrying out a manual handling risk assessment, it's essential to consider several key factors to ensure a thorough and accurate evaluation.

a. **The Task**: Start by identifying the nature of the task, whether it involves lifting, carrying, pushing, or pulling. Consider how frequently the task is performed and for how long. Also assess the movements required, such as bending, twisting, or reaching, which may increase the risk of injury.

b. **The Individual**: Consider the physical capabilities of the person performing the task, including their strength, fitness, and any health conditions. Check whether they have received appropriate training and have experience with similar tasks. Personal factors such as age, gender, or medical history may also influence their ability to carry out the task safely.

c. **The Load**: Evaluate the load being handled. Consider its weight, size, and shape, and whether it is stable and easy to grip. Identify any hazardous properties, such as sharp edges, hot surfaces, or toxic materials, which may require additional precautions.

The Working Environment: Review the space and layout of the work area. Ensure there is enough room to move safely and that the floor is free from hazards like uneven surfaces, slippery patches, or obstructions. Environmental conditions such as poor lighting, extreme temperatures, or inadequate ventilation can also affect the safety of manual handling tasks.

NEW OR EXPECTANT MOTHERS

SCOPE

1. Steadfast Security, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, acknowledges its legal and ethical duty to safeguard the health, safety, and wellbeing of new and expectant mothers within the workplace. This commitment is rooted in both statutory obligations and a broader responsibility to foster a supportive and inclusive working environment.

2. The organisation recognises that new and expectant mothers may face unique health and safety challenges during pregnancy, maternity leave, and upon returning to work. Considering this, Steadfast is dedicated to ensuring that appropriate measures are taken to identify and mitigate any risks that could adversely affect their physical or psychological wellbeing.

3. To fulfil this responsibility, and in accordance with the requirements set out in The Management of Health and Safety at Work Regulations 1999, the company will conduct tailored risk assessments for all new and expectant mothers. These assessments are designed to identify any workplace conditions, tasks, or environments that may pose a risk during pregnancy or maternity. A dedicated risk assessment checklist has been developed for this purpose and will be completed collaboratively by the Health & Safety Manager and the individual concerned. This process ensures that any necessary adjustments or controls are implemented promptly and effectively, promoting a safe and supportive working experience throughout this important period.

KEY LEGISLATION

4. This policy is shaped by several key legislative frameworks that collectively establish the rights and protections afforded to new and expectant mothers in the workplace. These laws ensure that employers uphold their responsibilities to provide a safe, fair, and supportive working environment.

5. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of all employees and others who may be affected by their work activities. It underpins all workplace health and safety regulations and serves as the basis for more specific protections for vulnerable groups, including pregnant workers.

6. Management of Health and Safety at Work Regulations 1999: These regulations require employers to carry out suitable and sufficient risk assessments, particularly when informed that an employee is pregnant, has recently given birth, or is breastfeeding. Specific provisions (Regulations 16–18) mandate that employers identify and manage risks to women of childbearing age and take appropriate action based on medical advice. This includes modifying working conditions or hours, offering suitable alternative work, or suspending the employee on full pay if no safe alternative is available.

7. Workplace (Health, Safety and Welfare) Regulations 1992: Regulation 25 of these regulations requires employers to provide suitable rest facilities for pregnant and breastfeeding employees. These facilities must be conveniently located and appropriate for the needs of the individual, ensuring comfort and privacy.

8. Equality Act 2010: This act makes it unlawful to discriminate against employees on the grounds of pregnancy, maternity, or breastfeeding. It provides protection from unfair treatment and dismissal, regardless of length of service, and applies to a wide range of workers including agency staff and apprentices. Employers must ensure that pregnant employees are not treated less favourably and that any breach of health and safety obligations does not result in discriminatory outcomes.

9. Sex Discrimination Act 1975: Although largely superseded by the Equality Act, this legislation remains relevant in highlighting that failure to protect the health and safety of pregnant workers may constitute sex discrimination. It reinforces the principle that employers must take proactive steps to safeguard pregnant employees.

10. Employment Rights Act 1996: Section 67 of this act stipulates that if a pregnant employee or new mother cannot continue in her current role due to health and safety risks, she must be offered suitable alternative work on the same terms and conditions, including pay. If no such work is available, she may be suspended on full pay until it is safe for her to return.

NOTIFICATION

11. To ensure that appropriate health and safety measures are in place, it is essential that employees formally notify their line manager as early as possible when they become, or plan to become, a new or expectant mother. This written notification allows the organisation to take timely and proactive steps to assess any potential risks and implement reasonable adjustments that support both the individual's wellbeing and the safety of their baby.

12. Early disclosure enables the Health & Safety Manager to initiate a tailored risk assessment process, ensuring that any necessary modifications to working conditions, duties, or schedules can be considered without delay. It also allows the organisation to comply with legal obligations under relevant health and safety and employment legislation.

13. In addition to the initial notification, any concerns that arise during the course of employment, whether related to physical working conditions, emotional wellbeing, or specific job tasks, should be promptly communicated to the employee's manager. Open and ongoing dialogue is encouraged to ensure that any emerging risks are addressed swiftly and appropriately, fostering a safe and supportive working environment throughout pregnancy, maternity leave, and the return to work.

ASSOCIATED RISKS

14. Steadfast Security recognises that new and expectant mothers may be particularly vulnerable to certain workplace hazards due to the physiological and physical changes associated with pregnancy and early motherhood. As such, the organisation is committed to identifying and mitigating risks that could compromise their health, safety, or wellbeing.

15. Certain tasks and working conditions are considered high-risk and may pose significant danger to pregnant employees or those who have recently given birth. These activities should be avoided or modified wherever possible, and appropriate adjustments will be made to ensure a safe working environment. Examples of high-risk activities include:

- **Use of ladders** – This presents a risk of falls and instability, especially as balance and mobility may be affected during pregnancy.
- **Heavy lifting and manual handling** – These tasks can strain the musculoskeletal system and increase the risk of injury or complications.
- **Exposure to hazardous chemicals** – Some substances may be harmful to both the mother and the developing baby, requiring strict controls or reassignment.
- **Overhead stretching and reaching** – These movements can cause discomfort or imbalance and should be minimised.
- **Prolonged standing** – Extended periods of standing can lead to fatigue, swelling, and circulatory issues.
- **Pulling heavy trolleys or equipment** – This can place undue pressure on the body and increase the risk of strain or falls.
- **Working in confined spaces or areas with restricted access** – These environments may be difficult to navigate safely and comfortably during pregnancy.

16. In addition to these high-risk areas, there are tasks that may generally be considered safe but still require individual assessment and discussion. These activities should be reviewed on a case-by-case basis, taking into account the employee's health, stage of pregnancy, and any medical advice received. Examples include:

- **Light lifting** – Acceptable if within safe weight limits and performed with proper technique.
- **Normal security duties** – May be suitable depending on the nature of the role and any physical demands involved.
- **Housekeeping duties** – Generally safe but should be adapted if they involve repetitive motion or physical exertion.
- **Standing for limited periods** – Should be balanced with opportunities for rest and movement.
- **Administrative work** – Typically low-risk but should be ergonomically assessed to prevent strain.
- **Handling of light loads** – Acceptable with appropriate posture and support.

17. Steadfast encourages all employees to speak up if they are unsure about the safety of any task or working condition. Open communication is vital to ensuring that risks are properly managed and that new and expectant mothers feel supported throughout their employment. **If in doubt, ask!**

RISK ASSESSMENTS

18. Steadfast Security is committed to maintaining a safe and supportive working environment for all employees, including those who are pregnant, have recently given birth, or are breastfeeding. In line with UK health and safety legislation, we undertake both general and individual risk assessments to identify and manage any risks that may affect new and expectant mothers.

19. **General Risk Assessments:** As part of our standard workplace safety procedures, Steadfast ensures that all general risk assessments include consideration of the specific needs of employees of childbearing age. This includes evaluating tasks, work environments, and exposure to substances or processes that may pose a risk to pregnant workers or new mothers. Potential hazards identified in general assessments may include:

- Exposure to harmful substances (e.g., chemicals, biological agents)
- Physical strain from lifting, carrying, or repetitive movements
- Prolonged standing or sitting
- Extreme temperatures or poor ventilation
- Work-related stress or fatigue

20. Where risks are identified, Steadfast will implement appropriate control measures. These may include modifying tasks, adjusting work schedules, providing suitable rest facilities, or reassigning duties to reduce physical or emotional strain.

21. **Individual Risk Assessments:** Once an employee formally notifies Steadfast in writing of their pregnancy, recent childbirth (within the last six months), or that they are breastfeeding, a personalised risk assessment will be conducted. This assessment is designed to address any unique risks associated with the individual's condition, job role, and working environment. Key considerations in the individual risk assessment include:

- The nature of the employee's duties and physical demands
- Any medical advice or recommendations provided by a GP or midwife
- The stage of pregnancy and any health-related developments

- The suitability of the work environment, including access, ergonomics, and facilities

22. Based on the findings, Steadfast will take appropriate action to safeguard the employee's health and wellbeing. This may involve:

- Adjusting working hours or conditions
- Providing more frequent breaks or rest periods
- Modifying tasks to reduce physical exertion
- Offering suitable alternative work on the same terms and conditions
- Suspending the employee on full pay if no safe alternative is available

23. The individual risk assessment will be reviewed regularly throughout the pregnancy and after the employee returns to work, particularly if they are breastfeeding. This ensures that any changes in health status, job duties, or workplace conditions are promptly addressed.

SUPPORT AND FACILITIES

24. Steadfast Security is committed to providing appropriate support and facilities for new and expectant mothers, recognising the importance of their health, wellbeing, and comfort during pregnancy, maternity leave, and upon returning to work. These provisions are not only a legal requirement under UK workplace regulations but also a reflection of our dedication to fostering an inclusive and supportive working environment.

ANTENATAL APPOINTMENTS

25. Employees who are pregnant are legally entitled to paid time off to attend antenatal care appointments. This includes medical check-ups, ultrasound scans, and any other appointments recommended by a qualified healthcare professional, such as midwives or obstetricians.

26. Steadfast will ensure that scheduling for these appointments is handled with flexibility and sensitivity, allowing employees to attend without unnecessary stress or disruption to their work. Managers are expected to support these arrangements and maintain confidentiality throughout the process.

REST FACILITIES

27. In accordance with the Workplace (Health, Safety and Welfare) Regulations 1992, Steadfast will provide suitable rest facilities for pregnant and breastfeeding employees. These facilities are essential for promoting comfort, reducing fatigue, and supporting recovery during and after pregnancy.

28. Rest areas will be:

- Conveniently located, ideally near toilet facilities to minimise walking distances.
- Comfortably furnished, with seating and, where necessary, space to lie down.
- Private and quiet, ensuring a peaceful environment for rest or expressing milk.
- Hygienic and secure, with access to a clean fridge for storing expressed milk if required.

29. Toilets are not considered appropriate spaces for expressing milk or resting, and Steadfast will ensure that designated areas meet the required standards for privacy and cleanliness.

ONGOING SUPPORT

30. Steadfast encourages open and ongoing communication between employees and their managers regarding any additional support needs during pregnancy, maternity leave, or upon returning to work. This may include adjustments to work duties or hours, provision of additional breaks for rest or expressing milk, flexible working arrangements, and access to occupational health advice. By offering these forms of support and maintaining a responsive and inclusive approach, Steadfast aims to safeguard the health and wellbeing of new and expectant mothers while fostering a workplace culture rooted in respect, equality, and care.

NOISE

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to maintaining safe and comfortable working environments by effectively managing noise levels across all operational sites. This commitment extends to both our security operatives and the communities in which we operate, recognising that excessive noise can pose serious health risks and disrupt the quality of life.

2. To uphold this standard, Steadfast will conduct regular noise assessments to identify sources of excessive or harmful noise and implement appropriate control measures. These may include the use of quieter equipment, installation of sound barriers, and provision of suitable hearing protection where necessary.

3. Through continuous monitoring, staff training, and adherence to relevant health and safety regulations, we aim to minimise noise-related risks and promote a culture of awareness and prevention throughout the organisation.

KEY LEGISLATION

4. This policy is shaped by several key legislative frameworks that define Steadfast Security Group's responsibilities in managing workplace noise and protecting the health and wellbeing of employees and the public. These laws ensure that noise risks are identified, assessed, and controlled in accordance with national standards.

5. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of employees and others who may be affected by their work activities. It serves as the legal basis for all subsequent health and safety regulations, including those related to noise exposure.

6. The Control of Noise at Work Regulations 2005: These regulations are the primary legal framework for managing noise risks in the workplace. They require employers to assess noise exposure levels, take action to reduce risks, provide hearing protection where necessary, and ensure that legal exposure limits are not exceeded. Employers must also offer health surveillance (e.g., hearing checks) for employees regularly exposed to high noise levels (above 85 dB(A)).

7. The Environmental Protection Act 1990: This act empowers local authorities to investigate and take action against statutory nuisances, including noise that unreasonably interferes with the use or enjoyment of property or poses a risk to public health. It supports community-level noise control and complements workplace regulations.

8. The Control of Pollution Act 1974: This legislation provides local authorities with powers to regulate noise from construction sites, industrial premises, and other sources. It enables enforcement of noise limits and the use of abatement notices to prevent nuisance.

9. The Noise and Statutory Nuisance Act 1993: This act addresses noise from vehicles, machinery, and equipment in public spaces. It allows local authorities to issue abatement notices where noise is deemed excessive or harmful, reinforcing the need for responsible noise management in mobile and outdoor operations.

10. INDG362 (rev2): Noise at Work – A Brief Guide to Controlling the Risks: Published by the Health and Safety Executive (HSE), this guide outlines practical steps employers must take under the Control of Noise at Work Regulations 2005. It includes advice on assessing risks, choosing quieter equipment, providing hearing protection, and implementing health surveillance. It is a useful resource for both employers and employees in understanding their roles in noise risk management.

ROLES AND RESPONSIBILITIES

11. Effective noise control in the workplace requires a coordinated effort across several key roles within Steadfast Security Group. **Management** holds the primary responsibility for ensuring compliance with noise regulations and safeguarding employee wellbeing. This includes conducting regular noise risk assessments to identify and evaluate

potential hazards, implementing control measures such as engineering solutions (e.g., sound barriers) and administrative strategies (e.g., rotating shifts), and providing appropriate hearing protection. Management must also ensure that employees receive adequate training and information on noise risks and control procedures, and that noise levels and mitigation strategies are monitored and reviewed consistently.

12. **Employees** also play a vital role in maintaining a safe working environment. They are expected to use the hearing protection provided to them correctly and consistently, report any concerns related to noise exposure or equipment to their supervisors, participate in training sessions, and follow all established noise control procedures. Their cooperation is essential in ensuring that control measures are effective and that risks are minimised.

13. **The Health and Safety Manager** is responsible for overseeing the implementation of noise control policies and procedures across the organisation. This includes conducting regular inspections and audits to ensure compliance with relevant legislation, providing expert guidance and support to both management and staff, and investigating any noise-related incidents to identify root causes and recommend improvements.

14. In addition, **equipment manufacturers** have a responsibility to support noise control efforts by designing and producing low-noise machinery and tools. They must provide accurate information on the noise levels of their products, recommend appropriate control measures, and offer maintenance guidelines to ensure equipment continues to operate efficiently and quietly.

TYPES OF NOISE

15. Noise in the environment can originate from a variety of sources, each presenting different challenges in terms of control and impact. Understanding these types is essential for effective noise management within Steadfast Security Group's operations.

- **Environmental noise** refers to sound generated by transportation systems, including road traffic, railways, and aircraft. This type of noise is often continuous and widespread, affecting both workers and the surrounding community. It can contribute to long-term health issues such as hearing loss and stress, particularly in areas with high traffic volumes or near transport hubs.

- **Neighbour noise** typically arises from within or around residential properties. It includes sounds from domestic activities, such as loud music, barking dogs, or DIY work, as well as noise from neighbouring homes or gardens. While often considered a private nuisance, neighbour noise can become a workplace concern when security operatives are stationed in residential areas or respond to complaints involving domestic disturbances.

- **Neighbourhood noise** encompasses a broader range of community-based sources. This includes industrial operations, entertainment venues, commercial premises, construction sites, and street-level activities involving machinery or public events. Such noise can be intermittent or sustained and may significantly affect both employees and the public. Managing neighbourhood noise requires collaboration with local authorities and adherence to statutory regulations to prevent nuisance and ensure public safety.

NOISE LEVELS

16. Under the Control of Noise at Work Regulations 2005, specific noise exposure thresholds have been established to guide employers in managing risks and implementing appropriate protective measures. These thresholds are known as **exposure action values** and **exposure limit values**, and they trigger different levels of responsibility depending on the intensity and duration of noise exposure.

- **Lower Exposure Action Level**: This is set at a daily or weekly personal noise exposure of **80 dB(A)** or a **peak sound pressure level of 135 dB(C)**. When this level is reached or exceeded, employers are required to provide employees with information and training about noise risks and offer hearing protection upon request. This level serves as an early warning to begin proactive noise management.

- **Upper Exposure Action Level**: This is defined as a daily or weekly personal noise exposure of **85 dB(A)** or a **peak sound pressure level of 137 dB(C)**. At this threshold, employers must take more robust action,

including implementing noise reduction measures, enforcing the use of hearing protection, and establishing designated hearing protection zones.

- **Exposure Limit Value**: The maximum permissible daily or weekly personal noise exposure is **87 dB(A)**, even after accounting for the attenuation provided by hearing protection. The **peak sound pressure limit** is **140 dB(C)**. Employees must not be exposed to noise above these levels under any circumstances. Employers are legally obligated to ensure that these limits are not exceeded through engineering controls, administrative measures, or personal protective equipment.

NOISE RISK ASSESSMENT

17. A noise risk assessment is a critical component of Steadfast Security Group's commitment to protecting employees from the harmful effects of excessive noise exposure. It involves more than simply measuring decibel levels, it is a comprehensive evaluation of the working environment, tasks, and equipment to determine the potential risks to health and safety.

18. The assessment begins by identifying areas and activities where noise may pose a risk, and determining which employees are likely to be affected. This includes evaluating both **health risks**, such as hearing loss or tinnitus, and **safety risks**, such as impaired communication or inability to hear warning signals. The process should include an estimate of employees' noise exposure levels, referencing the thresholds outlined in the regulations (see "Noise Levels").

19. The assessment must also determine what actions are required to comply with legal obligations. This may involve implementing noise control measures, providing personal hearing protection, adjusting working practices, or establishing hearing protection zones. Additionally, the assessment should identify any employees who require **health surveillance**, such as regular hearing checks, and highlight individuals who may be at **particular risk**, including those with pre-existing conditions or increased sensitivity to noise.

20. Steadfast will ensure that all noise risk assessments are carried out by a **competent person** with the necessary training and expertise. These assessments will be **reviewed annually**, or sooner if there are significant changes to the working environment, equipment, or job roles that could affect noise exposure. This proactive approach ensures that risks are continuously monitored and managed, and that employees remain protected from the long-term effects of workplace noise.

CONTROL MEASURES

21. Managing noise effectively in the workplace requires a combination of engineering, administrative, and personal protective strategies. Steadfast Security Group is committed to implementing a layered approach to noise control, ensuring that risks are minimised at the source and that employees are adequately protected.

