

Health and Safety Policy

1. Statement of General Policy

SGC Holdings Ltd T/A SGC Security Services (the Company) is committed to ensuring a safe and healthy working environment for its employees, workers, subcontractors, clients, visitors and members of the public who may be affected by its activities. This policy is issued under section 2(3) of the Health and Safety at Work etc. Act 1974.

The effective management of health and safety ranks equally with any other managerial or supervisory responsibility. Our aim is for health and safety to be an integral part of everything we do, including the provision of security officers to client sites and the supply of labour to other security companies.

Our statement of general policy is:

- to provide adequate control of the health and safety risks arising from our activities, including site specific risks at every location where our people work;
- to protect officers who work alone, at night or in situations where they may face conflict, violence or aggression;
- to maintain effective check call and welfare monitoring arrangements for all deployed officers;
- to ensure that those who drive for work do so safely, in line with the Company Driving Handbook;
- to ensure that when we supply labour to other security companies, our people are protected by suitable risk assessments, assignment instructions and welfare checks;
- to consult with employees on matters affecting their health and safety and encourage active participation to maintain and improve standards;
- to provide and maintain safe premises, work equipment and personal protective equipment;
- to ensure employees are competent to do their tasks, providing information, instruction, training and supervision;
- to ensure contractors and subcontractors are competent to manage the health and safety aspects of their work;
- to monitor health and safety standards through inspections, audits and reviews;
- to record and investigate accidents, incidents, near misses and cases of work related ill health, and to act to prevent them happening again;
- to review and revise this policy at least every 12 months, or sooner if there is significant change.

The organisation, responsibilities and arrangements for putting this policy into practice are set out below.

2. Organisation and Responsibilities

Managing Director

Paul Macarthur, Managing Director, has overall responsibility for health and safety within the Company and is responsible for ensuring that:

- adequate resources are available to implement this policy;
- all Directors and managers understand and carry out their health and safety responsibilities;
- board decisions reflect the commitments set out in this policy;
- a competent person is appointed to provide health and safety assistance;
- incident statistics, audit findings and monitoring reports are reviewed and acted on;
- this policy is reviewed at least annually and brought to the attention of all employees.

Directors

Directors are responsible for leading by example and ensuring effective action is taken to implement this policy within their areas of the business.

Health and Safety Manager (Competent Person)

A competent person, Beth Furby & Associates Ltd is appointed under Regulation 7 of the Management of Health and Safety at Work Regulations 1999 to:

- keep the Managing Director informed of relevant changes in health and safety law and guidance;
- assist managers to complete risk assessments and advise on control measures;
- carry out audits and workplace inspections and report on findings;
- provide health and safety information, guidance and training where appropriate;
- investigate serious accidents and incidents and recommend measures to prevent recurrence.

Operations Managers and Supervisors

Operations Managers and Supervisors are responsible for:

- ensuring a site specific risk assessment and assignment instructions are in place before any officer is deployed;
- implementing the arrangements in Section 3 and monitoring that they are working;
- ensuring officers receive site induction and are competent for the duties they are given;
- managing check call and welfare arrangements and responding to missed check calls;
- carrying out site visits and supervisory checks;
- reporting and investigating accidents, incidents and near misses;
- informing the Managing Director of any situation where risks cannot be adequately controlled.

Control Room and Duty Managers

The Control Room, or the Duty Manager outside office hours, is responsible for receiving and logging check calls, following the escalation procedure in Section 3.4 when a check call is missed, and recording all welfare concerns and actions taken.

All Employees and Workers

All employees and workers are responsible for:

- taking reasonable care of their own health and safety and that of others affected by their actions;
- following assignment instructions, site rules, training and safe systems of work;
- completing check calls and booking on and off duty as instructed;
- using work equipment and PPE correctly and reporting defects;
- reporting hazards, accidents, incidents and near misses straight away;
- telling their manager about any health condition, medication or circumstance that may affect their ability to work safely, particularly when working alone or driving.

