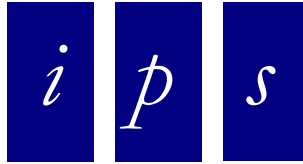


INTERNATIONAL

Health and Safety Policy

Health and Safety Policy

IPS International Ltd
Northbank House
Sir Thomas Longley Road
Rochester
Kent
ME2 4DU



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Health and Safety Policy

Contents

1 HEALTH AND SAFETY POLICY STATEMENT3

2 HEALTH AND SAFETY RESPONSIBILITIES4

3 HEALTH AND SAFETY ARRANGEMENTS.....6

3.1 RISK ASSESSMENTS6

3.2 CONSULTATION WITH EMPLOYEES7

3.3 PREMISES8

3.4 SAFE PLANT AND EQUIPMENT9

3.5 SAFE HANDLING AND USE OF SUBSTANCES11

3.6 INFORMATION, INSTRUCTION AND SUPERVISION.....12

3.7 COMPETENCY FOR TASKS AND TRAINING13

3.8 ACCIDENTS, FIRST AID AND WORK-RELATED ILL HEALTH.....14

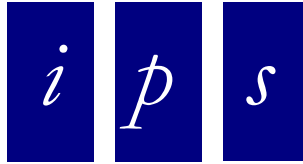
3.9 MONITORING15

3.10 EMERGENCY PROCEDURES – FIRE AND EVACUATION16

3.11 TRAINEES17

3.12 DELIVERY OF TRAINING18

3.13 DRIVING FOR WORK PURPOSES19



INTERNATIONAL

Health and Safety Policy

1 Health and Safety Policy Statement

This is the Health and Safety Policy Statement of:

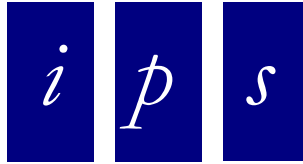
IPS International Limited Northbank House Sir Thomas Longley Road Rochester Kent ME2 4DU	IPS International Ltd 11a Lorne Road Dover Kent CT16 2AA
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Our statement of general policy is:

- to provide adequate control of the health and safety risks arising from our work activities, which may affect the employees, trainees and contractors of IPS International Ltd;
- to consult with our employees on matters affecting their health and safety;
- to provide and maintain safe plant and equipment;
- to ensure safe handling and use and storage of substances;
- to provide information, instruction and supervision for employees, trainees and contractors;
- 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; and
- to review and revise this policy as necessary at regular intervals.

IPS International Ltd (IPS) recognises that the health, safety and welfare of all its employees is of major importance and that it is the responsibility of the Board of IPS to do everything that is reasonably practicable to prevent injury and risk to health.

In recognising its responsibility to employees, contractors, customers and the general public the company also require acceptance of all employees that it is their personal responsibility to do all that is practicable to safeguard their own health and safety and that of their colleagues.



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Health and Safety Policy

2 Health and Safety Responsibilities

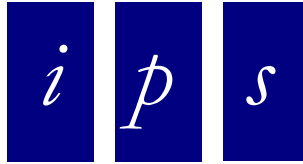
This section states the responsibilities of the management and employees of IPS for the maintenance and improvement of health, safety and welfare conditions within the company.

- 1 **Overall and final responsibility for health and safety** is that of the Board members of IPS International Ltd to:
 - 1) Ensure that there is an effective Health and Safety Policy.
 - 2) Provide adequate staff, funds and materials to meet the requirements of this policy and relevant legislation.
 - 3) Ensure responsibility for health and safety is properly understood at all levels.
 - 4) Include health and safety within the agenda at Directors meetings.
 - 5) Appraise the effectiveness of this policy and ensure that any necessary changes are communicated to all employees.

- 2 **Day-to-day responsibility** for ensuring this policy is put into practice is delegated to Senior Managers who will:
 - 1) Ensure all provisions and procedures under this policy are understood and carried out
 - 2) Ensure responsibility for Safety is properly assigned and understood at all levels.
 - 3) Provide adequate resources to meet health and safety responsibilities
 - 4) Insist on high standards of housekeeping and environmental control
 - 5) Ensure that health and safety is taken into account when appraising employee effectiveness.

