

HEALTH & SAFETY POLICY



January 26

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Introduction

Hilo Cleaning Ltd is a leading company in a developing industry - providing a range of cleaning services to the utility, industrial, commercial, local government, and housing sectors. Many of our contracts involve working on properties, which involve working at heights and using reach and wash, MEWP's (Mobile Elevated Working Platforms) as well as Rope Access Techniques.

It is the duty of each and every employee to co-operate in safety, health and welfare matters. Every employee is legally obliged to work as safely as is reasonably practicable and to do everything reasonably possible to avoid injury to him or her and others.

It is the duty of the management and supervisors to do everything reasonably practicable to prevent injury and ill health, wherever work activities are taking place.

Part 1 – General Statement of Policy

It is the policy of Hilo Cleaning Ltd to meet its moral and statutory responsibilities in this regard by ensuring, so far as is reasonably practicable, that employees are able to carry out their work without risks to their safety or health, and that clients, customers, contractors, agents, franchisees and other members of the public do not face unacceptable risks to their safety or health arising out of the conduct of Hilo Cleaning Ltd.'s activities.

Overall responsibility for safety and health matters in respect of each company rests with the CEO, who will ensure that effective arrangements and adequate resources are provided for the implementation of the terms of the policy within Hilo Cleaning Ltd.

To achieve these objectives, Hilo Cleaning Ltd will:

- Provide and maintain safe places of work and a safe and healthy working environment for all employees in accordance with the requirements of current legislation and Approved Codes of Practice
- Establish local safety policies and procedures, and devise and maintain methods and systems of work that ensure, so far as is reasonably practicable, the safety and health at work of all employees and, to the extent required by law, of others who carry out work under the control of or in the name of Hilo Cleaning Ltd
- Provide adequate information, instruction, training, and supervision, so that employees are made fully aware of the risks inherent in their work and are able through the understanding and implementation of good work practices to control those risks to an acceptable and appropriate level.
- Use materials, substances and equipment that are either inherently safe or that, subject to

appropriate safeguards and where necessary, an effective regime of control and maintenance, can continue to be used in a safe manner.

- Devise appropriate methods of work and provide suitable protective clothing and other safety equipment to ensure that, where identifiable hazards are unavoidable, work can be carried out in safety and without risks to health.
- Ensure that supervisors have the necessary information, training, and skills to enable them to make appropriate assessments of the risks from each work activity, and to carry out their duties and responsibilities for the effective management of health and safety.
- Ensure that all employees and others over whose work control is exercised to any material degree are aware of their own responsibilities for safety, and through the provision of information, instruction, training, and supervision ensure that their actions do not present unacceptable risks to the health or safety of others.
- Make suitable and effective arrangements for dealing with fire, security, and other emergencies in accordance with statutory and operational requirements.
- Exercise such control as may be appropriate or permitted in law over the activities of contractors and others carrying out work on Company premises or in connection with company business, to ensure that the health and safety of employees and others are not placed at risk by such activities.
- Ensure that, in working as a contractor on sites or in premises occupied or controlled by others, employees work in a safe manner, and comply fully with any established local rules and procedures intended to ensure the safety of persons on or near the site.
- Allocate sufficient resources process to ensure that this policy, and any local safety policies and procedures, can be implemented effectively across all work activities and places of work under the control of the group's businesses.
- Monitor performance in safety matters, and review from time to time through the health and safety audit process the effectiveness of this policy and the arrangements for its implementation.

Hilo Cleaning Ltd will meet these obligations under the law by actively promoting health and safety interests as fundamental to the success of Hilo Cleaning Ltd.'s business activities.

The CEO and Managing Director recognises the need for consistent standards and for a common direction and strategy in all matters affecting the health and safety of employees. To this end, and in accordance with the requirements of the Management of Health and Safety at Work Regulations 1999, a Health, Safety & Compliance Officer is appointed to fulfil a co-ordination and advisory role in safety matters for Hilo Cleaning Ltd.

The health and safety of employees is regarded as a management issue of an importance and priority at least equal with those of quality, productivity, and efficiency. Hilo Cleaning Ltd is

committed to the development of a positive safety culture, whereby; managers and supervisors effectively propagate and communicate the philosophy behind this safety policy.

It is the responsibility of employees at every level to implement the terms of this policy to the best of their ability. This policy will be reviewed every six months to ensure that it continues to provide the basis for good standards of health and safety at work for all employees within the Company.

