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St Leonards on Sea
East Sussex
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HEALTH & SAFETY Policy Documents 2023 - 24

Prepared by



Review Date June 2024

Updates

Revision	April 2016	Original
Rev A	July 2017	Review and update Addition of Deliveries / Collections Policy
Rev B	July 2018	Review and update
Rev C	August 2019	Review, addition of extra policies
Dev D	July 2020	Review and update
Rev E	July 2021	Review and update. Addition of COVID 19
Rev F	June 2022	Review and update. Amendments to COVID. Change of wording 2.18, 3.2,
Rev G	June 2023	Review and update

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Section 1 Health & Safety Policy

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1.1 Statement of Intent



This is the Statement of Intent Kiley's Karpets 2023 - 24

Our statement of general policy is

- To provide adequate control of the Health & Safety risks arising from our work activities
- To consult with our employees on matters affecting their Health & Safety
- To provide and maintain safe plant and equipment
- To ensure safe handling and use of substances
- To provide information, instruction and supervision for employees
- To ensure all employees are competent to do their tasks, and to give them adequate training
- To prevent accidents and cases of work-related ill health
- To maintain safe and healthy working conditions
- To review and revise this policy annually

- Our stated aims and objectives for the year 2023 – 24 are:
 - To continue to work to ensure an accident free workplace

Signed

Date July 2023

Dain Jensen

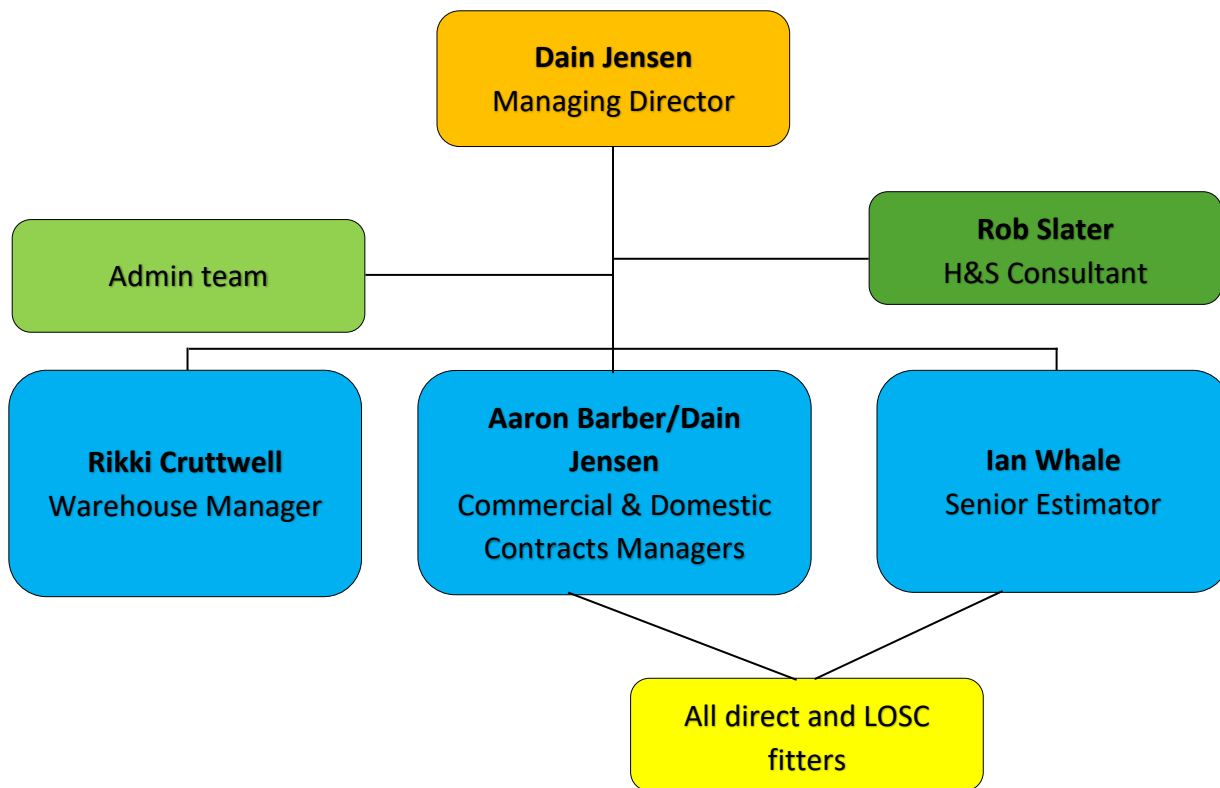
Managing Director



1.2 Health & Safety Policy

The following pages outline the responsibilities and duties of company officers and staff, external consultants and subcontractors. The organisation chart below shows the hierarchy for the reporting of Health & Safety matters, accidents or near misses.

Management Organisation for Health & Safety



Health & Safety Consultants

Clearwater Safety Group Ltd
Unit 3 Burnt Barns Farm
Freckley Hollow
Ninfield
Sussex TN33 9LZ

Tel: 01825 710002
info@clearwater-safety.co.uk
www.clearwater-safety.co.uk

The overall responsibility for Health & Safety within the Company lies with the Managing Director, Dain Jensen. It will be his responsibility, with the support of Rob Slater (Clearwater Safety Group Ltd) to keep all personnel informed of their responsibilities in respect to health & safety matters whether they are directly employed or sub-contracted. Unless otherwise delegated for site works, he has day to day responsibility for Health & Safety. For the purposes of this Policy, the term 'employee' refers to directly employed and labour only sub-contractors.

