

W Portsmouth & Co Ltd

Health and Safety Policy

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1.0 INTRODUCTION & SCOPE

This policy applies to all employees; at all W Portsmouth & Co Ltd (WP) premises (including sites) and to any employee located temporarily at the premises of another company. Similarly, all contractors, subcontractors, their employees, agents or visitors are to be advised of and must comply with this policy.

The Policy forms part of the company Health and Safety management system, and should be read and used in conjunction with it. The table below illustrates the structure of the company H&S management system:

Tier 1	This H&S Policy (Doc Ref: HSP)	Includes Policy Statement, Organisation, Responsibilities, and outline of Arrangements.
Tier 2	H&S (Procedures) Manual (Doc Ref: HSM) Issue 2	Provides detail on how H&S Arrangements function
Tier 3	H&S Procedures, including Method Statements, CPPs, etc H&S Guidance Notes	These are formulated to address specific needs. They could be temporary, or they could become incorporated into the H&S manual. Provide guidance on the H&S management system or legal compliance
	H&S site filing system	Used to support H&S management system
	H&S forms	Used to support H&S management system
Plus	Risk assessments	Considered separate from structure of the management system.

WP maintains separate policies and procedures for other operational aspects, for example Quality Management, Environmental Management etc.

2.0 GENERAL STATEMENT OF HEALTH AND SAFETY POLICY

W Portsmouth & Co Ltd company directors shall ensure the health and safety of all our employees, and others who could be affected by our work activities, as required by the Health and Safety at Work etc. Act 1974

In particular the company will:

- provide adequate control of the health and safety risks arising from our work activities,
- consult with our employees on matters affecting their health and safety, including employee participation;
- maintain safe and healthy working conditions at our own and client premises;
- ensure all employees are competent to do their tasks, and give them adequate training;
- provide information, instruction and supervision for employees;
- provide and maintain safe plant and equipment;
- ensure safe handling and use of substances;
- prevent accidents and cases of work-related ill health; and will
- review and revise this policy as necessary at regular intervals.

In order to implement this policy, the company further undertakes to:

- ensure that adequate resources are available for carrying out this policy,
- appoint competent health & safety consultants to provide expert advice to assist in complying with legal requirements and prohibitions,
- work in accordance with industry best practice standards, and whenever practicable, exceed them; and to
- seek to make continual improvements in health and safety performance.

The directors expect employees and all others carrying out work on behalf of the company to cooperate with and assist in the effective implementation of this policy.

Signed:

Dave Norsworthy

Director with responsibility for health and safety

Date: January 2022 Review date: January 2023

3.0 ORGANISATION AND RESPONSIBILITIES

3.1 GENERAL COMPANY ORGANISATION:

The Company H&S Manual contains a company organisation diagram. See HSM, section 5.02.1

3.2 Managing Director

The Managing Director has ultimate responsibility for ensuring WP's business is conducted safely and without harm to health at all locations. He will:

- ensure that WP maintains an effective policy for health and safety,
- periodically appraise the effectiveness of the policy and ensure all necessary reviews and revisions are made,
- provide adequate financial provisions, staff, training, materials, or other resources to meet health and safety requirements,
- ensure that responsibility is properly assigned and accepted at all levels, and will carry out strict disciplinary procedures for non-compliance with the policy,
- Comply with the requirements of RIDDOR reporting and accident investigations (where relating to non-operational incidents), and
- Set a personal example.

3.3 OTHER DIRECTORS AND MANAGERS

- Shall evaluate all risks at all sites relating to accidents at work, health risks at work, loss or damage to property and risks to public through company activity,
- Shall produce safe systems of work and emergency plans as required,
- Shall review health and safety reports,
- Shall review all accident and corrective action.
- Shall evaluate first aid requirements, and accident records,
- Shall ensure that all statutory regulations, codes of practice and other safety procedures are complied with, and
- Set a personal example.