- 3 To ensure **health and safety standards** are maintained and improved, the following people have delegated responsibility in the following business areas:

Responsibility	Business area	Delegated responsibility
Director	Engineering and Technical training	
Head of Apprentice Engineering training	Engineering Apprentice year 1 training	Internal Apprenticeships Section Manager
	Engineering Apprentice year 2/3 training	Internal and External Apprenticeships Section Manager
	BTEC Qualifications	BTEC Section Manager
Head of Health and Social Care training	Health and Social Care training	Health and Social Care Section Manager
Head of Business Skills Training	Business Skills Training Motor Vehicle	
Company secretary	Administration support and finance team	
Director	Business Development team	

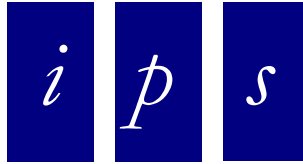


INTERNATIONAL

Health and Safety Policy

IPS operates from two locations, its head office is in Rochester, Kent and Care training operates from an office/training centre in Dover, Kent.

- 4 **All employees** have the responsibility to:
- co-operate with Directors and managers on health and safety matters;
 - not interfere with anything provided to safeguard their health and safety;
 - take reasonable care of their own health and safety; and that of others who may be affected by their acts or omissions
 - report all health and safety concerns to an appropriate person (as detailed in this policy statement).



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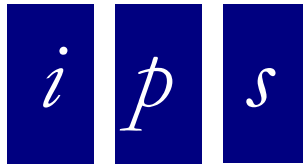
Health and Safety Policy

3 Health and safety arrangements

3.1 Risk assessments

Risk assessments are required under the Management of Health and Safety at Work Regulations. Key areas of risk are detailed in the appendix

- Risk assessments, will be undertaken by employees and those with delegated responsibilities (responsible persons) who are trained and competent in the risk area to be assessed.
- The findings of all risk assessments will be recorded and reported firstly to the responsible person for the business area and then to a Senior Manager/Director.
- Action required to remove/control risks will be approved by the responsible person in consultation with Senior Manager for the business area concerned
- The directly responsible person will ensure the action required is implemented.
- The Senior Manager responsible for the business area will check that the implemented actions have removed or reduced the risks.
- All risk assessments will be reviewed to coincide with the Safety Policy review or when the work activity changes, whichever is soonest.



INTERNATIONAL

Health and Safety Policy

3.2 Consultation with employees

IPS international Ltd will seek a co-operative approach to health and safety in the workplace by consulting directly with employees. The company will consult regarding matters, which may substantially affect the health and safety of employees.

IPS will maintain itself up to date with health and safety practice and legislation and maintain policies and procedures necessary to implement legislation and best practice.

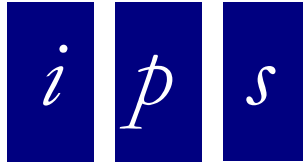
IPS will deal with any matter deemed to be a health and safety matter immediately. IPS employees are expected to raise health and safety matters at the time they become aware of them and not wait till the next meeting.

Consultation with employees is provided by the following methods:

- 1) All employees have direct and immediate access to a Section Manager or Senior Manager or a Director of the company on any matter which directly affects health and safety.
- 2) Team meetings for Rochester based employees, which are monthly and chaired by a Senior or Section Manager.

Near miss, potential accident and hazardous observation reporting

All employees must report any near miss, potential accident or observation of a hazardous occurrence whether it occurs within our training centres or offices or at a customer or a client premises. Any such occurrence will initially be investigated by a Senior Manager and if possible immediate remedial action taken. If definite remedial action is not immediately available, then the occurrence should be investigated as though an accident had occurred. In all cases of such occurrences the risk assessment for the task must be reviewed and the risk assessment updated.



INTERNATIONAL

Health and Safety Policy

3.3 Premises

IPS international Ltd has an obligation under the Health and Safety at Work Act to provide safe access and egress to places of work.

IPS has two premises from which it conducts training activities.

1. Northbank House, Sir Thomas Longley Road, Medway City Estate, Rochester, Kent, ME2 4DU
2. 11a Lorne Road, Dover, Kent CT16 2AA

IPS employees also visit other companies' premises to carry out training or other business activities.

