



**Innovators of Construction Products**

# **Health and Safety Policy 2026-2027.**

Company ownership:

**ACUPHON LTD** is co-owned and managed by **Craig Goodburn** and **Alexander Twigg** (Directors).

Approved by: Craig Goodburn, Director

Signed: *Craig Anthony Goodburn*

Date: 31 November 2025

# 1. General Statement of Intent – Health and Safety

This statement sets out how ACUPHON LTD will manage, comply with and implement all aspects of health and safety, including relevant regulations, legislation and client requirements.

ACUPHON LTD recognises that effective occupational health, safety and welfare are essential to the successful operation of our business. We believe that everyone has a responsibility to participate in our health, safety and welfare systems and to contribute towards achieving our overall objective of the highest standards of accident prevention and continual improvement.

It is the policy of ACUPHON LTD to:

- Provide, so far as is reasonably practicable, safe systems and methods of work, safe working conditions and a healthy working environment.
- Ensure the health and safety of all employees in connection with the use, handling, storage and transport of articles and substances.
- Provide and maintain safe access to and egress from all places of work under our control.
- Provide and maintain a working environment that is adequate with respect to facilities and arrangements for the health and welfare of employees whilst at work.
- Strive for ongoing and continual improvement in managing occupational health and safety through the implementation and maintenance of a Health & Safety Management System.
- Communicate the contents of this policy to all employees so that they understand their individual health and safety obligations.
- Provide training and/or instruction as necessary to personnel at all levels.
- Provide means of consultation on health and safety matters for all employees.
- Provide and display this policy and any necessary written instructions to assist in the regulation of safe practices and operations.
- Provide a copy of this policy to interested parties upon request.

Occupational health, safety and welfare are the responsibility of all employees. Everyone is expected to contribute towards achieving the organisation's overall aims and objectives.

Our aim, as Director(s), is to encourage initiative and adopt best practice within a culture where employees and managers are aware of their individual health and safety responsibilities, and are actively engaged and committed to improving standards of health, safety and welfare. ACUPHON LTD will maintain its management systems and allocate all necessary resources to achieve this.

We commit to providing all required resources, including financial resources, to ensure the full and proper implementation of this policy.

This policy will be reviewed periodically, and at least every two years, to ensure that it remains relevant and appropriate to the organisation and reflects changes in legislation, guidance or company operations.

**Approved by:** Craig Goodburn

**Job role:** Director

**Signed:** *Craig Anthony Goodburn*

**Date:** 31 October 2025

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## 2. Organisation and Managerial Responsibilities

ACUPHON LTD is co-owned and managed by **Craig Goodburn & Alexander Twigg**, who hold overall responsibility for health and safety matters within the company. Where necessary, external assistance will be sought to ensure the company meets its statutory obligations and the objectives set out in this Health & Safety Policy.

- The **Company Director(s)** are responsible for the organisation of the workforce and for ensuring that this Health & Safety Policy and associated procedures are implemented by all site operatives.
- Day-to-day management of operations is the responsibility of the Director, supported where necessary by **Works Supervisors**, each responsible for a site or customer premises.
- Depending on the size and nature of the project, Works Supervisors may be supported by additional supervisors for the direct supervision of operatives.

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## 3. Faction Health and Safety Group – Competent Advice

Faction Health and Safety Group are appointed as ACUPHON LTD's competent health and safety adviser in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

### **Faction Health and Safety Group will:**

- Provide competent advice based on information supplied by ACUPHON LTD.
- Advise on measures required to comply with legislation, HSE guidance and industry best practice.
- Support ACUPHON LTD in investigating significant accidents and incidents, and in improving health and safety performance.

This service is provided for the period specified in the current Certificate of Services.

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## 4. Employee and Contractor Responsibilities

All employees and contractors have a statutory duty to take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions at work.