Kiley's Contract Flooring Ltd – trading as Kileys Karpets (the Company) recognises and accepts its responsibilities under the Health & Safety at Work etc Act 1974 including:-

- providing and maintaining a safe and healthy place of work
- providing information, instruction, training and supervision
- providing and maintaining plant and equipment and safe systems of work
- ensuring safe access to the places of work
- the prevention of accidents and work related ill health

The Management are actively committed to ensuring the Company is compliant with the requirements of the Management of Health & Safety at Work Regulations 1999 and all other Regulations that apply to the Company's work activities, that of supplying and fitting carpets, vinyl and other floor coverings, and to achieving the highest possible standards of Health & Safety throughout the company through monitoring the safety performance and continuous improvement of the health & safety culture. To this aim they have employed the services of Clearwater Safety Group Ltd to provide advice and to monitor the health & safety performance of the company.

Through its Health & Safety Consultants, the Company will provide adequate arrangements for the regular assessment of all areas of work activities in order to identify hazards and control the risk of injury, disease or dangerous occurrences arising.

The Company recognises that the talent and energy of the people who work for it are its most valuable assets. The Directors are therefore fully committed to providing safe and healthy working conditions for all of its employees.

The management will strive to achieve excellence in Health & Safety matters, and all employees and sub-contractors will be encouraged to co-operate with the management in all safety matters to identify any hazards and reduce any risks found during work activities, and to report any situation which may appear dangerous. The Management will ensure appropriate consultation with the employees and other interested parties on these matters.

The Director will "so far as reasonably practicable" ensure that the Company will provide suitable financial resources and support needed to meet these objectives, and will ensure that procedures are in place which ensure that effective monitoring and review of the arrangements is maintained.

Copies of this policy are to be available to all company employees and other interested parties.



1.3 Directors' Duties

The Managing Director, Dain Jensen takes ultimate responsibility for health, safety and welfare throughout the Company. In order to protect the safety and health of employees and others affected by the Company's operations, he will:

- a) Be aware of the general requirements of the Health & Safety at Work Act etc 1974 and of the associated Regulations that apply to supplying and installing floor coverings and associated tasks etc.
- b) Take reasonable steps to familiarise himself with the hazards and risks associated with the work of the Company and with the precautions which need to be taken to eliminate or control those risks.
- c) Appoint a suitably trained, and experienced person to assist him in carrying out his Health & Safety duties. Rob Slater of Clearwater Safety Group Ltd has been appointed as that person.
- d) Ensure that employees and others receive sufficient information, training and advice so that they can carry out their duties safely and competently. Ensure adequate funds and facilities are available for this purpose.
- e) With aid of the Safety Consultant, initiate the timing and review of the Health & Safety Policy and ensure it is promoted to all employees and others working on behalf of the Company.
- f) With the aid of the Health & Safety Consultant (if needed), ensure that all employees and where relevant – sub-contractors satisfactorily discharge their Health & Safety responsibilities allocated to them.
- g) With the aid of the Health & Safety Consultant, ensure the safety performance of the Company is monitored and take action to remedy any identified deficiencies.
- h) With the aid of the Health & Safety Consultant, ensure that any incidents whether or not injury or damage is sustained are investigated and measures put in place to prevent reoccurrence.
- i) To ensure that all sub-contractors working for the Company comply with Company Policies and Procedures.
- j) To permit safety representation by employees in accordance with such regulations as the Secretary of State has prescribed and to encourage discussion of safety matters both in and outside the organisation.

1.4 Contracts Managers' Duties

The Contracts Managers, Aaron Barber and Dain Jensen, are responsible for ensuring that Health & Safety procedures that are compliant with Company Health & Safety Policies are built into every contract. When planning works they will:-

- a) Determine Health & Safety requirements for each job. This may require an assessment of any substances used (COSHH), noise or vibration levels or the degree of manual handling required etc. If needed they will carry out a pre-start site safety inspection and if necessary with the assistance of the Health & Safety Consultant.
- b) Ensure that the necessary expert advice is sought and that recommendations are followed with regard to Health & Safety hazards and identifying training needs.
- c) Liaise with the Health & Safety Consultant (where appropriate) to ensure the effective planning of contracts to take account of known and foreseen Health & Safety hazards and to obtain necessary work permits that are required.
- d) Ensure employees and others are capable of carrying out the work tasks allocated to them. Before entrusting work tasks to sub-contractors, take into account their capabilities as regards Health & Safety and ensure that suitable risk assessments are carried out for any hazardous activity.
- e) Ensure that suitable tools and equipment are supplied to all employees and assess the risk of using the equipment ensuring the 'provision of protection' and implement safe systems of work and training in their use.
- f) Ensure that PPE is only used when there are no other methods of reducing the risk. Ensure there is an adequate supply of Personal Protective Equipment and that employees are trained in the safe storage and use of the PPE.
- g) Work with the Directors to ensure that Health & Safety matters are regularly discussed with employees, both on site and in the office.
- h) Ensure each location has First Aid trained personnel and that injuries are notified where required by Regulations and that all details are entered in an Accident Book.
- i) At all times set a personal example in Health & Safety awareness by wearing the correct PPE and by working according to good practice and SSOW.



1.5 Estimator's Duties

When calculating prices for work, the Senior Estimator, Ian Whale will ensure that he factors in sufficient time and resources to allow the project to be carried out safely and in accordance with current best practice. Where necessary he will liaise with the Domestic or Commercial Contracts Managers to ensure adequate resources are allocated.