1) **Northbank House**

Northbank house is an industrial building with substantial front offices and car parking to the front and right-hand side of the building. Vans and HGV vehicles can access the right-hand side parking area.

- IPS will set a 5mph speed limit in the car park area and post warning signs to drivers that pedestrians may be crossing the car park areas.
- Visitors to Northbank House will access the premises via the front reception door. All visitors will sign in for the purpose of maintaining a Fire register. Visitor guideline notices in reception will give guidance on fire, first aid, fire alarm test soundings and general visitor information.

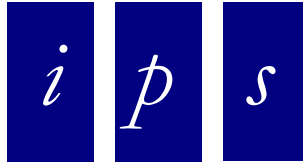
2) **Dover**

Dover is a detached building office with limited car parking adjacent. The office area is accessed a staircase with Fire Doors on the landing.

Visitors to the Dover offices will access the premises via the front gate and front door. All visitors will sign in for the purpose of maintaining a Fire register. Visitor guideline notices in reception will give guidance on fire, first aid, fire alarm test soundings and general visitor information.

3) **Visiting or training on other employers premises**

- IPS Instructors and associates are required to obtain, read and comply with any relevant health and safety information provided for visitors on attending the other employers' site.
- IPS Instructors and associates should ensure that the training location is safe for the training that is to be delivered and that trainees are aware of any local guidelines and emergency procedures particular to the other employers' site.



INTERNATIONAL

Health and Safety Policy

3.4 Safe plant and equipment

IPS International Ltd has a range of engineering plant and equipment from building facilities equipment through to office furniture and computer network equipment and company cars. The company is a training organisation and much of its fixed plant and equipment, will be operated by trainees learning new techniques, under the direct supervision of experienced instructors. In addition the company has training rigs and portable equipment which can be located temporarily in clients premises.

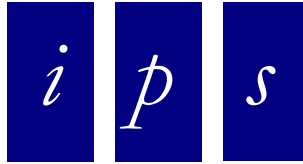
IPS has to comply with the requirements of the following regulations and will do so when purchasing new equipment:

- 1) Provision and use of Work Equipment Regulations 1998,
- 2) Lifting Operations and Lifting Equipment Regulations 1998,
- 3) Electricity at Work Regulations 1989,
- 4) Gas Safety Regulations 1998,
- 5) Pressure Systems and Transportable Gas Containers Regulations 1998
- 6) Health and Safety (Display Screen Equipment) Regulations 1992

The following will be responsible for identifying equipment/plant that needs maintenance.

Engineering workshop equipment and Lifting equipment	Section Manager first year Apprentices
Portable Appliances	Section Manager first year Apprentices
Welding equipment, gas & electric	Mechanical Technical Trainer
Motor Vehicle Lift	Motor Vehicle trainer
Computers and IT equipment	Director
Pool cars	Mechanical Technical Trainer
Company cars	The named driver

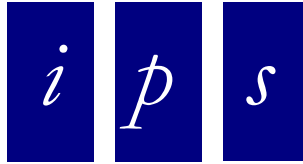
- Each of the above will be responsible for ensuring effective maintenance procedures are drawn up and creating a system of work involving appropriately timed inspections and work activities such that plant and equipment is maintained in an efficient working order and safe state of repair.
- Each of the above will be responsible for ensuring all identified inspections and maintenance are implemented.
- Statutory Inspections are carried out annually by On-Time Engineering covering lifting equipment, compressed air systems and lifts and jack support equipment



INTERNATIONAL

Health and Safety Policy

- The Fork Truck is serviced annually and drivers are all trained and certificated. Due to the intermittent use of the FLT re-assessment for fork truck driving is set at three years.
- Fume extraction equipment and filtration will be carried out at scheduled intervals by the manufacturer.
- Any problems found with plant/equipment should be reported to the people named above.