22. **Engineering controls** are the first line of defence and focus on reducing noise at its origin. This includes the use of **sound insulation**, where materials such as brick, concrete, or metal are used to create physical barriers that block or reflect sound waves. Additionally, **sound absorption** techniques involve installing materials like open-cell foams or fiberglass panels that absorb sound energy and convert it into heat, thereby reducing reverberation and overall noise levels. **Vibration damping** is another key method, where damping compounds are applied to machinery or structural surfaces to reduce the noise generated by mechanical vibrations.

23. **Administrative controls** involve changes to work practices and operational procedures to limit employee exposure to noise. This may include **modifying task schedules** so that noisy operations are carried out when fewer people are present, or **rotating staff** to ensure that no individual spends excessive time in high-noise areas. These measures help reduce cumulative exposure and allow for recovery periods.

24. Where noise cannot be sufficiently reduced through engineering or administrative means, **personal protective equipment (PPE)** becomes essential. Steadfast will provide suitable hearing protection devices, such as **earplugs or earmuffs**, to employees working in environments where noise levels exceed safe thresholds. Training will be provided to ensure correct and consistent use of PPE.

25. Additional control measures focus on **noise reduction at the source**. This includes **regular maintenance of equipment** to ensure it operates efficiently and quietly and **investing in low-noise machinery and tools** wherever possible. Proper upkeep not only extends equipment lifespan but also prevents unnecessary noise caused by wear and tear.

26. Finally, **design and layout considerations** play a crucial role in noise management. Increasing the **distance between noise sources and employees** can significantly reduce exposure, while installing **physical barriers** such as acoustic screens or partitions can block direct noise pathways and create quieter zones within the workplace.

27. Together, these control measures form a comprehensive strategy to manage noise risks, protect employee health, and maintain compliance with regulatory standards.

MAINTENANCE

28. Steadfast Security Group recognises its legal and operational duty to maintain all equipment and systems provided for the purpose of controlling noise in the workplace. Effective noise control is not a one-time solution; it requires ongoing attention to ensure that the measures in place continue to perform as intended. Even minor wear and tear or seemingly insignificant faults can drastically reduce the effectiveness of noise-reducing equipment, potentially exposing employees to harmful levels of noise.

29. To uphold this responsibility, Steadfast will implement a structured maintenance programme that includes regular inspections, servicing, and prompt repairs of all noise-control equipment. This includes sound barriers, acoustic panels, damping materials, and any machinery designed or modified to operate at reduced noise levels. The maintenance system will be overseen by competent personnel and integrated into the broader health and safety management framework.

30. By ensuring that all noise-control measures are kept in optimal condition, Steadfast aims to prevent deterioration in performance, maintain compliance with regulatory standards, and protect the long-term health and wellbeing of its workforce.

PERSONAL HEARING PROTECTION

31. Steadfast Security Group recognises that personal hearing protection plays a vital role in safeguarding employees from excessive noise exposure, particularly in environments where technical or organisational controls alone cannot reduce noise to safe levels. Hearing protection will be issued to employees in two key scenarios: firstly, where additional protection is required beyond what has been achieved through engineering or administrative noise control measures; and secondly, as a temporary solution while longer-term noise reduction strategies are being developed or implemented.

32. It is important to note that personal hearing protection is not a substitute for effective noise control at the source. Steadfast prioritises the use of technical and organisational methods, such as quieter equipment, sound barriers, and task rotation, to reduce noise exposure wherever possible. Hearing protection, such as earplugs or earmuffs, is considered a supplementary measure and will be provided alongside training to ensure correct and consistent use.

33. By integrating personal hearing protection into a broader noise management strategy, Steadfast aims to maintain compliance with legal standards and protect the long-term hearing health of its workforce.

TRAINING

34. Steadfast Security Group is committed to ensuring that all employees are properly trained to understand the risks associated with workplace noise and their responsibilities under the relevant regulations. Training is a vital component of our noise management strategy, equipping staff with the knowledge and skills needed to protect themselves and others from the harmful effects of excessive noise exposure.

35. Employees exposed to noise levels above the **lower exposure action value** (80 dB(A)) will be informed of their likely exposure and the potential risks this poses to their hearing health. They will be made aware of the control measures

in place to reduce noise, including engineering and administrative solutions, and will be shown where and how to access appropriate hearing protection.

36. Training will also cover how to identify and report defects in noise-control equipment and hearing protection, ensuring that any issues are addressed promptly to maintain effectiveness. Employees will be educated on their duties under the Control of Noise at Work Regulations 2005, including the proper use of noise-control equipment and personal protective devices.

37. In addition, staff will be introduced to Steadfast's **health surveillance systems**, which may include regular hearing checks for those exposed to high noise levels. This proactive approach helps detect early signs of hearing damage and ensures that appropriate interventions are made.

38. By providing comprehensive training, Steadfast aims to foster a culture of awareness, responsibility, and continuous improvement in noise risk management.

PERMITS TO WORK

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to ensuring the safety of its employees, contractors, and visitors through the effective management of high-risk activities via a structured Permit to Work (PTW) system.

2. This policy applies to all operations across Steadfast sites where work activities may present significant risks, including but not limited to hot works, electrical work, working at height, confined space entry, and intrusive maintenance tasks. The PTW system is designed to ensure that such activities are properly assessed, authorised, and monitored before commencement, and that appropriate control measures are in place to prevent accidents, injuries, or damage to property.

3. The scope of this policy includes the identification of work requiring permits, the roles and responsibilities of those involved in issuing and receiving permits, and the procedures for ensuring compliance with relevant health and safety legislation. It also covers the documentation, communication, and review processes necessary to maintain a safe working environment and uphold Steadfast's commitment to operational excellence and legal compliance.

KEY LEGISLATION

4. The Permit to Work (PTW) Policy at Steadfast Security Group is underpinned by several key pieces of UK health and safety legislation. These frameworks establish the legal duties and responsibilities of employers in managing high-risk activities and ensuring safe systems of work.

5. Health and Safety at Work etc. Act 1974 (HSWA): This foundational legislation sets out the general duties of employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others who may be affected by their work activities. The Act provides the overarching framework for workplace safety and supports the implementation of structured systems such as PTW to manage hazardous tasks effectively.

6. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations build on the HSWA by requiring employers to carry out suitable and sufficient risk assessments and implement appropriate control measures. The PTW system is a recognised method for managing specific high-risk activities, ensuring that hazards are identified, responsibilities are clearly defined, and safe procedures are followed. The regulations also emphasise the importance of training, coordination, and communication among all parties involved.

7. Construction (Design and Management) Regulations 2015 (CDM Regulations): The CDM Regulations apply to all construction-related activities and aim to improve health and safety throughout the lifecycle of a project, from design to completion. PTW systems are essential tools within the CDM framework, particularly for controlling high-risk tasks such as hot works, electrical isolation, confined space entry, and work at height. These regulations assign specific duties to clients, designers, contractors, and workers to ensure that risks are managed collaboratively and effectively.

ROLES AND RESPONSIBILITIES

8. The successful implementation of a Permit to Work (PTW) system relies on clearly defined roles and responsibilities to ensure that high-risk activities are properly assessed, authorised, and controlled. Each role within the PTW process plays a vital part in maintaining safety, compliance, and operational integrity across Steadfast Security Group.

9. **Permit Issuer**: The Permit Issuer is responsible for evaluating the proposed work and issuing the permit only after confirming that all necessary safety measures are in place. This includes detailing the scope of work, identifying potential hazards, and specifying the required control measures. The issuer ensures that the permit accurately reflects the risks and outlines the precautions to be followed before work begins.

10. **Permit Holder**: The Permit Holder is the individual who applies for the permit and is accountable for ensuring that the work is carried out strictly in accordance with the conditions specified. They must communicate the permit requirements to all team members involved in the task and supervise the work to ensure full compliance with safety protocols.

11. **Permit Approver**: The Permit Approver reviews the permit application to verify that all risks have been adequately assessed and controlled. They hold the authority to approve, suspend, or revoke the permit if safety conditions are not met or if circumstances change during the work. Their role is critical in maintaining oversight and ensuring that no work proceeds without proper authorisation.

12. **Work Supervisor**: The Work Supervisor monitors the work site throughout the duration of the permitted activity. They are responsible for ensuring that all safety measures are followed and that the work is performed in line with the permit's conditions. Regular inspections are conducted to identify any deviations, and corrective actions are taken as needed to maintain a safe environment.

13. **Employees / Workers**: All employees and contractors involved in the permitted work must follow the instructions and safety measures outlined in the permit. They are expected to report any unsafe conditions, equipment defects, or deviations from the permit requirements to the supervisor immediately. Their active participation is essential to the effectiveness of the PTW system.

14. **Health and Safety Manager**: The Health and Safety Manager provides overarching guidance on the PTW system and ensures that all personnel are trained and aware of their responsibilities. They conduct audits and reviews of the PTW process to assess its effectiveness, identify areas for improvement, and ensure ongoing compliance with health and safety legislation.

PERMIT TO WORK SYSTEM

15. Steadfast Security Group operates a structured Permit to Work (PTW) system designed to manage and control high-risk activities across all operational sites. This system ensures that potentially hazardous tasks are properly assessed, authorised, and monitored before work begins, helping to prevent accidents and maintain compliance with health and safety regulations.

16. The PTW system applies to specific categories of work that present elevated risks and require formal approval and control measures. These include:

- **Confined Spaces PTW** – Required for any work conducted in enclosed or partially enclosed spaces where there is a risk of hazardous atmospheres, restricted access, or limited ventilation.
- **Electrical Low Voltage PTW** – Covers work involving low voltage electrical systems, ensuring isolation procedures and safety protocols are followed.
- **Electrical High Voltage PTW** – Applies to work on or near high voltage systems, requiring strict controls and specialist authorisation.
- **Excavations / Permit to Dig PTW** – Necessary for any digging or trenching activities, particularly where underground services or structural risks may be present.
- **Hot Works PTW** – Required for tasks involving open flames, sparks, or heat-producing equipment, such as welding, cutting, or grinding.
- **Work at Height PTW** – Applies to any activity conducted above ground level where there is a risk of falling, including ladder use, scaffolding, and roof access.

17. Each permit type includes detailed documentation of the scope of work, associated hazards, control measures, and roles and responsibilities. The PTW system ensures that all relevant parties are informed, risks are mitigated, and work is carried out safely and in accordance with regulatory requirements.

PERMIT REQUESTS

18. To ensure that all high-risk activities are properly assessed and controlled, Steadfast Security Group requires that all work involving a Permit to Work (PTW) be carefully planned. Permit requests must be submitted by the designated **Permit Requestor** no later than **five working days** prior to the scheduled start of the activity. This lead time allows for thorough risk evaluation, coordination of safety measures, and proper authorisation of the work.

19. In exceptional circumstances where emergency or unplanned work arises, Steadfast will assess the situation on a case-by-case basis. The Health and Safety Manager will determine whether a permit can be issued under expedited conditions, ensuring that safety is not compromised despite the urgency.

20. All permit requests, regardless of type, must be submitted directly to the **Health and Safety Manager**, who is responsible for overseeing the PTW system and ensuring that all necessary documentation, risk assessments, and control measures are in place before work begins.

PERMIT REQUEST APPROVAL

21. Once all relevant documentation has been reviewed and agreed upon, including the Risk Assessment and Method Statement (RAMS), the asbestos register, and the proposed safe working methods, the Permit Requestor must formally submit the permit request. This submission should be made via email to **steven.hope@steadfastsecurity.co.uk**.

22. Following receipt of the request, the **Health and Safety Manager** will act as the **Permit Issuer**, responsible for initiating and completing the permit approval process. This includes verifying that all safety requirements have been met, confirming that the scope of work aligns with the permit type, and ensuring that all control measures are in place. Only once these conditions are satisfied will the permit be authorised for use.

23. This process ensures that all high-risk activities are properly assessed and controlled before work begins, maintaining Steadfast's commitment to safety, compliance, and operational integrity.

PERMIT ISSUE

24. Once a Permit to Work has been formally issued, all individuals involved in carrying out the task must strictly adhere to the conditions outlined within the permit. This includes following the agreed method statement without deviation, ensuring that all safety controls and procedures are implemented as specified. Compliance with the permit is essential to maintaining a safe working environment and preventing incidents.

25. If, during the work, changes to the scope or method of the activity become necessary, the current permit must be **safely terminated and formally closed** before any amendments are made. No work should continue under outdated or incorrect permit conditions. A revised risk assessment and method statement must be developed and agreed upon before a **new permit** is issued to reflect the updated task requirements.

PERMIT ACCEPTANCE

26. Before any work can commence under a Permit to Work (PTW), the permit must be formally accepted by the designated **Permit Acceptor**. This step confirms that the individual responsible for overseeing the task has reviewed the permit in full and agrees to the conditions outlined within it, including any associated documentation such as risk assessments, method statements, and site-specific arrangements.

27. By accepting the permit, the Permit Acceptor acknowledges their responsibility to ensure that all safety measures are followed and that the work is carried out strictly in accordance with the approved procedures. Only once this formal acceptance has been completed may the operator or work team begin the activity under the permit's authority.

28. This process ensures clarity, accountability, and a shared understanding of the safety requirements, helping to maintain control over high-risk tasks and uphold Steadfast's commitment to safe working practices.

PERMIT CLOSURE

29. Upon completion of the authorised work or when the permit reaches its expiry, whichever occurs first, the permit must be formally returned to the **Permit Issuer**. This step marks the official closure of the permit and confirms that the task has been concluded in accordance with the specified safety conditions.

30. Before the permit can be closed, a **visual inspection of the work area** must be jointly conducted by both the **Permit Requestor** and the **Permit Issuer**. This inspection ensures that the site has been left in a safe and compliant condition, free from residual hazards, waste materials, or equipment that could pose a risk to others.

31. The closure process is essential for maintaining control over high-risk activities and ensuring that the working environment is restored to a safe state. It also provides an opportunity to identify any lessons learned or improvements for future permit-controlled tasks.

AUTHORISER / ISSUER COMPETENCY

32. To ensure the safe and effective operation of the Permit to Work (PTW) system, Steadfast Security Group requires that individuals responsible for raising, approving, and issuing permits possess appropriate qualifications and training. Competency in these roles is essential for identifying hazards, assessing risks, and implementing suitable control measures for high-risk activities.

33. Permit Issuers and Approvers must hold either a **NEBOSH Certificate** or have completed **IOSH Managing Safely** training. These qualifications provide a solid foundation in occupational health and safety principles, risk management, and legal compliance. In addition to formal certification, individuals must also receive **task-specific training** relevant to the type of permit they are authorised to issue, such as confined space entry, hot works, or electrical isolation.

34. This combination of general health and safety knowledge and specialised training ensures that those managing the PTW process are equipped to make informed decisions, maintain regulatory compliance, and uphold Steadfast's commitment to workplace safety.

PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to protecting the health, safety, and welfare of its employees, contractors, and visitors across all operational environments.

2. As part of this commitment, the Group recognises its legal and moral obligation to provide suitable and sufficient Personal Protective Equipment **(PPE)** and Respiratory Protective Equipment **(RPE)** where risks to health and safety cannot be adequately controlled by other means. This includes, but is not limited to, environments involving physical hazards, exposure to harmful substances, or tasks requiring enhanced protective measures.

3. This arrangement applies to all personnel working under the Steadfast Security Group umbrella and is designed to support a safe working culture, reduce risk, and ensure compliance with the Personal Protective Equipment at Work Regulations 1992 (as amended), the Control of Substances Hazardous to Health (COSHH) Regulations, and other relevant legislation.

KEY LEGISLATION

4. This PPE Policy is shaped by several core legislative frameworks that define the legal duties of employers and employees regarding the provision, use, and management of Personal Protective Equipment (**PPE**) and Respiratory Protective Equipment (**RPE**) in the workplace.

5. Personal Protective Equipment at Work Regulations 1992 (PPER 1992): These require employers to provide suitable PPE to employees where risks to health and safety cannot be adequately controlled by other means. Employers must conduct thorough risk assessments to identify PPE needs, ensure that all equipment is appropriate for the task, compatible with other gear, and properly maintained. PPE must be provided free of charge, accompanied by clear training and instructions for its correct use. Employees are also expected to use the equipment responsibly and report any defects or concerns to ensure continued safety in the workplace.

6. Personal Protective Equipment at Work (Amendment) Regulations 2022: This amendment to the original 1992 regulations came into effect on 6 April 2022 and extends the employer's duty to provide PPE to include limb (b) workers, those who work under a contract for services, such as casual or freelance workers. Employers must ensure that all workers, regardless of employment status, receive appropriate PPE free of charge, along with training, maintenance, and support to ensure its correct and safe use.

7. Management of Health and Safety at Work Regulations 1999: These regulations establish a framework for managing health and safety in the workplace, requiring employers to carry out suitable and sufficient risk assessments and implement control measures. Where risks cannot be eliminated, PPE must be considered as part of a hierarchy of controls. Employers are also responsible for ensuring employees are trained, supervised, and informed about health and safety procedures, including the use of PPE.

8. Health and Safety at Work etc. Act 1974: As the foundation of health and safety law in Great Britain, this Act places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees. This includes providing and maintaining safe systems of work, supplying necessary PPE, and ensuring that employees are adequately trained and supervised in its use. The Act also outlines responsibilities for employees to cooperate with safety measures and use equipment properly.

RESPONSIBILITIES

9. **Board of Directors** hold overarching accountability for ensuring that the organisation meets its legal and ethical obligations regarding the provision and use of Personal Protective Equipment (PPE). Their role includes endorsing the PPE policy, allocating appropriate resources to support its implementation, and fostering a culture of safety throughout the organisation. The Board must ensure that senior leadership is empowered to enforce PPE standards and that systems are in place for monitoring compliance, reviewing performance, and responding to emerging risks. By providing strategic

oversight and leadership, the Board helps ensure that PPE is effectively integrated into the company's wider health and safety framework.

10. **Managers and Supervisors** play a pivotal role in ensuring the effective implementation and use of Personal Protective Equipment (PPE) across the workplace. They are responsible for conducting regular hazard assessments to identify risks that necessitate PPE, evaluating specific tasks to determine appropriate protective measures, and selecting PPE that is both suitable for the identified hazards and compliant with relevant safety standards. It is their duty to ensure that PPE is readily available to employees at no cost, and that systems are in place for its maintenance, cleaning, and timely replacement. Managers must also monitor PPE usage to confirm it is being worn correctly and consistently, and provide comprehensive training on its use, care, and limitations. This includes initial instruction upon issue and ongoing refresher sessions, especially when new equipment or risks are introduced. By fulfilling these responsibilities, managers and supervisors help foster a culture of safety and ensure PPE is used effectively to protect staff.

11. **Employees** also have essential responsibilities in relation to PPE. They must wear the provided equipment correctly and consistently whenever required, following all workplace safety protocols. Participation in training sessions, both initial and refresher, is mandatory to ensure they understand how to use, maintain, and store PPE properly. Employees are expected to inspect their PPE before each use, store it appropriately to prevent damage, and follow maintenance procedures as instructed. Any defects, damage, or concerns regarding PPE must be reported immediately to a supervisor to ensure prompt resolution. Additionally, employees are encouraged to provide feedback on the comfort and effectiveness of PPE to support continuous improvement in safety practices.

12. **The Health & Safety Manager** holds a strategic role in overseeing the PPE programme. This includes developing, implementing, and administering the PPE policy, ensuring it is communicated effectively and kept up to date with changes in legislation, workplace conditions, or emerging risks. The Health & Safety Manager is responsible for conducting detailed hazard assessments, evaluating the suitability of existing PPE, and maintaining thorough documentation of assessments and PPE selection rationale. They must also manage PPE inventories, track maintenance and replacement schedules, and maintain records of training sessions and incidents involving PPE. In addition, they are tasked with designing and delivering training programmes, offering guidance to staff and supervisors, and monitoring compliance with PPE procedures. Their oversight ensures that PPE is not only available and used correctly but also integrated into the wider health and safety management system.