1.6 Health & Safety Consultant Duties

- a) Monitor the effectiveness of the company's Policy for Health, Safety and Welfare against the safety performance of the company, and report accordingly to the Directors.
- b) Initiate any changes, developments and amendments to the policy as and when necessary.
- c) Ensure that company Managers and Employees are aware of their Health & Safety responsibilities.
- d) Work to promote an interest and enthusiasm for Health & Safety matters throughout the company.
- e) Report to the Directors/Managers on all matters relating to safety, training requirements, new safety directives and legislation and seek to establish the company's response, and, as a result, instigate the necessary changes throughout the company.
- f) Inform the HSE of all notifiable accidents. Investigate notifiable accidents or dangerous occurrences and recommend means of preventing re-occurrence.

Assist the management with implementation of safety legislation by:-

- g) Arranging training for all employees. Providing or sourcing training.
- h) Where required, prepare Method Statements and Risk Assessments (including COSHH, Noise, Manual Handling etc). Advise on manual handling requirements and advise as to the appropriate mechanical lifting aids where needed.
- i) Conduct site monitoring inspections where required/requested.
- j) Supervise the recording and analysis of information on injuries and ill health; assess trends.
- k) Foster within the company an understanding that injury and loss prevention, and occupational health are an integral part of the business and operational efficiency.
- l) Set a personal example when visiting site by wearing appropriate personal protective equipment.

1.7 All Employees Duties

All employees are to:

- a) Read the 'Health & Safety Statement of General Policy' and the 'Employees Duties' and carry out work in accordance with its requirements.
- b) Work in a safe manner at all times. They are not to take unnecessary risks, which could endanger themselves or others.
- c) Not use any tools or equipment for which it is not intended or they are not trained or experienced to use. Ensure that all portable electrical equipment has a is given at least a visual check before use. Always take a practical and ergonomic approach when manually lifting objects and always use the mechanical aids for lifting that are provided.
- d) Warn others, particularly new employees and young people of particular known hazards. e.g. particularly all substances used and the correct use of tools.
- e) Report any injury to themselves or others which results from an accident at work, even if the injury does not stop them working. Report any incident, which could have resulted in injury or damage i.e. near miss.
- f) Abide by any 'Codes of Practice' etc. issued by the Company
- g) Never introduce any substance without the written consent of their manager.
- h) Inform their line manager if their health is having an adverse effect on their work or their relations with others around them.
- i) Use any Personal Protective Equipment (PPE) identified as necessary by Risk Assessments. Be aware it is an offence to misuse or interfere with any Health & Safety equipment or personal protective equipment supplied for their safety.
- j) Employees working at customer premises or sites, must observe all Fire Precaution Notices and Fire Prevention Measures put in place and make themselves familiar with Site Fire Evacuation Procedures.
- k) Employees shall co-operate with the Kiley's Karpets management team to emphasise a high priority on good health and accident prevention. Management and employees must work together to identify, record and monitor those situations which could lead to personal injury and hazard to the health of other employers, sub-contractors, visitors and members of the general public.

Kiley's Karpets actively encourage employees to take part in the spirit of the Regulations by regular updates and discussions with line managers.



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2.1 Training and Supervision

It is Kiley's Karpets policy that full Health & Safety training is given to all new employees as part of their overall induction into the company. Decisions relating to ongoing training of employees will be reviewed on a regular basis.

Suitable training will be provided to ensure that directly employed staff at all levels are:

- Aware of their Health & Safety responsibilities
- Competent to carry out their duties
- Competent to operate specialist tools, plant and work equipment (where relevant).

The Managers with help from the Health & Safety Consultant will be responsible for identifying and implementing Health & Safety training needs. Records of the training will be kept on the employees personnel file.

In line with CDM 2015, where sub-contractors are engaged, a completed sub-contractor competency questionnaire will be required before works begin to ensure their Skills, Knowledge and Experience is adequate. These will be assessed by the Contracts Managers with the assistance of the Health & Safety Consultants if needed.

2.2 Risk Assessments

All potentially hazardous work activities shall have a 'suitable and sufficient' risk assessment carried out by a competent person. Upon a hazard being identified, appropriate measures will then introduced to manage it, and periodically revised to ensure its ongoing adequacy. It shall be the Director's duty, supported by the Health & Safety Consultant to ensure risk assessments are carried out and are reviewed as and when necessary.

2.3 Workplace safety

The Company will ensure that its primary workplace meets the Health, Safety and Welfare needs of all its employees, visitors, contractors, including wherever relevant, people with disabilities, in respect of lighting, heating, ventilation, eating and drinking facilities, hygiene/toilet facilities and general cleanliness.

2.4 Construction safety

When Kiley's Karpets staff or sub-contractors are working at external premises/sites, access to suitable welfare and hygiene facilities will be assured before works start. In compliance with CDM 2015, if the Company is working as the Sole Contractor the Contracts Manager will ensure that a suitable detailed Construction Health & Safety Plan (CHPP) is written to take account of any site specific hazards. The CHPP will be written by the Contracts Manager with the assistance of the Health & Safety Consultants if needed, and will clearly state how Health & Safety will be managed. In a domestic situation, this may be done via the CDM Wizard.

At no time will any Kiley's Karpets employees or sub-contractors, or any other persons in the vicinity be exposed to any hazardous situation as result of any building works.

The site foreman shall, as far as reasonable practicable, ensure the general tidiness of the work areas by keeping floors passages and stairs clear of obstacles and litter etc.



2.5 Control of Substances Hazardous to Health (COSHH)

Material Safety Data Sheets of substances used are kept on the Company Server. COSHH Risk Assessments will be carried out and information concerning the safe usage will be given to all fitters. It is the Directors' responsibility aided by the Health & Safety Consultants to ensure risk assessments are carried out and regularly reviewed. From the risk assessments the management will instigate the principles of good practice for the control of exposure as detailed in Schedule 2A Regulation 7(7).

No employee is permitted to introduce any substance without the specific consent of their Manager.

