



SEARCH CONSULTANCY LIMITED

HEALTH AND SAFETY POLICY

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PURPOSE

The purpose of this Health and Safety Policy is to communicate how Search Consultancy Limited (the Company) will fulfil its responsibilities in respect of current health and safety legislation and its duty of care obligations to:

- (a) All persons working at, or visiting, the Company's offices throughout the UK
- (b) To all persons assigned to carry out work/services at a client site within the UK.

The Company will ensure that there are sufficient arrangements in place for the safety of all employees, visitors, facility contractors and temporary associates/workers.

This Health and Safety Policy applies to the Company, its employees, visitors, facility contractors and temporary associates/workers. It outlines the process by which Senior Management devolves the roles and responsibilities for health and safety throughout the Company.

This Health and Safety Policy document was agreed by the Board of Directors of Search Consultancy Group plc, which holds 100% of the share capital in Search Consultancy Ltd. (the Company).

Signed:

A handwritten signature in black ink, appearing to read 'Grahame Caswell', written in a cursive style.

Director (Name): Grahame Caswell, Chief Executive Officer

Dated: 27 March 2019

POLICY STATEMENT OF INTENT

The Company's Group Board of Directors and the Chief Executive Officer (the CEO) of the Company accept their responsibility for the health, safety and welfare of the Company's employees, members of the public, facility contractors, and any other persons including temporary associates/ workers who are directly employed or engaged by the Company. They will, in so far as reasonably practicable, take general precautions to protect those persons from fire and to ensure their safety and wellbeing in the workplace.

The Company's Group Board of Directors and the CEO are committed to the prevention of injury and ill health of their employees and seek continual improvement in occupational health and safety management and performance.

It is a requirement of the Group Board of Directors and the CEO that health and safety matters are given equal priority to all other management and Company functions. Directors, Heads of Departments and Managers are to accord similar priority to health and safety matters and are to ensure that all employees, visitors and facility contractors observe the intent of this Policy.

The Company is committed to comply with the requirements of all relevant UK and European statutory provisions and guidance to meet these obligations.

The principles of the Policy apply to all Company activities, in the UK and anywhere that the Company's employees / temporary associates/workers are located for work purposes.

In order to achieve the above, the Company will:

- Establish realistic and achievable health and safety objectives.
- Develop hazard and prioritised risk registers to prevent injury and ill health to employees, visitors and facility contractors.
- Meet its legal and other requirements in relation to the Company's occupational health and safety hazards.
- Provide the necessary resources to meet the requirements of this Policy.
- Adopt a planned approach to continually improve the management and performance of health and safety.
- Delegate the duties for health and safety to the Director responsible for Health and Safety.

The Company's Health and Safety Policy Statement and occupational health and safety management system will be reviewed regularly to ensure that they continue to improve safety performance and reduce work related injuries and ill health.

STATUTORY REQUIREMENTS (COMPLIANCE)

The Company will ensure that the requirements of health and safety legislation are met. The legislation will be monitored by the Company's senior management who will revise this Health and Safety Policy and any of its supporting procedures to suit any future legislative amendments.

The Company will ensure that its duty of care towards all occupants of premises under its control is met with respect to the Health and Safety at Work etc. Act 1974, the Management of Health and Safety Regulations 1999 and other subordinate safety legislation including EU Regulations and Directives (if applicable).

The Company will evaluate compliance with applicable safety legislation requirements through review of its proactive and reactive monitoring processes. This evaluation will take place annually, as a minimum, with the results of the evaluation recorded and maintained.