All employees and contractors must:

- Take reasonable care for their own health and safety and that of others who may be affected by what they do or fail to do.
- Co-operate with management to ensure compliance with the company's health and safety policies and procedures.
- Refrain from intentional or reckless interference with anything provided in the interests of health, safety or environmental protection.
- Co-operate with management on accident prevention and comply with procedures arising from the Health and Safety at Work etc. Act 1974, the Environmental Protection Act 1990 and associated regulations and Approved Codes of Practice.
- Maintain high standards of housekeeping in company premises and on client premises.
- Report all accidents, incidents and near misses (whether or not personal injury results) to the office as soon as practicable.
- Report defects in equipment immediately to their Supervisor and **not** attempt repairs unless specifically authorised, suitably trained and competent to do so.
- Ensure no potentially hazardous item, substance or machine is brought onto site or used without the prior knowledge and authority of their Supervisor.
- Use and, where required, wear personal protective equipment (PPE) provided. PPE must be correctly used, maintained, cleaned and stored.
- Attend any health, safety, environmental or operational training deemed necessary by the company.

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## 5. Staff Consultation

ACUPHON LTD encourages open communication on health and safety matters.

- Employees or contractors who become aware of potential breaches of health and safety legislation or unsafe practices must notify the Site Supervisor, who will report to the Company Director.

- Employees and contractors are encouraged to suggest improvements to health and safety procedures, including alternative equipment or methods. Suggestions may be raised directly with management.

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## 6. Specific Safety Functions and Named Responsibilities

<b>Safety Function</b>	<b>Person Responsible</b>
Overall responsibility for health and safety	Company Director
Accident and incident investigation	Company Director
Provision of safe systems/methods of work	Company Director
Provision of safe electrical appliances	Company Director
Provision of information, instruction, training and supervision on projects	Company Director
Ensuring adequate first-aid provision on each site	Company Director
Ensuring adequate fire-fighting provision on each site	Company Director
Liaison with site management; support and progress reporting	Works Supervisors
Reporting hazards, incidents and concerns	All employees and contractors
Taking reasonable care of own and others' health and safety	All employees and contractors
Pre-use inspections of work equipment	All employees, contractors and equipment users
Inspection of work-at-height equipment	All employees, contractors and equipment users
Provision of health and safety advice and support	Faction Health & Safety Group Ltd

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## **7. Accident and Incident Reporting (Including RIDDOR)**

ACUPHON LTD accepts its duties under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

### **7.1 Internal Reporting**

- All injuries, incidents, dangerous occurrences and near misses must be reported and recorded.
- Injuries occurring in the office or while travelling between sites must be recorded in the company Accident Book.
- Injuries on client or principal contractor sites must be recorded in the site Accident Book; the injured person (or delegate) must also notify ACUPHON LTD so the incident can be recorded in the company Accident Book.
- Where ACUPHON LTD is Sole Contractor, the Site Manager or most senior person on site is responsible for ensuring all accidents are recorded.

### **7.2 Accident Investigation**

- It is our policy to investigate **all** accidents, dangerous occurrences and near misses.
- The Company Director (or a delegated manager) will investigate incidents using an Accident/Incident Report Form, identify corrective actions and ensure they are implemented.
- For high-potential or reportable incidents under RIDDOR, ACUPHON LTD may seek additional support from Faction Health and Safety Group.

### **7.3 Reporting to the Enforcing Authority (RIDDOR)**

- The Company Director is responsible for deciding whether an incident is reportable under RIDDOR and, where required, reporting it to the HSE via the appropriate route.
- If in doubt, advice will be sought from Faction Health and Safety Group.

ACUPHON LTD's policy is that verbal communication regarding any accident is not permitted. All requests for information from solicitors, insurers, enforcing authorities or other parties must be made in writing to the Policy Holder (the Director), who will provide the official response.

### **7.4 Categories of Incident**

#### **Minor accident to an employee**

- Ensure the incident is recorded in the Accident Book.
- If the employee is incapacitated for more than three consecutive days (excluding the day of the accident but including non-working days), an internal report must be completed and sent to the Director.

- If the employee is admitted to hospital for more than 24 hours, the incident may become a specified injury and RIDDOR requirements will apply.

### **Minor accident to others (e.g. contractors, visitors)**

- Record the details in the Accident Book and complete an accident report form.
- Inform the individual's employer or relevant organisation where appropriate.