2.6 Asbestos

In the unlikely event that Kiley's Karpets Ltd staff/sub-contractors encounter any substance suspected as being or containing asbestos, it will be reported immediately to a supervisor. All works in the area will cease until the substance has been identified and if appropriate made safe/removed by specialist contractors. No works will be carried out that may disturb suspect substances without a suitable Asbestos Survey having been done by a specialist contractor.

2.7 Manual Handling

Manual handling is an unavoidable part of the Company's business activities. With the aid of its Health & Safety consultants, the Contracts Managers will assess all manual handling operations within its workplaces, to take an ergonomic approach and where possible change the nature of any task or provide mechanical aids in order to reduce or lighten the manual handling of loads. With the aid of the Health & Safety Consultants, the Warehouse Manager, Rikki Cruttwell will ensure that risk assessments are carried out to identify the hazards associated with manual handling and ensure that suitable training and supervision is given, and where needed, lifting aids are provided. It will be the Director's responsibility supported by the Health & Safety Consultants to ensure that the requirements outlined in the Regulations are satisfactorily met.

2.8 First Aid

Kiley's Karpets shall ensure that an appropriate number of employees are trained in First Aid. The Health & Safety Consultants will assess the requirements and advise the Management as to the quantity and level of training required. These will be re-assessed annually or upon any major change in personnel or work practices. The office manager will be responsible for ensuring that the first aid kit within the Sedlescombe Road premises is kept full as needed.

2.9 Accident Reporting

All accidents and incidents must be recorded in the accident book at the particular site where the accident occurred irrespective of whether any injury occurred, and the Health & Safety Consultants informed. If appropriate an investigation will be carried out by the Health & Safety Consultants. Any reportable accidents, incidents, or dangerous occurrences will be reported to the senior management and the Health & Safety Consultants as soon as reasonably practicable. If necessary the Health & Safety Consultants will contact the appropriate body. Any reportable event will be investigated by the Health & Safety Consultants. From the findings of the investigation, if needed, the Management in conjunction with the Health & Safety Consultants will implement any alterations to working practices.



2.10 Electricity

Computer and IT equipment in the office will be visually checked by the Office Manager if it is moved and shall have a more thorough test every 36 months. Extension leads will be checked annually or whenever they are relocated. Site tools and equipment will be checked daily for visual damage by the user and undergo a full test at intervals not exceeding 6 months. Appliances will be tagged/labelled, and records kept at the Company offices. It is company policy that wherever possible, all tools supplied and used will be 110v. Where this is not possible a Residual Current Device (RCD) will be used.

2.11 Noise

Noise is not a known hazard in this industry. Where any noisy activities are to take place around the fitters, the Contracts Manager will ensure that suitable ear protection is provided.

2.12 Dust

The removal of old floor coverings or grinding sub-floors can cause dust to be raised. This dust may include living micro-organisms, exposure to which can have debilitating adverse short and/or long term health effects. Each project will be assessed by the relevant Contracts Manager to see if exposure to dusts can be avoided by using mechanical means. Such methods may include portable LEV's fitted to the cutting heads. Where this is not reasonably practicable the tool operators and anyone else in the vicinity will wear a suitable mask to prevent the inhalation of dusts. Masks to be worn in dusty environments will be individually faced fitted.

2.13 Vibration

Occasionally the nature of works using vibrating tools can be of any significant duration. Where the work requires longer use of tools that cause vibration, the Company shall ensure the tasks can be rotated amongst several employees to reduce the length of time any one person is exposed. The company will ensure that where the use of vibration causing hand tools cannot be reduced, that suitable safeguarding procedures are brought in, including where appropriate, anti-vibration gloves.

2.14 Working at Heights

Where staff/sub-contractors need to carry out any works close to exposed edges, the Contracts Manager with support from the Health & Safety Consultant will assess the most appropriate means of access and/or edge protection for each task. A site specific Risk Assessment will be carried out before any such works commence, and suitable control measures put in place to ensure the safety of Kiley's Karpets personnel, and those who will be working in the vicinity.

2.15 General work equipment

It will be the Directors' responsibility, advised by the Health & Safety Consultants where necessary to ensure that the company provide:

- Suitable equipment for the tasks to be done
- To ensure that equipment will be maintained in an efficient state, in efficient working order and in good repair.
- To ensure that all equipment is inspected as required.
- That persons who are required to use work equipment will receive adequate training, information, instruction and supervision as necessary

It will be the responsibility of the users/operators to ensure the tools are checked prior to use and are maintained in good working order and that guards or interlocks are in place and working.

All tools will be checked regularly, and details kept of any defects/actions needed. These checks will be carried out by the users.

On occasions the company may need to hire in equipment due to either specialised or quantity of work. The equipment will only be obtained from approved hire companies who supply the appropriate safety documentation and where necessary supply training to ensure all employees are suitably trained in the use of the equipment.

2.16 Fire

It will be the responsibility of the Office Manager, supported by the Health & Safety Consultant to ensure adequate fire extinguishers are available at the Company premises.

A Fire Risk Assessment will be carried out, and The Fire Evacuation Procedure will be published on the notice board. All fire extinguishers are to be checked annually by a specialist contractor. Where Kiley's Karpets personnel work at client's premises, they will ensure they are aware of the site fire evacuation procedures.

2.17 Computer screens

The Office Manager, with support from the Health & Safety Consultants will ensure suitable assessments are carried out for all persons who use computer screens (IT). The assessments will consider the type of IT equipment used, whether it is a static PC, Laptop or Tablet, the location if static and the length of time the equipment is used.

2.18 Personal Protective Equipment

The company recognises that this Regulation clearly states that PPE should only be used when risks cannot be avoided or sufficiently reduced by other preventive measures or through work re-organisation. Masks to be worn in dusty environments will be individually faced fitted.