3. Arrangements

3.1 Risk Assessment

Risk assessments are carried out under the Management of Health and Safety at Work Regulations 1999. They must be suitable and sufficient, identify who may be harmed and how, and record the significant findings. A site specific risk assessment is completed for every site before deployment and reviewed at least annually, after any incident, or when the site, duties or risks change.

When controlling risks, the following hierarchy is applied in order:

- eliminate the hazard;
- substitute with something less hazardous;
- use engineering controls, such as physical barriers, lighting or access control;
- use administrative controls, such as safe systems of work, assignment instructions, training and supervision;
- provide personal protective equipment as a last resort.

Specific assessments are completed for new and expectant mothers, young persons under 18, lone workers and any individual whose health or circumstances require additional controls.

3.2 Assignment Instructions and Site Induction

Every site has written assignment instructions setting out the duties, site hazards, emergency procedures, check call arrangements, welfare facilities and contact details. Officers must read and sign the assignment instructions and receive a site induction before working on site. Assignment instructions are reviewed alongside the site risk assessment.

3.3 Lone Working

Many security roles involve working alone, often at night. Lone working is managed through risk assessment and is not permitted where the risk assessment shows the risk cannot be adequately controlled.

Managers will ensure that:

- lone working is identified in the site risk assessment and assignment instructions;
- lone workers have a reliable means of communication, and a lone worker device where the risk assessment requires one;
- check call arrangements are in place and tested, as set out in Section 3.4;
- high risk tasks, such as work at height or confined spaces, are not carried out alone;

- lone workers are trained in dynamic risk assessment, conflict management and emergency procedures;
- any medical condition that could put a lone worker at increased risk is assessed before deployment.

Lone workers will ensure that they:

- follow the Company Lone Working Policy and the assignment instructions;
- keep their phone or device charged and with them at all times;
- complete all check calls on time;
- do not put themselves at risk, withdrawing to a place of safety and calling for help if a situation becomes unsafe;
- report any incident or concern immediately.

3.4 Check Calls and Welfare Monitoring

All deployed officers must book on at the start of duty, complete check calls at the intervals set in the assignment instructions, and book off at the end of duty. Check calls must be made at least hourly, or more often where the risk assessment requires. All check calls are logged by the Control Room.

If a check call is missed, the following escalation procedure applies:

- the Control Room attempts to contact the officer immediately by phone and any other available means;
- if there is no response within 15 minutes, the Duty Manager is informed and contact is attempted through the site, client contact or other officers on site;
- if the officer still cannot be contacted, a supervisor or mobile patrol is sent to the site to check on the officer;
- if there is any reason to believe the officer is injured or in danger, the emergency services are called without delay;
- every missed check call, action taken and outcome is recorded.

Supervisors also carry out welfare checks through site visits and calls, with particular attention to officers working alone, at night or on long shifts.

3.5 Violence, Aggression and Conflict Management

Security officers may face verbal abuse, threats or physical violence. These risks are assessed for each site and controlled through staffing levels, communication, CCTV or body worn video where provided, and training.

- all licensed officers hold SIA training that includes conflict management, and receive refresher training where required;
- officers must use dynamic risk assessment and must not put themselves at unnecessary risk;
- any use of force must be reasonable, proportionate and necessary, and must be reported;
- all incidents of violence or aggression are reported and investigated, and support is offered to those affected;
- injuries from physical violence that meet the RIDDOR criteria are reported to the HSE.

3.6 Driving at Work

Driving is one of the highest risk activities our people carry out, particularly on mobile patrols, key holding and alarm response. All employees who drive for work must follow the **Company Driving Handbook**, which sets out the detailed rules and procedures.

Directors and Managers will ensure that:

- driving licences are checked before anyone drives for work and at regular intervals thereafter;
- vehicles used for work, including employees' own vehicles, are roadworthy, taxed, have a valid MOT and are insured for business use;
- Company vehicles are serviced in line with the manufacturer's schedule and a defect reporting procedure is in place;
- journeys and patrol routes are planned to allow sufficient time and rest breaks, and to avoid driving when fatigued;
- drivers receive driving awareness information through the Company Driving Handbook and any additional training identified.