### **Specified injuries (reportable) include (non-exhaustive):**

- Fatality.
- Fractures other than to fingers, thumbs or toes.
- Amputation.
- Dislocation of shoulder, hip, knee or spine.
- Permanent or temporary loss of sight.
- Serious eye injuries (chemical/hot metal burns, penetrating injuries).
- Injuries from electric shock or burn leading to unconsciousness, resuscitation or hospital admission for more than 24 hours.
- Injuries leading to hypothermia, heat-induced illness or unconsciousness; requiring resuscitation; or hospital admission for more than 24 hours.
- Acute illness requiring medical treatment or loss of consciousness arising from absorption of a substance.
- Acute illness requiring medical treatment believed to result from exposure to a biological agent, its toxins or infected material.

These must be notified to HSE at the earliest opportunity using the appropriate RIDDOR reporting system.

### **Over 7-day injury**

- Where a work-related accident (including violence) results in a worker being away from work or unable to do their normal duties for more than seven days (including non-working days), the HSE must be notified within 15 days.
- ACUPHON LTD requires a copy of the RIDDOR notification for the company records.

### **Members of the public**

- An injury to a member of the public that results in their death or hospital treatment must be reported to the HSE at the earliest opportunity.

## Dangerous occurrences

Relevant dangerous occurrences (such as collapses, failures of lifting equipment, contact with overhead power lines, explosions, collapses of scaffolds or structures, significant releases of flammable or hazardous substances, etc.) must be reported in line with RIDDOR.

## Reportable diseases

Where ACUPHON LTD is notified by a doctor that an employee is suffering from a specified work-related disease (such as certain skin diseases, lung diseases, infections or vibration-related conditions), the HSE must be notified.

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## 8. Near Miss Reporting

A **near miss** is an unplanned event that did not result in injury, illness, damage or loss, but had the potential to do so.

- All employees and sub-contractors must report near-miss incidents as soon as practicable.
- The near-miss report form (site or company form) must be completed with as much detail as possible and returned to the office.
- Where ACUPHON LTD is Principal or Sole Contractor, the Site Manager or most senior person will collate near-miss forms, discuss findings with the Director and ensure any required investigations are completed.

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## 9. Civil Claims

ACUPHON LTD recognises that employees and others (including contractors, visitors and members of the public) may make claims for compensation where they believe an injury has resulted from negligence on our part.

- All incidents must be recorded, investigated and, where necessary, reported to the enforcing authorities.
- Any letter from a solicitor alleging negligence must be forwarded immediately to the Director.
- The Director will ensure that our insurers receive the claim notification and supporting evidence.
- Direct correspondence with claimants or their solicitors is not permitted, as this may prejudice our defence.

- The Director is responsible for compiling an evidence file (accident records, witness statements, risk assessments, training records, PPE records, maintenance records, RIDDOR forms, correspondence, etc.) for all reportable incidents and other incidents where a claim is foreseeable.

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## 10. Asbestos

Asbestos is a major cause of work-related ill health and fatal disease in Great Britain. ACUPHON LTD acknowledges the serious health hazards associated with asbestos exposure and will, so far as reasonably practicable, prevent exposure by using appropriate control measures and safe systems of work.

Where ACUPHON LTD has control of premises or is undertaking work where asbestos may be present, **we will**:

- Ensure that asbestos surveys and risk assessments are carried out by a suitably competent, UKAS-accredited organisation.
- Maintain an Asbestos Register detailing the location and condition of identified asbestos-containing materials (ACMs).
- Develop and implement a plan to manage the risks from asbestos and ACMs.
- Review and monitor the asbestos management plan and arrangements regularly.
- Use appropriately qualified, competent and licensed contractors to make safe or remove ACMs where required.
- Label ACMs where practicable.
- Provide information on the location and condition of ACMs to anyone liable to disturb them (e.g. employees, contractors, maintenance personnel).
- Ensure no ACMs are used or re-used in refurbishment or maintenance work.
- Ensure any work with ACMs is carried out in strict accordance with current legislation and industry good practice.

If any worker suspects that a material may contain asbestos, they must **stop work immediately** and inform their Supervisor.