The Directors will ensure that there is sufficient supply of PPE when required and in conjunction with the Health & Safety Consultant, will ensure all employees are suitably trained in the use and correct storage.

All PPE issued will be stored as per the manufacturer's specification.

All employees will be told of their duty to not misuse or interfere with any Health & Safety equipment including PPE supplied for their safety. (s7 HASAW 1974)

2.19 Consultation with Employees

Kiley's Karpets will consult with employees on matters relating to Health Safety and Welfare and furnish them with the information which is deemed necessary. Such information is to be seen on the company notice boards as displayed in the workplace, and in the employee safety handbook. Kiley's Karpets encourages employees to join in with spirit of the regulations by actively taking part in discussions with their managers. It is the responsibility of all managers to ensure that this consultation takes place.



2.20 Protection of Young Persons

The Company shall ensure that young persons (under 18 years of age) employed by them are protected at work from any risks to their health and safety which are a consequence of their lack of experience, or the fact that young persons have not yet fully matured and may not comprehend any hazards in the workplace. A specific Risk Assessment shall be undertaken on the Young Person and the tasks he/she will be carrying out before any work commences.

Persons under 18 years of age are prohibited from operating the following equipment, unless attending approved training or under the specific direction and supervision of a qualified and competent person:

1. Power tools

2.21 Occupational dermatitis

A COSHH assessment will be carried out before any chemicals are used and operatives will be given appropriate PPE to wear. Staff will be told of any hazards inherent with any substance and will be told of the need to inform their line manager if the material is having a deleterious effect on them.

2.22 Health Surveillance

In compliance with Regs 3 and 6 of the Management Regulations the Company will issue annual health questionnaires to all site staff. These will be monitored, and medical advice sought for any staff member whose answers suggest deterioration in health that could be attributed to their works.

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

Signed



Dain Jensen

Date July 2023

Managing Director

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3.1 Policy Statement

It has been estimated that there are 6 million cars on the road for business reasons. The Department of Transport has suggested that half of those will be involved in an accident every year.

As a conscientious employer whose work involves considerable travelling, Kiley's Karpets is committed to reducing the risk of work-related road traffic crashes and collisions.

We understand that the following legislation may apply to us.

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Road Traffic Acts supported by the Highway Code

This Driving Policy applies to all staff members and sub-contractors who drive in connection with Company business whether it is in their own vehicle, a Company vehicle or a vehicle hired by the Company.

A copy of this Policy will be given to everyone who drives on Kiley's Karpets business.

The purpose of this Policy is to set out how the management will ensure that all those who drive on Company business are acting in line with the both Health & Safety Law and Road Traffic Legislation.

This Driving Policy will be reviewed/updated as needed annually, and any changes made known to all driving staff.

All those who drive on Kiley's Karpets' business whether they use a company vehicle or their own, will be required to produce their Driving Licence annually or on request.

Failure to produce the licence when requested may result in disciplinary action being taken.

All drivers are required to inform the Director/ Line Manager of any Road Traffic Accidents (RTA) involving vehicles used on Company business as soon as it is safe to do so, whether or not any damage is sustained to the vehicle or personnel. All staff are required to follow the procedures set out in item 3.10.

All drivers must inform the Directors/Managers of any driving penalties either received or pending within 5 working days of notification.

3.2 Parking Tickets/Fines/Toll Charges

If parking tickets are given to any Company vehicles whether or not they are being used for Company business, the driver/keeper of the vehicle is to ensure that the office is informed as soon as reasonably practicable. Drivers are responsible for ensuring any Congestion Charge or Toll Road/Bridge fees are paid within the specified timescale. Failure to do so may result in the employee being held liable for extra costs over and above the original fine/fee.



3.3 Drink and Drugs including prescription / 'over the counter' medicines

Kiley's Karpets operates a zero tolerance Drink and Drug Driving Policy.

All drivers must report any pending prosecutions and/or cautions immediately, regardless of whose vehicle they were driving at the time. Failure to do so will result in disciplinary action.

Any driver prosecuted and/or convicted of any such offences will be subject to disciplinary procedures which may result in dismissal or removal from the driving rotas.

All employees are encouraged to report concerns about colleagues with regards to drink or drugs as soon as possible. This can be done anonymously if necessary.

Any driver who believes that they may be over the drink drive limit must inform their line manager. They must not drive. They may be given alternative duties if available or required to take annual leave. Should this become a regular occurrence disciplinary action may take place.

Any driver found to be affected by illegal drug use may face disciplinary procedures as well as prosecution by the Police.

Many prescription/over the counter medicines can have a serious effect on the ability to concentrate and can contribute to accidents. Such medication may include cold remedies, some cough medicines, pain relief – especially those including opiates, and antidepressants which may cause muscle spasms. Any driver whose abilities are found to be impaired through drugs/medicines may be prosecuted.

Any driver who feels they may be unfit to drive after taking prescription /over the counter medication must inform their line manager immediately. They will not be permitted to drive.

3.4 Defects & Drivers' responsibilities

All drivers are legally responsible for the roadworthiness of the vehicles they are driving. If the tyres are bald or the lights do not work etc. it is the driver who will receive penalty points and fines.

Any defects identified must be reported to the office immediately. The Director will ensure the fault is recorded.

All reported defects will be dealt with promptly. The Company will not permit un-roadworthy vehicles owned /leased by the Company to be used.

3.5 Grey Fleet

Any staff member driving their own vehicle on behalf of the company will be required to present their insurance certificate and MOT certificate (if applicable) on an annual basis. Employees must ensure that their vehicle is insured for business use.