3.4 ESTIMATORS, QUANTITY SURVEYORS, AND BUYERS

Estimators, quantity surveyors, and buyers are in a unique position to ensure that projects are set up, provided and maintained with goods and services that enhance the health and safety performance of the company. They will:

- be aware of the Company Health & Safety Policy and its supporting procedures and carry out their work in accordance with its requirements,
- ensure that tenders are adequate to allow for compliance with the Company Health & Safety systems and all applicable statutory legislation; including the requirements of the Construction (Design & Management) Regulations,
- ensure all contractor, sub-contract personnel, and consultants are assessed as competent to be engaged on WP projects, and that they fully understand and comply with the company Health and Safety Policy, and its supporting procedures,
- seek assistance of the health & safety consultants on matters of health and safety as necessary,
 and
- set a personal example.

3.5 CONTRACTS MANAGERS

The Construction Manager has a special responsibility for managing work and staff across the company's sites. In general, his responsibilities are as described in the section above, Other Directors and Managers. He is also responsible for:

- Co-ordination and implementation of the Health and Safety training requirements of WP site-based employees,
- Ensuring that Health and Safety training is recorded in each individual's personnel record,
- Complying with the requirements of RIDDOR reporting and accident investigations (where relating to operational incidents),
- Compiling and maintain records of accidents, incidents, dangerous occurrences, and ill-health, and
- Co-ordination and implementation of the Health and Safety training requirements of W Portsmouth's site-based employees,
- Ensuring that Health and Safety training is recorded in each individual's personnel record,
- Carry out the function of the Designated Individual for appointing Temporary Works Coordinators, and will
- Set a personal example.

3.6 SITE MANAGERS, SUPERVISORS

Site Managers, and supervisors are in a unique position to control operations on their designated sites or sections. In their site or section they will:

- ensure that persons are adequately trained and fully aware of any relevant hazards,
- ensure that persons are familiar with H&S procedures, method statements, and risk assessments relevant to the work in hand,
- ensure that all persons know what to do in case of fire and know the location of, and how to use, fire equipment, as appropriate,
- ensure that first-aid arrangements are adequate, and all persons know the whereabouts of first aid facilities for all shifts,
- continually develop safe practices in their area of responsibility and carry out site audits / inspections on a daily basis,
- comply with and utilise company systems put in place for management and supervision of H&S,
- liaise with regulatory, local, or other statutory bodies requiring to visit their site,
- ensure that adequate supervision is available at all times, particularly where young or inexperienced workers are concerned, and
- Set a personal example.

3.7 COMPANY EMPLOYEES

It is the responsibility of all employees to take reasonable care of the Health and Safety of themselves and of other persons who may be affected by their acts or omissions at work and to have regard for the environment in which they live and work. All employees are therefore required to:

- Familiarise themselves with the company Health and Safety Policy and Manual, and supporting rules and procedures relating to Health and Safety, including risk assessments, method statements, arrangements for First Aid, Emergency Evacuation, Fire Safety and Accident Reporting,
- Accept their obligations in accordance with Health and Safety legislation,
- Promptly report any accidents, incidents or dangerous occurrences (no matter how small) to their immediate manager / supervisor,
- Report any potential Health and Safety hazard immediately to their immediate manager / supervisor and assist where necessary in the investigation of any accidents that occur,
- Co-operate with management at all times on matters relating to health and safety and where appropriate, discuss with and / or assist the manager / supervisor in resolving such matters,

- Ensure that equipment issued to them or for which they are responsible is correctly used and properly maintained so that it presents no threat to health and safety,
- Wear protective clothing or use equipment whenever instructed or when circumstances require its
 use.
- Maintain a good standard of housekeeping in the area in which they are working,
- Ensure that items provided for the purposes of Health and Safety are not misused or tampered with, and
- Carry out their duties in such a manner as to ensure compliance with all legislation relating to individual job responsibilities.
- Employees are not permitted to alter any scaffold or interfere with any other plant or equipment unless authorised to do so
- Employees are encouraged to make suggestions to improve health and safety in the Company.
 These should, in the first instance, be made to the Supervisor concerned or to their Safety Representative
- When employees visit customer sites they are required to establish with the client the nature of any Hazards to which they might be exposed and to carry out their work observing the client's control measures
- As with other areas of the company's business, the support and assistance of all employees is necessary to ensure the company's continual success and high health and safety standards.

