

Subject:	Health & Safety Manual	Reference:	MPL/HSM/1
Date:	January 2011	Issue:	4



Mono Pumps Limited

Health & Safety Manual 2011

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Section 1

Policy, Organisation & Arrangements for Health & Safety At Work

Mono Pumps Limited is committed to ensuring the health, safety and welfare of employees, non-employees, visitors and members of the public.

Mono Pumps Limited considers health, safety and welfare to be as equally important as any of its other business activities.

Mono Pumps Limited regards health and safety as an integral part of its business strategy and as such contributes to business performance by reducing injuries and ill health. To that end it seeks to develop a high degree of health, safety and environment awareness and commitment among its employees through communication, training, and development.

Mono Pumps Limited considers accidents; dangerous occurrences, injuries and occupational ill health are preventable.

Mono Pumps Limited is committed to continuous improvement in health and safety. Every manager shall demonstrate commitment to this goal and shall strive to provide adequate resources to achieve this goal and follow these principles.

Employees are required to co-operate with the company in respect of health and safety matters. Mono Pumps Ltd regards communication and consultation between employees at all levels as an essential part of effective Health & Safety management. This will be undertaken via regular employee briefing sessions and appropriate workforce/management meetings.

Mono Pumps Limited is committed in its undertaking to surpass and comply with current applicable Health and Safety Legislation.

The SHE Manager is responsible for the monitoring and reporting of external and internal Health and Safety legal and operational information.

Mono Pumps Ltd will provide adequate financial resources to achieve a safe working environment.



GROUP MANAGING DIRECTOR

January 2011

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Section 2

ORGANISATION CHART

National Oilwell Varco L.P.

M. A. (Pete) Miller, Jr.

Chairman, President & Chief Executive Officer.

National Oilwell Varco LP

Robert Workman.

President – Distribution Services

National Oilwell Varco L.P.

Santosh Mathilakath.

Senior Vice President – Distribution Services

Mono Pumps Limited

Paul Naylor.

Group Managing Director _ _ _

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Mono Pumps Limited

Steve Valentine.

Financial Director

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Mono Pumps Limited

Senior Management Team

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Mono Pumps Limited

Operational Management Team

SHE Manager. Dave Collinge. _ _ _

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Mono Pumps Limited

Employees

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Section 3

ORGANISATION FOR HEALTH AND SAFETY AT WORK

General:

The purpose of this section is to clarify the arrangements that have been established to minimise risks of injury to prevent unsatisfactory working conditions and to provide a ready way of identifying those persons on whom responsibility is likely to fall in the event of an accident/incident.

The necessity for this is two-fold. In the first place to show all employees where they stand in relation to their duties under the **Health and Safety at Work Act 1974** and also to enable Inspectors appointed under the Act to know with whom they ought to deal when visiting the Company. In this document, Senior Management refers to those reporting directly to the Managing Director.

Training and Development:

It is Company policy that continuing attention will be paid to the development of all employees in matters relating to health and safety. This policy applies not only to induction training but also to new skills training programmes and periodic refresher courses to ensure that skills are maintained.

Communication and Consultation:

The company regards communication between employees at all levels as an essential part of effective health and safety management. Employees will be made aware of the contents of the Health and Safety Policy. Communication will be effected by a variety of methods e.g. Management meetings, Team Briefings, electronic mail, memoranda, posters, notices, etc. A copy of the Health and Safety Policy will be available on the computer Business Management System. The policy will be reviewed annually and any policy amendments will be brought to the attention of employees.

Consultation will be facilitated by means of Health & Safety Committee meetings and Safety Representatives meetings each quarter or as often as is deemed necessary. The purpose of safety meetings is to provide a forum in which information may be conveyed and employees' questions on health and safety issues answered. In addition these meetings will provide an opportunity to assess the continuing effectiveness of the policy and plan.

Safety Representatives will be elected by area and be accredited by their trade union. The functions of "Safety Representatives" will be as described in the Code of Practice on Safety Representatives and In accordance with the **Health and Safety at Work Act 1974** and the **Safety Representatives and Safety Committees Regulations 1977**. Non-trade union Employee Representatives of Safety may also be members of the Health & Safety Committee in accordance with the **Health and Safety (Consultation with Employees) Regulations 1996**.