Signed:
Date: 02/01/2026
Name: Jason Morgan
Position: MD

PART 2 – Organisation and Responsibilities

2.1 Head of Company, CEO (Gavin Stanley)

The head of the company has overall responsibility for health and safety in Hilo Cleaning Ltd, and as such will monitor the Managing Director.

2.2 Managing Director (Jason Morgan)

The Managing Director is responsible for:

- Ensuring suitable financial provision is made for health and safety obligations.
- Providing appropriate information and instruction to employees.
- Ensuring work is planned to take into account health and safety issues.
- Ensuring that staff at all levels receive appropriate training.
- Monitoring and assessing risk to health and safety.
- Understanding Hilo Cleaning Ltd policy for health and safety and ensure it is readily available for employees.
- Setting a personal example when visiting site by wearing appropriate protective equipment.
- Actively promoting at all levels Hilo Cleaning Ltd.'s commitment to effective health and safety management.
- Overseeing provisions and procedures for Mental Health & Safety and awareness.

2.3 Health, Safety & Compliance Officer (Trish Miles)

The Health, Safety & Compliance Officer will undertake and be responsible for:

- Monitoring the implementation of the health and safety policy throughout Hilo Cleaning Ltd and reviewing its appropriateness by regular safety audits/inspections carried out in various workplaces.
- Investigating accidents and implementing corrective action
- Reviewing health and safety legislation and implementing any new requirements pertaining to Hilo Cleaning Ltd.'s undertaking
- Liaising with managers, employees, sub-contractors and specialists as and when appropriate
- Collating and reporting any accidents reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.) 2013
- Arrange the annual review of all Policies & Procedures
- Actively promoting at all levels Hilo Cleaning Ltd.'s commitment to effective health and safety management.
- Ensuring all staff receive relevant training and update the training matrix to ensure all training is current and in date.
- Ensuring the company, all its staff and sub-contractors are compliant in all health and safety matters.
- Ensuring staff are fit & well to be working safely.
- Ensure the company as a whole is compliant for meeting Environmental & ISO14001 standards and promoting awareness, including chemical safety standards and COSHH reports.
- Conducting site audits/reviews and setting a personal example when visiting site by wearing appropriate protective equipment.
- Implementing and reviewing provisions and procedures for Mental Health & Safety.

2.4 Employees

Section 7 of the Health and Safety at Work Act 1974 states the following:

It shall be the duty of every employee while at work to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work; and as regards any duty or requirement imposed on their employer or any other person by or under any of the relevant statutory provisions, to co-operate with them so far as is necessary to enable that duty or requirement to be performed or complied with.

In order for all employees to comply with their legal duties, they will undertake and be responsible for:

- Reading and understanding Hilo Cleaning Ltd.'s health and safety policy and carry out their work safely and in accordance with its requirements.

- Attend any training as required by the company and put into practice this knowledge.
- Ensuring that all protective equipment provided under a legal requirement is properly used in relation to any instruction / training given and in accordance with this health and safety policy.
- Reporting any defects to work equipment immediately to the Site Supervisor
- Report to H&S any incidents, which have led or might lead to injury or damage.
- Reporting any accidents or near misses however minor to the Site Supervisor and or H&S.
- Using the correct tools and equipment for the job in hand and in accordance with training and instructions.
- Co-operating with any investigation, which may be undertaken with the objective of preventing reoccurrence of incidents.
- Complying with and promoting Environmental Awareness and contributing to ISO14004. Requirements.
- Report to H&S and health issues or medication being used that may affect your ability to work safely.

PART 3 – Arrangements

3.1 Communication

In order to meet the legal requirements of the Safety Representatives and Safety Committees Regulations and the Health and Safety (Consultation with Employees) Regulations, Hilo Cleaning Ltd will communicate and consult with all employees on the following issues:

- The content of this policy.
- Any rules specific to a site or job.
- Changes in legislation or working best practice.
- The planning of Health and Safety training.
- The introduction or alteration of new work equipment or technology.

This communication and consultation will take place directly with the employees via regular safety meeting, toolbox talks, e-mails and memos posted on the staff internal portal.

3.2 Training

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations. Training will be provided for the following situations:

Induction training for new employees (Health and safety awareness, company procedures etc)

- The introduction or modification of new/existing machinery or technology.
- A change in employee position/work activity or responsibility.

