

Health and Safety Policy

General policy statement

It is our policy to give the greatest importance to the health, safety, and welfare of all employees, learners, apprentices, others working on our premises and sites, and individuals visiting our premises and sites or who may be affected by our work activity. This policy sits alongside the RELX (UK) PLC policy.

This policy has two basic objectives:

- To provide a safe working environment and to ensure that all operations are carried out safely;
- To secure the co-operation and involvement of all employees in achieving safe working.

Under the provisions of the Health and Safety at Work Act 1974, Tolley has a specific duty to, so far as is reasonably practicable:

- Provide and maintain plant and systems of work that are safe and without risks to health;
- Make arrangements for ensuring safety and the absence of risks to health in connection with the use, handling, storage, and transport of articles and substances;
- Provide such information, instruction, training, and supervision as is necessary to ensure the health and safety of employees;
- Maintain the place of work in a condition which is safe and without risks to health, and to provide and maintain safe

means of access to and exit from such places of work that are safe and without risks to health;

- Provide and maintain a working environment for employees that is safe and without risks to health, and adequate as regards facilities and arrangements for welfare at work;
- Conduct the business in a manner which will not put at risk the health, safety, and welfare of other persons not in our employment whether working on or visiting our premises;
- Ensure that each person is aware of their individual responsibilities and duties;
- Ensure that all quotations allow for the cost of the provision of adequate welfare facilities and safe working methods;
- Ensure that there is liaison between Tolley and local representatives of the Health and Safety Executive or local authority;
- Enforce a disciplinary system where a breach of this policy or some serious negligent act places persons in danger or affects their health;
- Bring this policy to the attention of all employees and ensure its compliance;
- Ensure full consultation on health and safety matters will take place between management and staff as and when required, or when new and improved work practices are investigated;
- Provide the services of a competent health and safety adviser;

- Modify this policy as required by amended regulations.

Organisation

Senior staff within Tolley, including the CEO, are responsible for health, safety, and welfare, including, but not limited to, the following:

- The effective development and implementation of the company's health and safety policy;
- Providing and maintaining a working environment for employees, learners, and apprentices that is safe and without risks to health and adequate as regards to facilities and arrangements for welfare at work;
- Ensuring that each person is aware of their individual responsibilities and duties and complies with the company's safety rules and procedures;
- Providing adequate resources to meet the requirements of this policy including support for persons carrying it out;
- Enforcing a disciplinary system where a breach of this policy or some serious negligent act places a person in danger or affects their health;
- Modifying this policy as required by amended regulations, any new plant or equipment, new materials, equipment, changes to the organisation etc;
- Setting a personal example and fostering a positive culture within Tolley towards health and safety;
- Ensuring that all levels of staff within Tolley (including learners and apprentices) are given adequate instruction, information and training to carry out the health, safety, and

welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work;

- Monitoring the health and safety performance of Tolley to ensure compliance with the safety policy standards set;
- Ensuring all personnel are aware of the health, safety, and welfare equipment and facilities provided by Tolley and are familiar with the procedures for their use;
- Undertaking an identification of all hazardous activities carried out and hazardous substances used by Tolley. Undertaking a risk assessment of these hazardous activities and substances and where appropriate producing a safe system of work to eliminate or minimise any risk of injury to the worker or other persons affected by the work activity or substance;
- Ensuring adequate monitoring and health surveillance arrangements and procedures are undertaken where necessary;
- Ensuring that all injuries, diseases, and/or dangerous occurrences are notified to the relevant enforcing authority in compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, and records kept;
- Carrying out investigations into injuries, cases of work-related illness, and near misses, and identifying in each case why they happened and ensuring when appropriate steps are taken to prevent a reoccurrence.

Accountability

HR Director has direct day-to-day responsibility for health, safety, and welfare matters within Tolley and is responsible for:

- Ensuring that all personnel under his/her control understand and comply with the company's policy and procedures on health, safety, and welfare;
- Communicating with other directors and managers to ensure that the safety organisation and policy are monitored, reviewed, and updated as appropriate in order to modify the policy, as required by amended regulations, any new plant or equipment, new materials, equipment, changes to the organisation etc;
- Providing and maintaining a working environment for employees that is safe and without risks to health, and adequate as regards facilities and arrangements for welfare at work;
- Providing adequate resources to meet the requirements of this policy including support for persons carrying it out;
- Enforcing a disciplinary system where a breach of this policy or some serious negligent act places a person in danger or affects their health;
- Setting a personal example and fostering a positive culture within Tolley towards health and safety;
- Ensuring that all under his control are given adequate instruction, information and training to carry out the health, safety, and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work;
- Monitoring the health and safety performance of Tolley to ensure compliance with the safety policy standards set;

- Ensuring all personnel understand Tolley procedures for the use and maintenance of all equipment, first aid, and welfare facilities and are familiar with their use;
- Ensuring that all injuries, diseases, and/or dangerous occurrences are notified to the relevant enforcing authority in compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, and records kept;
- Carrying out investigations into injuries, cases of work-related illness and near misses and identifying in each case why they happened and ensuring when appropriate steps are taken to prevent a reoccurrence;
- Carrying out regular inspections and maintenance of the premises, facilities and equipment to ensure safety standards are maintained and keeping inspection records.