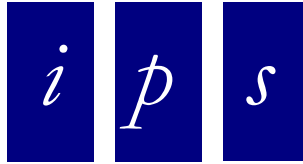


INTERNATIONAL

Health and Safety Policy

3.5 Safe handling and use of substances

- A member of the First year engineering Apprentice team will be responsible for identifying all substances that need a COSHH assessment, and for undertaking COSHH assessments.
- The department head with delegated responsibility will be responsible for ensuring that all actions identified in the assessments are implemented.
- Those listed with delegated responsibility will be responsible for ensuring that all relevant employees are informed about the COSHH assessments.
- The purchaser and user will check that new substances can be used safely before they are purchased.
- COSHH assessments will be reviewed annually to coincide with the safety policy review or when the work activity changes, whichever is soonest.
- Asbestos; A survey of Northbank House was carried out in 2005 by an HSE licensed Inspection company and no asbestos products are present.

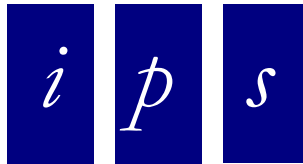


INTERNATIONAL

Health and Safety Policy

3.6 Information, instruction and supervision

- The Health and Safety Law poster is displayed on the Safety notice board within the main workshop.
- Health and Safety leaflets and HSE published books are also available on request
- Health and Safety advice is available from
 - a) Director or,
 - b) A Health and Safety Associate, who is approved by a Director of IPS
 - c) Those listed with delegated responsibility.
- Supervision of young workers/trainees, working directly for IPS International Ltd, will be undertaken and monitored by the Section Manager (delegated responsible person) for the business area where the trainee will work.
- Employees of IPS who are consultants, trainers or instructors are on occasions required to provide training services at locations under the control of other employers. Each employee is required to obtain, read and comply with any relevant health and safety information provided for visitors on attending the other employers' site.

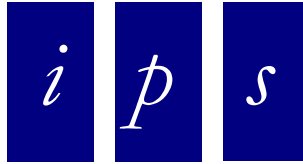


INTERNATIONAL

Health and Safety Policy

3.7 Competency for tasks and training

- Induction training will be planned by the business area Senior Manager for all new employees and will include the IPS International Health and safety policy, procedures and arrangements.
- Induction training, including health and safety training will be provided for all contractors/associates who are required to provide training services for and on behalf of IPS International.
- Training will be identified, arranged and monitored by the Senior Managers and/or team leaders with delegated responsibilities
- IPS has identified IOSH Managing Safely as an appropriate qualification for employees whose job role covers and aspect of Health and Safety.
- Job specific training will be planned and provided by the team leader with delegated responsibilities
- Specific jobs requiring special training are;
 - a) First-Aider/Appointed persons
 - b) Fire Controller and Fire Marshall
 - c) Handling storage and connecting pressurised gas cylinders
 - d) Mounting and dismounting Abrasive Wheels
 - e) Use of the IPS forklift truck with re-assessment at three year intervals
- Training records are kept with each individuals Personal Development record file and recorded on the Training record spreadsheet.

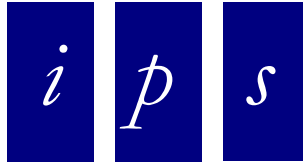


INTERNATIONAL

Health and Safety Policy

3.8 Accidents, first aid and work-related ill health

- IPS will appoint and train members of staff as First Aiders to ensure that injuries are dealt with properly and correctly by staff who are trained and have a First Aid qualification.
- IPS First Aiders will deal with any other member of staff or visitor to our premises who has an injury while on, entering or exiting or within the near vicinity of our premises.
- First aid boxes are kept at the following locations,
 1. Rochester
 - a) Workshop north wall by the reception doorway
 - b) Workshop south wall to the left of the welding bay entrance
 - c) Workshop mechanical bay
 - d) A mobile First Aid bag is kept in the Instructors office
 2. Dover - located within the office and the upstairs office room.
- First-aiders at Rochester are listed on a name board beside the reception admin office
- Appointed persons at Rochester are listed on a name board beside the reception admin office
- Epi-pen trained staff are listed on a name board beside the reception admin office
- First-aiders at Dover are on a name board beside the reception admin office
- All accidents and cases of work-related ill health are to be recorded in the accident book; the book is located at the workshop north wall by the reception door for Rochester. At Dover the accident book is located in the office.
- The business area Section Manager with delegated responsibility is responsible for investigating accidents and reporting them to a Senior Manager / Director.
- A Director is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority (HSE).
- Accidents involving publicly funded trainees are to be investigated and if necessary reported to the Skills Funding Agency following procedures laid down in the funding contract.
- The Senior Managers / Directors of IPS is responsible for investigating work-related causes of sickness absences, and is responsible for ensuring investigation findings are acted on to prevent a recurrence.