Training is also specifically provided for work with hazardous substances, use of PPE / PFPE and manual handling. Any training provided by Hilo Cleaning Ltd will be formally recorded with a hard copy kept on file.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

3.3 Risk Assessments

The Health, Safety & Compliance Officer will carry out and record formal risk assessments. In addition, risk assessments are carried out continuously by employees throughout their work. Hazards are considered, and work methods established to minimize the risk of injury to themselves and others affected by the work. Where the employee does not have sufficient knowledge about a specific hazard, such as work in confined spaces, they will take further advice from the Health, Safety & Compliance Officer if required.

The head of Hilo Cleaning Ltd ensures operators are provided with appropriate instruction and training on risk assessments.

3.4 Method Statements

Formal method statements (safe working procedures) will be prepared in writing where the risk is particularly high. The method statements will provide information on the task to be undertaken including site set up, chain of responsibility and will detail a clear sequence of work that would be followed in order to undertake the given task safely.

3.5 Co-operation with Clients

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high-risk work activities including permit to work systems. Clients site procedures and specific instructions will be followed at all times.

3.6 Welfare Facilities

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of Welfare facilities at sites under their management.

As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site.
- Eating/rest facilities accessible on site.

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3.7 Work Equipment

All work equipment (including Electrical equipment) used at work, as part of Hilo Cleaning Ltd.'s undertaking will comply with the Provision and Use of Work Equipment Regulations (P.U.W.E.R.). Before new equipment is introduced into the working environment, an assessment will be made by the Health, Safety & Compliance Officer in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturers guidance and industry best practice. Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file.

If any faults or damage are found on any equipment it is Hilo Cleaning Ltd policy to stop using the equipment and report the fault to the Health, Safety & Compliance Officer.

3.8 Personal Protective Equipment (P.P.E.)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage, and maintenance of the relevant equipment before issue and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunctions of PPE must be reported to the Health, Safety & Compliance Officer.

3.9 Personal Fall Protection Equipment (P.F.P.E.)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use and storage of the relevant equipment before issue, and a written record detailing what PFPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PFPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunction of PFPE must be reported to the Health, Safety & Compliance Officer.

3.10 Hazardous Substances

The risks associated with hazardous substances are considered for all work activities. Alternative less harmful substances are used wherever possible. In case of risks to health, PPE is provided and used by employees, and health surveillance undertaken where necessary.

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance undertaken by the Health, Safety & Compliance Officer in line with the Control of Substances Hazardous to Health Regulations (COSHH).

An inventory of all substances and materials hazardous to health is held at head office.

All COSHH reports are available on the internal staff portal and reviewed accordingly.

3.11 First Aid & Accident Reporting

Adequate first aid provision will be made at every place of work occupied by Hilo Cleaning Ltd and/or in each Hilo Cleaning Ltd vehicle. Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.

Head Office – the first aid box is located in the main kitchen.

Mobile workers – first aid boxes are in all work vehicles and are included in vehicle 6 monthly audits.

Hilo Cleaning Ltd is dedicated to the importance of First Aid and as such all Hilo Cleaning Ltd employees are qualified First Aiders.

On Project Sites – wherever possible arrangements are made with clients/principal contractors to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site. All accidents MUST be reported to the site Supervisor and the details recorded in the accident book (held at head office). Serious accidents where hospital treatment is required must be reported to the Health and Safety Advisor as soon as possible after the incident.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.):

Certain accidents are reportable to the HSE's Incident Contact Centre. The Health, Safety & Compliance Officer must be notified as soon as practicable after incidents causing the following injuries:

- any work-related injury that leads to an employee being absent from work for more than 7 working days
- fracture other than to fingers, thumbs, or toes
- amputation
- dislocation of the shoulder, hip, knee, or spine
- loss of sight (temporary or permanent)
- chemical or hot metal burn to the eye or any penetrating injury to the eye
- injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- any other injury: leading to hypothermia, heat-induced illness, or unconsciousness; or requiring resuscitation; or requiring admittance to hospital for more than 24 hours.

All accidents / incidents will be investigated by senior management and any action taken as a result of an investigation will be formally recorded.

3.12 Asbestos

As Hilo Cleaning Ltd.'s cleaning methods do not involve breaking the integrity of the building or using any chemicals that could cause any damage to possible risk areas the risk of exposure to asbestos fibres are very low but Hilo Cleaning Ltd is dedicated to Health and Safety so all Hilo Cleaning Ltd employees have undergone asbestos awareness training which includes identification of type of asbestos, identification of places where asbestos may be present and procedures for inhalation of asbestos fibres.

Before any work commences the employee will assess the likelihood of asbestos being present. If the employee chooses a request for the site-specific asbestos register can be made to site Supervisor. The position and condition of any asbestos that may be in the area where the employee will be working should be noted within the asbestos register.