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Responsibilities:

THE MANAGING DIRECTOR HAS OVERALL RESPONSIBILITY FOR HEALTH AND SAFETY.

The company has appointed a Safety Health & Environmental (*SHE*) *Manager* who reports to the Managing Director through the Employee Relations Manager.

Duties of the SHE Manager:

To advise the company on health & safety issues or proposed changes in legislation which may affect its undertakings.

Keep up-to-date and informed on all health and safety issues.

Be available to all employees to offer health and safety advice where possible.

To assist and provide general guidance to senior management in the implementation of health and safety at work policies.

To provide the management team with information on current best practice in other major organisations and on present and future legislation and its likely impact upon the company.

To facilitate (supported by the Employee Relations Manager) such training courses as are necessary and/or required by Directors and senior management.

To advise senior management on the maintenance of such records as is required by health and safety legislation.

To advise Directors and senior managers of hazards or risks which might endanger employees and to assist in the elimination of or guarding against such hazards or risks.

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Duties of the SHE Manager (continued):

To provide regular reports of progress to the senior management team, in order that implementation of health and safety policies can be effectively monitored and controlled.

Annually implement and review a Safety Health & Environmental (SHE) Plan to develop and focus Managements Health and Safety involvement.

Undertake regular auditing of departmental safety systems and procedures.

In conjunction with the *Employee Relations Manager* oversee the management and maintenance of the Mono Medical Centre, contract occupational health service provision requirements.

Oversee the conduct of First Aiders and assist them in the discharge of their responsibilities.

As required, assist Managers/Team Leaders to carry out risk assessments and assist them to identify protective measures.

Assist Managers/Team Leaders to interpret legislation, Codes of Practice and Guidance Notes.

Make regular visits to the workplace to monitor standards and the effectiveness of this policy.

Help Team Leaders investigate lost time accidents, and dangerous occurrences at work.

Establish and maintain contacts with external Health and Safety authorities.

Maintain a central resource of Health & Safety Legislation and Information.

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Duties of Directors and Senior Management:

To maintain appropriate arrangements for the management of health and safety in their areas of responsibility and keep these arrangements up-to-date and in writing.

To ensure those Managers under their control understand and puts into effect the company Health and Safety Policy.

To ensure that Managers are fully aware of their safety duties and are acquainted with the types of hazards which may be encountered in their working environment and that of their employees.

To maintain resources to the undertaking of the SHE Plan.

To ensure periodic audits of Health and Safety arrangements in areas under their control are carried out.

To assess the performance of their managers with regards to their compliance with Mono Pumps Ltd Health and Safety Policy.

To ensure that matters affecting health and safety at work are regular agenda items at management meetings, that induction and training in relation to safety matters is carried out and records of such training are maintained.

To undertake bi-annually a Management review of health and Safety performance and develop health and safety strategy's for continual improvement, compliance to regulatory requirements.

To assist managers in the speedy resolution of any health and safety problems which may be referred to them and to bring such matters to the attention of higher authority at once, if for any reason a satisfactory solution cannot be achieved at their own level.

To continue to stimulate and maintain Interest in safety matters throughout their area of responsibility and to ensure that managers understand that their duties in the field of health and safety are of no less importance than in any other function.

To be aware of legislation affecting health and safety.

To ensure that suitable and sufficient assessments are made and records kept of the extent to which any employee/visitor/contractor may be exposed to risk from hazards within the work environment. Such records are to be readily available for inspection by Health and Safety officials.

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Duties of Departmental Managers:

To retain and make available a copy of the company's statement of policy related to health and safety at work, the company objectives, the company organisation and up-to-date departmental arrangements for the management of health and safety at work.

To ensure that the Team Leaders under their control understand and put into effect the company's Health and Safety Policy.

To maintain resources to the undertaking of the SHE Plan.

To ensure that Team Leaders are fully aware of their safety duties and are acquainted with the types of hazards which may be encountered in their working environment and that of their employees.