13. **Visitors** to any Steadfast Security Group site or facility must also adhere to PPE requirements where applicable. It is the responsibility of the hosting manager or supervisor to ensure that visitors are informed of any PPE obligations prior to entering operational areas. Appropriate PPE must be provided to visitors free of charge, and guidance should be given on its correct use. Visitors are expected to wear the equipment as instructed and report any issues or discomfort immediately. While they are not subject to the same training requirements as employees, clear communication and supervision must be maintained to ensure their safety during their time on site.

14. **Contractors** working on behalf of the Steadfast Security Group are required to comply with all PPE requirements relevant to the tasks they are undertaking. Prior to commencing work, contractors must be informed of site-specific PPE standards and provided with appropriate equipment if not already supplied by their employer. It is the responsibility of the contracting company to ensure their personnel are trained in the correct use, maintenance, and limitations of PPE. Steadfast managers must verify that contractors are wearing PPE correctly and consistently, and that it meets the required safety standards. Any issues or non-compliance must be addressed immediately to maintain a safe working environment for all parties.

PPE REQUIREMENTS

15. All employees are responsible for ensuring that their Personal Protective Equipment (PPE) is properly maintained, clean, and in good working condition. PPE must be used as instructed and inspected regularly to ensure it continues to offer effective protection.

16. **Hi-Visibility Clothing:** Hi-visibility clothing must be manufactured to the EN ISO 20471 standard, which ensures garments provide enhanced visibility in high-risk environments. Clothing should include fluorescent fabric and retroreflective strips positioned to ensure visibility from all angles. The effectiveness of hi-vis garments depends on

cleanliness and correct wear. They must be worn when instructed by the employer, when required by the task or signage, or in conditions of reduced visibility, especially when working near vehicles or machinery.

17. **Hard Hats and Bump Caps:** Hard hats must comply with EN 397, offering protection against falling objects, impact, and penetration. They should be in good condition, fit securely, and not interfere with other PPE such as hearing protection. Chin straps must be fastened where fitted. Bump caps, compliant with EN 812, are suitable for low-risk environments where protection from minor bumps is needed. Helmets should be replaced every three years or sooner if damaged.

18. **Safety Goggles and Eye Protection**: Eye protection must meet EN ISO 16321 standards, offering protection against mechanical impact, chemical splashes, dust, and optical radiation. Goggles and safety glasses must fit properly and be stored in protective cases when not in use. They should be cleaned according to manufacturer instructions and replaced if visibility is impaired or damage is present. Use is mandatory when signage indicates, or when tasks involve exposure to flying debris, chemicals, dust, or intense light sources.

19. **Hearing Protection:** Hearing protection must comply with BS EN 352, which includes various sub-standards for earmuffs, plugs, and helmet-mounted devices. It should be used when noise levels exceed **85 dB(A)** or when other control measures are insufficient. Equipment must be comfortable, correctly fitted, and not cause overprotection that isolates the wearer. All hearing protection must carry conformity markings and be maintained in line with manufacturer guidance.

20. **Safety Gloves:** Safety gloves must meet EN ISO 21420 for general requirements, ensuring they are safe, comfortable, and suitable for the task. Additional standards apply depending on the hazard: EN 388 for mechanical risks, EN 374 for chemical protection, EN 407 for heat/flame, and EN 511 for cold. Gloves must fit properly, be free from damage, and not cause allergic reactions. They should be worn when handling sharp objects, chemicals, hot/cold materials, or when vibration or electrical hazards are present.

21. **Safety Footwear:** Safety footwear must comply with EN ISO 20345:2022, offering protection against impact (200J), compression, puncture, slips, and environmental hazards. Footwear should be appropriate to the task, comfortable, and regularly inspected for wear and tear. Features such as anti-static soles, water resistance, heat insulation, and metatarsal protection may be required depending on the work environment. Footwear must be worn when signage indicates, or when tasks involve manual handling, hazardous substances, or extreme temperatures.

22. **Safety Harnesses:** Safety harnesses must comply with BS EN 361, which sets out the requirements for full-body harnesses used to prevent falls from height. Under the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER), equipment used for lifting or lowering people must be safe and regularly inspected. Regulation 9 of LOLER requires that harnesses exposed to wear or environmental stress be examined every six months by a competent person. Special attention should be paid to webbing and rope components, which are prone to deterioration. Employees must be trained and assessed for competency in using fall protection systems. Harnesses must be worn when instructed, when required by the task or signage, and in accordance with the Work at Height Regulations 2005, which mandate fall arrest equipment for work at heights of 2 metres or more.

23. **Respiratory Protective Equipment (RPE):** RPE must be adequate and suitable for the intended use, offering effective protection against inhalation hazards. It **must be CE-marked** and selected, used, and maintained by trained personnel. RPE should be stored correctly and regularly inspected, tested, and maintained. It should only be used when a risk assessment identifies residual inhalation risks that cannot be controlled by other means. This includes short-term exposure, emergency escape, temporary failure of control systems, or emergency rescue operations. Employers must ensure RPE is fit-tested and appropriate for the wearer, task, and environment.

24. **Protective Clothing:** *EN ISO 20471:2013* – High-Visibility Clothing**,** *EN 13034:2005+A1:2009* – Chemical Protective Clothing (Type 6)**,** *BS EN 17673:2022* – Protection Against Heat and Flame**.** Protective clothing must be selected based on the specific hazards present, including chemical exposure, heat, flame, and visibility requirements. Clothing must be stored separately when contaminated, cleaned according to manufacturer instructions, and inspected for wear, damage, or loose seams before use. Chemical suits should not be used beyond their recommended breakthrough times, and decontamination may not always be effective. Loose clothing must not be worn near moving

machinery. Protective garments must be worn when instructed, when required by the task or signage, and in environments involving chemicals, explosive atmospheres, water sprays, radiant heat, welding, or electrical hazards.

TRAINING

25. Steadfast Security Group is committed to ensuring that all employees receive comprehensive training on the correct use of Personal Protective Equipment (PPE). This training will cover when PPE is required, how to properly wear and adjust it, its limitations, and the procedures for care, maintenance, and storage. The goal is to ensure that employees understand not only how to use PPE, but also why it is essential for their safety and the safety of others.

26. Training will be delivered during induction and refreshed periodically, especially when new equipment is introduced, tasks change, or updated legislation or standards come into effect. Practical demonstrations, visual aids, and hands-on sessions will be used to reinforce understanding and encourage correct usage.

27. All training sessions will be formally documented, including attendance records, topics covered, and any assessments conducted. Employees must demonstrate competence in PPE use through observation or practical assessment. Where gaps in understanding are identified, additional support and retraining will be provided.

28. Supervisors and managers are responsible for ensuring that training is completed and that employees are confident in using their PPE correctly. The Health & Safety Manager will oversee the training programme, ensuring it remains up to date and aligned with current legislation and industry standards.

COMPANY POLICY BY OPERATIONAL AREA.

29. Steadfast Security Group is legally obligated to safeguard the health and safety of all employees while they are engaged in company activities. In line with this duty, and following site-specific risk assessments, Steadfast will provide suitable Personal Protective Equipment (PPE) to employees **free of charge** wherever it is deemed necessary. The Personnel Department is responsible for the administration, issue, tracking, and replacement of all PPE across the organisation.

30. **Security Operatives:** Security Operatives are issued **hard hats**, **safety boots**, and **high-visibility jackets** as standard PPE. These items are essential for visibility and protection in environments where physical hazards or vehicular movement may be present. Additional PPE such as **safety glasses**, **gloves**, or **ear protection** may be provided based on client-specific health and safety requirements or site conditions. Operatives must wear PPE as instructed and report any defects or concerns immediately.

31. **Installation Teams:** Installation personnel may face varying levels of risk depending on the nature of the job. While some tasks may require minimal PPE, **safety boots**, **high-visibility jackets**, and **hard hats** are made available for use during installation work involving construction areas, elevated platforms, or exposure to moving equipment. Additional PPE will be issued where required by the task or client specifications.

32. **Office Staff:** Office-based employees typically operate in low-risk environments. However, PPE may be required when visiting operational sites or participating in activities outside the office. In such cases, appropriate PPE, such as **high-visibility vests**, **safety footwear**, or **hard hats**, will be provided. Office staff must follow all site-specific safety instructions and wear PPE when required.

33. **Drivers:** Drivers employed by Steadfast Secure Storage Ltd or other divisions are required to wear **high-visibility clothing** and **safety footwear** as standard. Depending on the nature of the delivery or collection site, additional PPE such as **gloves**, **hard hats**, or **eye protection** may be necessary. Drivers must ensure their PPE is kept clean, serviceable, and worn correctly when entering client premises, loading/unloading goods, or working in areas with moving vehicles or machinery.

34. **Warehouse Operatives:** Warehouse staff are issued **safety footwear**, **high-visibility clothing**, and **gloves** as standard PPE. These items are essential for protection against manual handling risks, vehicular movement, and contact with stored goods. Where tasks involve exposure to dust, chemicals, or noise, additional PPE such as **respiratory**

protection, **ear defenders**, or **eye protection** will be provided. Operatives must inspect their PPE regularly and report any damage or wear to their supervisor.

PPE INSPECTIONS

35. Monthly inspections of PPE are essential to ensure equipment remains safe and effective. Managers must inspect all PPE before use and once a month, checking for damage, wear, or defects. Any faulty equipment must be removed from service and replaced immediately. Employees should also inspect their PPE before each use and report any issues. Proper cleaning and storage are vital to maintain PPE performance and extend its lifespan.

PROCUREMENT

SCOPE

1. Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is dedicated to ensuring that all procurement activities across the group are conducted with integrity, fairness, and transparency.

2. This commitment applies to every stage of the procurement process, from initial sourcing and supplier selection to contract management and ongoing supplier relationships. We strive to foster a competitive environment that encourages innovation and value for money, while also maintaining ethical standards and compliance with relevant legislation and internal policies.

3. Furthermore, we recognise the importance of managing incumbent suppliers effectively. This includes regular performance reviews, clear communication, and collaborative problem-solving to ensure that our partnerships continue to meet the evolving needs of the business and support our strategic objectives.

KEY LEGISLATION

4. The procurement practices of Steadfast Security Group are shaped by several key legislative frameworks. These laws ensure that procurement activities uphold safety, fairness, and legal compliance across all areas of operation.

5. Health and Safety at Work etc. Act 1974 (HSWA): This foundational legislation places a duty on employers to safeguard, as far as is reasonably practicable, the health, safety, and welfare of employees and others affected by their work. In the context of procurement, this includes sourcing equipment and materials that meet safety standards and do not pose undue risk to users or the public.

6. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations build on the HSWA by requiring employers to carry out thorough risk assessments and implement appropriate control measures. When procuring goods or services, Steadfast must ensure that any equipment, substances, or systems introduced into the workplace are safe, suitable, and do not introduce new hazards.

7. Personal Protective Equipment at Work Regulations 1992 and Amendment 2022 (PPER): Under these regulations, Steadfast is required to provide suitable personal protective equipment (PPE) to employees at no cost. The 2022 amendment extends this duty to include limb (b) workers, those in more casual or non-standard employment arrangements, ensuring broader protection across the workforce. PPE must be properly assessed, maintained, and supported with training.

8. Control of Substances Hazardous to Health Regulations 2002 (COSHH): COSHH mandates that employers assess and manage risks associated with hazardous substances. This includes ensuring that any chemicals or materials procured are properly evaluated for health risks, stored safely, and accompanied by appropriate training and protective measures.

9. Provision and Use of Work Equipment Regulations 1998 (PUWER): PUWER requires that all work equipment provided is suitable for its intended use, maintained in a safe condition, and operated only by trained personnel. Procurement decisions must therefore consider the safety features, maintenance requirements, and compatibility of equipment with existing systems and processes.

10. Public Procurement Regulations 2015: These regulations govern how public sector organisations procure goods and services, with a focus on transparency, fairness, and compliance with EU-derived principles. When sourcing health and safety-related equipment or services, Steadfast must ensure that procurement processes are competitive, non-discriminatory, and aligned with legal thresholds and procedural requirements.

PERSONAL PROTECTIVE EQUIPMENT

11. Steadfast Security Group is committed to ensuring that all Personal Protective Equipment (PPE) procured and provided to employees meets the highest standards of safety and suitability. Before any PPE is selected, a comprehensive hazard assessment will be conducted to identify and evaluate potential risks in the workplace. This ensures that the chosen equipment is appropriate for the specific tasks and environments in which it will be used.

12. All PPE will be supplied to employees free of charge. It will be maintained in good working condition through regular inspections, servicing, and timely replacement when necessary. This proactive approach helps to prevent equipment failure and ensures continued protection for all personnel.

13. Training is a vital component of Steadfast's PPE policy. Employees will receive thorough instruction on the correct use, care, and limitations of their protective equipment. Refresher training will be provided periodically to reinforce safe practices and accommodate any updates in equipment or procedures.

14. To support effective implementation, Steadfast will actively monitor compliance with PPE requirements. Employees will be involved in the procurement process to ensure that their feedback and practical experience inform purchasing decisions. Strong relationships with trusted suppliers will be maintained to guarantee consistent quality and reliable delivery.

15. Detailed records of all PPE-related activities, including procurement, maintenance, training, and compliance checks, will be kept supporting accountability and continuous improvement. Regular reviews of PPE needs and updates to the policy will be carried out to reflect changes in workplace conditions, emerging risks, and evolving regulatory requirements.

16. All PPE purchase orders will specify that items must be CE marked, confirming that they meet European safety, health, and environmental protection standards.

PLANT EQUIPMENT AND MACHINERY

17. Steadfast will conduct hazard assessments before purchasing any plant equipment or machinery to ensure it meets safety standards, including certifications like CE marking where applicable. Supplier reliability and the provision of safety documentation are key considerations.

18. Pre-purchase inspections and demonstrations help confirm suitability and safety features. Once acquired, equipment must be installed correctly, with staff trained in its safe use and maintenance. Regular servicing ensures continued safe operation.

19. For second-hand machinery, even if CE marking is absent, suppliers must ensure it is safe and comes with usage instructions. Steadfast must verify that such equipment is safe to use, fit for purpose, and properly maintained.

FIRST AID SUPPLIES

20. Steadfast will assess workplace hazards to determine appropriate first aid provisions, ensuring compliance with health and safety standards. This includes essential items like bandages and antiseptics, as well as risk-specific supplies such as eyewash and burn dressings.

21. First aid kits must be clearly accessible, routinely checked, and restocked as needed. Employees will receive training on the location and proper use of supplies, with periodic refreshers to maintain awareness and readiness.

HAZARDOUS SUBSTANCES

22. When procuring hazardous substances, Steadfast will carry out detailed hazard assessments to identify specific risks and ensure full compliance with applicable health and safety legislation. This includes the Control of Substances Hazardous to Health (COSHH) Regulations 2002 and the Chemical Hazards Information and Packaging Regulations

1997. Substances selected must pose the lowest possible risk, be properly labelled and stored, and be accompanied by comprehensive safety data sheets.

23. Steadfast will establish clear procedures for the safe handling, use, and disposal of hazardous substances. Employees will receive appropriate training to ensure they understand and follow these procedures effectively.

24. To maintain a safe working environment, safety measures will be regularly monitored and reviewed, ensuring they remain effective and aligned with current regulations and operational needs.

VEHICLE PURCHASE

25. When procuring vehicles, Steadfast will assess safety requirements through hazard evaluations and ensure compliance with health and safety regulations. Vehicles must include key safety features such as forward collision warning, automatic emergency braking, and lane departure warning.

26. Environmentally friendly options, like electric or hybrid models, will be prioritised to support sustainability goals. Supplier selection will consider safety credentials and environmental performance, ensuring vehicles meet required standards and certifications.

27. Employees will receive training on safe vehicle operation and maintenance, supported by regular inspections and servicing to maintain safety and compliance.

TRAINING

28. When procuring health and safety training, Steadfast will assess workplace needs to ensure compliance with regulations and select reputable providers offering industry-standard courses. Training will cover key topics such as risk assessment, emergency procedures, and PPE use.

29. Courses will be tailored to specific workplace hazards and include both initial and refresher sessions. Training records will be maintained and regularly reviewed to support ongoing compliance and effectiveness.

RADIOACTIVE MATERIAL OR APPARATUS

30. In the UK, the procurement of radioactive materials or apparatus is strictly regulated to ensure safety and legal compliance. Before acquisition, approval must be obtained from the Environment Agency or other relevant authority. Materials must meet acceptable radiation levels and must not contain unauthorised radioactive substances.

31. Organisations must consult a qualified Radiation Protection Adviser (RPA) and complete all required documentation, including detailed risk assessments. Compliance with the Ionising Radiations Regulations 2017 (IRR17) and the Environmental Permitting (England and Wales) Regulations 2016 is mandatory. These regulations govern safe use, storage, transport, and disposal of radioactive substances, ensuring protection for employees, the public, and the environment.

EQUIPMENT HIRE

32. Steadfast requires hire companies to supply equipment that is safely designed, manufactured, and maintained for its intended use. Any equipment powered by mains electricity must have a valid test certificate.

33. For automotive hire equipment used on public roads, appropriate motor vehicle registration is mandatory to ensure legal compliance and safe operation.

ELECTRICAL EQUIPMENT

34. Steadfast will ensure that all electrical equipment procured complies with the Electrical Equipment (Safety) Regulations 2016, which require products to meet essential safety standards before being placed on the UK market. This

includes verifying that manufacturers have conducted conformity assessments, prepared technical documentation, and affixed the **UKCA marking** (or CE marking, where still accepted) to demonstrate compliance.

35. Procurement must follow principles of transparency, non-discrimination, and equal treatment to ensure fair competition and value for money. Importers and distributors also have legal responsibilities to confirm that equipment is safe and compliant before supply.

SAFE USE OF WORK EQUIPMENT POLICY

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to promoting the safe and responsible use of work equipment throughout all areas of its operations. This commitment is embedded in our health and safety framework, supported by regular employee training on the correct use, inspection, and maintenance of equipment.

2. In accordance with the Provision and Use of Work Equipment Regulations (PUWER) 1998, Steadfast will ensure that all machinery and equipment used by personnel is safe, suitable for its intended purpose, and does not pose a risk to users or others who may be affected. Where hazards are identified, appropriate risk assessments will be conducted.

3. All equipment will be subject to routine inspection and maintenance to guarantee ongoing safety and compliance. The Health & Safety Manager will be responsible for maintaining accurate records of all inspections and servicing activities.

KEY LEGISLATION

4. This policy is shaped by several key legislative frameworks that govern the safe use of work equipment across Steadfast Security Group.

5. The Provision and Use of Work Equipment Regulations (PUWER) 1998 require that any equipment provided for use at work is appropriate for its intended purpose, safe to operate, properly maintained, and only used by individuals who have received adequate training. These regulations form the foundation for ensuring equipment safety and competency in its use.

6. The Health and Safety at Work etc. Act 1974 outlines the general duties of employers to safeguard the health, safety, and welfare of their employees. This includes ensuring that all work equipment is used safely and does not pose a risk to users or others affected by its operation.