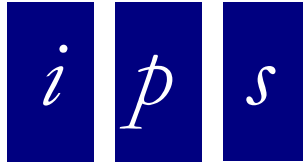


INTERNATIONAL

Health and Safety Policy

3.9 Monitoring

- To check our working conditions, and ensure our safe working practices are being followed, we will periodically carry out monitoring of the following;
 - 1) Noise emitted from the machining and welding areas
 - 2) Fumes emitted from the welding training area
 - 3) Fumes emitted when training in soldering techniques is occurring
 - 4) Risk assessments and the control measures identified for hazards
- An appropriate level of health screening is required for employees and trainees while carrying out the following jobs and training;
 - 1) Working with milling, turning, drilling and grinding machines where cutting fluid is used
 - 2) Welding where weld fumes are emitted
 - 3) Soldering where fumes are emitted.
- Health Screening will be arranged by;
The Engineering Apprentice Section Manager with delegated responsibility,
- A record that health screening has been carried out will be kept with each persons personal file and for employees will be carried out at the same time as the annual appraisal



INTERNATIONAL

Health and Safety Policy

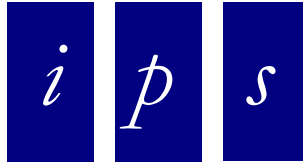
3.10 Emergency procedures – fire and evacuation

- A Director is responsible for ensuring the fire risk assessment is undertaken and implemented.
- At Rochester staff designated as Fire Controllers have their names listed on a board by the Reception fire alarm panel
- At Dover staff listed as Fire Controllers have their names listed on a board by the entrance door
- Fire Marshals will account for the following groups:
 1. Engineering apprentice team – Apprentices
 2. Business Admin Team– Staff and visitors

Apprentice numbers will be checked in/out cards

Staff and Visitors will be checked against the staff in/out board and the visitor reception book

- Fire Controllers will be responsible for,
 1. Ensuring safe, efficient and complete evacuation of the building
 2. Investigating the source of fire alarms,
 3. Determining the source of any fire,
 4. Determining the subsequent course of action – re-entry or call for assistance,
 5. Resetting the fire alarm
 6. Calling out the Fire brigade
 7. Liaising with the Fire Brigade
- Fire Marshals will be trained and will be responsible for carrying out the following;
 - 1) Assist with safe and prompt evacuation
 - 2) Ensure full and accurate headcount
 - 3) Liaising with the Fire Controllers
- The apprentice Engineering team are responsible for checking Fire Doors and escape routes around the workshop at Rochester every week.
- Fire extinguishers are maintained and checked annually through a contract with County Fire Protection,
- Fire Alarms and Emergency lights are tested and maintained annually by Chubb Protection Services.
- Emergency evacuation procedures will be practised according to the Fire Risk Assessment.



INTERNATIONAL

Health and Safety Policy

3.11 Trainees

IPS International Ltd has trainees whose training is either government or publicly funded or privately funded by a company or employer. IPS has a duty to ensure, that so far as is reasonably practicable, trainees and non-employees of IPS are not exposed to risks to their health and safety. The duty extends to assessing the risks that arise from placing publicly funded trainees with an employer and includes identifying what must be done to comply with health and safety law.

Publicly Funded Trainees

TRAINEE - refers to both adults and young persons that are placed with an employer on any publicly funded programme including employed status trainees.

EMPLOYER - refers to the organisation or company that exercises control in the work place where the trainee is placed.

PLACEMENT - refers to the location or situation within the employer organisation, where the trainee is placed and/or in employment. The employer organisation will be contracted to IPS International who will be the training provider.

- IPS will help employers understand their responsibilities with regard to the health, safety and welfare of trainees.
- IPS will ensure that its staff is able to identify inadequate or inappropriate employers and take necessary action to ensure the safety of the trainee.

