

# QBD08 Health & Safety Policy

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## Part 1: Statement of Intent

Our company strives to take strict measures to monitor and control Health & Safety as an integral part of running our business operation.

We will, so far as is possible:

- Make sure that all working practices and work equipment are safe and that they do not pose a risk or hazard to Safety and Health.
- Make sure that needed measures are carried out to safely use, store, and transport all substances and materials.
- Give all needed training, supervision, instruction and information to make sure that all employees have a working environment that does not endanger their Health or Safety.
- Control all workplaces, equipment and utilized transport in a condition that is safe and free from Health and Safety risks
- Make sure that employees have access to adequate facilities to safeguard their welfare
- Take measures to protect the Health and Safety of visitors, contractors and any members of the public who could be impacted by our operations
- Give employees all needed information concerning procedures to protect their Health and Safety and the Health and Safety of others, and, when needed, consult with them to improve how our company handles these issues.
- Make sure that all employees carry out their Health and Safety responsibilities and work with management to carry out this policy
- Monitor how this policy is carried out in the workplace.
- Make sure sufficient funds are available to implement this statement.

Bold Security Group (UK) Ltd will also regularly review this policy to see if any changes are needed.

## Part 2: Responsibilities for health and safety

Overall responsibility for health and safety within Bold Security Group rests with the Managing Director.

Day-to day responsibility for the delivery of the health and safety culture, and management system by the senior leadership team formed of the Operations Director, Head of Key Accounts, Head of Compliance, Head of HR and Head of Finance.

To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:

- Operations Director; safety, risk assessments, accidents including investigations, first aid, monitoring, instruction and supervision.
- Head of HR; consulting with employees, work related ill-health, reasonable adjustments to the workplace, training and development.
- Head of Compliance; emergency procedures, fire and evacuation procedures, maintaining equipment and information.
- Head of Finance; ensuring appropriate budgeting is in place for the delivery of the H&S management system and activities.

However, all employees hold a duty to operate legally, safely and responsibly. All employees should:

- co-operate with supervisors and managers on health and safety matters;
- take reasonable care of their own health and safety; and
- report all health and safety concerns to an appropriate person (as detailed above).

Bold Security Group (UK) Ltd. operates a 'Stop the Job' approach where any employee regardless of position can order everyone to stop work if they feel safety measures are not being followed or unsafe practice is taking place.

## Part 3: Arrangements for health and safety

### Risk Assessment

- We will complete risk assessments for all identified tasks and duties within the business. Employees who are asked to complete a task where a risk assessment does not exist should notify the Operations Director.
- We will review risk assessments annually as a minimum, or after incidents or near misses, or legislative changes take place.
- Risk Assessments should provide Method Statements or Safe Systems of Work for activities assessed as higher risk.

### Training

- We will give all employees and contractors a health and safety induction, and provide appropriate training for their roles/duties.
- We will provide all employees with appropriate PPE, and ensure contractors have PPE provisions in place.

### Consultation

- We will consult employees routinely on matters of health and safety as they arise, and formally when we review health and safety.
- We will invite front line representation at management review meetings when discussing health and safety, when implementing new duties/activities, and when reviewing risk assessments and method statements.

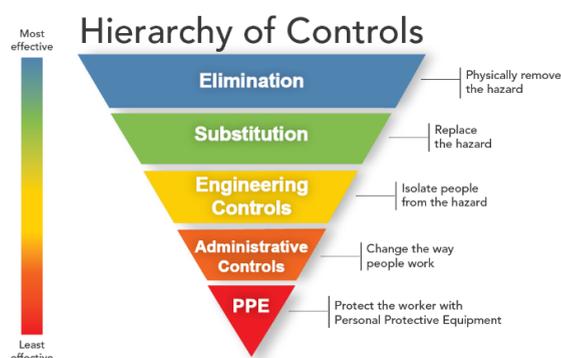
### Evacuation

- We will ensure emergency escape routes are well signposted and kept clear at all times within our offices and sites where our services are being delivered.
- We will create and maintain evacuation plans, and test them regularly, updating them based on feedback from the testing.

## Part 4: Provisions and Procedures

### Personal Protective Equipment

The business ensures that all identified tasks undertaken by our employees are risk assessed. We then apply the hierarchy of controls as shown below to eliminate, substitute, re-engineer the task, or create safe systems of work. Where this still presents a risk to our employees and those around them, we issue full personal protective equipment (PPE). It must be recognised by all employees within Bold Security Group, that PPE is the final mitigation step, and that all other steps of the control measures should have been fully explored first.



### Worked Example:

We are asked to deliver security personnel into a healthcare environment, where patients are often in mental health crises, displaying violence and aggression. A risk assessment identifies risks of injury through assault, infection risks through blood borne viruses and saliva.