### Training and competence – asbestos

- All employees who may encounter asbestos (or disturb building fabric) must have, as a minimum, **Category A Asbestos Awareness Training** prior to starting such work.
- Refresher training will be provided as required, including updated information, standards and techniques.

- Sub-contractors are responsible for ensuring their own employees are suitably trained, but ACUPHON LTD will verify competence before allowing work on our projects.

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## 11. Confined Space Working

Confined spaces can be extremely hazardous due to oxygen deficiency, toxic or flammable atmospheres, the risk of drowning or entrapment.

### ACUPHON LTD will:

- Identify any activities where hazardous substances or physical features may cause an area to be classified as a confined space.
- Carry out detailed risk assessments where entry into confined spaces cannot be avoided.
- Develop safe systems of work and control entry using a permit-to-work system where required.
- Carry out atmospheric testing before entry.
- Provide effective communication between those inside and outside the confined space.
- Provide appropriate first-aid equipment and trained personnel.
- Put suitable and sufficient emergency and rescue arrangements in place.
- Ensure that all personnel involved in confined space work are adequately trained and competent.
- Provide, issue and maintain appropriate PPE and any necessary specialist equipment.
- Ensure workers are medically and physically suitable for confined space tasks.
- Review confined-space arrangements periodically and when significant changes occur.

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## 12. Construction (Design and Management) Regulations – CDM 2015

Much of ACUPHON LTD's work falls under the Construction (Design and Management) Regulations 2015 (CDM). We recognise our duties as a client, principal contractor, sole contractor and/or contractor, as applicable.

## **12.1 Client (for information)**

The client is responsible for:

- Assembling a competent project team and ensuring roles and responsibilities are clear.
- Setting and maintaining appropriate health and safety standards throughout the project.
- Providing pre-construction information.
- Appointing a Principal Designer and Principal Contractor where more than one contractor is involved.
- Ensuring duty holders comply with their duties under CDM 2015.
- Ensuring a Construction Phase Plan is prepared and maintained.
- Notifying the HSE (via F10) where projects are notifiable.
- Ensuring a Health and Safety File is prepared for projects involving more than one contractor.

## **12.2 Domestic Clients**

Domestic clients do not have the same formal duties as commercial clients. Under CDM 2015 their duties are normally transferred to:

- The contractor where there is only one contractor; or
- The Principal Contractor where there is more than one contractor (or to the contractor in control where no Principal Contractor is appointed).

ACUPHON LTD will ensure that when working for domestic clients, these duties are fulfilled in practice, even where legal responsibilities default to us.

## **12.3 Principal Designer (for information)**

Where appointed, the **Principal Designer is responsible for:**

- Ensuring designers eliminate, reduce or control foreseeable health and safety risks through design.
- Producing and issuing pre-construction information.
- Co-ordinating the design team and liaising with the Principal Contractor.
- Preparing and updating the Health and Safety File.

## **12.4 Principal or Sole Contractor – ACUPHON LTD's duties**

Where ACUPHON LTD acts as **Principal Contractor or Sole Contractor**, **we will**:

- Develop, implement and review the **Construction Phase Plan** using the pre-construction information provided.
- Allocate adequate time and resources for managing health and safety.
- Check the competence of all contractors and review their risk assessments and method statements.
- Co-ordinate health and safety during the construction phase, ensuring co-operation between all parties.
- Provide and maintain suitable welfare facilities.
- Ensure all workers receive a site-specific induction and comply with site rules.
- Ensure site security and prevent unauthorised access.
- Co-ordinate emergency procedures and arrangements.
- Provide information needed for the Health and Safety File.

## **12.5 Contractor – ACUPHON LTD's duties**

Where ACUPHON LTD acts as a **Contractor** on a project, **we will**:

- Co-operate with the Principal Contractor and comply with the Construction Phase Plan.
- Provide details of any sub-contractors we intend to use.
- Ensure our employees are competent and suitably trained.
- Provide suitable supervision and monitoring.
- Provide risk assessments and method statements (RAMS) for our activities.
- Report accidents, incidents and near misses to the Principal Contractor.