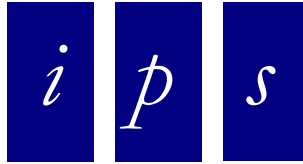
IPS staff will ensure the suitability of placements by,

1. Initially completing the HASPS form (Health and Safety Placement System);
2. IPS staff will advise remedial action with an employer where that is deemed necessary or a deficiency has been identified through the HASPS check
3. Carrying out regular monitoring of health and safety through the monitoring review system
4. Carry out an annual review of a placement HASPS check to identify any changes.
5. The date of the HASPS check and its scheduled review will be entered on the trainee database system PICS.

Trainees have the same responsibilities as other employees in the workplace to ensure their own health and safety, and that of other people who may be affected by their acts or omissions. They must co-operate with the employer and IPS in complying with their legal duties.

IPS will ensure that the trainee is,

1. Briefed and prepared for the workplace role
2. Receives appropriate induction training to the placement company/organisation
3. Supported throughout the training programme.



INTERNATIONAL

Health and Safety Policy

3.12 Delivery of Training

Trainees who are publicly or privately funded will receive training from IPS Instructors either at IPS premises or at their employers' own premises. IPS also uses contract trainers/instructors (Associates) to deliver some training courses.

Training on IPS premises

Instructors (IPS employees and Associate Instructors)

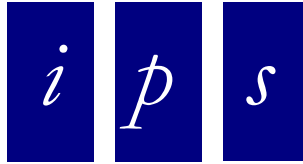
- Instructors shall comply with IPS Training Centre Visitor Guidelines as displayed in each training room and centre reception areas and ensure that trainees under his/her control are made aware of these at the start of each training session.
- Instructors shall know of emergency procedures, fire evacuation, first aid etc and while trainees are under their control act to prevent unsafe or undisciplined acts by trainees.
- Instructors shall ensure that any machine, training rig, tools, equipment, and substance or transport equipment provided by IPS is operated in a correct and safe manner.

Additional duties for Associate Instructors

- Associates must co-operate with the management of IPS to enable all statutory duties to be complied with.
- Associates have to comply with Health and Safety Legislation as stated under the Health and Safety at Work Act 1974 and any other legislation or Approved Codes of Practice (ACOP) as may be relevant.
- Associates have an obligation to take reasonable care for his or her own safety and for the safety of other's who may be affected by his or her acts or omissions.

Trainees

- Each trainee must co-operate with the Instructors and management of IPS to enable all statutory duties to be complied with.
- Each trainee shall comply with Health and Safety Legislation as stated under the Health and Safety at Work Act 1974 and any other legislation or Approved Codes of Practice (ACOP) as may be relevant.
- Each trainee has an obligation to take reasonable care for his or her own safety and for the safety of other's who may be affected by his or her acts or omissions.
- Each trainee shall use any training rig, tools, equipment, and substance or transport equipment provided by IPS in a correct and safe manner.
- Each trainee shall take steps to ensure that he/she is aware of emergency procedures, fire evacuation first aid etc and that while under training instruction act to prevent unsafe or undisciplined acts.
- Each trainee shall ensure that he/she complies with IPS Training Centre Visitor Guidelines as displayed in each training room and centre reception areas.



INTERNATIONAL

Health and Safety Policy

3.13 Driving for work purposes

IPS has a limited number of company and pool cars available for employees to use in connection with business purposes.

Where employees use their own vehicle for business use it is a mandatory requirement that the car is legal for use has correct insurances, motor vehicle tax and a current MOT. Motor vehicle insurance must be for business use and employees must provide a valid certificate of motor insurance before being reimbursed any motor vehicle expenses.

Employees who use their own vehicles for business use driving must ensure they are properly maintained and that brakes and tyres are fully legal and safe to use.

IPS employees must report any instances of ill health and medication use that is either a reportable condition to the DVLA or any other condition that affects their ability to drive any vehicle safely while on a business related journey.

IPS employees are required to show exemplary and proper driving conduct that is in full compliance with the Highway Code and not cause situations or incidents that cause dangerous or hazardous situations or offence to other road users.

Smoking in IPS pool vehicles is not permitted under any circumstances.

IPS employees are expected to comply with reasonable driving hours and take suitable rest breaks such that they are alert and responsive while driving for business purposes.

Further guidance of driving for business purposes is contained in the IPS policy on expenses.