7. Under the Management of Health and Safety at Work Regulations 1999, employers are required to carry out thorough risk assessments and implement suitable control measures to manage risks associated with work equipment. These regulations reinforce the importance of proactive risk management and continuous safety improvement.

8. The Workplace (Health, Safety and Welfare) Regulations 1992 address various aspects of workplace safety, including the upkeep of equipment and the provision of a safe and healthy working environment. These regulations ensure that the physical conditions in which equipment is used support safe and effective operations.

OPERATION OF EQUIPMENT & MACHINERY

9. Steadfast Security Group maintains a strict policy that only authorised, and appropriately trained personnel are permitted to operate equipment or machinery that presents significant risks. Documented training will be provided to selected employees, focusing on the correct and safe use of such equipment and machinery to ensure competence and reduce risk.

10. Special consideration is given to young persons who may be required to use potentially hazardous equipment. In these cases, strict supervision will be enforced, and additional safety measures will be implemented to protect their wellbeing.

11. In line with Regulations 11, 12, and 13 of the Provision and Use of Work Equipment Regulations (PUWER) 1998), Steadfast will take all necessary steps to prevent access to dangerous parts of machinery and other hazards identified through risk assessments. This will typically involve the use of appropriate guarding and safety features designed to eliminate or reduce exposure to risk.

12. A machine part is considered dangerous if it has the potential to cause injury, regardless of whether it is powered or manually operated. Importantly, a part does not need to be in motion to be hazardous, examples include hot surfaces or exposed electrical components. All such parts must be securely guarded to prevent accidental contact and ensure safe operation.

HAND TOOLS

13. Injuries from hand tools often occur when the wrong tool is used for the task or when the tool is in poor condition. It is essential to always use the correct tool for the job and avoid makeshift solutions. Tool handles should be smooth and free from cracks, rough surfaces, or improvised repairs. Sharp or pointed tools must not be carried in pockets, and cutting tools such as knives should be kept sharp, used with care, always cutting away from the body, and stored with their edges protected. When using screwdrivers, the correct size should be selected, and work should be secured rather than held by hand to prevent slips. Similarly, the correct size spanner should be used, with ring spanners preferred over adjustable ones where possible. Pliers or similar tools should never be used as substitutes for spanners, and spanners or wrenches must not be used as hammers.

PUWER

14. Steadfast Security Group acquires and utilises a wide range of work equipment across its offices, residential homes, catering facilities, and special projects, all of which are subject to regulatory requirements, including vehicles. In line with the Provision and Use of Work Equipment Regulations (PUWER) 1998, Steadfast is committed to ensuring that all equipment is appropriate for its intended use and operated in a manner that does not compromise the health and safety of employees, service users, or others, regardless of the equipment's age, condition, or origin.

DEFINITIONS

15. For the purposes of this policy, "**work equipment**" refers to any machinery, appliance, apparatus, tool, or installation used in the course of work. The term "**use**" encompasses all activities involving work equipment, including starting, stopping, programming, setting, transporting, repairing, modifying, maintaining, servicing, and cleaning.

SUITABILITY

16. Managers and those responsible for specifying, ordering, or overseeing work processes involving equipment must ensure that all equipment is appropriately constructed or adapted for its intended use, selected with consideration for the working conditions and the health and safety of users, and only operated under conditions for which it is suitable. This includes evaluating risks associated with specific environments, such as wet, hot, cold, or steamy conditions commonly found in catering, and choosing safer alternatives where practical, such as using scissors instead of knives with exposed blades.

17. Equipment must be assessed for suitability on a case-by-case basis, and all machinery and tools must be subject to a formal risk assessment in line with Steadfast's arrangements for managing workplace hazards.

MAINTENANCE

18. Managers and personnel responsible for maintenance must ensure that all work equipment is kept in an efficient state, maintained in effective working order, and in good repair, in full compliance with PUWER requirements. Maintenance logs must be kept up to date and readily available for inspection, supported by relevant documentation such as service certificates. This often involves routine and planned preventive maintenance, with checks prioritising safety, operational performance, and the general condition of the equipment.

19. Maintenance tasks must only be carried out by individuals with the appropriate skills and competencies, as not all professionals, for example, electricians, may be familiar with specialised systems like CCTV. Additionally, inspection and certification of all gas and electrically powered equipment, including items like refrigerators, should be recorded to demonstrate safe and efficient operation at the time of testing.

INSPECTIONS

20. Work equipment whose safety depends on installation conditions must be inspected after initial installation and before first use, as well as following assembly at a new site or location, to confirm correct setup and safe operation. Equipment exposed to conditions that may cause deterioration and lead to hazardous situations must be inspected at appropriate intervals and following any exceptional circumstances.

21. All inspections must be carried out by competent individuals and may range from simple visual checks to detailed examinations involving dismantling or testing.

22. Accurate records must be maintained, including equipment identification, location, inspection dates and times, faults found, actions taken, the person responsible for the inspection, repair details, and the date of the next scheduled inspection.

23. Manufacturer guidelines should be used to inform inspection schedules and procedures.

SPECIFIC RISKS

24. When the use of work equipment presents specific risks, its operation must be restricted to individuals who have been formally designated and trained for that task. In some cases, all employees may be required to use certain equipment, in which case they must be appropriately authorised and trained.

25. Designated users must receive suitable training to ensure they can operate the equipment safely and competently. This training may take various forms depending on the nature of the equipment and the level of risk involved. It could include one-to-one, on-the-job instruction from an experienced colleague or supervisor, formal training provided by the equipment manufacturer or installer, or attendance at a specialist training course.

26. Less formal training may also be based on manufacturer guidelines, user manuals, or internal procedures. Regardless of the format, all training must be documented and evidenced to demonstrate compliance and competence.

27. As with any workplace hazard, risks associated with work equipment must be managed using the hierarchy of control measures outlined in Steadfast's arrangements for risk assessment. This ensures that risks are identified, evaluated, and controlled effectively.

INFORMATION, INSTRUCTION AND TRAINING

28. Anyone who uses work equipment must be provided with adequate health and safety information, along with written instructions where appropriate, to ensure safe and effective use. This includes clear guidance on the equipment's operation, associated hazards, and the precautions necessary to minimise risks.

29. Training must also be provided to ensure users understand the correct methods for operating equipment safely. This requirement extends to individuals who supervise the use of work equipment, even if they do not operate it themselves.

30. Particular attention must be given to the training of young persons, as they may be more vulnerable to risks. A specific risk assessment should be carried out to address their needs. In cases where service users are operating equipment and lack work experience, it may be appropriate to treat them as young persons for the purpose of health and safety assessments.

CONFORMITY WITH COMMUNITY REQUIREMENTS

31. When purchasing new work equipment, Steadfast must ensure that it complies with relevant European Directives. This includes verifying that the equipment bears a valid CE marking, is accompanied by suitable operating instructions, and is supported by a Certificate of Conformity. These requirements help confirm that the equipment meets essential health and safety standards and is safe for use within the workplace.

MARKINGS AND WARNINGS

32. Work equipment must display all necessary markings and warnings to ensure safe use and protect health and safety. These may include indicators such as maximum safe working loads, temperature limits, rotation speeds, and the presence of hazardous substances. All markings and warnings should be clearly visible or audible under normal working conditions, easy to understand, and unambiguous. They must also be distinguishable from other signage or alerts to prevent confusion and ensure users can respond appropriately to potential risks.

IMPLEMENTATION

33. Managers are responsible for ensuring the effective implementation of this arrangement and must review its application at least annually, taking into account operational experience and any changes in work practices or equipment. This review process helps maintain compliance and supports continuous improvement in equipment safety.

34. Employees are expected to fully cooperate with Steadfast in the implementation of this arrangement, including following procedures, attending training, and reporting any concerns or issues related to equipment use.

35. Additionally, managers must incorporate compliance with this arrangement into their annual safety audits, ensuring that all aspects of equipment use, maintenance, and training are being properly managed and documented.

SAFETY INSPECTIONS & REPORTING PROCEDURES

SCOPE

1. The Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is fully committed to upholding the highest standards of health and safety across all areas of its operations. This commitment extends to the safe use, maintenance, and inspection of work equipment, ensuring that all activities are carried out in accordance with relevant legislation and best practice.

2. Through robust inspection protocols, thorough reporting procedures, and continuous staff training, Steadfast aims to minimise risk and promote a culture of safety and accountability. This policy applies to all employees, contractors, and visitors who interact with work equipment across the organisation's sites and forms a key part of our wider compliance and operational framework.

KEY LEGISLATION

3. This policy is shaped by several important legislative frameworks that ensure employees are actively involved in health and safety matters.

4. **Health and Safety at Work etc. Act 1974:** This is the foundational legislation for workplace health and safety in the UK. It places a duty on employers to ensure, as far as is reasonably practicable, the health, safety, and welfare of employees. It underpins all safety inspection requirements by mandating safe systems of work and regular monitoring.

5. **Management of Health and Safety at Work Regulations 1999:** Requires employers to carry out risk assessments and implement preventive and protective measures. It also mandates regular inspections to ensure these measures remain effective and relevant.

6. **Workplace (Health, Safety and Welfare) Regulations 1992:** Covers the physical conditions of the workplace, including cleanliness, lighting, ventilation, and maintenance. Safety inspections help ensure compliance with these standards.

7. **Provision and Use of Work Equipment Regulations (PUWER) 1998:** Requires that work equipment is suitable, safe, and maintained in good condition. Regular inspections are essential to verify equipment safety and identify faults.

8. **Lifting Operations and Lifting Equipment Regulations (LOLER) 1998:** Mandates thorough examination and inspection of lifting equipment to ensure it is safe for use. Inspections must be carried out by competent persons at specified intervals.

9. **Regulatory Reform (Fire Safety) Order 2005:** Requires that fire safety measures, including escape routes and fire-fighting equipment, are regularly inspected and maintained. Walkways and exits must always remain clear.

10. **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013:** Requires employers to report certain incidents. Safety inspections help identify and prevent conditions that could lead to reportable events.

11. **Control of Substances Hazardous to Health (COSHH) 2002:** Requires risk assessments and inspections of areas where hazardous substances are used or stored, ensuring control measures are in place and effective.

SAFETY INSPECTIONS

12. Steadfast Security Group will conduct regular safety inspections across all major contract sites to ensure compliance with health and safety standards. These inspections will be carried out jointly by Supervisors and Management to provide comprehensive oversight and accountability.

13. Each inspection will be thoroughly documented to maintain a clear and auditable record of safety practices, observations, and any issues identified. The purpose of these inspections is not to monitor staff performance, but to

confirm that safe working procedures and method statements are being effectively implemented and are sufficient to protect the health and safety of employees and others who may be affected by site operations.

14. This proactive approach supports a safe working environment and ensures ongoing compliance with relevant health and safety legislation. In addition to contract sites, safety inspections will also be conducted monthly across all Steadfast premises.

GOOD PRACTICE FOR INSPECTIONS

15. To ensure inspections are effective and well-organised, it is recommended to plan a structured inspection programme in advance. This allows both management and employee representatives to coordinate their efforts and maintain consistency in safety checks.

16. The number of representatives involved in any formal inspection should be agreed beforehand to ensure clarity and avoid overcrowding. Where multiple representatives are involved, inspections should be coordinated to prevent duplication and ensure comprehensive coverage.

17. Conducting inspections jointly with employee representatives can help build positive working relationships and encourage shared responsibility for workplace safety. Where available, safety officers or specialist advisers should be consulted to provide expert input.

18. In larger workplaces, it may not be practical to inspect the entire site in one session. In such cases, inspection tasks should be broken down into manageable sections to ensure thoroughness without compromising quality.

SAFETY TOURS

19. Safety tours are a proactive method for maintaining a safe working environment by regularly assessing workplace conditions and practices. These tours involve walking through the site to visually inspect operations and identify any signs of non-compliance or system failures.

20. Typically conducted by managers, supervisors, or designated safety personnel, safety tours serve to demonstrate visible leadership in health and safety, reinforce good practices, and identify potential hazards. Their informal nature allows for real-time observation of work activities and immediate action to address any unsafe conditions.

21. Following each tour, a briefing is held to review findings and agree on any necessary corrective actions. This process not only helps improve safety standards but also fosters open communication around health, safety, and employee well-being.

HEALTH AND SAFETY TRAINING

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to delivering comprehensive training in all areas of health and safety. As legislation evolves, training programmes will be updated accordingly to ensure that no personnel are exposed to risks arising from their work activities, the equipment and machinery they operate, substances they may encounter, or any other health and safety concerns within the workplace, without first receiving appropriate and effective instruction.

KEY LEGISLATION

2. This policy is guided by several core legislative frameworks that underpin health and safety responsibilities in the workplace.

3. The Health and Safety at Work etc. Act 1974 establishes the fundamental duty of care for employers to safeguard the health, safety, and welfare of their employees and others who may be affected by their operations. It serves as the cornerstone of workplace safety legislation in the UK.

4. The Management of Health and Safety at Work Regulations 1999 build on this foundation by requiring employers to carry out risk assessments, implement appropriate control measures, appoint competent individuals to oversee health and safety, and ensure that employees receive relevant information and training.

5. The Workplace (Health, Safety and Welfare) Regulations 1992 address a broad range of essential workplace conditions, including ventilation, temperature control, lighting, cleanliness, and the provision of suitable welfare facilities. These regulations help ensure that the working environment supports both safety and comfort.

AIMS

6. The purpose of providing health and safety training to all employees is to ensure they fully understand their responsibilities and are equipped to carry out their duties safely. Training is designed to enable staff to perform tasks without risk to themselves or others, in compliance with relevant health and safety legislation. Additionally, it supports the development of a positive safety culture and encourages continuous improvement in health and safety performance across the organisation.

TRAINING PROGRAMS

7. At Steadfast Security Group, health and safety training is an ongoing commitment throughout every employee's career. The training programme is designed to ensure all staff are equipped with the knowledge and skills necessary to maintain a safe working environment and comply with relevant legislation.

8. **Induction Training**: All new employees, contractors, and visitors receive comprehensive induction training upon joining. This includes an overview of Steadfast's health and safety policies, emergency procedures, and individual responsibilities. The training also covers general safety awareness, hazard identification and reporting, and the correct use of personal protective equipment (PPE). This structured approach ensures everyone understands their role in maintaining a safe workplace and is prepared to respond effectively in emergency situations.

9. **Role-Specific Training**: Employees receive training tailored to their specific job roles, focusing on the safe operation of equipment, manual handling techniques, and appropriate use of PPE. For roles involving higher levels of risk—such as working at height or handling hazardous substances—additional specialised training is provided. This ensures employees understand the unique hazards associated with their tasks and the safety measures required to mitigate them.

10. **Refresher Training**: To maintain high standards of safety and compliance, regular refresher training is conducted. The frequency of this training is determined by the nature of the work, with high-risk roles requiring more frequent

updates. Refresher sessions are also scheduled in response to changes in procedures, technology, or legislation, ensuring employees remain up to date with current best practices.

11. **Specialised Training**: Specialised training is provided to prepare employees for critical situations. This includes:

- **First Aid** – equipping staff with the skills to respond to medical emergencies.
- **Fire Safety** – covering fire prevention, use of extinguishers, and evacuation procedures.
- **Emergency Response** – training for handling incidents such as natural disasters or security threats.

12. Designated personnel, such as first responders and fire wardens, receive enhanced training to ensure they can lead and manage emergency situations confidently and competently.

ROLES AND RESPONSIBILITIES

13. At Steadfast Security Group, maintaining a safe and compliant working environment is a shared responsibility across all levels of the organisation. Every individual, whether employee, contractor, visitor, or member of the leadership team, has a role to play in upholding health and safety standards.

14. **Board of Directors**: The Board provides strategic oversight and ensures that health and safety remains a core priority within the organisation. They are responsible for setting the tone from the top, endorsing policies, and ensuring adequate resources and governance structures are in place to support health and safety training and compliance.

15. **Management**: Managers are accountable for implementing the health and safety training policy. This includes allocating resources such as funding, time, and materials, and ensuring training programmes are delivered effectively. They must also monitor and review training outcomes, gather feedback, and make improvements to maintain high standards and relevance.

16. **Employees**: All employees are expected to actively participate in training sessions and apply the knowledge gained to their daily tasks. Their engagement is essential to maintaining a safe working environment and ensuring that safety procedures are followed consistently.

17. **Health and Safety Manager**: The Health and Safety Manager is responsible for coordinating and delivering training programmes, ensuring content meets regulatory and company standards. They also maintain accurate records of training activities, including attendance, content delivered, and assessments, to support compliance and continuous improvement.

18. **Contractors**: Contractors working on Steadfast premises must receive appropriate health and safety induction and role-specific training relevant to their tasks. They are expected to comply with all safety procedures and cooperate fully with Steadfast's health and safety requirements.

19. **Visitors**: Visitors must be briefed on relevant health and safety procedures upon arrival, including emergency protocols and site-specific hazards. While they are not expected to undergo formal training, they must follow all instructions provided and avoid entering restricted or hazardous areas without supervision.

20. By fulfilling these responsibilities, all individuals contribute to a safe, well-managed, and legally compliant workplace.

TRAINING METHODS

21. Steadfast Security Group offers a range of training methods to ensure all employees receive comprehensive and accessible health and safety education throughout their careers.

22. **Classroom Training**: Classroom-based sessions provide a structured environment for learning the theoretical aspects of health and safety. Led by experienced instructors, these sessions cover key topics such as workplace safety regulations, hazard identification, risk assessment, and emergency procedures. The interactive format encourages discussion and questions, helping participants to fully understand and apply the material in their roles.

23. **Practical Training**: Delivered by qualified supervisors or trainers, practical training allows employees to engage in hands-on exercises that reflect real job tasks. This method reinforces theoretical knowledge through direct application, improving skill proficiency and ensuring employees are confident in performing their duties safely. It is especially valuable for roles requiring technical expertise or operational competence.

24. **E-Learning**: Steadfast provides flexible e-learning modules that employees can complete at their own pace and from any location. These courses cover a wide range of health and safety topics using interactive content such as videos, quizzes, and simulations. E-learning supports consistent training delivery and allows progress tracking through digital platforms, making it ideal for balancing training with daily responsibilities.

25. **Interactive Sessions**: Workshops and interactive sessions offer employees the opportunity to engage in practical learning experiences focused on emergency procedures, evacuation protocols, and the use of safety equipment. These sessions promote active participation, scenario-based learning, and open discussion, helping to reinforce safety practices in a controlled setting.

26. **Drills**: Regular emergency drills, including fire and first aid exercises, are conducted to ensure employees are familiar with their roles and responsibilities during critical incidents. These simulations enhance readiness, build confidence, and ensure that safety protocols are well understood and effectively implemented in real-life situations.

27. **External Training**: Steadfast partners with accredited external training providers to deliver specialised programmes in areas such as advanced first aid, fire safety, risk management, and regulatory compliance. These sessions are led by industry experts and offer recognised certifications, ensuring employees receive up-to-date training aligned with best practices and legal standards.

INDIVIDUAL TRAINING PROGRAMS

28. At Steadfast Security Group, individual training programmes are tailored to meet the specific needs of each employee, with particular attention given to those under the age of 18 and 16 to ensure full compliance with health and safety requirements. Supervisors are responsible for monitoring progress and documenting each stage of training, which must be reviewed and signed off by both the employee and the trainer.

29. All health and safety training is thoroughly recorded, including details such as participant signatures, trainer names, and dates of attendance. This ensures a clear audit trail, supports regulatory compliance, and reinforces Steadfast's commitment to maintaining high standards of safety across the organisation.