## **13. Consultation and Communication with Employees**

ACUPHON LTD is committed to consulting with employees on health and safety matters and complying with all relevant legislation, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Consultation with Employees) Regulations 1996
- The Equality Act 2010

### **We will:**

- Consult with employees or their representatives on health and safety matters.
- Provide appropriate information, instruction and training.
- Establish a Health and Safety Committee if requested in writing by at least two appointed safety representatives (within three months of a valid request).
- Ensure safety representatives are given time off with pay and appropriate training.
- Allocate adequate resources to implement this policy.
- Review consultation arrangements at least annually.

### **13.1 Open Door Policy**

All levels of management are encouraged to operate an “open door” approach in relation to health and safety. Employees are encouraged to raise concerns and take positive action to prevent unsafe acts and conditions. Contact details for supervisors, managers and the Director are made widely available.

### **13.2 Safety Alerts and Information**

#### **ACUPHON LTD will:**

- Issue safety alerts to employees and subcontractors to highlight changes in legislation, company procedures, recent incidents, or HSE campaigns.
- Use inductions, briefings, toolbox talks, team meetings and notice boards to communicate health and safety information.

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## 14. Control of Substances Hazardous to Health (COSHH)

Some substances used or generated in our work may be hazardous to health. ACUPHON LTD will comply with the Control of Substances Hazardous to Health Regulations.

### We will:

- Maintain a register of hazardous substances used or produced by our processes.
- Obtain and use Safety Data Sheets (SDS) to identify hazards and control measures.
- Carry out COSHH assessments for relevant substances and tasks.
- Implement control measures to eliminate or reduce exposure, including engineering controls and PPE where appropriate.
- Provide information, instruction and training to employees on safe use, storage and disposal.
- Provide health surveillance where required.
- Prohibit eating and drinking in areas where hazardous substances are used.

### Employees must:

- Use hazardous substances only as instructed and with the specified controls.
- Wear and look after PPE provided.
- Report any defects in control measures or PPE immediately.

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## 15. Coronavirus / Covid-19

ACUPHON LTD recognises Coronavirus / Covid-19 as a significant hazard and will manage it as part of our routine health and safety arrangements.

### We will:

- Follow relevant government guidance and the Construction Leadership Council “Site Operating Procedures”, as well as any additional requirements of the Principal Contractor or client.
- Include Covid-19 controls in risk assessments and method statements where relevant (e.g. social distancing, hygiene, travel, shared facilities).
- Provide Covid-19 related toolbox talks and company inductions for employees and subcontractors.
- Support workers in exercising a **“Stop the Job”** authority if they believe Covid-19 controls are not being followed.

## 16. Display Screen Equipment (DSE)

ACUPHON LTD will comply with the Health and Safety (Display Screen Equipment) Regulations.

### We will:

- Identify DSE “users” (employees who use DSE for continuous or near-continuous periods of one hour or more, on most days).
- Assess DSE workstations and ensure they meet minimum requirements.
- Provide users with information on good posture, screen adjustment, breaks and eye and vision care.
- Offer eye tests for DSE users and contribute to the cost of special corrective appliances where required for DSE use.
- Encourage regular breaks from screen work (for example, 10 minutes away from the screen after each hour of continuous use).
- Review DSE assessments when workstations, equipment or individuals’ needs change.

### Employees must:

- Follow the guidance provided on safe DSE use.
- Report discomfort, visual difficulties or symptoms associated with DSE work.

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## 17. Driving Company Vehicles

ACUPHON LTD recognises that driving for work is a significant risk.

### We will:

- Ensure company vehicles are suitable for their intended use, maintained and serviced in accordance with manufacturers’ recommendations.
- Ensure vehicles have valid MOTs where required.
- Allow only authorised, appropriately licensed drivers to use company vehicles.
- Check driving licences on commencement of employment and periodically thereafter.
- Plan journeys to avoid excessive driving time and encourage safe driving within speed limits.

- Prohibit driving under the influence of alcohol or drugs (including certain prescription medications).

#### **Drivers must:**

- Complete weekly vehicle checks and report defects immediately.
- Observe the Highway Code and drive safely and considerately.
- Not use hand-held mobile phones whilst driving.
- Inform the company of any driving convictions or medical conditions that may affect driving.
- Pay any fines for driving or parking offences incurred while in charge of a company vehicle.