3.8 ALL OTHER PERSONS ON COMPANY PREMISES

- Shall observe all statutory regulations, Company safety rules, and instructions given by persons enforcing Company H&S policy & procedures,
- Shall not work on the premises or sites until the relevant H&S rules are read and understood and accepted, and
- Shall not work on the premises or sites unless covered by appropriate insurance.

3.9 OFFICE MANAGERS

The office manager has a particular responsibility for those staff employed to work in the company's (non-site) office facilities. They will:

- ensure that persons are adequately trained and fully aware of any relevant hazards,
- ensure that persons are familiar with H&S procedures, and risk assessments relevant to their work,
- ensure that all persons know what to do in case of fire and know the location of, and how to use, fire equipment, as appropriate,
- ensure that first-aid arrangements are adequate, and that all persons know the whereabouts of the first aid facilities,
- continually develop safe practices in the office and carry out inspections on a regular basis,
- comply with and utilise company systems put in place for management and supervision of H&S,
- ensure that adequate supervision is available at all times, particularly where young or inexperienced workers are concerned, and
- Set a personal example.

They are also responsible for:

- Co-ordination and implementation of the Health and Safety training requirements of WP office based employees, and
- Ensuring that Health and Safety training is recorded in each individual's personnel record.

3.10 HEALTH & SAFETY ADVISORS

WP's Health & Safety Advisors, Ottaway & Associates Ltd, are responsible to the Managing Director for advising him of the company's obligations, monitoring implementation of this policy and ensuring it is kept up to date with current legislation and practices. As instructed, they will:

- Review the Company Health and Safety management system periodically and propose any amendments as a result of new or changed legislation, approved codes of practice, or other information,
- Analyse H&S performance, through inspection reports, accident statistics and other information,
- Carry out site and other inspections and advise on any remedial or preventative action required to safeguard Health and Safety,
- Investigate potential RIDDOR or other serious incidents as instructed by, and report to, the Managing Director / Contracts Managers,
- Review accident statistics,
- Advise any member of staff requesting information about Health and Safety matters,
- Advise Managers and Supervisors on training, systems of work, and other H&S matters.

3.11 CONTRACTORS & SUB-CONTRACTORS

WP relies on carefully selected and trusted specialist tradespersons and professionals to fulfil the company's obligations to the highest standards. There persons / companies are to:

- comply with the relevant requirements of WP's Health & Safety policy and procedures, and must ensure that their own Company Policy is adequate and is also complied with,
- provide, when necessary / requested, written method statements and risk assessments, including the arrangements for health and safety,
- ensure all plant, tools or equipment brought on to a job is safe and in good working condition. It
 must be fitted with any necessary guards and safety devices and have any necessary certificates
 available for checking, thus ensuring it is in full compliance with all applicable statutory
 legislation,
- ensure any injury sustained or damage caused by or to themselves or their employees is reported immediately to the WP Site or Construction Manager,
- Wear all necessary protective clothing and health & safety equipment as required by the operations in progress, and
- comply with any health & safety instruction given by an authorised WP representative
- Contractors and their employees are not permitted to alter any scaffold or interfere with any other plant or equipment unless authorised to do so.

An integral part of the contract selection process (prior to commencement of any work) is a review of a contractor's health and safety performance, working practices and H&S management systems.

4.0 HEALTH & SAFETY ARRANGEMENTS (GENERAL)

In developing the arrangements for implementing this Policy, the requirement to comply with good working practices and loss control practices is paramount. WP considers this to be an integral part of achieving good business efficiency.

4.1 H&S PLANNING

Annually a proactive Health and Safety Action Plan will be prepared which will normally comprise a series of objectives or targets. Other plans or improvement programmes may be prepared from time to time, to react to specific situations. These plans will be approved and the implementation monitored by senior management.