The person who has day-to-day responsibility for Health and Safety in Tolley is the Director of Tax Markets. They are responsible specifically to the Chief Executive and overall has responsibility for:

- Setting a personal example and fostering a positive culture within Tolley towards health and safety;
- Assisting Tolley in keeping up to date with changes in legislation and safe working practices through external sources such as the HSE, manufacturers, Trade associations, and consultants;
- Ensuring that all staff, learners, and apprentices are given adequate instruction, information and training to carry out the health, safety, and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work;

- Communicating with directors and managers to ensure that the safety organisation and policy is monitored, reviewed and updated as appropriate in order to modify the policy, as required by amended regulations, any new plant or equipment, new materials, changes to the organisation etc;
- Ensuring all staff, learners, and apprentices understand Tolley procedures for the use and maintenance of all equipment, first aid, and welfare facilities and are familiar with their use;
- Ensuring regular inspections and maintenance of the premises, facilities, plant, and equipment are carried out to ensure safety standards are maintained and keeping inspection records;
- Carry out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting Tolley in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity;
- Carry out an identification of the key risks that apply to learners, apprentices, and visitors. Identifying the key risks, and proposing mitigating steps to reduce them;
- Arranging for appropriate fire-fighting equipment to be available and maintained;
- Ensuring methods of communication with staff, learners, and apprentices are established as to the way they can be contacted;

- Ensuring that training and refresher training are carried out in accordance with the Management of Health and Safety at Work Regulations 1999;
- Advising the Chief Executive, directors, managers, or the work force upon this policy.

The Director of Tax of Apprenticeships is responsible for:

- Liaising with the HR Director and identifying risks that relate to apprentices;
- As part of the risk identification/mitigation process, they should work with the HR Director to develop the mitigation outcomes and reduce identified risks;
- Keep up to date the risk register as it applies to apprentices;
- Take responsibility for the effective management of situations when learners and apprentices have accidents or are ill. This is to include:
 - Ensuring the safety/welfare of the learner/apprentice;
 - Communicating with the next of kin/person responsible for the learner;
 - Ensuring that the emergency services have been alerted (where appropriate);
 - Recording the incident/outcomes etc.

Managers are responsible to the Chief Executive and are responsible for:

- Setting a personal example and fostering a positive culture within Tolley towards health and safety;

- Ensuring that all those under their control understand and comply with the company's safety policy provisions and that they are being effectively carried out and adhered to;
- Inspecting machinery, equipment, and structures regularly and if there are faults, preventing access by any person to the defective apparatus until the faults have been rectified;
- Ensuring that all those under their control understand and comply with the company's safety policy provisions for the use and maintenance of all safety/personal protective equipment, first aid, fire, and welfare facilities;
- Ensuring that employees are adequately instructed in the safe operation of equipment, machinery or apparatus;
- Advising the Director, health and safety co-ordinator, or the work force upon this policy;
- Communicating with all those under their control the Director and the health and safety co-ordinator to ensure the distribution of health and safety information and attending any meeting as required in respect of health and safety;
- Ensuring that all under his control are given adequate instruction, information and training to carry out the health, safety and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work;
- Arranging for incidents, accidents, near misses, and dangerous occurrences to be reported;
- Ensuring that those under their control do not take unnecessary risks;

- Assisting the company in carrying out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting the company in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity;
- Ensuring that all those under their control understand and comply with the company's safety policy provisions for the use and maintenance of all safety/personal protective equipment, first aid, fire, and welfare facilities;

Tutors and the Client Service Team are responsible for:

- Setting a personal example and fostering a positive culture within the company towards health and safety;
- Assisting Tolley in carrying out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting Tolley in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity;
- Working safely in the interests of both themselves and other persons;
- Adhering to safe systems of work procedures and practices and using the appropriate safety devices, equipment, and clothing provided;
- Reporting to the appropriate person all unsafe conditions, accidents, damage, and 'near misses' whether or not there

are any personal injuries in order that remedial action can be taken;

- Familiarising themselves with, and complying with, all rules, regulations, practices, and procedures affecting health and safety;
- Applying good housekeeping standards in the area in which they work;
- Attending safety training in accordance with requirements;
- Taking reasonable care for the health and safety of themselves and of others (including fellow employees, other persons working on or visiting the premises/sites) who may be affected by their acts or omissions at work;
- Co-operating with their employer in the steps taken to meet the legal obligations;
- Reporting to their immediate manager any physical condition, system, or practice which they consider unsafe or potentially unsafe;
- Refraining from intentionally or recklessly interfering with or misusing anything provided in the interests of health and safety.

All learner, apprentices, sub-contractors or self-employed persons working on behalf of Tolley will be required to conform to all health and safety and welfare legislation and company instructions applicable to the work being undertaken. They will:

- Ensure compliance with the relevant statutory requirements;

- Ensure compliance with Tolley policies and procedures;
- Comply with instructions from Tolley and other staff regarding safe working practices;
- In the case of sub-contractors and self-employed persons, provide copies of their own health and safety policy, risk assessments, method statements, and COSHH assessments together with a completed contractor's questionnaire form and any other safety documentation that has been produced which is relevant to the work being undertaken.



Jonathan Scriven – Director of Tax Markets