Any employee driving their own vehicle must ensure that it is kept in a safe and roadworthy condition at all times. The management accept that employees may be without their vehicle when repairs are necessary to keep the vehicle in a safe and roadworthy condition. However, employees must give as much notice as possible so that alternative arrangements can be made.

3.6 Mobile Phones

The mobile phone is now seen as an essential means of work communication. However, it is illegal to use a handheld mobile phone while in control of a vehicle, whether it is mobile or stationary –ie in traffic.

Whenever possible, mobile phones are to be switched off while driving and a message facility used. Messages are only to be picked up and responded to when it is safe to do so.

Drivers will not be encouraged to use the phone to make or receive calls while in motion.

Where possible, vehicles supplied by the Company will usually have a Bluetooth system fitted. Drivers will not be required to use a mobile phone while they have no hands-free kit.

Any driver failing to adhere to the mobile phone policy may be subject to disciplinary proceedings.

All drivers will be given an extended version of this Policy.

3.7 Satellite Navigation Systems

Satellite Navigation Systems can be a useful tool for drivers; however, they can also be a dangerous distraction.

All destinations are to be entered while the vehicle is stationary in a safe place. Drivers will be told to stop if it is necessary to take their eyes off the road to check routes.

Portable units are to be positioned so as not to impair vision. They should not be positioned where they are likely to cause injuries in the event of a collision.

All 'in vehicle' distractions should be kept to a minimum and it is the responsibility of the driver to ensure that they are not likely to be distracted.

3.8 Journey Planning

The management will ensure that appointments are scheduled to a realistic timetable and are planned to take into account the essential need for adequate rest periods. Any staff member or contractor who feels that their timetables/schedules are unrealistic and they need to take risks/ break speed limits to complete them must voice their concerns with the Director as soon as possible.

The management will monitor weather conditions and will reschedule appointments etc, if conditions become too dangerous for the drivers and /or passengers.

Driver fatigue is a well-known cause of accidents. All drivers are required to ensure that their personal lives do not cause them to come to work tired.

3.9 Vehicle maintenance

All drivers are required to carry out basic maintenance on the vehicle for which they are responsible. They should check oil, water, tyre pressures, windscreen washer fluid weekly.

Drivers are to be reminded that in winter months, that they must have a clear windscreen before setting off. Peering through a small section while the screen de-mists is not acceptable.

The management will ensure that all vehicles supplied by the Company are regularly inspected and maintained using the manufacturers' recommended service schedules.



3.10 Emergency procedures


In the event of an accident or breakdown employees must prioritise:

- Their own safety
- The safety of anyone else involved
- The safety of other road users

All those who drive on Company business will be given a set of instructions detailing what they must do in the event of an accident or breakdown.

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

Signed



Date July 2023

Dain Jensen

Managing Director



Section 4 The Environmental Policy

4.1 Environmental statement

The management of Kiley's Karpets recognises that its day to day business activities generate waste material which can impact both directly and indirectly on the environment through use of resources and disposal to landfills.

It is our stated Policy that we intend to protect and improve the environment through good management and by adopting best practice wherever possible.

The management of Kiley's Karpets will work to integrate environmental considerations into our business decisions and adopt greener alternatives wherever possible throughout our operations.

4.2 Policy

In all our activities we will:

- Comply fully with all legal requirements, regulations and codes of practice.
- Ensure that our work does not cause pollution to land, air or water.
- Work to reduce water and energy use.
- Ensure that as many waste materials as possible are recycled via waste contractors.
- Work to identify and manage environmental risks and hazards.
- Involve customers, suppliers and subcontractors in the implementation of our objectives. Where possible try to encourage the use of recycled materials.
- Provide suitable training to enable employees to deal with their specific areas of environmental control.
- Improve the environmental efficiency of our transport where practicable.
- Establish targets to measure the continuous improvement in our environmental performance.

In the event of an environmental incident, it is Kiley's Karpets policy that the details are promptly and properly reported to the Directors and the Health & Safety Consultants, who will investigate and take prompt action to make good any damage and to avoid any recurrence.

4.3 Recycling

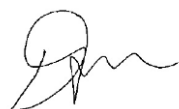
We will ensure so far as reasonably practicable our waste materials are recycled. Suppliers of carpets or vinyl will be required to take back carpet cores for reuse.

It shall be a condition of employment that all employees work towards the objectives contained within this Policy. Training will be given to all employees as needed to ensure all staff are aware of company recycling policies.

4.4 Review

This Environmental Policy Statement will be regularly reviewed and updated as necessary. The management team endorses these policy statements and is fully committed to their implementation.

This Environmental Policy has been approved & authorised by:



Dain Jensen

Date July 2023

Managing Director



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Section 5 Lone Working

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5.1 Policy Statement

Lone workers spend some or all their working hours alone for a variety of reasons: they may work in an isolated location, be at a client's premises, work from home or may simply be working outside normal office hours.

The aim of this Policy is to:

- a) Ensure the safety of any employees who are working in a location that is isolated from other people.
- b) Ensure that the Company complies with all its legal obligations.

The Management will ensure compliance with R3, Management of Health and Safety at Work Regulations 1999 by ensuring that where Lone Working has to take place, a proper assessment of the hazards involved is carried out, and suitable control measures are implemented to minimize the risks to the health or safety of the employee.

5.2 Risk Assessments

When Lone Working is to take place, the Company will carry out a specific risk assessment on all types of work that are (or are likely to be) undertaken with particular regard to the following factors:

- Risk of violence against the employee (particularly when handling money or dealing with the public).
- Trips, slips or falls, especially when surveying buildings or locations.
- Equipment or materials needed (must be suitable and safe for use by one person).
- Might the geographical location hinder any rescue, is there a phone signal.
- Proximity to other people, the ability to get help from the emergency services.