Employees who drive will ensure that they:

- comply with road traffic law and the Highway Code;
- never use a hand held mobile phone or device while driving, which is illegal, and only use hands free systems where safe;
- never drive under the influence of alcohol or drugs, including prescribed medication that may affect driving;
- complete vehicle checks before use and report defects;
- take breaks to prevent fatigue and stop if they feel tired;
- report any accident, penalty points, disqualification or medical condition affecting their driving to their manager immediately.

3.7 Supply of Labour to Other Security Companies

When the Company supplies officers to work under the direction of another security company, the Company remains the employer and keeps its duties under health and safety law. Both companies must cooperate and coordinate under Regulation 11 of the Management of Health and Safety at Work Regulations 1999, and the other company must provide our officers with the information they need under Regulation 12.

Before any officer is supplied, Managers will ensure that:

- a written agreement is in place setting out each company's health and safety responsibilities;
- the receiving company has provided a site specific risk assessment, and the Company has reviewed it and is satisfied that the risks are adequately controlled;
- the receiving company has provided assignment instructions, which the officer has read and understood;
- the officer holds a valid SIA licence for the activity and is competent for the duties;
- check call and lone working arrangements are agreed in writing, including who monitors check calls and how the Company is told about missed calls or incidents;
- suitable welfare facilities, such as toilets, rest areas and drinking water, are available on site;
- any PPE and equipment required is identified and provided;
- the receiving company holds suitable insurance.

During the assignment, Managers will ensure that:

- welfare checks are carried out with officers at regular intervals, independently of the receiving company;
- officers know they can raise concerns directly with the Company at any time;
- all accidents, incidents and near misses are reported to the Company immediately, and the Company completes any RIDDOR report required for its own employees;
- hours worked across all assignments are monitored to comply with the Working Time Regulations 1998;
- site visits or reviews are carried out to confirm that arrangements are being followed;
- officers are withdrawn from any site where their health and safety cannot be assured.

3.8 Working on Client Premises

Managers will ensure that:

- the risks on client premises are assessed and adequately controlled, including risks created by the client's own activities;
- information on site hazards, emergency arrangements and welfare facilities is obtained from the client and included in the assignment instructions;
- there is ongoing communication and cooperation with clients so that risks to all persons are controlled.

Employees will ensure that they:

- familiarise themselves with and follow the client's health and safety arrangements;
- report any shortcomings in the client's arrangements to their manager and the site contact.

3.9 Working Time, Night Working and Fatigue

Working hours are managed under the Working Time Regulations 1998. Managers will ensure that:

- employees do not work more than an average of 48 hours per week over a 17 week reference period, unless they have signed a voluntary opt out;
- night workers do not work more than an average of 8 hours in each 24 hours and are offered a free health assessment before starting night work and regularly afterwards;
- adult workers receive at least 11 consecutive hours' rest in each 24 hour period, 24 hours' uninterrupted rest each week (or 48 hours each fortnight) and a 20 minute rest break when working more than 6 hours;
- workers under 18 receive at least 12 hours' daily rest, 48 hours' weekly rest and a 30 minute break when working more than 4.5 hours;
- all workers receive their statutory annual leave entitlement;
- shift patterns are planned to reduce fatigue, avoiding excessive consecutive shifts and quick changeovers.

3.10 Stress, Mental Health and Wellbeing

The Company follows the HSE Management Standards for work related stress, covering

demands, control, support, relationships, role and change. Managers will be alert to signs of stress, particularly after a violent or traumatic incident, and will offer support. Employees are encouraged to speak to their manager about any concern affecting their wellbeing.

3.11 Workplace and Welfare

Company premises will meet the Workplace (Health, Safety and Welfare) Regulations 1992, including safe floors and traffic routes, suitable lighting and temperature, clean toilets and washing facilities, drinking water and rest facilities. On client sites, access to suitable welfare facilities is agreed with the client before deployment and recorded in the assignment instructions.