To ensure that personnel under their control are trained in health and safety matters and records of such training are maintained.

To ensure that personnel who work off-site are fully aware of their safety duties and are acquainted with the types of hazards which may be encountered in their working environment.

To ensure that personnel are aware of the First Aid facilities and know where they can be found.

To ensure that all accidents/dangerous occurrences are investigated, recorded and reported in accordance with the company procedures and to take such measures as may prevent a recurrence of the accident/occurrence.

To ensure that safety regulations and policies are displayed, understood and up to date and to ensure that Information on health and safety matters affecting employees is properly communicated to them.

To ensure all new employees undergo induction training in relation to the company Health and Safety policy, local safety regulations and procedures and that records of such training are maintained.

To carry out periodic inspections and audits of their area In order to ensure that working conditions are satisfactory under the terms of "the current legislation and that Health and Safety management systems are in place and being properly applied.

To ensure that competent Team Leaders/Supervisors are appointed to assist them in managing the implementation of the Mono Pumps Ltd Health and Safety Policy and in achieving compliance with statutory provisions.

To ensure that suitable and sufficient risk assessments are made and records kept of the extent to which any employee/visitor/contractor may be exposed to risk from hazards within the work environment. Such records are to be readily available for Inspection by Health and Safety officials.

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Duties of Team Leaders/Supervisors:

To understand and implement the Health and Safety Policy in their section.

To maintain resources to the undertaking of the SHE Plan.

To ensure that all employees receive a copy of the Health and Safety Policy and are kept informed of any changes.

To ensure that emergency procedures and equipment are provided, maintained and checked and those employees are aware of such provision. Team Leaders/Supervisors will encourage, and where necessary, enforce adherence to company personal protective equipment requirements.

To ensure that Risk Assessments are carried out (where necessary with the assistance of the SHE Manager) and that significant findings are recorded and made known to employees.

To ensure that all machinery is safe to use, correctly maintained and regularly inspected.

To ensure that employees have adequate information, instruction, training and supervision to ensure their health and safety whilst at work.

To ensure that new or transferred employees have received an adequate Health and Safety induction to their workplace.

To communicate and consult with their staff on safety issues.

To investigate any deficiency in Health and Safety arrangements or any potential hazards reported which may require remedial action.

To investigate accidents, incidents and dangerous occurrences (in their section) in order to determine root causes and ways to prevent repetition.

To ensure that the Health and Safety notice board is maintained containing relevant health and safety information for staff to view.

To ensure that all Health and Safety information, relevant to their section, is made available to any employee.

To ensure that good standards of housekeeping are maintained within their section and any deficiency rectified.

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Duties of Employees:

Section 7 of the Health and Safety at Work, etc Act 1974 (HSW Act) states that it is the duty of every employee while at work:

- (a) to take reasonable care for the health and safety of himself and of other persons who may be affected by his acts or omissions at work; and
- (b) as regards any duty or requirement imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with.

This duty is imposed on employees at all levels, including managers. The more senior the employee, the more onerous will this duty prove to be.

Furthermore, under s.8 no-one may intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety or welfare in pursuance of any of the relevant statutory provisions.

These general duties under the HSW Act are expanded by regulation 14 of the Management of Health and Safety at Work Regulations 1999 which requires employees to use any machinery, equipment, dangerous substances, transport, safety devices and means of production in accordance with any training and instructions provided by the employer. Employees must also inform the employer of any serious and imminent dangers to health and safety, and any shortcomings in the employer's health and safety arrangements.

In addition, employees also have specific duties under the Control of Substances Hazardous to Health Regulations 2002 (COSHH); the Personal Protective Equipment at Work Regulations 2002 and the Manual Handling Operations Regulations 1992.

Employees must:

Co-operate with the company in respect of health and safety matters.

Comply with all safety rules, safety instructions, safety signs and notices.

To report ALL accidents, incidents and near misses as soon as possible.

Wear Personal Protective Equipment provided, not to wilfully abuse or damage it, and to report any faults or defects to their Team Leader immediately.

Operate machines and processes in accordance with working procedures.

Promptly report any faulty or broken equipment to their line manager.