5.3 Safety procedures

All lone workers should adhere to the following guidelines:

- A 'buddy system' is to be used at all times. An agreed schedule is to be set up for phone calls to be made to/from the lone worker.
- All personnel involved are to be aware of the emergency contact list, and timescales before any actions.
- The Lone Worker is to ensure that their proposed location is known by their buddy before they start.
- If they do not have a suitable mobile device, all lone workers will be provided with a mobile phone by the Company which they must ensure they keep charged and switched on while working.

All Company personnel must comply fully with this policy and with any complementary instructions received from the Company. Failure to do so may constitute a disciplinary offence.

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

Signed

Date July 2023



Dain Jensen
Managing Director

Section 6 Equality and Diversity

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6.1 Introduction

Kileys Karpets Ltd hereinafter called 'the Company' recognises that discrimination or victimisation of personnel on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation is unacceptable, and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the stated aim of the Company that no current employee or applicants for new roles receives any less favourable treatment (either directly or indirectly) in either the recruitment process or subsequent employment.

It is the Company's intention so far as reasonably practicable that its workforce is representative of all sections of society and as such each employee feels respected and able to give of their best.

The purpose of this policy is to provide equality and fairness for every member of staff.

6.2 Policy Statement

To create a working environment in which individual differences of all our staff are recognised and valued.

Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.

All staff will have the opportunity to develop their career through training, development and progression.

Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.

This policy is fully supported by the management of Kileys Karpets.

We will review all our employment practices to ensure that fairness is applied throughout the business.

All employees, whether full or part-time will be treated fairly and with respect

Selection for employment, promotion, training etc will be on purely on the basis of aptitude and ability.

All employees will be encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Personnel working for or on behalf of the Company will not discriminate or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Any staff member including sub-contract personnel found to have behaved in an inappropriate manner will be subject to disciplinary procedures.

The nature of the Company's business means that it is unlikely that anyone with a physical disability would be able to carry out the required work on site. Nevertheless, the Company attaches particular importance to the needs of the disabled.

In accordance with this policy, the management are required to:

make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, re-training, provision of special equipment, reduced working hours. (Managers will be expected to seek advice and guidance from external agencies on how to keep any disabled staff members employed);

give reasonable consideration to disabled people who apply for work with the Company, having regard for their ability to allow them to do the job.

consider making reasonable adjustments to the job and /or the working environment.

This policy and any associated procedures or arrangements shall operate in accordance with statutory requirements or Codes of Practice issued by HM Government Departments, and any other statutory bodies.

The policy will be monitored and reviewed annually.

6.3 Management Duties

The Director is responsible for ensuring the implementation of this Policy; both management and supervisors will ensure that they and their staff operate within this policy and that all reasonable steps are taken to avoid discrimination.

- Each manager/supervisor will ensure that:
- all their staff are aware of the policy, and the reasons for it. any grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained of all correspondence and meetings.

The Director will be responsible for monitoring the operation of the policy.

6.4 Staff Responsibilities

All staff members have a responsibility for ensuring that there is no discrimination applied to anyone inside the company or to any clients.

The attitudes of all staff members are crucial to having fair employment practices.

In particular, all members of staff are required to:

- comply with the policy and its arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform their manager if they become aware of any discriminatory practice.

6.5 Training

Training on equality issues will be given to all staff when they join the Company .

All managers who are involved in recruitment will receive specialist training to ensure that they are aware of this Policy and their responsibilities.

6.6 Monitoring

The Company will maintain details on any members of staff who have been involved in any disciplinary procedures involving bullying harassment or any discrimination.

Where the Company employs anyone with a disability, an equality impact assessment will be carried out to ascertain the effectiveness that the Company's policies may have on those who experience them. These will normally be carried out at the annual performance appraisal interviews.

Any information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

If monitoring or the equality impact assessments highlight any indication that the Company, or specific people are not fully compliant, then an action plan will be developed to address these issues. Where necessary this will include a review of recruitment and selection procedures, Company policies and practices.

6.7 Grievances/Disciplinary Procedures

Any employee who considers he has been the victim of unequal treatment or discrimination on the grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation has the right to pursue his complaint in accordance with the Company Grievance or Harassment Procedures.

Any member of staff found to have breached this Policy will be liable to be dealt with under the Company Disciplinary Procedure.

6.8 Review

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

This policy will be reviewed annually or when there is a change in circumstances in work practices or the introduction of new legislation.

Signed

Date July 2023



Dain Jensen
Managing Director

Section 7 Anti-Bribery and Corruption Policy

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7.1 Introduction

It is Kileys Karpets Policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

7.2 The Policy

We will not provide or accept gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

7.3 Who is covered by the Policy?

This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

7.4 What is a Bribe?

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his duties.

7.5 Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with the Company's policy in respect of gifts and hospitality.

7.6 Facilitation Payments and Kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7.7 Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.



7.8 Record Keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

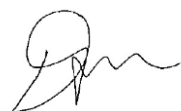
7.9 Raising Concerns

Employees will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

7.10 Monitoring

The effectiveness of this policy will be regularly reviewed by the Board. Internal control systems and procedures will be subject to audit under the internal audit process.

This statement represents our general position on all forms of bribery and corruption issues and the policies and practices we will apply in conducting our business



Dain Jensen

Date July 2023

Managing Director

Section 8 General Data Protection Policy

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8.1 Introduction

This policy applies to all data held by Kileys Karpets (“the Company”) whether it is stored on computer/cloud or in manual (paper based) files. The aim is to protect all information pertinent to the Company and to its employees.

8.2 The Policy

This policy applies to all staff members of the Company. For the purposes of this policy, the term “Staff” means all permanent, fixed term, and temporary staff, Labour Only Sub-Contractors, and agency workers.