We discuss with the client ways to remove this risk; however the nature of the job means that we cannot *not* intervene when a violent incident is taking place. We clearly cannot substitute the patient, and we cannot substitute our employees with another solution (i.e. CCTV/robotics etc.) as a human, empathetic approach is needed. We can look at environmental controls, such as a suitable environment within which to safely contain the patient, i.e. ligature free, soft furniture, lockable door, however the client has no budget for this. We therefore undertake a full training needs analysis, implement full conflict resolution and control skills training, have safe systems of work with minimum staffing levels for techniques outlined in comprehensive assignment instructions, and establish strong working relationships with the clinicians. However, the risks remain, even if reduced. Therefore officers are personally equipped with body armour providing blunt force protection, needle protection as well as blade protection. Given the risk of biting/spitting, a pool of spit guards and bite-proof sleeves are also made available.

### Welfare Facilities

Generally, our employees are deployed on customer sites. We must however ensure that our staff have access to minimum welfare standards. These include, but are not limited to:

- Drinking water
- Comfortable working temperature (or appropriate clothing for extremes)
- Rest areas including clean areas for eating
- Toilets with handwashing
- Shelter from weather (or appropriate clothing and rotation of work)
- Lighting
- Risk assessed environment, i.e. patrol routes free of trip hazards or appropriately highlighted to prevent risk

### Accident Reporting and Investigation

#### Accident Reporting Procedure:

- If you witness or are involved in an accident, immediately inform your supervisor or designated safety representative.
- Provide details of the accident, including the location, date, time, and any injuries sustained.
- If necessary, provide first aid to those involved in the accident.
- Fill out an accident report form, which should be available from your supervisor or safety representative.

#### Accident Investigation Procedure:

- An investigation will be carried out by a designated safety representative, who will visit the site of the accident and interview witnesses and those involved.
- The investigation will identify the root cause of the accident, and any contributing factors.
- Recommendations for preventing similar accidents in the future will be made and implemented.

#### RIDDOR Procedure:

If an accident occurs that meets the criteria set out in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), it must be reported to the relevant enforcing authority within the required timeframe.

The designated safety representative will be responsible for completing the RIDDOR report, which should include details of the accident and any resulting injuries or fatalities.

The report should be submitted online to the Health and Safety Executive (HSE) or by telephone to the Incident Contact Centre. Overall, it is important to follow these procedures to ensure that accidents are reported, investigated, and RIDDOR incidents are properly documented, analysed and addressed to prevent further accidents or incidents from occurring.

Please also refer to QBD18 Accident Incident Investigation Policy V2.0.

## First Aid Provision

### Office

The Bold Security Group office, used for simple clerical duties only, is assessed as a low risk environment. We must have at least a first aid station with appropriate levels of inventory for the number of staff working within the premises, and an appointed person for first aid arrangements, with communication to employees on the arrangements in place. The nominated person is the Head of Compliance.

Given that the business employs a large number of SIA licensed security professionals, and first aid is a requirement of maintaining a license, we generally exceed the number of first aiders required.

### Customer Sites

Customer site first aid requirements will vary depending on the risks present. We should work with the customer health and safety representatives to determine their policy on first aid arrangements. However, we still have a legal duty to make our own assessment and ensure appropriate provisions are in place.

Refer to the Health and Safety Executive website for detailed guidance on first aider - employee ratios, and what first aid equipment is required.

## Hazardous Substance Safety and COSHH

COSHH (Control of Substances Hazardous to Health) is a set of regulations in the UK that require employers to control exposure to hazardous substances to protect employees and others from potential harm.

We are committed to preventing or reducing the risk of harm to our employees, contractors, visitors, and others who may be exposed to hazardous substances in the workplace. We will comply with the COSHH Regulations by:

- Identifying hazardous substances in the workplace and assessing the risks associated with them;
- Implementing control measures to eliminate or minimize exposure to hazardous substances;
- Providing information, instruction, and training to employees and others who may be exposed to hazardous substances;
- Monitoring the effectiveness of control measures and reviewing them regularly;
- Ensuring that appropriate emergency procedures are in place in case of accidental exposure to hazardous substances.

### Responsibilities:

1. Management: The management is responsible for ensuring that this policy is implemented and followed in the workplace.
2. Employees: All employees are responsible for following this policy and for reporting any concerns or incidents related to hazardous substances to their supervisor or manager.

### COSHH Procedure

1. Hazard Identification:
  - Identify all hazardous substances in the workplace and assess the risks associated with them.
  - Keep an inventory of all hazardous substances used, stored or produced in the workplace.
  - Check safety data sheets for each hazardous substance, and ensure they are up-to-date.
2. Risk Assessment:
  - Conduct a risk assessment for each hazardous substance and determine the control measures needed to reduce the risk of harm.
  - Review and update risk assessments regularly, or when there are changes in the substances or the work processes.
3. Control Measures:
  - Implement control measures to eliminate or minimize exposure to hazardous substances, such as substitution, ventilation, enclosure, or personal protective equipment (PPE).
  - Ensure that control measures are maintained and tested regularly, and that they are adequate to protect employees from exposure.
4. Information, Instruction and Training:
  - Provide information, instruction, and training to all employees who may be exposed to hazardous substances.