TRAINING RECORDS

30. All health and safety training records at Steadfast Security Group are meticulously maintained by the HR Department. These records include employee signatures, trainer details, and dates of attendance, ensuring that every training session is properly documented.

31. Centralising this information within HR allows for efficient tracking, verification, and retrieval of training history, supporting both legal compliance and internal standards. This structured approach ensures that all employees are up to date with required training and that Steadfast maintains a reliable and auditable system for managing health and safety documentation.

TRAINING MATRIX

32. The training matrix at Steadfast Security Group is a central tool used to track employee training status and requirements across all departments. Maintained by department managers and overseen by the HR Manager, the matrix ensures consistency, accuracy, and compliance with internal standards and legal obligations. It includes key details such as training topics, completion dates, renewal schedules, and role-specific requirements, allowing for effective monitoring and verification of all training activities. By managing this process centrally, Steadfast ensures that every employee remains up to date with mandatory training, supporting a safe, competent, and compliant workforce.

MONITORING AND EVALUATION

33. To ensure the continued effectiveness of health and safety training programmes, Steadfast Security Group will regularly assess their impact through a combination of feedback, direct observation, and performance metrics. This ongoing evaluation process helps identify areas for improvement and ensures that training remains relevant, practical, and aligned with operational needs.

34. Training materials and delivery methods will be reviewed and updated in line with changes to legislation, industry standards, and best practices. By incorporating these updates, Steadfast maintains a high standard of training that supports legal compliance and promotes a culture of continuous improvement in workplace safety.

CONTINUOUS IMPROVEMENT

35. Steadfast Security Group is committed to fostering a culture of continuous improvement by regularly reviewing and enhancing its health and safety training programmes. This ongoing process ensures that training remains effective, relevant, and aligned with evolving workplace needs.

36. Employee feedback is actively encouraged and used to identify areas for improvement and address any gaps in training delivery. By incorporating these insights and staying up to date with the latest legislation, industry standards, and best practices, Steadfast ensures its training programmes continue to evolve, supporting high standards of safety, compliance, and employee development.

DISPLAY SCREEN EQUIPMENT

SCOPE

1. Steadfast Security Group, including Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to ensuring the safe and effective use of Display Screen Equipment (DSE) across all areas of its operations. This commitment includes providing comprehensive training to employees on the correct setup and use of DSE to minimise health risks such as eye strain, musculoskeletal disorders, and repetitive strain injuries. Through proactive measures and ongoing education, Steadfast aims to promote employee wellbeing and maintain a safe and ergonomically sound working environment.

KEY LEGISLATION

2. This policy is shaped by several key legislative frameworks that govern the safe use of display screen equipment (DSE) in the workplace.

3. The Health and Safety (Display Screen Equipment) Regulations 1992: These regulations require Steadfast to assess risks associated with DSE use, ensure that workstations meet minimum standards, and provide appropriate training and eye tests for DSE users. The aim is to prevent health issues such as musculoskeletal disorders, visual fatigue, and stress.

4. Health and Safety at Work etc. Act 1974 (HSWA): This foundational legislation places a general duty on employers to protect the health, safety, and welfare of employees and others affected by their work activities, including those using display screen equipment.

5. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations require employers to carry out suitable and sufficient risk assessments and implement control measures to manage risks associated with DSE use. They also mandate the appointment of competent persons and the provision of relevant information and training.

6. Workplace (Health, Safety and Welfare) Regulations 1992: These regulations cover a wide range of workplace conditions, including ventilation, lighting, cleanliness, and the maintenance of equipment, all of which contribute to a safe and comfortable environment for DSE users.

WORKSTATION ASSESSMENTS

7. Workstation assessments are a vital part of Steadfast Security Group's commitment to employee health and safety, particularly for those who regularly use Display Screen Equipment (DSE). These assessments focus on ensuring that workstations are ergonomically designed to minimise the risk of strain and injury. This includes providing adjustable chairs, correctly positioned desks, and monitor placement that supports good posture and reduces neck strain.

8. As part of the assessment process, potential risks such as poor posture or repetitive strain injuries are identified and addressed. Mitigation measures may include the provision of footrests, document holders, and appropriate lighting to support a comfortable and safe working environment.

9. Workstation setups are reviewed regularly to reflect changes in work practices or individual employee needs. This proactive approach helps reduce the risk of health issues associated with prolonged DSE use and supports a safer, more productive workplace.

BREAKS AND CHANGES IN ACTIVITY

10. To support the health and well-being of employees who use Display Screen Equipment (DSE), Steadfast Security Group promotes regular breaks and changes in activity throughout the working day. Employees are encouraged to take short scheduled breaks of **5–10 minutes every hour** to rest their eyes and stretch. Alternating between screen-based tasks and other non-DSE activities is also recommended to reduce eye strain and physical fatigue.

11. Microbreaks, brief pauses of **20–30 seconds every 20 minutes**, are advised to allow the eyes to relax and refocus. In addition, employees should stand, stretch, and move periodically to improve circulation and reduce muscle tension. To support these practices, staff are encouraged to use electronic reminders to prompt regular breaks and posture adjustments.

12. By incorporating these measures into daily routines, Steadfast helps minimise the risks associated with prolonged DSE use, such as fatigue, musculoskeletal discomfort, and eye strain, while promoting a healthier and more productive working environment.

EYE AND EYESIGHT TESTS

13. Steadfast Security Group will provide eye and eyesight tests for employees who regularly use Display Screen Equipment (DSE), either upon request or at regular intervals. If the results of the test indicate that special corrective appliances, such as prescription glasses, are required specifically for DSE work, Steadfast will contribute towards the cost of these items.

14. It is important to note that any eye conditions identified during the examination that are unrelated to DSE use will not be eligible for financial support from Steadfast.

TRAINING AND INFORMATION

15. Steadfast Security Group is committed to providing comprehensive health and safety training for all Display Screen Equipment (DSE) users to ensure their well-being and safe working practices. Training will include guidance on proper workstation setup, helping employees adjust chairs, monitor positions, and keyboard placement to maintain good posture and minimise strain.

16. The importance of regular breaks will be emphasised to prevent fatigue and eye strain, with employees encouraged to take short, frequent breaks and vary their tasks throughout the day. Training will also help employees recognise symptoms of DSE-related health issues, such as headaches, eye strain, and musculoskeletal discomfort, enabling early intervention and support.

17. Instruction on ergonomic practices, such as correct sitting posture, the use of footrests, and supportive seating, will be provided to reduce the risk of injury. Additionally, employees will be informed about Steadfast's health and safety policies, including procedures for reporting concerns and accessing support.

18. By delivering thorough and practical training, Steadfast ensures that employees are equipped to work safely and comfortably with DSE, promoting a healthier and more productive workplace.

WORKSTATION REQUIREMENTS

19. To ensure a safe and comfortable working environment for employees using Display Screen Equipment (DSE), Steadfast Security Group adheres to key workstation standards designed to reduce the risk of strain and injury.

20. **Adjustable Chairs**: Chairs must be height-adjustable with supportive backrests to promote good posture and lower back support. Employees should be able to sit with their feet flat on the floor or on a footrest.

21. **Appropriate Lighting**: Workstations must be well-lit to prevent eye strain, with lighting levels that avoid glare on screens and are neither too dim nor excessively bright.

22. **Monitor Position**: Screens should be positioned at or slightly below eye level and at a comfortable viewing distance to minimise neck and eye strain.

23. **Keyboard and Mouse Placement**: Keyboards and mice should be placed to allow arms to rest comfortably, with wrists straight and hands at or below elbow level to reduce strain.

24. **Sufficient Space**: Workstations must provide adequate space for employees to move freely and change positions, helping to prevent static postures and encourage regular movement.

25. **Desk Setup**: Desks should be large enough to accommodate all necessary equipment and allow for a comfortable working position. Items such as documents and accessories should be within easy reach to avoid unnecessary stretching or twisting.

26. By meeting these requirements, Steadfast helps reduce the risk of musculoskeletal disorders and other health issues associated with prolonged DSE use, supporting employee well-being and productivity.

VISITORS AND CONTRACTORS

SCOPE

1. Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to ensuring the health and safety of all visitors and contractors across its sites. This commitment includes providing clear guidance, appropriate supervision, and adherence to all relevant safety protocols to maintain a secure and compliant environment for everyone entering or working within Steadfast premises.

KEY LEGISLATION

2. This policy is guided by several key legislative frameworks that ensure the health and safety of visitors and contractors at Steadfast Security Group sites:

3. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on Steadfast to safeguard the health, safety, and welfare of employees, contractors, and visitors. It requires that all individuals affected by the organisation's activities are protected from harm.

4. Management of Health and Safety at Work Regulations 1999: These regulations require Steadfast to carry out suitable risk assessments, implement necessary control measures, appoint competent personnel, and provide appropriate health and safety information and training to all relevant parties, including contractors and visitors.

5. Construction (Design and Management) Regulations 2015 (CDM): Applicable to construction-related activities, CDM regulations mandate the effective planning and management of health, safety, and welfare throughout construction projects. This includes ensuring contractors and visitors are aware of site-specific risks and comply with safety protocols.

6. Occupiers' Liability Acts 1957 and 1984: These acts impose a duty of care on Steadfast to ensure that all visitors, and even trespassers, are reasonably safe while on the premises. This includes maintaining safe access routes, controlling hazards, and providing adequate signage and supervision.

SITE INDUCTION

7. Site induction is a vital process at Steadfast Security Group, designed to ensure the safety of all visitors and contractors while on site. It provides essential information about the environment, risks, and procedures that must be followed to maintain a safe working area.

8. One of the key components of the induction is a detailed overview of emergency procedures. This includes instructions on evacuation routes, designated assembly points, and the location of emergency equipment such as fire extinguishers and first aid kits. Ensuring that everyone knows how to respond in an emergency is critical to maintaining site safety.

9. Visitors and contractors are also briefed on site-specific hazards. These may include construction zones, hazardous substances, or restricted areas. Understanding these risks helps individuals navigate the site safely and avoid potentially dangerous situations.

10. Safety protocols are clearly outlined during the induction. This includes the mandatory use of personal protective equipment (PPE), adherence to safe working practices, and compliance with any site-specific rules. These guidelines are in place to protect everyone on site and ensure consistent safety standards.

11. Access control procedures are explained to ensure that only authorised personnel are present. This includes signing in and out, and the use of identification badges to monitor site access and maintain security.

12. Finally, the induction provides information on supervision and support, including who to contact in case of an issue or emergency. Key safety personnel are identified, and their roles are explained to ensure that visitors and contractors know where to turn for assistance.

13. By delivering a thorough and structured site induction, Steadfast Security Group ensures that all individuals entering the site are informed, prepared, and able to work safely and responsibly.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

14. All visitors and contractors entering Steadfast Security Group sites are required to wear appropriate personal protective equipment (PPE) as specified by site regulations. This may include, but is not limited to, hard hats, high-visibility vests, safety glasses, and other protective gear relevant to the environment and tasks being undertaken. Compliance with PPE requirements is essential to ensure safety and minimise the risk of injury while on site.

ACCESS CONTROL

15. Steadfast Security Group enforces strict access control measures to ensure that only authorised personnel are permitted to enter its sites. All visitors and contractors must sign in and out at reception upon arrival and departure. Identification badges may be issued to help monitor access and ensure individuals are easily identifiable while on site. These procedures are essential for maintaining site security, safeguarding sensitive areas, and ensuring compliance with health and safety protocols.

SUPERVISION

16. To ensure compliance with health and safety regulations, all contractors working on Steadfast Security Group sites must be supervised by a competent person throughout the duration of their activities. This supervision helps ensure that safety procedures are followed and that any risks are promptly identified and managed. Additionally, all visitors must be accompanied at all times by a designated Steadfast representative. This ensures that visitors are guided safely through the site and remain within authorised areas, maintaining a secure and controlled environment.

RISK ASSESSMENTS

17. Risk assessments are a critical component of maintaining safety on site at Steadfast Security Group. Before commencing any work, contractors are required to submit detailed risk assessments and method statements. These documents must clearly outline the potential hazards associated with the tasks and the control measures that will be implemented to mitigate those risks.

18. Once submitted, the documents undergo a thorough review by Steadfast's Compliance Manager. This review ensures that all foreseeable risks have been identified and that appropriate safety measures are in place. Only after the risk assessments and method statements have been reviewed and formally approved can contractors begin work on site.

19. Even after approval, ongoing monitoring is essential. Work activities are observed to confirm that the agreed safety measures are being followed effectively. If there are any changes to the work process or new hazards are identified, these must be documented and reassessed to maintain a safe working environment.

EMERGENCY PROCEDURES

20. Emergency procedures are a vital part of Steadfast Security Group's commitment to ensuring the safety of all visitors and contractors on site. Upon arrival, individuals receive clear instructions outlining what to do in the event of an emergency. This includes details on evacuation routes, designated assembly points, and the location of emergency exits and equipment such as fire extinguishers and first aid kits.

21. Evacuation routes are clearly marked throughout the premises with signage and maps to guide individuals safely out of the building. These routes are designed to be easily accessible and free from obstructions, ensuring a swift and orderly evacuation if required.

22. Designated assembly points are located at a safe distance from the building and are clearly identified. After evacuating, all personnel must report to these points to ensure everyone is accounted for and to receive further instructions from safety personnel.

23. To reinforce these procedures, Steadfast conducts regular emergency drills. These drills help visitors and contractors become familiar with the evacuation process and understand their roles during an emergency, improving overall preparedness and response times.

24. Emergency contact information is also provided, including the names and phone numbers of key safety personnel and first responders. This ensures that help can be quickly accessed in the event of an incident, further supporting a safe and responsive environment.

HEALTH AND SAFETY BRIEFINGS

25. Regular health and safety briefings are conducted at Steadfast Security Group to ensure that all visitors and contractors remain informed and up to date with the latest safety information. These briefings cover changes in site conditions, the identification of new hazards, and updates to safety protocols. In addition to scheduled briefings, any urgent changes are communicated immediately to all relevant parties to ensure timely awareness and response. This proactive approach helps maintain a safe working environment and reinforces Steadfast's commitment to continuous safety communication and compliance.

INCIDENT REPORTING

26. Incident reporting is a critical part of maintaining a safe working environment at Steadfast Security Group. All accidents, incidents, or near misses must be reported immediately to a designated Steadfast representative. Prompt reporting ensures that any hazards are addressed quickly and effectively, reducing the risk of further harm.

27. Once an incident is reported, a detailed account must be documented. This includes the time and location of the event, individuals involved, and a clear description of what occurred. Accurate documentation is essential for understanding the circumstances and identifying any underlying issues.

28. An investigation will then be carried out to determine the root cause of the incident. This process may involve gathering witness statements, reviewing safety procedures, and analysing contributing factors. The goal is to understand what went wrong and how similar incidents can be prevented in the future.

29. Based on the findings, appropriate preventive measures will be implemented. These may include updates to procedures, additional training, or changes to the work environment. The effectiveness of these measures will be monitored over time, and further actions will be taken if necessary.

30. This continuous improvement approach ensures that Steadfast maintains a proactive stance on safety, learning from incidents to strengthen its health and safety practices.

YOUNG PERSONS

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to ensuring a safe working environment for all young persons across its premises.

2. Introducing young individuals to the workplace offers valuable opportunities to help them understand professional environments, appreciate safety responsibilities for themselves and others, explore career options, and prepare for future employment.

3. When employing individuals under the age of 18, whether in paid roles or through work experience, Steadfast holds the same duty of care for their health, safety, and welfare as it does for all other employees.

4. In accordance with the Management of Health and Safety at Work Regulations (MHSWR), Steadfast is required to give particular attention to identifying and managing health and safety risks for young persons (under 18), considering their physical and mental maturity, as well as their limited experience in the workplace.

KEY LEGISLATION

5. This policy is shaped by the following core legislative frameworks, which outline Steadfast Security Group's responsibilities toward young persons in the workplace.

6. Health and Safety at Work etc. Act 1974: This foundational legislation places a general duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of all employees, including young persons. Employers must consider their lack of experience, maturity, and awareness of potential risks when assessing workplace hazards.

7. Management of Health and Safety at Work Regulations 1999: These regulations require employers to carry out suitable and sufficient risk assessments for all employees, with specific attention to young persons under 18. Employers must identify and control risks arising from inexperience, lack of awareness, or immaturity, and implement appropriate safety measures before employment or work experience begins.

8. Working Time Regulations 1998: These regulations set limits on working hours for young workers (aged under 18). Young workers must not work more than 8 hours per day or 40 hours per week. They are also entitled to, a 30-minute rest break if working more than 4.5 hours, 12 hours of rest between shifts and 48 hours of uninterrupted rest each week (or 36 hours with 12 hours taken later)

9. Equality Act 2010: This Act protects young workers from discrimination based on age and other protected characteristics such as race, sex, disability, and religion. It ensures fair treatment in recruitment, employment, training, and workplace practices, and requires employers to promote equality of opportunity.

10. Health and Safety (Young Persons) Regulations 1997: These regulations reinforce the need for employers to assess and manage risks specific to young persons. Employers must consider factors such as physical and psychological capacity, exposure to hazardous substances, and susceptibility to risks due to inexperience. Risk assessments must be completed prior to employment or work experience, and findings should be communicated to the young person and, where applicable, their parent or guardian.

DEFINITIONS

11. For the purposes of this policy, the following definitions apply:

- **Young Person**: An individual under the age of 18.

- **Child**: A subset of young persons who have not yet reached the official age at which they may leave school, typically just before or after their 16th birthday. This is commonly referred to as the **Minimum School Leaving Age (MSLA)**.

RISK ASSESSMENTS

12. While many risks to young persons are already addressed through existing workplace risk assessments, these must be reviewed and, where necessary, adapted to ensure adequate protection. Additional measures may include tailored induction, clear instruction, close supervision, site familiarisation, and provision of appropriate protective equipment.

13. Steadfast recognises that young persons, defined as individuals under 18, require special consideration due to their limited experience, developing physical and mental maturity, and reduced awareness of workplace hazards. In line with the Management of Health and Safety at Work Regulations 1999, Steadfast will conduct specific risk assessments to identify and manage risks that may affect young persons.

14. For individuals below the **Minimum School Leaving Age (MSLA)**, typically reached during the school year in which they turn 16, employment will be rare and only permitted under approved work experience arrangements. In such cases, copies of the risk assessments will be shared with the young person's parent or guardian, and Steadfast will seek to discuss the findings with them.

15. Recognising that each young person develops differently, Steadfast will use a **two-tiered approach** to risk assessment:

- **Generic risk assessments** will be developed for roles and activities commonly undertaken by young persons.
- **Individual risk assessments** will be completed for each young person under 18, based on their specific role, maturity, and capabilities. A standardised risk assessment checklist will support this process.

16. Key areas for consideration include:

- **Manual handling**: Young persons may have varying physical capabilities due to ongoing development.
- **Use of equipment and machinery**: Certain tasks may require skills or maturity that young persons have not yet acquired.
- **Supervision and training**: Young persons may be unfamiliar with workplace norms and safety procedures, requiring enhanced oversight.

17. Any incidents involving young persons, including accidents, near misses, or health concerns, **must be reported immediately to the Personnel Department**. Employers are legally required to report certain incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Accurate records must be maintained to ensure compliance and support ongoing risk management.