4.2 RISK ASSESSMENT

Risk assessments of places, processes, plant, and substances (including COSHH, Manual handling, Display Screen risk assessments, etc) are carried out only by competent persons. They may be carried out by various levels of management, with assistance from the Health and Safety Advisor if required. In individual offices and sites they will be the responsibility of the office / site managers. The Significant findings of risk assessments will be recorded, made available to those affected or involved, and will be retained and reviewed as required.

Risk assessments will be validated through workplace inspections made by managers and supervisors. Any newly identified potential hazards, unsafe conditions or unsafe acts must be reported promptly to the appropriate Manager who will ensure that the appropriate action is taken for their management, removal or mitigation. Where necessary the advice of the Health and Safety Advisors can be obtained to ensure the appropriate measures are implemented.

4.3 HEALTH SURVEILLANCE

Management concerns itself with the occupational health of employees. Routine health surveillance is carried out for personnel exposed to hazardous substances or processes. Additionally, any case causing concern is to be reported confidentially to the appropriate manager or medically trained person(s), following which appropriate action will be taken.

4.4 H&S MANAGEMENT & SUPERVISION

WP employs a staff of skilled, knowledgeable and experienced managers and supervisors. Health and safety roles and responsibilities will be clearly defined. Senior staff members and directors will ensure that their subordinate staff are provided with sufficient training and resources, and understand clearly their role and responsibilities. The company's contractor / subcontractor management procedures are outlined in section 5 of this policy.

4.5 COMMUNICATION, CONSULTATION & CO-OPERATION

Workforce consultation is conducted on a site or workplace basis, led by the senior manager responsible for health and safety at the location. It often follows a tool-box talk presentation on a particular subject. Pertinent comments and suggestions from the workforce are recorded.

Where contact with external organisations or co-operation in shared or adjoining workplaces is required, it will be managed by the site or office manager. Where employees operate on client sites, a WP senior manager will liaise with the client to ensure that the facilities are compliant.

Personnel who wish to discuss matters related to Health, Safety or the Environment should initially do so with their immediate Line Manager. If it is necessary for the matter to be taken further the following actions are available:

- Review and discussion with the Health and Safety Advisors or relevant Safety Committee.
- Review and discussion with a Contracts Manager, a Director or the Managing Director.

Recommendations made will be reviewed by senior management and appropriate responses given and / or action taken.

Information is relayed to personnel through training programmes, safety meetings, toolbox talks, Correspondence and safety bulletins, etc. Copies of all pertinent documents, procedures etc., relating to Health and Safety are freely available to individuals. Documents, procedures, posters etc. are displayed on notice boards as required.

4.6 Training & Maintaining Competence

WP recognises that the training and development of its employees is an investment for the future and therefore represents a vital business activity.

Managers and Supervisors, in conjunction with the Health and Safety Advisors, will identify the health & safety training needs of their work group and plan and allocate time and other resources to ensure these needs are fulfilled.

4.7 H&S ASSISTANCE

WP employs Ottaway & Associates as Health and Safety Advisors. They are available to all for advice on any aspect of health and safety. The company has appointed providers to assist in other specialist areas relating to health and safety management.

4.8 DOCUMENTATION & COMPLIANCE

Registers of relevant legislation and standards are maintained for reference in the head office. In all work areas the responsible Manager or Supervisor ensures that a safe system of work is operated. Where appropriate to control potentially hazardous situations, WP Permit-to-Work procedures are used.

4.9 FIRST-AID, ACCIDENTS, INCIDENTS & EMERGENCIES

All accidents, incidents and dangerous occurrences, no matter how seemingly trivial are reported to the responsible Manager or immediate Supervisor, and the next senior manager. An initial investigation would be carried out by line management, and a report passed to the Health and Safety Advisors.

The accident / incident / occurrence would be reported in accordance with the (electronic) company Accident Reporting System. The responsible Manager or Supervisor would ensure that the appropriate records are completed and that the incident is thoroughly investigated, where appropriate assisted by the Health and Safety Advisors. In addition to formally recording the incident the procedure is intended to establish the cause in order to prevent future incidents.