Promptly report any health and safety hazards to their line manager.

Be aware of their Mandatory Health and Safety training requirements in order to carry out their role.

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Section 4

ARRANGEMENTS FOR THE MANAGEMENT OF HEALTH AND SAFETY AT WORK

The *Managing Director* is responsible for ensuring, so far as is reasonably practicable, the health and safety and welfare at work of all company employees.

The organisation structure of the company provides for involvement, where appropriate, by the *SHE Manager and the Employee Relations Manager*.

The Management of Health and Safety at Work Regulations 2006 places a duty on all employees to take reasonable care for their own health and safety and also that of others affected by their activities. In this connection, employees are required to inform management of any workplace hazards that they identify in order that a suitable and sufficient assessment of the risk may be made. Any recommendations, questions or comments in respect of health, safety and welfare should be raised directly with the person in charge of the workgroup.

The regulations also require an employer to appoint competent persons to assist him in undertaking the measures he needs to take to achieve compliance with statutory provisions. The following apply:

Fire and other emergencies

The *Employee Relations Manager* is the co-ordinator for the emergency response plan, with responsibility for ensuring that all staff is acquainted with the emergency plan, procedures, use of extinguishers and emergency drills. The *Employee Relations Manager* in conjunction with the *Site Facilities Manager* are responsible for the management system associated with The Regulatory Reform (Fire Safety) Order 2005, to undertake fire risk assessments and actions in compliance with regulatory provisions.

The fire notice on the notice boards contains more detailed information and should be studied carefully.

First Aid:

The *Employee Relations Manager* and the *SHE Manager* oversee the management of the first aid facilities with guidance from the professional/qualified contract occupational health service.

First aid service is undertaken by trained employees on a 24hr/7day provision, centrally located at the Security Lodge and supported locally by departmental personnel throughout working hours.

Occupational Health:

The *Employee Relations Manager* and the *SHE Manager* coordinate the management of the employee occupational health screening programme in compliance with regulatory provisions.

New employees undertake a drug screen test and a base line health screening programme determined by their work role hazards.

A vaccination programme is undertaken for specific employees determined by their work role hazards.

General health provision is made available to all employees by appointment with the occupational health nurse via the *Organisational Development Department*, e.g. blood pressure, basic cholesterol check and general health advice. Health information booklets are made available to all employees.

The *Employee Relations Manager* and the *SHE Manager* coordinate Workplace Stress support to employees via the OD Department, occupational health nurse and local specialist external resources. A 24 hour confidential Employee Assistance Program is available to all employees, provided by an independent organisation – First Assist Services Ltd. Contact 0800 028 1791. www.firstassistonline.com
NOV Mono code 72194.

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Accidents/dangerous occurrences:

All accidents/dangerous occurrences, which occur on company premises or elsewhere when employees are on authorised company business, must be reported to supervision and be recorded in the Accident Book.

The *SHE Manager* is responsible for ensuring that line management investigates accidents and incidents, using procedures described in the Accident/Incident Investigation Process available on the company intranet.

The *SHE Manager* is responsible for co-ordinating the Accident/Incident Investigation Process SCAR (safety corrective action reports) to remove/reduce the root cause factors.

The *SHE Manager* is responsible for preparing/analysis and presenting accident/incident reports and data to all levels of management.

The *SHE Manager* is also responsible for ensuring that notification and reporting of injuries and dangerous occurrences are submitted to the local Health and Safety Executive office in accordance with the requirements of the **Reporting of Injuries, Disease and Dangerous Occurrence Regulations 1995 (RIDDOR)**.

Control of Substances Hazardous to Health 2002 (COSHH):

Certain substances used in work processes or in product manufacture, engineering, cleaning, etc. may be classified as irritant, corrosive, harmful or toxic etc. In order to comply with the **Control of Substances Hazardous to Health Regulations 2002** each department will include COSHH controls in their risk assessment process activities and provide suitable storage facilities for substances; Mono Procedure, REACH/COSHH Information and Management DP101/69.

Provide a suitable and appropriate Occupational Health Screening Programme where the MSDS or risk assessment indicates an exposure risk to health; Mono Procedure, Occupational Health Provision DP311/304.