- Ensure that employees are aware of the risks associated with hazardous substances and the control measures in place to reduce the risk of harm.
  - Ensure that employees know how to use and maintain PPE.
5. Monitoring and Review:
- Monitor the effectiveness of control measures, and review them regularly or when there are changes in the substances or the work processes.
  - Review risk assessments and control measures regularly to ensure that they remain effective.
6. Emergency Procedures:
- Ensure that appropriate emergency procedures are in place in case of accidental exposure to hazardous substances.
  - Ensure that all employees know the emergency procedures and how to use them.
7. Reporting and Investigation:
- Employees should report any concerns or incidents related to hazardous substances to their supervisor or manager immediately.
  - Investigate all incidents and near-misses related to hazardous substances and take appropriate corrective actions to prevent recurrence.

## Work Equipment

If work equipment is provided to our employees, we must ensure that it remains safe to use, and that procedures are in place for safe use. This can include machinery, tools, vehicles, and other equipment that employees may use during their work activities.

Each piece of equipment should have its own procedure, considering:

1. Equipment inspection: Establish a regular schedule for inspecting and maintaining equipment to ensure it is safe to use. This can include checks for wear and tear, damage, and faulty components.
2. Training: Ensure that all employees who will be using the equipment are trained and qualified to do so. Provide appropriate training on how to use the equipment safely and effectively.
3. Risk assessment: Conduct a risk assessment to identify potential hazards associated with the use of the equipment. Develop controls and procedures to reduce or eliminate these hazards.
4. Personal protective equipment (PPE): Identify the PPE required for using the equipment and ensure that it is provided to employees.
5. Storage: Establish procedures for storing the equipment when not in use to ensure it remains in good condition and is not a hazard to employees.
6. Emergency procedures: Develop procedures for responding to emergencies involving equipment, such as a malfunction or injury.
7. Records: Keep records of inspections, maintenance, and repairs of equipment to track its condition and ensure that it remains safe to use.

By following a work equipment procedure, we can help prevent accidents and injuries in the workplace and ensure that employees are working with equipment that is safe and well-maintained.

## Manual Handling

Please refer to the Manual Handling Policy for guidance, including a procedure for employees to follow.

## Near Miss Reporting

The purpose of this policy is to ensure that all near-miss incidents (including minor incidents) are reported, recorded, and investigated. Reporting and sharing information with relevant parties creates an opportunity to answer the questions of what happened and why, and then to use this insight to determine how to prevent a reoccurrence.

Following the steps outlined in this policy Bold Security Group (UK) LTD will:

- Promote an open, learning culture in regard to workplace safety.
- Employ a systematic approach for all staff.
- Report all **NEAR MISS INCIDENTS**.
- Encourage an opportunity to gain understanding and insight from an incident's analysis.

Utilize that knowledge to prevent or reduce future risk of reoccurrence; and support management's goal of establishing a reporting culture with an aim to identify and control hazards, reduce risk and prevent harmful incidents.

It is the policy of Bold Security Group (UK) LTD that employees will perform work in the safest manner possible.

### Relevance

Many safety activities are reactive and not proactive, and some organizations wait for losses to occur before taking steps to prevent a recurrence. **NEAR MISS** incidents precede **MAJOR** events and are often overlooked as there was no harm (no injury, damage, or loss). An opportunity to prevent the incident is lost if these events are not reported. Recognizing, reporting and investigating **NEAR MISS** incidents can significantly improve worker safety and enhance an organization's safety culture.

### Procedure For Reporting A "Near Miss" Incident

1. An employee who witnesses a **NEAR MISS** incident must complete the **NEAR MISS REPORTING FORM** and submit to the Supervisor or line manager. The reporting system is non-punitive and, if desired by the person reporting, anonymous.
2. **All NEAR MISS INCIDENTS** will be reviewed by the company to identify the root cause and the weaknesses in the system contributing to the incident. The reporting employee may be asked to participate in the incident investigation.
3. Investigation results will be used to improve safety systems and processes, hazard control, risk reduction, and to educate employees. All of these represent opportunities for training, feedback on performance, and a commitment to continuous improvement.

### Communication

The steps taken (training, new policies & procedures, etc.) to improve workplace safety as a result of the **NEAR MISS** investigation will be reported to the Managing Director.

### Roles & Responsibilities

It is the responsibility of Bold Security Group (UK) LTD Management team to:

- Ensure all health and safety regulations are fully complied to.
- Support the development and implementation of safe working practices through provision of proper resources.
- Review health and safety procedures annually (minimum) or as necessary; and
- Consider incentives that encourage **NEAR MISS** reporting and enhance the culture whenever possible.
- It is the responsibility of Bold Security employees to:
  - Ensure action has been taken to maintain safety and ensure safety of the area.
  - Provide statements and participate in the **NEAR MISS** investigation.

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