Compilation and issue of all health and safety reports and statistics are the responsibility of the Site Manager.

Senior management carry out the requirements of RIDDOR reporting and other statutory reports.

Each location has its own **emergency procedures**. The procedures are designed to manage effectively a wide range of incidents that may occur at any given location. Personnel are required to familiarise themselves with the procedures applicable to the location at which they are employed. Such procedures are held on file and / or displayed on notice boards throughout each location. Alarms and procedures are regularly tested and where necessary, procedures updated and additional training given to personnel.

Appropriately qualified medical staff and / or trained first-aid personnel are employed / appointed at all work locations to ensure proper levels of medical care and attention are available. All trained first-aiders are required to complete an approved course to re-qualify at least every three years.

Fire risk assessments and prevention and emergency plans are drawn up for sites / workplaces by the site

or workplace manager.

The names and telephone numbers of first-aid and other emergency personnel are listed in site RAMS and / or posted on notice boards. Each site / workplace manager is responsible for ensuring that this information is displayed and updated.

4.10 WORKING CONDITIONS, PLANT & EQUIPMENT, & SUBSTANCES

The WP site and office managers are responsible for maintaining safe & healthy working conditions, for the safe provision and maintenance of plant, equipment and machinery, and for ensuring safe storage and use of substances. Welfare facilities are provided as required for all employees.

Before introducing any new machinery, substance or process a full technical appraisal is carried out. Part of this appraisal is to ensure that, when in normal use, the equipment, substance or process can be used or operated within the limits required by legislation and to comply with company standards.

Work with substances is assessed in accordance with COSHH (Control of Substances Hazardous to Health Regulations), CLAW (Control of Lead at Work Regulations) and other regulations as required.

4.11 PROTECTIVE CLOTHING AND EQUIPMENT

Where hazards relating to any employee's job require it, an assessment is made by the site manager / supervisor and personal protective clothing and equipment is provided by WP without charge to the employee. All equipment conforms to a relevant BS / ISO or, in the absence of such a standard, to WP standards. Note that employees have a legal responsibility to take care of PPE issued to them.

4.12 Coronavirus / COVID-19

W Portsmouth complies with the regulations in force current at the time. The Government guides relevant to the business are followed as well as those of the Construction Leadership Council, the CITB and other bodies. The company also receives updated advice from Ottaway & Associates when the guidance etc develops or changes, or if new threats appear.

We have ensured workplace safety by carrying out Covid-19 risk assessments; we have developed cleaning, hygiene, social distancing and other documented procedures; and we enable staff to work from home safely as applicable. Specific Company information will, for the foreseeable future, be detailed in separate documents which support the HSP & HSM. This is because the level of risk from the virus varies from week to week and place to place at the current time, and we recognise the potential for gross change in the event of new developments (an outbreak of a new variant for example). Correspondingly, documents and arrangements relating to this virus will be subject to frequent review.

5.0 HEALTH & SAFETY ARRANGEMENTS (PROJECT BASED ACTIVITIES)

5.1 CDM COMPLIANCE & PROJECT CONTROL

WP recognises that the foundations for effective site safety management are established at the pre-contract stage of a project and therefore require close co-operation between the Project Surveyor, Client and Principal Designer at an early stage. Equally essential is the communication and co-operation between contractors, designers, project management and site managers, and the maintenance of high health and safety standards throughout the construction phase. An efficient working relationship is maintained throughout the life of the project in order to ensure that client and company objectives are achieved. Company systems will be followed to enable healthy, safe, and efficient project execution.

5.2 DESIGNER (& PRINCIPAL DESIGNER)

When WP carries out the role of Designer (as encompassed by the wide scope of the CDM regulations), or is appointed as Principal Designer, all relevant requirements of the CDM regulations will be complied with. The company aims to serve Construction Clients by following not only the legal requirements of CDM, but also by working to the spirit of the regulations. By the application of CDM, high levels of service, compliance, and utility are achieved – not only throughout the pre-construction and construction process, from appointment to commissioning and hand-over, but also beyond to building use and eventual final decommissioning.