There is open access to information regarding all chemical substances used on site, via the intranet electronic COSHH database and the paper copy supplier MSDS information, located locally in the department or central at the Security Lodge. Any employee can access this database at any time.

Various expertise is available on site to assist Management with the requirements of the Regulations.

The Control of Noise at Work Regulations 2005: The Control of Vibration at Work Regulations 2005 (HAV):

Noise and HAV emissions monitoring to be undertaken and assessment reports are produced. The programme for completing the checks is managed by the *SHE Manager with support from the Cell 6 MTM Team Leader*. The relevant Departmental Managers implement control measures and manage engineering corrective action.

Provide a suitable and appropriate Occupational Health Screening Program where the risk assessment indicates an Exposure Action Value for HAV/WBV and an 'upper exposure action value' for noise.

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Engineering controls:

The *Site Facilities Manager and the Maintenance Team Leader* are responsible for managing requirements of the **Electricity at Work Regulations**, the **Pressure Systems Regulations**, the **Abrasive Wheel Regulations**, the **Asbestos Regulations**, the **Control of Legionella L8 Regulations** and the **Working at Heights Regulations**. The *Site Facilities Manager* is responsible for the compliance with the **LOLER Regulations**; Mono Procedure, LOLER Lifting Equipment Control DP101/71.

The *Maintenance Team Leader* is responsible for the compliance with the **PUPER Regulations**; Mono Procedure, PUPER Work Equipment Control DP101/70.

Manual handling, lifting and carrying:

Manual handling will be avoided as far as is reasonably practicable. Unavoidable manual handling tasks will be assessed as part of the risk assessment process.

Manual handling training will be routinely provided.

It is the responsibility of departmental managers to ensure that their manual handling operations are assessed reviewed regularly and amended whenever a change is made to a task or the environmental factors affecting it.

Overall co-ordination of the control of manual handling operations is the responsibility of departmental manager.

Forklift Trucks:

External Training Providers train all Forklift Truck Drivers to the recognised standard. Badges of authorisation are issued to all trained Forklift Truck Drivers.

Each *Departmental Manager* is responsible for ensuring segregation of pedestrians from forklift trucks, pre-use checks and the safety of battery charging operations.

Internal and External Work Place Transport measures are in operation to control the segregation of personnel from vehicles.

Permits to work:

Certain operations are carried out which are hazardous unless proper controls are applied. Only authorised personnel may raise permits. The permit to work system is the responsibility of the *Site Facilities Manager*.

Contractor Safety:

The *Site Facilities Manager and the Maintenance Team Leader* is responsible for managing the requirements of the Mono Contractor Management Procedure.

The pre work induction of contractors and issue of the Contractor H&S Standards Handbook.

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Display Screen Equipment:

Departmental Managers are responsible for ensuring that assessment, in accordance with the **Display Screen Equipment Regulations 1992**, and the **Health & Safety (Miscellaneous Amendments) Regulations 2002**, is carried out. Measures will be implemented to reduce any risks to the minimum.

Personal Protective Equipment (PPE):

Mono Pumps Limited will strive to minimise work place risks through engineering control, as far as is reasonably practicable. Where this cannot be achieved Personal Protective Equipment (PPE), appropriate to the circumstances will be provided to employees, free of charge. Appropriate information and instruction in the use of PPE will be given to employees. Storage facilities, maintenance and replacement will be provided as appropriate.

Commencing from the 18th March 2002 it is the policy of the company that all personnel, contractors and visitors must wear safety glasses as a basic standard of eye protection in any of the shop floor areas, any changes to this policy can only be implemented by documented risk assessment controls approved by the *SHE Manager*.

Workplace (Health, Safety and Welfare) Regulations

The site's welfare provision and compliance with the **Workplace (Health, Safety and Welfare) Regulations 1992** requirements is overseen by the *Employee Relations Manager*; Mono Company Welfare Policy MPL/CWEB/1.

Restricted Areas

Certain areas are restricted to authorised employees trained in the appropriate safe working methods. These are signposted and employees must not enter unless authorised to do so.