ROLES AND RESPONSIBILITIES

18. **Board of Directors:** The Board of Directors must ensure that all relevant risk assessments appropriately account for the presence of young persons in any areas they may reasonably be expected to access. When young persons are invited onto Steadfast premises, whether for work experience, training, or use of facilities, the Board is responsible for ensuring that all activities are properly planned, managed, and supervised. This includes assigning enough competent personnel with clear supervisory responsibilities to oversee the safety and wellbeing of young persons during their time on site.

19. **Managers:** Managers must ensure key risk assessment findings and control measures are shared with the organisation arranging the placement. That organisation is responsible for informing the young person's parent or guardian. Young persons must not be assigned tasks beyond their physical or mental capabilities, exposed to harmful

substances, ionising radiation, or placed in high-risk environments (e.g. extreme temperatures, noise, vibration). Before any placement begins, managers must review relevant risk assessments, identify additional controls, and implement them. A clear plan must outline the placement scope, supervision, and safety protocols. Risk assessments should consider the young person's physical and mental development, experience level, and need for tailored training and PPE. Increased supervision may be required.

20. **Employees:** All staff, including temporary workers, students, and cadets, must take reasonable care of their own health and safety, as well as that of others affected by their actions. Any physical or medical condition that could impact safe working should be reported to a manager or supervisor. Health and safety concerns should be raised promptly with a supervisor or manager. All work-related accidents, incidents, or illnesses must be reported immediately.

21. **Health and Safety Manager**: The Health and Safety Manager is responsible for overseeing the implementation of all health and safety policies and procedures, including those relating to young persons. They must ensure that risk assessments are regularly reviewed and updated, and that appropriate control measures are in place. The manager should also provide guidance and support to supervisors and staff, ensure compliance with relevant legislation, and coordinate training and awareness initiatives. Any incidents involving young persons must be investigated promptly, with findings used to improve safety practices.

22. **Visitors**: All visitors to Steadfast premises must comply with site safety rules and follow any instructions provided by staff. Visitors should remain in designated areas unless escorted and must report any hazards or incidents they observe. If a visitor is under 18, additional precautions may be required, including supervision and briefing on site-specific risks. Visitors must not interfere with equipment or engage in any activity that could compromise safety.

23. **Contractors**: Contractors working on Steadfast premises are required to follow all health and safety procedures and ensure their activities do not pose risks to others, including young persons. They must complete relevant risk assessments and provide evidence of competence and insurance where applicable. Contractors are responsible for briefing their staff on site rules and ensuring appropriate supervision is in place. Any incidents or unsafe conditions must be reported immediately to the site manager or Health and Safety Manager.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

24. Steadfast will provide all young workers with the necessary PPE appropriate to their tasks. This includes items such as safety helmets, high-visibility clothing, and protective gloves. Young persons will also receive training on the correct use and maintenance of PPE to ensure their safety while working.

MENTORING

25. Young workers will be paired with experienced staff who can offer guidance, support, and answer any questions during their placement. To ensure safeguarding, all mentors must hold a valid DBS check before taking on this responsibility.

HEALTH MONITORING

26. Steadfast will regularly monitor the well-being of young workers to ensure any health concerns are identified and addressed promptly. This helps maintain a safe and supportive working environment throughout their placement.

EMERGENCY PROCEDURES

27. Young workers must be familiar with all emergency procedures, including evacuation routes and designated assembly points. Regular drills should be conducted to ensure they understand what to do in the event of an emergency and can respond confidently and safely.

OCCUPATIONAL HEALTH

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is dedicated to safeguarding the health and wellbeing of its workforce through robust occupational health initiatives, including health surveillance and ongoing health monitoring programmes.

KEY LEGISLATION

2. This policy is shaped by several core legislative frameworks that govern occupational health and safety in the United Kingdom.

3. Health and Safety at Work etc. Act 1974: The foundational legislation for workplace health and safety in the UK. It places a legal duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees and others affected by their operations.

4. Management of Health and Safety at Work Regulations 1999: These regulations require employers to assess workplace risks and implement appropriate measures to protect employees' health and safety. They also mandate the provision of relevant training and information.

5. Control of Substances Hazardous to Health (COSHH) Regulations 2002: COSHH requires employers to manage and control exposure to hazardous substances, including implementing health surveillance where necessary to monitor potential health effects.

6. Control of Asbestos Regulations 2012: These regulations outline strict requirements for identifying, managing, and monitoring asbestos in the workplace, including mandatory health surveillance for workers exposed to asbestos fibres.

7. Ionising Radiations Regulations 2017: Employers must ensure health surveillance for employees who are exposed to ionising radiation, in line with risk assessment outcomes and exposure levels.

8. Control of Lead at Work Regulations 2002: These regulations require employers to monitor and manage exposure to lead, including conducting health surveillance for workers at risk.

9. Work in Compressed Air Regulations 1996: These regulations govern work carried out in compressed air environments and include provisions for medical examinations and health surveillance to protect workers from associated risks.

ROLES AND RESPONSIBILITIES

10. To maintain a safe and healthy working environment, Steadfast Security Group assigns clear responsibilities across all levels of the organisation in relation to occupational health, health surveillance, and health monitoring.

11. **The Board of Directors** holds overall accountability for ensuring that Steadfast Security Group complies with all applicable health and safety legislation. They are responsible for setting the strategic direction for health and safety across all group companies, allocating sufficient resources to support occupational health initiatives, regularly reviewing performance to drive continuous improvement, and fostering a positive culture of health, safety, and wellbeing throughout the organisation.

12. **Steadfast Management** is responsible for the effective implementation of health and safety policies and ensuring operational compliance across all areas of the business. This includes conducting regular risk assessments to identify workplace health hazards, applying appropriate control measures to reduce risks, and ensuring that health surveillance is carried out for employees exposed to specific dangers such as chemicals, noise, or radiation. Managers must also provide relevant training and education to staff on safe working practices and maintain full compliance with all applicable health and safety legislation.

13. **All employees** at Steadfast Security Group share a responsibility for maintaining a safe and healthy working environment. This includes following all safety procedures and guidelines provided by the company, promptly reporting any health and safety concerns or hazards, actively participating in health surveillance programmes and attending any required assessments, and consistently using personal protective equipment (PPE) as instructed to minimise risk and ensure personal safety.

14. **The Health and Safety Manager** plays a vital role in maintaining a safe working environment by ensuring compliance with health and safety regulations across all Steadfast Security Group sites. This includes conducting regular workplace inspections to identify and address potential risks, acting as a key liaison between employees and management on health and safety matters, and promoting awareness and understanding of safe working practices throughout the organisation.

15. **Occupational Health Professionals** play a critical role in supporting employee wellbeing through both clinical care and advisory services. Their responsibilities include conducting health assessments and surveillance to monitor employee health, developing and implementing programmes aimed at disease prevention and health promotion, and managing work-related injuries and illnesses. They also provide expert advice on workplace improvements to enhance safety, offer counselling and mental health support, and educate employees on the importance of health surveillance and maintaining safe working practices.

PROACTIVE HEALTH SURVEILLANCE

16. Steadfast Security Group is committed to protecting the health and wellbeing of its employees through a proactive health surveillance programme. This initiative is designed to identify early signs of work-related ill health, particularly among staff who may be exposed to specific occupational hazards such as chemicals, noise, radiation, or other environmental risks. Health surveillance is not simply a general health check, it is a targeted, systematic process that helps detect adverse changes in health before they become serious, enabling timely intervention and support.

17. The programme involves regular, planned assessments carried out by qualified occupational health professionals. These may include lung function tests, skin examinations, hearing checks, or other relevant screenings depending on the nature of the exposure. Importantly, the results are interpreted by competent practitioners in occupational medicine, ensuring that any necessary actions, such as adjustments to working conditions or redeployment, are taken to protect the individual and prevent further harm.

18. This proactive approach aligns with the legal requirements set out in the Control of Substances Hazardous to Health (COSHH) Regulations 2002, which mandate health surveillance when employees are exposed to substances known to cause disease, and where early detection is possible and beneficial. By embedding health surveillance into its operational practices, Steadfast not only ensures regulatory compliance but also fosters a culture of safety, care, and continuous improvement. This commitment contributes to higher morale, reduced absenteeism, and improved productivity across the organisation.

RISK ASSESSMENTS AND CONTROL MEASURES

19. At Steadfast Security Group, risk assessments and control measures form the foundation of our occupational health and safety strategy. We carry out thorough and systematic risk assessments across all operational areas to identify potential health hazards that may affect our workforce. These hazards can include exposure to harmful substances, ergonomic challenges, physical risks, and environmental factors that could compromise employee wellbeing.

20. Once risks are identified, Steadfast implements a range of control measures tailored to the nature and severity of each hazard. These controls may include **engineering solutions**, such as improved ventilation systems to reduce airborne contaminants; **administrative controls**, like rotating job roles to limit prolonged exposure to specific risks; and the provision of **personal protective equipment (PPE)**, including gloves, masks, and hearing protection, to safeguard employees directly.

21. This proactive and structured approach not only ensures compliance with key health and safety legislation, such as the Management of Health and Safety at Work Regulations 1999 and COSHH, but also reinforces our commitment to creating a safe and supportive working environment. By continuously assessing and addressing workplace risks, Steadfast reduces the likelihood of work-related injuries and illnesses, enhances operational efficiency, and promotes a culture of safety and accountability throughout the organisation.

TRAINING AND EDUCATION

22. Training and education are central to Steadfast Security Group's commitment to occupational health and safety. The organisation provides ongoing training programmes and accessible educational resources to ensure all employees are fully informed about workplace hazards and the best practices to manage them. These initiatives cover essential topics such as the correct use of personal protective equipment (PPE), emergency response procedures, and the safe handling of hazardous materials. By keeping staff up to date with current health and safety protocols, Steadfast empowers its workforce to take an active role in protecting themselves and others. This proactive approach not only helps prevent accidents and occupational illnesses but also reinforces a strong culture of safety, responsibility, and awareness throughout the organisation.

COMPLIANCE WITH LEGISLATION

23. Compliance with legislation is a fundamental pillar of Steadfast Security Group's occupational health and safety strategy. The organisation rigorously adheres to all relevant UK laws, including the Health and Safety at Work etc. Act 1974, which places a legal duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees. Steadfast also complies with more specific regulations such as the Control of Substances Hazardous to Health (COSHH) Regulations 2002, which require the identification, assessment, and control of hazardous substances to prevent harmful exposure. In addition, the organisation follows the Control of Asbestos Regulations 2012 and the Ionising Radiations Regulations 2017, ensuring robust protection for employees working in environments where these risks are present. By maintaining strict compliance with these legal frameworks, Steadfast not only fulfils its statutory obligations but also reinforces its commitment to providing a safe, healthy, and legally sound workplace for all staff.

EMPLOYEE SUPPORT PROGRAMS

24. Employee support programmes are a vital component of Steadfast Security Group's commitment to promoting holistic health and wellbeing across the workforce. The organisation offers a comprehensive range of services designed to support both physical and mental health, including access to occupational health professionals for medical assessments, advice, and treatment of work-related conditions. In addition, Steadfast provides mental health resources such as confidential counselling services, stress management initiatives, and emotional wellbeing support to help employees navigate personal and professional challenges.

25. Wellness programmes focusing on physical fitness, nutrition, and lifestyle improvements are also available, encouraging healthier habits and long-term wellbeing. Through these initiatives, Steadfast ensures that employees have the tools and support they need to maintain their health, enhance resilience, and thrive both in and out of the workplace.

CONTINUOUS IMPROVEMENT

26. Steadfast Security Group is committed to continuous improvement in its occupational health and safety practices, particularly in the delivery of health surveillance programmes. This involves regularly reviewing and updating procedures to ensure they remain effective, compliant with current legislation, and aligned with the latest industry standards. The organisation actively monitors developments in occupational health, integrates feedback from employees, and adopts best practices from across the sector to enhance its approach. By consistently refining its systems and processes, Steadfast strengthens its ability to manage emerging risks, improve employee wellbeing, and maintain a resilient and proactive safety culture throughout the organisation.

MENTAL HEALTH

SCOPE

1. The Steadfast Security Group, comprising of Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited and Complete Security (Europe) Limited recognises our workforce's mental health and wellbeing is key to organisational success and providing a positive work environment is a cornerstone to employees' mental health and wellbeing. We are committed to providing a positive working environment alongside and in support of the requirements of the Equality Act and the Health and Safety at Work Act.

KEY LEGISLATION

2. Several Frameworks shape this policy.

3. Health and Safety at Work etc. Act 1974: This is the primary piece of legislation covering occupational health and safety in the UK. It places a duty on employers to ensure, as far as reasonably practicable, the health, safety, and welfare of their employees at work.

4. Management of Health and Safety at Work Regulations 1999: These regulations require employers to carry out risk assessments and implement necessary measures to protect workers' health and safety.

5. Mental Health Act 1983: This is the primary legislation covering the assessment, treatment, and rights of individuals with mental health disorders. It provides a legal framework for the detention and compulsory treatment of individuals who are considered at risk of harming themselves or others

6. Mental Capacity Act 2005: This Act provides a framework for making decisions on behalf of individuals who lack the mental capacity to make decisions for themselves. It includes provisions for safeguarding the rights and wellbeing of these individuals

7. Health and Social Care Act 2012: This Act led to the creation of Health and Wellbeing Boards in local authorities, which are responsible for improving the health and wellbeing of their local populations

8. Care Act 2014: This Act places a duty on local authorities to promote the wellbeing of individuals when making decisions about their care and support needs. It includes provisions for mental health and wellbeing

9. Equality Act 2010: This is a crucial piece of legislation in the UK that protects individuals from discrimination, including those with mental health conditions. Under this Act, mental health problems can be considered a disability if they have a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.

AIMS

10. The aim of this policy is to:

    a. Promote mental health and wellbeing for all staff.

    b. Promote an open and supportive culture where mental health problems can be raised and dealt with effectively

    c. Communicate and promote Steadfast's commitment to identifying and tackling organisational issues that negatively impact on mental health

    d. Ensure appropriate risk assessments are regularly undertaken to prevent, identify and control sources of work-related stress and ensure that the outcomes of risk assessments are reported and acted upon

    e. Provide employees experiencing mental health problems with access to professional assistance and support

f. Ensure that no worker, either current or potential, is discriminated against either directly or indirectly because of their mental health problem

g. Reduce barriers to employment for disabled people with mental health problems and consider and accommodate all reasonable adjustment needs.

STEADFAST DUTY OF CARE

11. Steadfast has a duty under The Health & Safety at Work Act 1974 to ensure, as far as is reasonably practicable, the health, safety and welfare of its staff and others. This includes taking all reasonable steps to resolve drug (illegal, prescription or recreational), alcohol and other substance misuse related problems known within the workplace.

STEADFAST COMMITMENT

12. Steadfast Security Group is committed to fostering a workplace that supports mental health, wellbeing, and fairness. The Board of Directors leads this effort by promoting a culture free from discrimination and encouraging awareness of mental health issues through training and open dialogue. The organisation provides proactive support for employees facing mental health challenges, both inside and outside the workplace, and ensures that management practices reflect HSE guidance on stress. This includes regular policy reviews, training mental health first aiders, and offering access to support services.

13. Managers are expected to treat affected employees with respect and confidentiality, while also being responsible for setting performance standards that align with wellbeing goals. Steadfast follows the HSE Management Standards for Stress, addressing key areas such as workload, control, support, relationships, role clarity, and change management. Through consultation, training, and continuous improvement, Steadfast ensures a safe, supportive, and adaptable working environment for all staff.

RESPONSIBILITIES

14. **Board of Directors**: The Board of Directors at Steadfast Security Group carries ultimate responsibility for ensuring the health, safety, and welfare of all employees, as required under the Health and Safety at Work etc. Act 1974. This duty includes both physical and mental wellbeing and must be fulfilled as far as is reasonably practicable. Directors are expected to provide strategic leadership on health and safety matters, ensuring that mental health is treated as a core business priority. They must ensure that appropriate policies, resources, and oversight mechanisms are in place, and that health and safety performance is regularly reviewed. Failure to meet these obligations can result in personal liability and legal consequences, including prosecution under health and safety law.

15. **Compliance Manager**: The Compliance Manager plays a key role in supporting Steadfast's mental health and wellbeing strategy. This includes organising training and awareness programmes in collaboration with qualified professionals to ensure staff understand mental health issues and how to manage them. The Compliance Manager also acts as a point of contact for advice and guidance, helping both employees and managers navigate the policy and access appropriate support. By promoting clarity and consistency in compliance procedures, the role helps reduce uncertainty and stress, contributing to a healthier workplace culture.

16. **Human Resources Manager**: The Human Resources Manager is responsible for monitoring and reporting on mental health-related absences, working closely with occupational health services and departmental managers. This includes identifying patterns of stress-related illness and ensuring that appropriate interventions are in place. HR must also ensure that absence management is handled sensitively and in line with legal obligations under the Equality Act 2010, which may require reasonable adjustments for employees with mental health conditions. By maintaining accurate records and facilitating early support, HR helps prevent long-term absence and supports successful reintegration into the workplace.

17. **Line Managers**: Line managers are central to the day-to-day implementation of Steadfast's mental health and wellbeing policy. They are responsible for identifying and mitigating workplace risks, maintaining open communication—especially during times of organisational change—and supporting employees experiencing mental health challenges,

whether work-related or personal. Managers must ensure that staff have the resources and training needed to perform their roles effectively, monitor workloads to prevent burnout, and encourage staff to take their full holiday entitlement. They also play a key role in recognising early signs of distress and signposting employees to support services, including counselling and Employee Assistance Programmes.

18. **Employees**: All employees have a shared responsibility to contribute to a mentally healthy workplace. This includes raising concerns about their own wellbeing or that of colleagues, seeking help when needed, and engaging with support services such as counselling when recommended. Employees are encouraged to participate in wellbeing initiatives and to communicate openly with their line managers, HR, or occupational health when facing challenges. By taking an active role in their own mental health and supporting others, employees help foster a culture of openness, respect, and mutual care.

COMMUNICATION

19. All employees will be made aware of the mental health and wellbeing policy and the facilities available. This will be part of a health at work policy, which will be included in the employee handbook and employee information or induction packs.

20. Regular updates will be provided to all employees via their line management.

IDENTIFYING MENTAL HEALTH AND WELLBEING HAZARDS

21. If Steadfast employees start acting differently, it can be a sign they are suffering from Mental Health related issues. Managers should look out for signs in teams and workers. Think about whether this could be linked to work pressure.

22. Acting early can reduce the impact of pressure and make it easier to reduce or remove the causes. If managers are worried that a worker is showing some of these signs, they should encourage them to see their GP. These signs can also be symptoms of other conditions.

23. If there is something wrong at work, and this has caused the problem, managers should act.

24. **Signs of stress in teams.** These can include:

    a. Arguments amongst the team.

    b. Higher staff turnover.

    c. More reports of Mental Health Issues.

    d. Increase of sickness absences.

    e. Decreased performance.

    f. Increase in complaints and grievances.