3.12 Fire Safety and Emergency Procedures

Fire safety at Company premises is managed under the Regulatory Reform (Fire Safety) Order 2005 and the Fire Safety (England) Regulations 2022. The fire risk assessment is recorded in full, including who carried it out, and reviewed regularly.

Managers will ensure that:

- emergency and evacuation procedures are in place, communicated and practised through regular drills;
- fire marshals are appointed and trained, and fire alarms, extinguishers and emergency lighting are checked and maintained;
- escape routes, corridors and stairwells are kept clear;
- officers on client sites are briefed on the site emergency plan and any role they have in it.

3.13 Terrorism and Security Threats

Officers are briefed on suspicious items, hostile reconnaissance and the Run, Hide, Tell guidance, and are encouraged to complete ACT Awareness training. Emergency procedures for bomb threats and suspicious packages are included in assignment instructions where relevant. The Company will support clients in preparing for the Terrorism (Protection of Premises) Act 2025 (Martyn's Law), which is expected to come into force after an implementation period ending no earlier than April 2027.

3.14 First Aid

First aid is provided under the Health and Safety (First Aid) Regulations 1981. Managers will ensure that a first aid needs assessment is completed, trained first aiders and first aid kits are available, and officers know the first aid arrangements on each site, including where they work alone.

3.15 Accident and Incident Reporting and Investigation

All accidents, incidents, near misses and cases of work related ill health must be reported to a manager immediately and recorded. The Health and Safety Manager reports to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) as follows:

- deaths, specified injuries and dangerous occurrences without delay, with a report submitted within 10 days;
- injuries causing a worker to be unable to do their normal work for more than 7 consecutive days within 15 days of the incident;
- injuries causing more than 3 days' incapacity are recorded but not reported;
- reportable occupational diseases when a written diagnosis is received.

Investigations identify root causes and corrective actions, which are tracked to completion. Accident records and RIDDOR records are kept for at least three years.

3.16 Work at Height

Work at height is avoided where possible and, where it cannot be avoided, is planned and carried out under the Work at Height Regulations 2005 using suitable, inspected access equipment. Officers must not work at height unless it is covered by the risk assessment and they are trained to do so.

3.17 Manual Handling

Hazardous manual handling is avoided where possible and, where it cannot be avoided, is assessed and controlled under the Manual Handling Operations Regulations 1992. Employees must not lift anything they consider too heavy or awkward, should seek help where necessary and must report any task beyond their capability.

3.18 Hazardous Substances (COSHH)

Managers will ensure that COSHH assessments are completed for hazardous substances used, safety data sheets are available, and suitable controls, PPE and training are provided under the Control of Substances Hazardous to Health Regulations 2002. Employees must follow the assessments, store substances correctly and report spills or symptoms of exposure.

3.19 Asbestos

Under the Control of Asbestos Regulations 2012, the Company obtains information from clients on the location and condition of any asbestos containing materials on site. Officers are told where these are and must not disturb them. Suspect materials are treated as containing asbestos until confirmed otherwise.

3.20 Noise

Noise is managed under the Control of Noise at Work Regulations 2005. Where noise may exceed the lower exposure action values of 80 dB(A) daily exposure or 135 dB(C) peak, a noise assessment is completed, information and training are given, and hearing protection is made available. At the upper exposure action values of 85 dB(A) or 137 dB(C) peak, hearing protection must be worn, hearing protection zones are marked and health surveillance is provided. Exposure must never exceed 87 dB(A) or 140 dB(C) peak, taking account of hearing protection.

3.21 Display Screen Equipment and Home Working

Employees who use display screen equipment as a significant part of their work have their workstation assessed under the Health and Safety (Display Screen Equipment) Regulations 1992, are entitled to an eye test on request, and should take regular breaks or changes of activity. Home workers complete a workstation assessment and report any problems with equipment or working arrangements.