If the employee identifies asbestos or is uncertain as to the content of a material within the potential work area and is unsure of the relevant procedures contact the Health, Safety & Compliance Officer for further instruction.

Hilo Cleaning Ltd.'s policy regarding asbestos is upon discovery the employee should:

- stop work immediately.
- prevent any dust/fibres being released e.g., turn off power tools, minimise air movement etc.
- evacuate the immediate area and prevent access by others e.g., the public.
- inform those responsible for the premises and the Health, Safety & Compliance Officer, so that the necessary sampling can be arranged.
- do not return to that area until informed that it is safe to do so.

3.13 Manual Handling

Manual handling risks are considered prior to each work activity. The method of work is adapted to minimise manual handling risks wherever possible, including use of alternative lifting and carrying methods. Our employees are advised not to manually handle loads which they feel incapable of moving safely.

3.14 Fire Safety & Emergency Procedures

It is Hilo Cleaning Ltd.'s policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with Hilo Cleaning Ltd.'s no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

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

The person with responsibility for the maintenance and testing of fire alarms and firefighting equipment is Trish Miles (Health, Safety & Compliance Officer).

In the event of the fire alarm being activated, or in any other emergency situation (e.g., bomb care), all employees must leave the building by the nearest available exit and assemble at the designated assembly points.

3.15 Sub-Contractors

If utilised, sub-contractors are instructed primarily on the basis of their technical capability, though due regard is also taken of health and safety. Serious breaches of health and safety and the contractor's capability for specific risks will be taken into account during the selection process.



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Director: Gavin Stanley

Once a sub-contractor is selected, they must sign the sub-contractor agreement as evidence that they have read and agree to follow all Health and Safety requirements with regard to the task they are contracted to undertake. A written record will be signed by the sub-contractor and a hard copy kept on file.

Hilo Cleaning Ltd assess and monitor all sub-contractors using job inspections and site audits to certify that the sub-contractors are adhering to the standards this company follows.

3.16 Public safety

The safety of members of the public and other contractors is considered at all times whilst on site. In any work area where the Companies activities could place others at risk there will be warning signs displayed by appropriate means (e.g., Safety Cones, Bollards, Tape, Hoarding) in order to advise others of the possible risks in entering that area.

3.17 Working at Height

If employees are required to work at Height, Hilo Cleaning Ltd will provide a safe working environment for all employees who may be required to do so. All work will be carried out in accordance with the Working at Height Regulations 2005. We will achieve this by: -

- Identifying work activities that may involve working at height.
- Eliminating the need to work at height whenever it is reasonably practicable to do so.
- Ensuring that, where work at height cannot be eliminated, we use the risk assessment process to evaluate & manage risk.
- Implementing a safe system of work that will prevent falls of persons, materials & equipment.
- Providing suitable plant and equipment to allow safe access for persons and materials.
- Ensuring working platforms and any supporting structures are appropriate and designed in accordance with current standards.
- Ensuring that inspections of all equipment required for working at height are undertaken before work is carried out.
- Providing adequate information and training to ensure that only competent persons are engaged in working at height.

3.18 Portable Electrical Equipment

The day to day working practices of Hilo Cleaning Ltd employees do not generally involve the use of portable electrical equipment. However, when such equipment is employed Hilo Cleaning Ltd will ensure that such equipment is suitable for purpose and safe to use. This will be by ensuring that

portable Appliance Testing (PAT) is carried out annually on all electrical equipment and by a visual inspection of portable electrical items before use.

3.18 Health & Wellbeing

Employees have a duty of care to inform the Health, Safety and Compliance Officer should they experience a new condition or a development to an existing condition, whether physical or mental health, that may affect their ability to work. This includes, but is not limited to, changes to or the introduction of medication.

For employees who report a condition or condition update, regular discussions/meeting with the Health, Safety and Compliance office or MD (as appropriate) will be conducted in order to ensure that the employee is fit & safe to work and to keep the line of communication open. All personal information will remain confidential, however any required adjustments to work that are practically possible will require communication with the relevant departments.

Further corresponding information can be found in the companies Mental Health & Wellbeing Policy.

Part 4 – Summary

Hilo Cleaning Ltd is committed to fulfilling both the moral responsibilities and the legal obligations arising out of common and statute law in respect of the health, safety, and welfare at work of the employees. Hilo Cleaning Ltd also accept their obligation to ensure the health and safety of others, including customers and other members of the public, as far as they may be affected by the conduct of Hilo Cleaning Ltd.'s business activities.