25. **Signs of Stress in a Worker**. These can include:

    a. A change in the way someone acts can be a sign of stress, for example they may:

        1) Take more time off

        2) Arrive for work later

        3) Be more twitchy or nervous

    b. A change in the way someone thinks or feels can also be a sign of stress, for example:

1) Mood swings

2) Being withdrawn

3) Loss of motivation, commitment and confidence

4) Increased emotional reactions – being more tearful, sensitive or aggressive

26. **Process for Identifying Hazards.**

a. The Compliance Manager must enter the following 3 hazards in the 'Hazard Description' column of Steadfast's risk register:

1) Workplace bullying

2) Occupational violence

3) Employee challenging behaviour.

b. The Health and Safety Manager should assess the level of risk associated with workplace indicators and the workplace contributing factors. Management must not be provided with employee's medical information without their consent.

c. When assessing the level of risk, the Health and Safety Manager must utilise the risk matrix. The risk assessment is to be conducted in consultation with the employees.

d. The assigned level of risk should be recorded in Steadfast's risk register and / or Risk Assessment Template or equivalent.

e. If the risk level in the risk register is rated 'High' or 'Extreme' a documented risk assessment must be completed in consultation with relevant parties (including management).

f. A risk assessment should also be conducted when:

1) there is limited understanding and/or knowledge about individual tasks to be performed and the psychological impact

2) there is uncertainty about the level of risk associated with activities to be undertaken.

g. A risk assessment should consider when:

1) the circumstances in which employees are exposed to specific work-related risk factor(s)

2) the frequency and duration of exposure to specific work-related risk factor(s) (for example, whether risk to health and safety builds up over time or occurs in a single incident)

3) the likelihood that a mental health injury may occur if there are not adequate controls in place to manage the work-related risk factor(s).

HOW WORKPLACE CHANGES CAN IMPACT MENTAL HEALTH AND WELLBEING

27. The impact of change on employee mental health for those that are managing mental health issues increases because organisational change can make their symptoms worse. Steadfast will aim to reduce the risk by conducting thoughtful planning, effective communication, and engaging employees in exploring how you can handle the changes in a psychologically safe way.

28. **Strategies to Support Employees during change**. To help with the transition and to lessen the impact of change on employee mental health Steadfast will:

a. Set Expectations.

b. Recognise the Work under the previous system.

c. Create a compelling vision of the intended outcomes.

29. **How Steadfast will implement the changes.** Steadfast will do all it can to lessen the negative impact of change on employee mental health by:

a. Providing as many details as possible about the timeline and steps of the changes that you will undertake.

b. Openly discussing the known challenges and concerns to make the change as positive as possible.

c. Reminding employees of other successful changes.

d. Making the changes in small steps.

SUPPORT FOR STAFF WITH MENTAL HEALTH PROBLEMS

30. Staff experiencing mental health problems are encouraged to inform their line manager. While this is not obligatory, it is recommended that they do so to facilitate making reasonable adjustments.

31. Steadfast will consider and accommodate all reasonable adjustment needs of employees experiencing mental health problems and will do so within a reasonable timetable as agreed with the staff member. All decisions made about adjusting will be documented.

32. Steadfast will consult a variety of sources of information on adjustments including:

a. The employee.

b. The employee's GP, such as through a 'Fit for Work' Statement.

c. Any specialist mental health support that the individual may be receiving, such as a community psychiatric nurse or consultant psychiatrist occupational health services.

d. Any occupational health service provided by Steadfast.

SYSTEMS FOR DEALING WITH MENTAL HEALTH RELATED ISSUES

33. If you are feeling signs of stress at work, **it is important to talk to someone**, for example your manager. If you talk to them as soon as possible, it will give them the chance to help and stop the situation getting worse. If the pressure is due to what your line manager is doing, find out what policies are in place to deal with this. If there aren't any, you could talk to:

a. Workplace Support, such as HR Manager, Health and Safety Manager or Peer Support.

b. Steadfast Mental Health First Aider (Steadfast currently have 2)

c. Your General Practitioner

d. The NHS, via 111 or 111 Online

e. A trained Therapist

f. Friends, Family and/or Neighbours

g. Community Support Services, such as Community Mental Health Teams (CMHT's) and Crisis Teams.

h. National Charity Organisations

1) **'The Samaritans'** by calling 116 123 or by emailing jo@samaritans.org.

2) **'SHOUT'** by texting "SHOUT2 to 85258, or if you are under 19, text "YM" to the same number.

3) **'mind'** by calling 0300 102 1234, 9am to 6pm, Monday to Friday only.

i. Local Charity Organisations

1) **Spare 10 for Ben**, located in Easington Village and can be contacted on 07976 924 119

2) **Andy's Mans Club**, located at Horden Parish Council and can be contacted via email at info@andysmanclub.co.uk

AVAILABILITY OF OPPORTUNITIES FOR RECOVERY AND RECHARGE

34. Steadfast encourages all employees to incorporate the following Five mini practices into their work life and their personal life:

a. Press the pause button and take a time out. Leave the working environment and stretch your muscles. This is one way to help the employee relieve some tension.

b. Take a few minutes to write down those things that are repeating on your mind. This will help you focus on what is important and not worry about short-term issues.

c. One way to change the mindset is and prepare yourself for excellence, is to have some alone time. Go for a short walk to help recharge your batteries.

d. Change the environment that is making you focus, execute and hustle to a more relaxing one that offers a state of reflection and strategic thinking.

e. Learning something new is a great way to stimulate your mind and recharge that energy. Embrace being a beginner and become accustomed with uncomfortable feelings.

SUPPLY CHAIN ENGAGEMENT

35. The environments we work in have a profound effect on the way we work as well as our health. Companies around the world are increasingly concerned with making sure that sites not only operate productively and efficiently, but also promote healthy and safe working practices.

36. Wellness can be promoted in the way that facilities are built, managed and upgraded. But it can also form an important part of the way supply chains work by setting standards, preventing accidents and increasing productivity.

37. Promoting wellbeing means that Steadfast are meeting the physical and non-physical needs of your employees, subcontractors and Supply Chain in a functional way.

38. Steadfast need to know that the suppliers we work with share our commitment to safety and wellbeing and work to the highest standards. Therefore, department heads will communicate regularly with their individual suppliers to ensure that this is the case.

39. Steadfast asks that if any member of our supply chain notices any changes in our employees, that they bring it to our attention at the earliest opportunity. This can be done in confidence and by contacting our Health and Safety manager at steven.hope@steadfastsecurity.co.uk

INFORMATION AND TRAINING

40. All staff will be informed of this mental health policy. A copy of the policy will be made available to staff on the intranet, and a copy will be provided to new employees on induction.

41. In addition, training about mental health and wellbeing and about this policy will be given to all employees, including supervisors, managers and new staff. This will include information on what support is available for staff with mental health problems, and, for managers, on what their responsibilities are.

42. Steadfast will provide training for all managers and supervisory staff in good management practices and will provide adequate resources to enable managers to implement Steadfast's agreed stress management strategy.

CDM REGULATIONS

SCOPE

1. The Steadfast Security Group , comprising of Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited and Complete Security (Europe) Limited is committed to ensuring that works always comply with the Construction (Design and Management) Regulations 2015 (CDM 2015).

2. The current CDM Regulations came into force on 6 April 2015, replacing the CDM Regulations 2007. They require that health and safety is considered and managed throughout all stages of a project, from conception, design and planning through to site work and subsequent maintenance and repair of the building. Steadfast must allow sufficient time for each stage and advise Designers and Contractors as to how much time they have for each stage.

3. CDM affects everyone who takes part in the construction process: Steadfast colleagues, the Designers and Contractors. The Group demonstrates the commitment at Board level to reduce health and safety risks as far as possible in everything that the company does.

KEY LEGISLATION

4. Several frameworks shape this policy.

5. Health and Safety at Work etc. Act 1974 (HSWA): This act requires employers to ensure, as far as is reasonably practicable, the health, safety, and welfare of their employees at work. It includes providing and maintaining systems of work that are safe and without risks to health

6. Management of Health and Safety at Work Regulations 1999 (MHSWR): These regulations mandate that employers conduct risk assessments and implement measures to manage identified risks. They also require employers to provide employees with adequate health and safety training

7. Workplace (Health, Safety and Welfare) Regulations 1992: These regulations cover various aspects of workplace safety, including the maintenance of equipment and the provision of a safe working environment.

8. The Construction (Design & Management) Regulations (CDM 2015): These are the main set of regulations for managing the health, safety and welfare of construction projects. CDM applies to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repair and maintenance.

APPLICATION OF CDM 2015

9. CDM 2015 is the main set of regulations for managing the health, safety and welfare of construction projects. CDM 2015 applies to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repair and maintenance.

10. A project is notifiable if the construction work on a construction site is scheduled to:

    a. Last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project; and

    b. Exceed 500 person days.

11. Where a project is notifiable, Steadfast must give notice in writing to the Health and Safety Executive (HSE) as soon as is practicable before the construction phase begins.

STEADFAST OBLIGATIONS

12. Steadfast has a responsibility regardless of the project size, through their influence on deciding which designer and contractor will carry out the work and how much money, time and resource is available. These decisions made by the Group have an impact on the health, safety and welfare of workers and others affected by the work. Steadfast will ensure:

a. The appointment of the right people who have the appropriate experience, knowledge and skills to identify, reduce and manage health and safety risks. This will be carried out by establishing clear health and safety goals and targets for projects, along with arrangements for monitoring and review. Steadfast will have systems in place for assessing the competency/resources of designers and contractors and will evaluate competencies of all parties at the end of each project.

b. There are arrangements in place for managing and organising the project.

c. Sufficient time is allowed for the project to be designed, planned and constructed properly.

d. Good communication with the Designer and Contractor through the project duration which will aid the efficiency.

e. The Contractor has made adequate welfare facilities for their works prior to the commencement of works on site.

f. An adequate Construction Phase Plan is in place which explains how health and safety risks will be managed.

g. Protective procedures are in place for visiting members of the public or colleagues from the risks of a construction site.

RESPONSIBILITIES

13. CDM 2015 places clear responsibility on Clients, Designers, Principal Designers, Principal Contractors and Contractors.

14. **Client**. Steadfast will always be a client for works they require, and on occasion Steadfast will carry out works for other clients. The client is responsible to make suitable arrangements for managing a project. This includes making sure that:

a. Other duty holders are appointed.

b. Sufficient time and resources are allocated.

c. Relevant information is prepared and provided to other duty holders.

d. The principal designer and principal contractor carry out their duties.

e. Welfare facilities are provided.

15. **Principal Designer**. Steadfast staff may be acting as the Designer or Principal Designer when defining works. A principle designer must be appointed by the client for all projects with more than one contractor. It can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role. Responsible for planning, managing, monitoring and coordinating health and safety in the pre-construction phase of a project. This includes:

a. Identifying, eliminating or controlling foreseeable risks.

b. Ensuring designers carry out their duties.

c. Preparing and providing relevant information to other duty holders

d. Liaising with the principal contractor to help in the planning, management and monitoring of the health and safety in the construction phase.

16. **Designer**. Someone who as part of a business, prepares or modifies designs for a building, product or system relating to construction work.

a. The designer's role when preparing or modifying designs is to eliminate, reduce or control foreseeable risks that may happen during construction or maintenance and use of a building after it's been built, and provides information to other members of the project team to help them fulfil their duties.

b. The design process should now consider the 'whole life' and the purpose of a building, and designers are required to design risk out as far as practicable during the design phase.

c. Anyone at Steadfast who decides or instructs a course of action in relation to the design of a construction project is a designer under the regulations.

17. **Principal Contractor.** Steadfast Employees may be acting as the Contractor or Principal Contractor when carrying out works with staff employed directly by Steadfast. Appointed by the client to plan, manage, monitor and co-ordinate health and safety during the construction phase of a project when there's more than one contractor involved. The principal contractor's duty is to:

a. Plan, manage, monitor and coordinate health and safety in the construction phase of a project

b. Liaise with the client and principal designer.

c. Prepare the construction phase plan.

d. Organise cooperation between contractors and coordinate their work.

18. **Contractor**. The individual or organisation doing the actual construction work. Anyone who directly engages construction workers or manages construction work is a contractor. This includes companies that use their own workforce to do the work on their premises and duties apply to all workers be they employees, self-employed or agency workers. The contractor's duty is to:

a. Plan, manage and monitor construction work under their control so that it is carried out without risks to health and safety.

b. For projects involving more than one contractor, co-ordinate their activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor.

c. For single contractor projects, prepare a construction phase plan.

19. **Workers**. The individual working for or under the control of contractors on a construction site.

APPLICATION OF CDM 2015 AT STEADFAST

20. The application of CDM 2015 at Steadfast aims to comply with regulations in a way that is proportionate to the risk. When undertaking any construction works, employees at Steadfast should consider first and foremost the aims of the legislation which are to:

a. Sensibly plan the work so the risks involved are managed from start to finish.

b. Have the right people for the right job at the right time.

c. Cooperate and coordinate your work with others.

d. Have the right information about the risks and how they are being managed.

e. Communicate this information effectively to those who need to know.

f. Consult and engage with workers about the risks and how they are being managed.

CONSTRUCTION MANAGEMENT

21. The Project Manager as the Client is responsible overall for the project. They can rely on the advice of the competent people they appoint but remain liable for all arrangements relating to the project. If needed the Project Manager must consult Steadfast to define what evidence is required to show competence.

22. Principal Designers must be competent advisor for health & safety to clients as defined in CDM2015, and Project Managers must account for that responsibility. Additional health and safety advice can be sought from the Compliance Manager. The Principal Contractor becomes responsible for site safety for the period of the construction phase.

PROJECT RECORD KEEPING

23. **Pre-construction Phase.** The Principal Designer is required to provide Pre-construction Information to the contractor. For large or high-risk projects, the appropriate advice must be sought from the Compliance Manager.

24. **Construction Phase.** The Principal Contractor is responsible for site safety during this phase; however, the Client remains responsible overall. The Principal Designer will advise the Client to ensure their responsibilities are properly discharged.

25. **Post Construction**. The Principal Designers is responsible for updating or compiling the Health & Safety Files as appropriate and passing the file to the client at project handover or when they cease to be part of the project.

HEALTH AND SAFETY FILE

26. The Health & Safety File is defined as the file containing health and safety information to be considered during any subsequent project on the building. The file should be relevant and not include information which is of no help in planning future construction work. There is no mandatory format for a health & safety file however the contents must include specific information required by the CDM2015 Regulations. The Specific Information required is:

a. Section 1 Introduction

1) Brief description of the works

2) Project team contacts

3) Contractors contacts

4) Project particulars

b. Section 2 Design Criteria

1) Architectural design concept

2) Structural design concept

3) Mechanical design concept

4) Electrical design concept

5) Fire strategy

c. Section 3 Construction Methods and Materials Used

1) Construction method

2) List of materials used

3) List of manufacturers

d. Section 4 Maintenance Requirements

1) List of equipment/materials to be maintained

2) Maintenance procedures

e. Section 5 Certificates and Warranties

1) Planning consent

2) Building regulations approval

3) Test certificates

4) Commissioning certificates

f. Section 6 Operation and Maintenance

1) Mechanical

2) Electrical

3) Others

g. Section 7 Drawings

1) “As built” drawings

2) Incoming services

3) Residual Risk Register

WELFARE PROVISIONS

22. Steadfast will conduct pre-checks to ensure that the site has the correct welfare provisions as laid down in CDM 2015. The following is the minimum requirement for construction sites:

a. Suitable and sufficient **sanitary conveniences** must be provided or made available at readily accessible places.

b. Suitable and sufficient **washing facilities**, including showers if required by the nature of the work or for health reasons, must, so far as is reasonably practicable, be provided or made available at readily accessible places.

c. An adequate supply of wholesome **drinking water** must be provided or made available at readily accessible and suitable places.

d. Suitable and sufficient **changing rooms** must be provided or made available at readily accessible places, if required.

e. Where necessary for reasons of propriety, there must be **separate changing rooms** for, or separate use of rooms by, men and women.

f. Suitable and sufficient facilities must, where necessary, be provided or made available at readily accessible places to enable persons to **lock away** kit.

g. Suitable and sufficient **rest rooms** or **rest areas** must be provided or made available at readily accessible places.

COMMUNICATIONS

23. Steadfast will co-operate with the client, other designers, contractors, workers and anyone else who provides information, particularly the principal designer.

24. Steadfast will co-ordinate and communicate with others to provide clear information on how to control any remaining risks. This includes temporary and permanent works designers, who should themselves co-operate to ensure that their designs are compatible with each other.

25. Methods for communicating information such as design risks and the level of detail could include drawings, registers, electronic systems, email and web-based systems.

VIOLENCE IN THE WORKPLACE

SCOPE

1. Steadfast Security Group, which includes Steadfast Security Solutions Ltd, Steadfast Security Systems Ltd, Steadfast Secure Storage Ltd, and Complete Security (Europe) Ltd, is firmly committed to maintaining a safe and healthy working environment for all employees. The company recognises that a secure workplace is essential to the wellbeing and productivity of its staff.

2. Violence in any form is strictly prohibited under this policy. This includes, but is not limited to, verbal abuse, intimidation, threats, physical assault, and damage to property. Such behaviours are considered unacceptable and contrary to the values and standards upheld by the Company.

3. Should an employee engage in any form of violence towards another employee, a member of the public, a contractor, or a visitor, and the allegation is substantiated, disciplinary action will be taken. This may include measures up to and including dismissal, depending on the severity of the conduct.

4. In instances where employees are subjected to violence by members of the public, contractors, or visitors, the Company will conduct a thorough investigation. Appropriate support will be provided to the affected employee, and preventative actions will be implemented to reduce the risk of recurrence.

KEY LEGISLATION

5. Several pieces of UK legislation shapes our Violence in the Workplace Policy, which includes several important laws and regulations aimed at protecting employees from harm while at work.

6. Health and Safety at Work etc. Act 1974: This foundational legislation places a legal duty on employers to ensure, so far as is reasonably practicable, the health, safety, and welfare of their employees. This includes protection from work-related violence. Employers must assess risks and implement measures to safeguard workers.

7. The Management of Health and Safety at Work Regulations 1999: employers are legally required to take proactive steps to safeguard employees from risks, including workplace violence. This involves conducting thorough risk assessments to identify potential hazards, appointing competent individuals to oversee health and safety matters, and ensuring staff receive appropriate training and information.

8. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013: Employers must report certain incidents, including those involving non-consensual physical violence, to the HSE. This helps monitor trends and enforce accountability.

9. Safety Representatives and Safety Committees Regulations 1977: These regulations require employers to consult with recognised trade union safety representatives on health and safety matters, including workplace violence.

10. Health and Safety (Consultation with Employees) Regulations 1996: Where trade unions are not recognised, employers must consult directly with employees or their elected representatives about health and safety issues.

11. Equality Act 2010: While not specific to violence, this Act makes harassment unlawful when it relates to protected characteristics such as race, gender, disability, etc. It supports anti-bullying and anti-harassment policies that often overlap with violence prevention.

COMMITMENT

12. Steadfast Security Group is dedicated to the ongoing development and implementation of effective measures to protect and support employees while they are engaged in company-related duties. This commitment reflects the organisation's proactive approach to preventing workplace violence and ensuring the safety and wellbeing of its staff. To achieve this, the Company has established robust security systems and procedures designed to prevent and manage

situations that may pose a risk of violence. These systems are regularly assessed to ensure they remain effective and responsive to emerging threats.

13. Employees are provided with relevant and comprehensive information and training to equip them with the knowledge and skills necessary to recognise, avoid, and respond to potential incidents of violence. This includes guidance on personal safety, conflict resolution, and reporting procedures.

14. A structured system for reporting and recording incidents, near misses, and concerning behaviours is in place. This enables the Company to monitor trends, respond promptly to risks, and continuously improve its preventative strategies.

15. If an employee becomes a victim of violence while at work, the Company will ensure access to appropriate medical care and professional support services. This includes counselling and other resources aimed at helping affected individuals recover and return to work safely.

16. All measures and procedures under this policy are subject to periodic review and monitoring to ensure they remain relevant, effective, and aligned with best practices in workplace safety.