Off-site Work

Managers will ensure that employees working off-site have all the necessary information, training, equipment and supervision to perform their tasks safely. The company will provide any relevant health advice and immunisation against disease.

Employees are required to comply with all health, safety and environment rules applicable to the site at which they are working.

Managers will ensure that where reasonably practicable risks will be eliminated. Where residual risk remains this will be further reduced through engineering controls. As a last resort, employees at risk will be issued suitable and sufficient personal protective equipment. Managers and Supervisors will ensure that employees receive the necessary instruction and training in its use and will ensure that it is worn.

Off-Site Installations

The Projects Manager in conjunction with the European Drawing Office team leader are responsible for ensuring compliance with all relevant legislation, **CDM Regulations, Pressure Equipment Regulations, COSHH Regulations, Confined Spaces Regulations.**

Mono employees managing installations on customer sites are responsible for the management of health and safety of all workers under their control at the time whether direct Mono employees or appointed sub-contractors and all visitors to the working area.

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Off-Site Installations (continued)

Risk assessment will be carried out to assess all site hazards, access and egress, confined space working, manual handling, site emergency procedures. The risk assessment and resulting method statement will be compiled following a survey of the site and in conjunction with the clients appointed representative.

Prior to appointment all sub-contractors shall be approved by the Projects Manager. This approval procedure will be by completion of the Installation Sub Contractor Questionnaire which includes details on the sub-contractors insurance, training and health and safety.

The Projects Manager is responsible for carrying out regular site Health and safety audits.

Health and Safety Inspections:

Departmental Health and Safety self-inspections will be undertaken regularly By Team Leader/Supervisors as part of normal supervisory duties, or if a significant change (e.g. new machinery, process or working practice) has taken place within a department. The Team Leader/Supervisor and Safety Representative will carry out SHE inspections on an organised basis. Intranet reports should be filed in the respective department and must be forwarded to the departmental manager and *SHE Manager*.

It is the responsibility of *Managers/Team Leaders* to ensure that any identified unsafe equipment, plant, processes etc. are made safe.

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Section 5

HEALTH & SAFETY OBJECTIVES

The Management Team believes that good health and safety performance will only be achieved if:

Effective management and communication systems are in place,
Training in matters affecting health and safety is given to all employees,
Measurable standards of performance are expected and achieved,
A process of continuous improvement and review is applied to Health and Safety,
Industry Benchmarking for performance and improvement indication.

The following objectives have been set for the end of the year 2011.

The company lost time accident rate and accident lost work days will continue to fall, with ZERO Lost Time Accidents being the ultimate aim.

2011 Accident Frequency Rate – AFR average twelve month period target of 5.00.

2011 Lost Time Accident Frequency Rate – LTAFR average twelve month period target of 2.00.

2011 NOV Total Reportable Incident Rate – TRIR average twelve month period target of 3.00.

Objectives and targets are detailed in the SHE Plan MPL/SH&EP/1 available on the Mono intranet.

All departments to be fully compliant with all risk assessments required by UK legislation. Assessments are to be reviewed regularly and used to actively minimise health and safety hazards to employees and visitors. Product safety assessments are also required to ensure the protection of customers and the general public.

All departments to develop and implement training programmes appropriate to those aspects of health and safety that apply to their activities. The *SHE Manager* to support the Employee Relations Manager with health and safety training as required.

All departments are required to adhere with contractor control procedures, permit to work and equipment lock off requirements based upon risk assessment and method statements.

All departments will identify their own major cause of accidents / ill health and develop management, education/training initiatives to reduce numbers of incidents and improve safety.

These are the target areas:

Reduce hand cuts and bruises.

Improve housekeeping and spillage prevention to reduce slips, trips and falls.

Lifting, carrying and pushing/pulling – undertake local manual handling risk assessments and implement control measures.

Contact with chemicals, substances and emissions – identify, control and reduce.

Develop generic risk assessments for local activity/machine hazard identification and control measures.

Further develop the occupational health screening as an ongoing chronic health reduction program.

Introduce improved awareness and control measure for working with Display Screen Equipment.