3.22 Work Equipment and Personal Protective Equipment

Work equipment is suitable, maintained and inspected under the Provision and Use of Work Equipment Regulations 1998. Where risks cannot be controlled by other means, suitable PPE, such as high visibility clothing, protective footwear or body armour where risk assessed, is provided free of charge to employees and workers under the Personal Protective Equipment at Work Regulations 1992 (as amended in 2022). Employees must use PPE as instructed, look after it and report defects.

3.23 Construction Sites (CDM 2015)

On construction sites, the Company works within its contracted role and under the direction of the Principal Contractor or client duty holder, as required by the Construction (Design and Management) Regulations 2015. Managers will ensure that officers receive the site induction, are aware of the construction phase plan and site rules, and that the Company cooperates and coordinates with other duty holders.

3.24 Contractors and Subcontractors

Contractors and subcontractors used by the Company are assessed for health and safety competence before appointment, must provide risk assessments and method statements where required, and are monitored during their work. Work is stopped if controls are not satisfactory, and performance is reviewed at least annually.

3.25 Training and Competence

All officers hold the appropriate SIA licence and receive Company induction, site induction and any further health and safety training identified by risk assessment. Refresher training is provided where needed and training records are kept. Detailed

training arrangements are covered in the Company's training process.

3.26 Consultation and Communication

The Company consults employees on health and safety matters under the Health and Safety (Consultation with Employees) Regulations 1996, through toolbox talks, site meetings, supervisor visits, emails and messages. Employees can raise concerns at any time with their manager or directly with the Managing Director. The HSE health and safety law poster is displayed, or the leaflet provided, and the current Employers' Liability insurance certificate is made available to all employees.

3.27 Monitoring, Audit and Review

Health and safety performance is monitored through site inspections, supervisory visits, check call records, incident trends and audits. Findings are reported to the Managing Director, and corrective actions are tracked to completion. Health and safety arrangements are also reviewed through internal audit, external audits and the ACS assessment. This policy is reviewed at least every 12 months.

4. Legislation and Guidance

This policy has been prepared with regard to the following legislation and guidance.

Legislation / Guidance	Relevance
Health and Safety at Work etc. Act 1974	General duties of employers and employees, and the requirement for a written policy
Management of Health and Safety at Work Regulations 1999	Risk assessment, competent assistance, cooperation between employers and information for workers
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013	Reporting accidents, diseases and dangerous occurrences to the HSE
Working Time Regulations 1998	Working hours, night work, rest breaks and annual leave
Workplace (Health, Safety and Welfare) Regulations 1992	Workplace conditions and welfare facilities
Regulatory Reform (Fire Safety) Order 2005 and Fire Safety (England) Regulations 2022	Fire risk assessment and fire safety duties
Road Traffic Act 1988 and the Highway Code	Safe and lawful driving

Legislation / Guidance	Relevance
Private Security Industry Act 2001	SIA licensing of security operatives
Health and Safety (First Aid) Regulations 1981	First aid provision
Provision and Use of Work Equipment Regulations 1998	Safe work equipment
Personal Protective Equipment at Work Regulations 1992 (as amended 2022)	Provision of PPE to employees and workers
Work at Height Regulations 2005	Planning and control of work at height
Manual Handling Operations Regulations 1992	Manual handling risk assessment and control
Control of Substances Hazardous to Health Regulations 2002	Hazardous substances
Control of Asbestos Regulations 2012	Asbestos information and protection
Control of Noise at Work Regulations 2005	Noise exposure
Health and Safety (Display Screen Equipment) Regulations 1992	DSE workstation safety
Construction (Design and Management) Regulations 2015	Duties on construction sites
Health and Safety (Consultation with Employees) Regulations 1996	Consulting employees
Employers' Liability (Compulsory Insurance) Act 1969	Employers' liability insurance
Terrorism (Protection of Premises) Act 2025	Public protection duties for qualifying premises (not yet in force)
HSE Management Standards	Managing work related stress

Signed on behalf of SGC Holdings Ltd T/A SGC Security Services by the person with

overall responsibility for health and safety:

Name	Paul Macarthur	Position	Managing Director
Signature		Date	7/10/2026