DEFINITION OF WORKPLACE VIOLENCE

17. The Health and Safety Executive (HSE) define work-related violence as: ***'Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work.'***

18. This definition encompasses a wide range of behaviours, including:

- **Verbal abuse or threats** — whether face-to-face, online, or via telephone
- **Physical attacks** — from members of the public, clients, patients, service users, or students
- **Aggressive behaviour** — that occurs in connection with work activities

19. This might include violence from members of the public, customers, clients, patients, service users and students towards a person at work.

20. For violence to be work-related, it must be in connection with the work activity. For example, the following situations would not be included in this definition:

- personal disputes between workers and other people, such as family members
- violence between people not at work, such as customers or service users

REPORTING

21. Employees who believe they have been subjected to workplace violence, whether verbal or physical, are required to report the incident promptly to their line manager and complete an incident report form. In cases where the alleged aggressor is the employee's line manager, the report should be escalated to the next level of management or, in exceptional circumstances, to the designated Human Resources Officer. Once completed, the incident form must be submitted to the Health and Safety Officer for review and appropriate follow-up action.

SUPPORT FOLLOWING A VIOLENT INCIDENT

22. In cases where an employee has been subjected to physical violence resulting in injury, immediate medical attention must be provided. This may involve calling a first aider or, where necessary, arranging for ambulance services to ensure the employee receives appropriate treatment and advice.

23. Following any incident of physical or verbal violence, the Company is committed to offering timely and appropriate support to the affected employee. Managers are expected to respond sensitively, recognising the potential emotional impact of such incidents. Employees should be encouraged to speak openly about their experience, and managers may seek additional guidance or assistance from the Senior Management Team or Human Resources.

24. It is important to acknowledge that individuals may react differently to traumatic events, and the level of distress experienced can vary. Support measures should be tailored to the needs of the individual. One effective approach is debriefing, which allows the employee to discuss the incident, express their emotions, and identify any concerns or needs. Depending on the situation, this may be facilitated by the line manager or, alternatively, through Human Resources.

25. Support may also include temporary adjustments to the employee's role, location, or working arrangements. In more serious cases, this could extend to time off work, a phased return, or referral to Occupational Health or counselling services. Human Resources can provide advice on the most appropriate course of action based on the circumstances.

26. The role of colleagues in providing emotional support should not be underestimated. Fellow employees often serve as a primary source of reassurance and understanding. Additionally, employees who are members of a Trade Union may find further practical and emotional support through their union representatives.

27. Further advice and information on available support options can be obtained from the Human Resources Department. As harassment may also constitute a form of workplace violence, employees experiencing such behaviour are encouraged to seek assistance through the same channels.

WITNESSES TO VIOLENCE

28. Employees who witness any form of workplace violence, whether verbal or physical, are strongly encouraged to report the incident to their line manager. The Company is committed to fostering a culture of openness and safety, and staff should feel confident in coming forward without fear of intimidation or retaliation. Prompt reporting by witnesses plays a vital role in ensuring incidents are addressed appropriately and helps maintain a safe working environment for all.

EXTREME ACTS OF VIOLENCE

29. In the event that an employee or group of employees becomes the victim of, or witnesses, an extreme act of violence, Steadfast Security Group will provide appropriate and timely support. The nature of this support will be tailored to the individual circumstances, recognising that people respond differently to traumatic experiences and may require varying levels of assistance.

30. Should a violent incident occur on site that results in major injuries, fatalities, or multiple casualties, the Compliance Manager will assume responsibility for managing the situation. In such cases, the Compliance Manager will act as the designated disaster coordinator, overseeing the immediate response, ensuring the safety of all personnel, and coordinating with emergency services and senior management as required.

ROLES AND RESPONSIBILITIES

31. **Board of Directors**: The Board of Directors holds ultimate responsibility for ensuring the health, safety, and welfare of all employees across Steadfast Security Group. The Managing Director carries executive responsibility for ensuring that appropriate procedures are in place to implement this policy and monitor compliance. In practice, the Managing Director delegates day-to-day management responsibilities to Line Managers and Supervisors to ensure effective implementation.

32. **Department Managers**: Managers are responsible for taking all reasonable steps to ensure that safe working practices, procedures, and environments are maintained for their teams. This includes consulting with employees and relevant stakeholders to develop safe systems of work through risk assessments. Managers must aim to prevent staff from being placed in situations that pose significant risks to their personal safety, identify roles that may be considered at risk due to the nature of the work, and ensure those individuals receive appropriate training and information. They must also communicate safe working procedures clearly to all staff, including part-time and temporary employees, and promote awareness through inductions, supervision, and team meetings. Managers should respond sensitively to concerns raised by employees, ensure all incidents are reported and investigated thoroughly, and take appropriate action to support affected individuals and prevent recurrence. Suspicious activity should be reported promptly to estates services or security staff, and all incidents should be monitored and reviewed regularly.

33. **All Employees:** The success of this policy relies on the cooperation between the Company and its employees. All staff are expected to familiarise themselves with the policy and associated procedures, take reasonable steps to avoid potentially violent situations, and report any incidents or concerns to their line manager immediately. Employees should actively participate in training and preventative initiatives and work with their managers to identify risks and develop safe working practices.

34. **HR Manager**: The Human Resources Manager plays a key role in supporting both employees and managers in the implementation of this policy. They provide guidance on appropriate support measures following incidents, assist in investigations, and help coordinate training and awareness programmes. HR also serves as a point of contact for employees who may feel uncomfortable reporting incidents through their usual line management structure.

35. **Visitors & Contractors**: Visitors and contractors are expected to adhere to the Company's standards of conduct while on site. They must not engage in any form of violent, aggressive, or abusive behaviour. Any incidents involving visitors or contractors will be investigated thoroughly, and appropriate action will be taken to ensure the safety of employees and others on the premises.

ACTION

36. Steadfast Security Group maintains a zero-tolerance approach to acts of violence in the workplace, regardless of whether the perpetrator is an employee, contractor, or visitor. Such behaviour is considered wholly unacceptable and will be dealt with firmly and appropriately.

37. This policy should be read in conjunction with other relevant Steadfast Security Solutions policies applicable to all staff. Allegations of violence involving employees will be investigated under the Company's Staff Disciplinary Procedure. Similarly, complaints of harassment will be addressed through the same formal process to ensure consistency, fairness, and accountability.

ENVIRONMENTAL

SCOPE

1. **Steadfast Security Group** (Steadfast), which includes **Steadfast Security Solutions Limited (Solutions), Steadfast Security Systems Limited (Systems), Steadfast Secure Storage Limited (Storage),** and **Complete Security (Europe) Limited (Complete)**, is dedicated to preventing pollution linked to its operations. The Group is also committed to continuously enhancing its Quality and Environmental standards, ensuring compliance with **BS EN ISO 14001**, relevant legislation, codes of practice, imposed requirements, the **Pressure Equipment Directive 97/23**, and **EN ISO 9001**.

2. We believe that fostering a culture of environmental responsibility and quality awareness among all employees is essential to meeting customer expectations and maintaining our reputation for excellence in Quality and Environmental management.

3. Both employers and employees play a vital role in reducing the business's energy and material consumption. This policy outlines practical steps we can take to positively impact our environmental footprint by lowering energy use and minimizing material waste.

RESPONSIBILITY

4. This Environmental Policy applies across all areas of our operations, including management, office services, printing, delivery, and procurement. The **Compliance Manager** holds overall responsibility for ensuring the policy is effectively implemented and reports directly to the **Board of Directors**. However, every employee shares a responsibility within their role to support and uphold the aims and objectives of this policy.

AIMS

5. The Steadfast Environmental Policy aims to promote environmental enhancement across the Northeast, creating lasting benefits for the local community. It seeks to raise awareness of the value of a high-quality environment and encourage public engagement with it. Additionally, the policy is committed to ensuring that all operations are carried out efficiently, with minimal or no negative impact on the environment.

CLIMATE CHANGE

6. Steadfast is firmly committed to achieving full carbon neutrality by the year 2030. To support this goal, we will implement a combination of immediate and long-term actions designed to reduce our environmental impact and improve energy efficiency across all operations.

7. We will encourage all staff to adopt energy-conscious behaviours, such as switching off electrical equipment and unnecessary lighting when not in use, keeping windows and external doors closed when heating is active, and limiting the use of electric heaters and fans. These small changes, collectively, can make a significant difference.

8. In addition, we will begin a phased replacement of lighting systems with LED bulbs throughout our premises, and upgrade electrical equipment to models with the highest energy efficiency ratings. We also plan to transition all our electricity supply contracts to 100% renewable energy tariffs.

9. To further support sustainable practices, we will invest in electric vehicle charging infrastructure at our sites. We will also conduct a comprehensive audit of our current emissions and establish clear measures to monitor and track our carbon footprint over time, ensuring transparency and accountability as we progress toward our 2030 target.

NATURE AND WILDLIFE

10. Steadfast is dedicated to creating and enhancing opportunities for nature to flourish across the assets it owns or manages. This commitment to environmental growth reflects our broader goal of supporting biodiversity and preserving natural habitats for future generations.

11. We aim to protect and improve the quality and reach of the natural environment, with a particular focus on conserving trees, hedgerows, ponds, streams, and coastal ecosystems. These elements are vital to maintaining ecological balance and supporting local wildlife.

12. Our approach to asset management—including public rights of way, coastal areas, play areas, playing fields, and roadside verges—will prioritise practices that safeguard and promote biodiversity. Through thoughtful stewardship, we will ensure these spaces contribute positively to the natural landscape.

13. In addition, we will actively introduce new opportunities and initiatives that support environmental growth, encouraging community engagement and fostering a deeper connection with nature.

PESTICIDE USE

14. Steadfast is committed to phasing out the use of pesticides across all assets it owns or manages, as part of its broader environmental and biodiversity strategy. We recognise the harmful impact that chemical pesticides can have on ecosystems, wildlife, soil health, and water quality. By reducing and ultimately eliminating their use, we aim to create safer, more sustainable environments for both people and nature.

15. This commitment involves reviewing current land management practices, exploring and adopting alternative methods of pest control, and working closely with contractors and staff to ensure environmentally responsible approaches are implemented. Where possible, we will prioritise natural and non-toxic solutions that support biodiversity and protect pollinators, while maintaining the safety and usability of our sites.

16. Through education, training, and ongoing monitoring, Steadfast will ensure that this transition is effective, practical, and aligned with our long-term goal of environmental growth and stewardship.

SUSTAINABLE TRAVEL

17. Steadfast is committed to promoting sustainable travel practices across its operations, recognising the environmental benefits of reducing reliance on traditional, high-emission transport methods. We actively support modern working practices that reduce the need for travel, such as remote working and virtual meetings, helping to lower our overall carbon footprint.

18. Where travel is necessary, we encourage staff to car-share whenever possible for business-related journeys. This not only reduces emissions but also supports a more collaborative and cost-effective approach to travel. We also promote the use of alternative, low-impact transport options such as cycling, walking via public footpaths, and using public transport.

19. To ensure our fleet operates efficiently and responsibly, all Steadfast vehicles are regularly serviced and maintained to high standards. We continue to invest in electric-powered vehicles and are committed to purchasing only environmentally friendly models with low carbon dioxide emissions. These vehicles offer better fuel efficiency, reduced road tax, and significantly lower environmental impact.

20. Through these measures, Steadfast aims to lead by example in adopting sustainable travel solutions that contribute to our broader environmental goals.

WATER MANAGEMENT

21. Steadfast is committed to responsible water management and conservation across all areas of its operations. We recognise the importance of protecting this vital resource and aim to reduce water waste while promoting sustainable practices throughout our premises.

22. We actively encourage staff, visitors, and contractors to use water efficiently, adopting simple habits that contribute to long-term conservation. Where feasible, we will utilise water tanks to collect and store non-potable water for appropriate uses, helping to reduce reliance on mains supply.

23. Awareness around wastewater management is also a priority. We will ensure that all individuals working on or visiting our sites understand which materials can be safely disposed of through wastewater systems, helping to prevent pollution and protect local watercourses.

24. In addition, Steadfast supports the use of natural solutions to manage surface water run-off, such as permeable surfaces, rain gardens, and sustainable drainage systems. These approaches help to reduce flooding risks and improve water quality.

25. Finally, we will give preference to water-efficient equipment wherever possible, ensuring that our facilities operate with minimal environmental impact while maintaining high standards of functionality and safety.

WASTE & RECYCLING

26. Steadfast is committed to minimising waste and promoting responsible recycling practices across all its operations. We aim to reduce the volume of waste generated by prioritising prevention, reuse, recycling, and recovery wherever possible. This approach supports our broader environmental goals and helps conserve valuable resources.

27. All waste produced on Steadfast premises will be appropriately sorted, stored, and disposed of in line with environmental regulations and best practices. We are actively working to eliminate the use of single-use plastics and will ensure that all recyclable materials are processed correctly. Staff, visitors, and contractors will be encouraged to participate in recycling efforts, helping to foster a culture of sustainability throughout the organisation.

28. Wherever feasible, we will use products that are recyclable, compostable, or made from recycled materials. We also aim to reduce unnecessary printing and minimise wastepaper, supporting both environmental and cost-saving objectives.

29. Steadfast will continue to uphold its duty of care under waste management contracts, ensuring that all waste handling is carried out responsibly. We are also committed to minimising pollution in all forms, including light, noise, solid waste, liquids, and chemicals, and will take proactive steps to prevent environmental harm.

30. Finally, we will seek to dispose of surplus, obsolete, or redundant materials in the least environmentally damaging way, ensuring that our waste management practices align with our commitment to sustainability and environmental stewardship.

HAZARDOUS PRODUCTS

31. Steadfast is committed to minimising the use of hazardous products across all its operations to protect the health of employees, contractors, and the environment. Wherever possible, we will avoid purchasing substances known to pose risks to health. In cases where hazardous products are necessary, clear and adequate warnings will be provided to ensure safe handling and use.

32. We will prioritise the procurement of biodegradable and phosphate-free detergents and cleaning materials, provided they are suitable for their intended use. This supports our goal of reducing harmful chemical residues in the environment. Additionally, Steadfast will not purchase chemicals listed on the UK ‘Red List’ or the EC ‘Blacklist’, nor any products containing Atrazine, Simazine, or Lindane. We will actively seek to reduce the range and quantity of chemicals, pesticides, herbicides, and fungicides used, and where such products are required, preference will be given to non-residual and biodegradable options.

33. The use of aerosol products, particularly those containing CFC or HFC propellants, will be avoided. Instead, refillable hand sprays will be used wherever possible. Similarly, the use of batteries, especially those containing cadmium or mercury, will be minimised. Where batteries are essential, rechargeable alternatives will be considered to reduce environmental impact.

34. All employees who handle hazardous substances must be fully aware of the relevant Risk Assessments, Safe Systems of Work, and COSHH Assessments before use. Proper training and documentation will be provided to ensure safe practices are followed.

35. Hazardous waste will be disposed of responsibly. Waste containers must be made of materials appropriate for the substances they hold, clearly labelled, and stored in designated bunded areas outside. Only licensed hazardous waste carriers will be used for the collection and disposal of such waste from Steadfast sites, ensuring full compliance with environmental regulations and duty of care obligations.

RESPONSIBLE & SUSTAINABLE PROCUREMENT

36. Steadfast is committed to responsible and sustainable procurement practices that support environmental stewardship, ethical sourcing, and the local economy. We aim to source materials and services locally wherever possible, provided they meet our standards for quality and value for money. This approach not only reduces transportation-related emissions but also strengthens community ties and supports regional businesses.

37. In line with our sustainability goals, all catering produce, including tea and coffee provided in offices, will be plant-based and sourced from suppliers that are local, organic, and certified by recognised schemes such as Fair Trade. This ensures that our food and beverage choices align with ethical and environmental standards.

38. We will ensure that any timber or similar materials used by Steadfast are sourced from **Forest Stewardship Council (FSC)** certified suppliers, guaranteeing responsible forest management and traceability. Additionally, all consumables used on our premises, such as cleaning products and printer inks, will be eco-friendly and selected with environmental impact in mind.

39. Our procurement processes will be designed to favour local suppliers, helping to promote the circular economy and reduce the environmental footprint of our supply chain. We will also avoid purchasing products with excessive packaging, choosing instead items that are minimal, recyclable, or reusable in their packaging design.

AWARENESS, LOBBYING & PARTNERSHIPS

40. Steadfast is committed to raising awareness of environmental issues and promoting sustainable practices through meaningful engagement with customers, partners, and the wider community. We will actively share information and resources to encourage environmentally responsible behaviour and foster a shared understanding of the importance of sustainability.

41. We will support and advocate for local environmental concerns, acting as a voice within our networks to highlight issues and promote positive change. By working collaboratively with customers and partners, we aim to strengthen our collective impact and contribute to environmental growth beyond our own operations.

42. It is essential that everyone involved with Steadfast, including employees, contractors, and suppliers, is fully aware of their responsibilities in implementing this Environmental Policy. We will ensure that clear guidance and training are provided to support compliance and encourage proactive participation.

43. Where appropriate, Steadfast will work in partnership with other organisations to develop and deliver initiatives that enhance environmental outcomes. These collaborations will help us share knowledge, pool resources, and drive innovation in support of our sustainability goals.

ENERGY USE

44. Steadfast is committed to responsible energy management and the reduction of its overall energy consumption across all operations. As part of this commitment, we will conduct a comprehensive audit of our current energy use to identify areas for improvement and establish a clear baseline for future progress.

45. Following the audit, we will develop a strategic plan outlining practical steps to reduce energy usage throughout the organisation. This plan will include both short-term actions and long-term investments aimed at improving energy efficiency and lowering our environmental impact.

46. We will prioritise the procurement of energy from sustainable sources and actively promote the use of renewable energy within our operations. This includes transitioning to green energy tariffs and exploring opportunities for on-site renewable energy generation where feasible.

47. Steadfast will also closely monitor its utility consumption and encourage working practices that minimise energy use. Through staff engagement, training, and operational adjustments, we aim to embed energy-conscious behaviours into our daily routines and decision-making processes.

CIRCULAR ECONOMY

48. Steadfast is committed to embedding the principles of the circular economy within its operations, aiming to reduce waste, extend the lifecycle of materials, and promote sustainable resource use. As part of this commitment, we will carry out a thorough audit of the materials and services currently used across the organisation. This will help identify opportunities to reduce consumption, reuse resources, and improve efficiency.

49. Based on the findings of this audit, we will develop policies that actively support the transition to a circular economy. These policies will focus on reducing dependency on single-use items, encouraging reuse and recycling, and promoting the responsible sourcing of goods and services.

50. A key part of our strategy involves prioritising local suppliers within our procurement processes. By supporting local businesses, we not only reduce transportation-related emissions but also contribute to the resilience and sustainability of the regional economy. This approach aligns with our broader environmental goals and reinforces our commitment to sustainable growth.

FEEDBACK

Steadfast encourages all employees to share feedback on its policies to support continuous improvement. If you have any comments, questions, or concerns regarding this policy, please contact the Compliance Manager by emailing steven.hope@steadfastsecurity.co.uk. Your input is valued and helps ensure our policies remain clear, effective, and inclusive.

APPROVAL

This policy has been formally approved by the Board of Directors of Steadfast Security Group and is authorised for distribution across the organisation. All employees are expected to familiarise themselves with its contents and adhere to the principles and procedures outlined herein.

Paul Harbord
Managing Director, The Steadfast Security Group
20 November 2025