All contractors and agents acting for or on behalf of the Company will be made aware of this policy.

8.3 Definitions

The Data Protection Act 2018 and the General Data Protection Regulations (GDPR) are designed to protect individuals and personal data, which is held and processed on their behalf. The Act defines the individual as the ‘data subject’ and their personal information as ‘data’. These are further defined as:

8.3.1 Data Subject: Any living individual who is the subject of personal data whether in a personal or business capacity

8.3.2 Data: Any personal information which relates to a living individual who can be identified. This includes any expression of opinion about the individual.

Data is information stored electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems

Manual records which are structured, accessible and form part of a ‘relevant filing systems’ (filed by subject, reference, dividers or content), where individuals can be identified and personal data easily accessed without the need to trawl through a file.

8.3.3 Personal Data: Any information which relates to a living individual who can be identified from the information. It also extends to any information which may identify the individual. Examples of personal data:

- A person’s name and address (postal and email)
- Date of birth
- Statement of fact
- Any expression or opinion communicated about an individual
- Minutes of meetings, reports
- Emails, file notes, handwritten notes, sticky notes
- CCTV footage if an individual can be identified by the footage
- Employment applications
- Spreadsheets and/or databases with any list of people set up by code or staff number
- Employment or education history

8.3.4 Sensitive Personal Data:

Any information relating to an individual's:

- Ethnicity
- Gender
- Religious or other beliefs
- Political opinions
- Membership of a trade union
- Sexual orientation
- Medical history
- Offences committed or alleged to have been committed by that individual

8.4 General principles

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data. The Data Protection Act 2018 sets legislative requirements for organisations processing personal data (referred to under the Act as 'Data Controllers').

The Company will be open and transparent when processing and using private and confidential information by ensuring we follow the eight Data Protection Principles of good data handling:

- meeting our legal obligations as laid down by the Data Protection Act 2018
- ensuring that data is collected and used fairly and lawfully processing personal data only in order to meet our operational needs or fulfil legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly regularly reviewing data protection procedures and guidelines within the organisation.

Data protection principles

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 2018.

- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The Company recognises and understands the consequences of failure to comply with the requirements of the Data Protection Act 2018 may result in:

Criminal and civil action;

Fines and damages;

Personal accountability and liability;

The Company may also consider taking action, in accordance with the Company's Disciplinary Procedure, where staff do not comply with the Data Protection Act 2018.

8.5 Roles and responsibilities

Staff will not attempt to gain access to information that is not necessary to hold, know or process. Any information which is held will be relevant and accurate for the purpose for which it is required. The information will not be kept for longer than is necessary and will be kept secure at all times.

The Company will ensure that all personal information is anonymised as part of any evaluation of assets and liability assessments except as required by law.

Staff who manage or process personal information will ensure that it is kept secure and confidential. Sensitive personal information will only be processed in line with the provisions set out in the Data Protection Act 2018 and only processed in accordance with instructions set out by the respective Data Controllers.

The Company will ensure that all staff who are involved in handling personal data are made aware of the reasons:

why personal and sensitive personal data is being processed:

how it will be processed

who will process it

how it will be stored and

how it will be disposed of when no longer required.

8.6 Data subjects rights

Data subjects have the right to access any personal data held on our systems and in our files upon their request, or to delete and/or correct this information if it is proven to be inaccurate, excessive or out of date.

The Company recognises that individuals have the right to make a request in writing and obtain a copy of their personal information, if held on our systems and files.

The Company recognises that individuals have the right to prevent data processing where it is causing them damage or distress, or to opt out of automated decision making and stop direct marketing.

8.7 Company (data controllers) obligations

The Company will adhere to and follow the eight principles of data protection when conducting surveys, marketing activities etc., where the Company collects, processes, stores and records all types of personal data.

The Company will not transfer or share personal information with countries outside of the European Union unless that country has a recognised adequate level of protection in place in line with the recommendations outlined in the Data Protection Act.

The Company will ensure all staff are provided with data protection training and promote the awareness of the Company data protection policies, procedures and processes.

8.8 Complaints

Complaints relating to breaches of the Data Protection Act 2018 and/or complaints that an individual's personal information is not being processed in line with the 8 principles of data protection will be managed and processed by the Company Secretary.

All complaints of dissatisfaction will also be processed in accordance with the Company Grievance and Complaints Process and should be sent to:

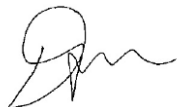
Kileys Karpets Ltd
107 Sedlescombe Road North
St Leonards on Sea
East Sussex
TN37 7EJ

8.9 Confidentiality and information sharing

The Company will only share information in accordance with the provisions set out in the Data Protection Act 2018.

Where applicable the Company will inform individuals of the identity of third parties to whom we may share, disclose or be required to pass on information to, whilst accounting for any exemptions which may apply under the Data Protection Act 2018.

This is Kileys Karpets stated Policy of Data Protection and Information Security. It will be reviewed and updated as legislation changes.



Dain Jensen

Date July 2023

Managing Director



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Section 9 Modern Slavery Policy

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9.3 Quality and Sustainability Agreement..... 39

9.4 Training..... 39



9.1 Introduction

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Kileys Karpets recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We are also committed to ensuring as far as we are able that no-one in our supply chain uses child labour as part of their processes.

9.2 Policy

We will undertake due diligence when considering taking on new suppliers, and where relevant we will be reviewing our existing suppliers. This due diligence includes:

- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

9.2.1 Whistleblowing Policy - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

9.3 Quality and Sustainability Agreement

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's Quality and Sustainability Agreement will lead to the termination of the business relationship.

9.4 Training

The Company requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.



Dain Jensen

Date July 2023

Managing Director