Driving a company vehicle without authorisation or whilst under the influence of alcohol or illegal drugs is considered gross misconduct and may lead to summary dismissal.

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## **18. Electrical Safety**

Electricity can cause fatal injury, serious burns and fires. ACUPHON LTD will comply with the Electricity at Work Regulations.

#### **We will:**

- Ensure electrical systems and equipment are suitable for their environment and use.
- Ensure electrical work is undertaken only by suitably trained and competent persons.
- Provide effective means of isolation and secure isolation procedures.
- Inspect and test electrical systems at appropriate intervals.
- Use reduced-voltage (110V) or battery-powered tools on construction sites wherever reasonably practicable.
- Prohibit unnecessary use of 240V portable equipment on site and require RCD protection where its use is unavoidable.
- Implement safe isolation and, where necessary, permit-to-work procedures for live electrical work (which is only allowed where absolutely necessary for testing/diagnosis and under strict control).

## **Users must:**

- Carry out pre-use checks on equipment, cables and plugs.
- Remove damaged equipment from use and report it.
- Not interfere with electrical installations or attempt repairs unless authorised and competent.

Portable Appliance Testing (PAT) will be carried out in line with HSE guidance, and equipment failing tests or inspections will be removed from service until repaired or replaced.

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## **19. Fatigue Management**

ACUPHON LTD will comply with the Working Time Regulations and manage fatigue risks by:

- Planning work primarily within normal daytime hours where practicable.
- Monitoring working hours, including overtime, to avoid excessive hours.
- Ensuring workers have adequate rest breaks and weekly rest periods.
- Considering fatigue in risk assessments, particularly for safety-critical work and driving.
- Encouraging workers to report fatigue concerns without fear of reprisal.

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## **20. Fire Safety**

### **ACUPHON LTD will:**

- Carry out fire risk assessments and keep them up to date.
- Provide suitable fire detection and alarm arrangements where required.
- Maintain clear escape routes and provide appropriate signage.
- Provide suitable fire-fighting equipment and ensure it is maintained.
- Ensure all workers are informed of site-specific fire and emergency procedures through inductions.
- Control hot work through a permit-to-work system.
- Conduct fire drills where required (office and long-term sites).

All employees and contractors must familiarise themselves with local fire procedures and escape routes before starting work, and must follow all instructions given in the event of a fire or emergency.

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## 21. First Aid

### **ACUPHON LTD will:**

- Carry out a First Aid Needs Assessment for offices and each project.
- Provide suitably stocked first aid kits and ensure they are checked regularly.
- Ensure an adequate number of trained first aiders or appointed persons are available, taking account of project size, risk level and shift patterns.
- Display the names and locations of first aiders and first aid kits.
- Ensure all injuries, however minor, are recorded in the Accident Book and, where required, in incident report forms.

Where ACUPHON LTD is Principal or Sole Contractor, first aid arrangements will be detailed in the Construction Phase Plan or method statements and communicated at induction. Where we are a sub-contractor, we will use the main contractor's first aid arrangements where available and supplement these if necessary.

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## 22. Hand-Arm Vibration (HAV)

Hand-arm vibration can cause serious and irreversible health effects such as Hand-Arm Vibration Syndrome (HAVS) and carpal tunnel syndrome.

### **ACUPHON LTD will:**

- Identify work activities involving significant exposure to hand-arm vibration (e.g. use of powered hand tools).
- Assess vibration exposure and compare it with the Exposure Action Value and Exposure Limit Value defined in the Control of Vibration at Work Regulations.
- Eliminate or reduce exposure so far as reasonably practicable by selecting low-vibration tools, limiting exposure time and using job rotation.
- Maintain tools correctly to minimise vibration.
- Provide information, instruction and training on HAV risks and symptoms.
- Implement health surveillance where required.

**Workers must:**

- Use tools as instructed and maintain a light grip and correct posture.
- Report any symptoms (numbness, tingling, loss of grip strength, blanching of fingers) immediately.
- Co-operate with health surveillance.

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**Approved by:** Craig Goodburn, Director

**Signed:** *Craig Anthony Goodburn*

**Date:** 31 October 2025