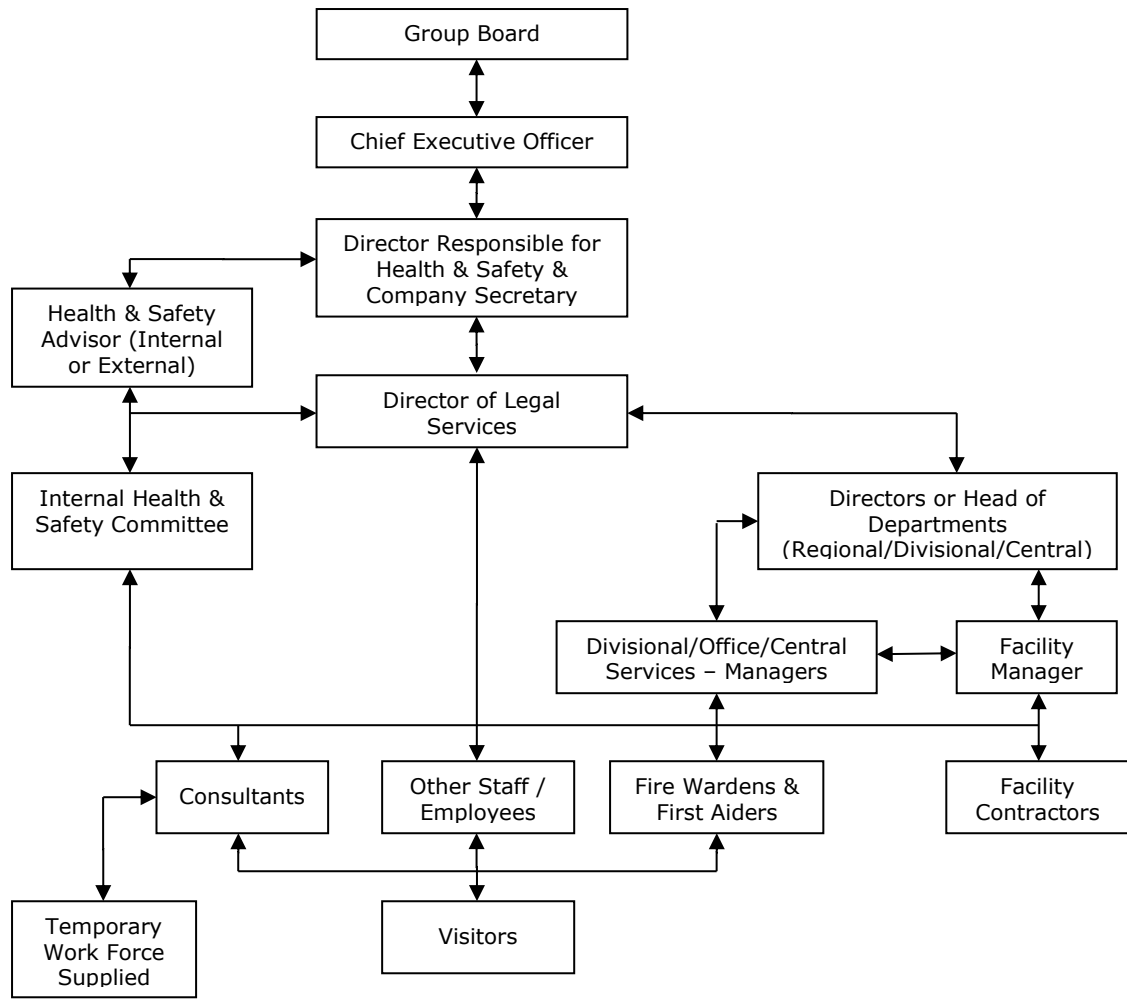
Employees with health and safety responsibilities will be provided with relevant training. The implementation of the occupational health and safety management system will be given appropriate priority and is considered an integral part of the Company's operations.

OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM (OH&SMS)

In response to the requirements of health and safety legislation, the Company has elected to meet the requirements of BS OHSAS 18001:2007 for health and safety through the definition and implementation of the Health and Safety Management System (OH&S SMS).

RESOURCES, ROLES, RESPONSIBILITIES, ACCOUNTABILITY AND AUTHORITY

The organisation chart below indicates the Company’s health and safety line of responsibilities for each level of management, and particular individuals assigned specific responsibilities.



Responsibilities levels will include:

- The Group Board of Directors and the CEO who will oversee the effectiveness of health and safety management.
- The Director Responsible for Health and Safety as the assigned person responsible for the implementation of the health and safety management system and the effectiveness of the implementation of the policy.
- The Company Secretary, Directors, Heads of Departments, Managers and Consultants who all have a vital part to play.
- Representatives of employee safety will be consulted through a Health and Safety Committee and by other means.
- The Health and Safety Advisor.

HEALTH AND SAFETY PROCEDURES

In order to promote uniformity of working methods, irrespective of office location, department or site, certain fundamental procedures will be operated across the whole of the Company, without significant deviation.

The individual Office Safety Plans identify the specific health and safety procedures that are required for a particular office or department. This will allow for tailoring of the OH&S SMS to office or departmental needs.

Common processes have been identified within the procedures in areas such as risk assessment; induction; training and monitoring arrangements.

HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROLS

Hazard identification

The Company will undertake a review of hazards and risks on an annual basis, as a minimum. Hazards will have been identified through previous knowledge and experience and the visual inspection of areas and activities and will include all hazards and risks arising from the activities undertaken by the operational divisions and central departments including routine and non-routine activities.

Risk assessment

The Company will identify risks arising from the hazards and carry out an evaluation of risk tolerance. Prioritised risk registers will be produced for the Company, as a whole, and its offices / operational divisions / central departments from which programmes of action will be developed to address and manage risks.

Generic risk assessments will be produced to address the risks identified.

An index of generic risk assessments will be available on Reach (the Company's intranet) accessible by all Company staff.

Where a new hazard is deemed to be significant and not included within the generic risk assessments, a specific risk assessment shall be undertaken prior to any works taking place.

Determining and monitoring controls

Results of the assessments shall help determine the controls required to be put in place in order to reduce or manage the risks. Controls will be included in the risk assessment. Where required, operational safety procedures shall be developed to detail controls required. An index of safety procedures will be available. Procedures will be briefed to employees prior to carrying out that particular activity.

Controls will be monitored on an ongoing basis by supervisory employees.

HEALTH AND SAFETY OBJECTIVES

The Company is committed to the ultimate objective of preventing injury and ill health, of complying with all legal requirements and to a process of continual improvement.

In order to help achieve this, the Company will set annual health and safety objectives. Objectives will be set by senior management following an annual health and safety review.