5.3 CONTRACTOR (& PRINCIPAL CONTRACTOR)

When WP carries out the role of Contractor, or is appointed as Principal Contractor, all relevant requirements of the CDM regulations will be complied with. This is achieved through following the company's site documentation procedures. For every site, suitably skilled, knowledgeable and experienced staff is allocated, given the scale and complexity of the project and the nature of the health and safety risks involved.

The company recognises the unique and important role the Principal Contractor has in managing the risks of the construction work and providing strong leadership to ensure standards are understood and followed.

5.4 SUBCONTRACTORS & CONSULTANTS

Refer to Section 3.11 of this Policy.

5.5 CONSTRUCTION SITE HEALTH, SAFETY, & WELFARE

WP operates a documented site management system incorporating health and safety management along with other aspects of the company business including quality and environmental management. The key to maintaining a successful, safe and healthy site are the WP competent Site Managers. Site Managers will ensure compliance with all parts of the CDM Regulations. The attention paid to welfare provision equally important as ensuring workers' health and safety.

5.6 PRE-CONSTRUCTION INFORMATION, CONSTRUCTION PHASE PLANS & H&S FILE

WP recognises the importance of and the requirement to compile pre-construction information, the construction phase plan and the health and safety file, as applicable to our various appointments on projects. We have a full understanding of the processes of the processes involved, including communicating and retaining the information essential for the safe and healthy execution of projects and for maintaining structures after project completion. The company recognises the proper time-frames for liaising and for collating and communicating information for these documents to the relevant parties. Also the requirement for including all information required, for reviewing, revising, and monitoring the effectiveness of documents, whilst avoiding the inclusion of information that will not be of help.

6.0 AUDIT AND REVIEW

6.1 WORKPLACE INSPECTIONS

Our Health and Safety Advisors are liable to visit sites at any time, without announcement, to carry out an audit for compliance with the company procedures.

The level of activity and inherent operational risk of each particular location project / workplace determines the frequency and type of inspection. Any inadequately controlled risks or procedures improperly followed that are identified during an inspection are remedied immediately.

As soon as practicable after an inspection, a report is prepared detailing any shortfalls, and the actions taken or recommendations made to mitigate or control them. After appropriate action has been taken further inspections are made by on- or off-site personnel, to confirm the situation has been dealt with.

6.2 FORMAL AUDIT & REVIEW

H&S arrangements, including this policy, are formally and informally reviewed at regular intervals.

The company directors review the company's health and safety performance at least once a year. The review process will:

- examine whether the health and safety policy reflects the organisation's current priorities, plans and targets;
- examine whether health and safety performance has been effectively reported to the board;
- evaluate the company's H&S strengths and weaknesses, in order that company policy can be directed most effectively;
- report health and safety shortcomings, and the effect of all relevant board and management decisions:
- decide actions to address any weaknesses and a system to monitor their implementation; and
- consider immediate reviews in the light of major shortcomings or events.

Records of the management reviews will be retained.

6.3 INFORMAL REVIEW

There are occasions when H&S procedures need to be changed locally or augmented in response to certain situations, and when a formal review is not required. These occasions could include response to new legislation, new best practices or regulatory pressure, to client or contract requirements, or following an internal or external near miss or accident report. Informal reviews allow the company H&S management systems to function responsively. They may be carried out by management less senior than directors and may focus on a single or number of aspects of the company systems. Managing Director approval is always required following informal review.

6.4 CONTINUAL IMPROVEMENT

WP recognises that opportunities often arise to improve performance in health and safety, as with other business areas. Such opportunities can arise following client requirements, management review or worker suggestions, for example, and can be trialled on a limited number of sites. Health and safety process improvements normally become incorporated into the body of procedure documentation following the annual review and revision.

6.5 ISO 45001

WP operates a H&S management system that is certified compliant with ISO 45001. Annual audits are carried out by BM Trada to ensure this compliance is maintained.