COMPETENCE, TRAINING AND AWARENESS

The Company will provide induction training for all new employees and procure the same for temporary associate/workers supplied to clients.

The Company will establish a matrix or database of skills, training and competence of employees. This will indicate the training / competence they have and any training / competency requirements they require. Training needs will be identified and a training programme will be put in place.

Any training that takes place will be evaluated as to its effectiveness.

COMMUNICATION, PARTICIPATION AND CONSULTATION

The Company will, through a variety of means, ensure communication of all health and safety matters both internally among the various divisions, departments, functions and levels of the Company and externally with facility contractors and visitors.

The Company recognises the importance of participation of employees and anyone who may be affected by its operations and that consultation is a vital part of the health and safety management process. The Company will facilitate the participation and consultation process by various means.

OH&S SMS DOCUMENTATION

The Company will develop a documented health and safety management system in line with OHSAS 18001 and proportionate to the level of risks and hazards concerned. Documents and records will be produced and maintained that may be necessary for the effective planning, operation and control of processes that relate to the management of occupational health and safety.

OPERATIONAL CONTROL

The Company will establish and maintain arrangements for the effective application of control measures where required to control operational risks, fulfil the health and safety policy, meet health and safety objectives and conform to legal and other requirements.

Control procedures will be regularly reviewed, any changes documented and communicated to the required employees, as appropriate.

All necessary controls will be communicated to employees and any person who may be affected by the activities, in an appropriate format or other such manner or means that they understand, as outlined in the Company's communication procedures.

MANAGEMENT OF FACILITY CONTRACTORS

Prior to their appointment all contractors shall be subject to the Company's procurement process, which will include the completion of a health and safety questionnaire which shall be evaluated prior to appointment.

Facility contractors will receive the Company's induction prior to any works taking place. Facility contractor performance will be reported back to the Company's management on a monthly basis.

Monitoring of facility contractors shall take place.

EMERGENCY PREPAREDNESS AND RESPONSE

The Company will identify the need for emergency planning including fire safety for all of its departments / facilities.

Where the need for an emergency plan is identified in order to respond to any potential emergency situation such a plan will be developed.

The Company will periodically test any specific procedures / plans developed and record such tests.

The plans / procedures will be reviewed periodically, and at least annually, and where necessary the plan / procedures shall be revised as appropriate.

PERFORMANCE MEASUREMENT AND MONITORING

The Company will monitor and measure health and safety performance on a regular basis, using both proactive and reactive means.

Proactive monitoring will be undertaken through regular inspections of work activities and controls. Such monitoring will be used to check the effectiveness of controls and conformance to controls and the Company's health and safety activities.

Reactive monitoring is used to investigate management system failures and will include the following:

- Accident and incident investigations.
- Near miss reports.
- Ill health.
- Property damage.

INCIDENT INVESTIGATION

The Company will ensure effective reporting and investigation of all accidents, incidents and non-conformances in order to prevent further occurrence of the situations by identifying and dealing with the root cause(s), in addition to the detection, analysis and elimination of potential causes of non-conformities.

All accidents, incidents, dangerous occurrences and near misses, no matter how minor, must be reported to the Director of Legal Services and Facility Manager. This applies to all personnel including employees, facility contractor personnel, visitors or any other person in the workplace including temporary associates/workers supplied to a client.

The results of all investigations shall be recorded and a report provided to senior management, as a minimum. Results will be documented and maintained by the Director of Legal Services with advice from the Health and Safety Advisor, where appropriate.

All accidents and incidents will be reviewed as part of the management review process on a regular basis, and as a minimum annually. This review will also look at any corrective actions taken and assess if any further action is required.

INTERNAL AUDIT

The Company will establish an audit programme identifying annual planned audits of the OH&S SMS. This programme will be reviewed to ensure all elements of the system are audited throughout the year. The programme will be based on the results of risk assessments, departmental activities and the results of previous audits.

The audit will determine whether the OH&S SMS conforms to planned arrangements for health and safety management including the requirements of OHSAS 18001, that the system is being properly implemented and maintained and is effective in meeting the Company's policy and objectives.

The results of the audits will be recorded, reported to management involved in the audits and to the Health and Safety Advisor. This will include any corrective actions along with agreed time frames for corrective actions to be completed.

MANAGEMENT REVIEW

The Company will ensure that, on an annual basis, senior management review the operation of the OH&S SMS to assess whether it is being fully implemented and remains suitable for achieving the Company's stated health and safety policy and objectives.

HEALTH AND SAFETY COMMITTEE

The Health and Safety Committee is intended to coordinate health and safety management within the Company and to ensure statutory and duty of care responsibilities are being discharged. The Health and Safety Committee (via the Director of Legal Services) also facilitates communication between the highest levels of management down to all levels of employees and facilitates compliance with consultation legislation.

The Health and Safety Committee consists of the following members.

- Director with Responsibility for Health and Safety (Chair)
- Director of Legal Services
- Property and Health & Safety Manager (Facilities Manager)
- Finance Director
- Relevant Office Manager(s)