

Health and Safety Policy

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Organisation and Responsibilities

Top Management Accountability

The Managing Director retains ultimate accountability for the occupational health and safety management system and the health, safety and welfare of all persons affected by Promont Limited's operations. Top management ensures that:

- Health and safety responsibilities and authorities are assigned, communicated, and understood at all levels;
- Workers at all levels are encouraged to report hazards, risks, and opportunities for improvement without fear of reprisal;
- Adequate resources are allocated to establish, implement, maintain, and continually improve the OH&S management system;
- Health and safety performance is integrated into business planning and review processes.

Designated Competent Person

Promont Limited has appointed a competent person(s) in accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999 to assist in undertaking preventive and protective measures. The competent person has the knowledge, skills, experience, and qualifications necessary to fulfil this role and is given adequate time and resources to discharge their duties.

Management Responsibilities

Operations Managers and Site Supervisors are responsible for:

- Implementing this policy within their areas of control;
- Ensuring suitable and sufficient risk assessments are completed before work commences;
- Providing adequate supervision, instruction, and training;
- Monitoring compliance with safe systems of work;
- Investigating incidents and implementing corrective actions;
- Consulting with workers on health and safety matters;
- Ensuring adequate communication between Promont Limited, clients, contractors, and other parties sharing workplaces.

Worker Responsibilities

All workers have a legal duty under Section 7 of the Health and Safety at Work Act 1974 to:

- Take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions;
- Co-operate with Promont Limited to enable compliance with health and safety duties;
- Use work equipment, personal protective equipment, and safety devices correctly and in accordance with training;
- Report all hazards, near misses, incidents, and work-related ill health immediately;

- Not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare;
- Participate in consultation processes and contribute to continual improvement;
- Attend mandatory health and safety training and assessments.

Planning and Risk Management

Context of the Organisation

Promont Limited determines external and internal issues relevant to our purpose and strategic direction that affect our ability to achieve the intended outcomes of our OH&S management system. We consider:

- Client requirements and contractual obligations across diverse security sectors;
- SIA licensing requirements and Approved Contractor Scheme standards;
- British Standards applicable to our services (BS 7858, BS 7960, BS 7984, BS 8484, BS 10800);
- Sector-specific regulations including CDM 2015 for construction sites;
- Geographical and operational diversity of our service delivery;
- Worker characteristics including shift patterns, lone working, vehicle operations, and exposure to violence;
- Climate change impacts on outdoor operations including temperature extremes and severe weather.

Hazard Identification and Risk Assessment

Promont Limited maintains ongoing processes to identify hazards, assess risks, and determine necessary controls. Our hazard identification considers:

- **Work organisation and social factors** including workload, work hours, leadership, organisational culture, bullying, harassment, and violence;
- **Routine and non-routine activities and situations** including start-up, shut-down, maintenance, emergency response, and abnormal conditions;
- **Past incidents** both internal and external, including their root causes and effectiveness of existing controls;
- **Emergency situations** including fire, bomb threats, terrorist incidents, medical emergencies, and site evacuations;
- **People** including those with access to the workplace (workers, contractors, visitors, members of the public, emergency services) and vulnerable individuals;
- **Change** including new locations, processes, equipment, organisational structure, legislation, knowledge, and technology;
- **Physical hazards** including violence and aggression, slips/trips/falls, working at height, manual handling, driving, confined spaces, lone working, adverse weather;
- **Psychosocial hazards** including work-related stress, fatigue from shift work, trauma exposure, isolation, and mental health impacts;
- **Situations not under the organisation's direct control** including client premises, construction sites, public areas, and third-party managed locations.

Risk assessments are:

- Conducted by competent persons with involvement of workers who perform the work;
- Suitable and sufficient, considering the likelihood and severity of harm;
- Documented and made available to affected workers;
- Reviewed when there is reason to believe they are no longer valid, following significant change, or at least annually;
- Specific to each client site and service type, with generic assessments used only as templates requiring site-specific adaptation.

Controls are determined using the hierarchy of controls in the following order of priority: elimination, substitution, engineering controls, administrative controls including training and procedures, and personal protective equipment.

Legal and Other Requirements

Promont Limited maintains a legal register of all applicable health and safety legislation, approved codes of practice, British Standards, and SIA requirements. This register is reviewed regularly to ensure currency and compliance. We evaluate compliance through internal audit, management review, and where necessary, external compliance verification.

OH&S Objectives

Health and safety objectives are established at relevant functions and levels, taking into account:

- Applicable legal and other requirements;
- OH&S risks and opportunities;
- Results of consultation with workers;
- Results from monitoring, measurement, analysis, and evaluation.

Objectives are SMART (Specific, Measurable, Achievable, Relevant, Time-bound), communicated, and reviewed annually as part of management review.

Support and Operational Arrangements

Resources

Promont Limited determines and provides the resources needed for the establishment, implementation, maintenance, and continual improvement of the OH&S management system, including human resources, infrastructure, technology, and financial resources.

Competence and Training

All workers receive induction training covering this policy, emergency procedures, incident reporting, and role-specific hazards. Ongoing training is provided based on identified needs and includes:

- SIA licensing and renewal training as legally required;
- CSCS certification for construction site operatives;
- Conflict management and de-escalation techniques;
- Physical intervention training where risk assessment identifies significant violence risk;
- Lone worker procedures and personal safety device operation;
- Driver assessment and defensive driving for mobile patrol operatives;
- Manual handling techniques;
- Working at height awareness;
- Display screen equipment (DSE) training for CCTV operators;
- First aid training with sufficient first aiders available;
- Fire safety and emergency evacuation procedures;
- Mental health awareness and trauma support;
- Counter-terrorism awareness (ACT training);
- Site-specific induction for each client location.

Training records are maintained demonstrating competence, currency, and refresher training compliance.

Awareness and Communication

Workers are made aware of:

- The OH&S policy and their contribution to the effectiveness of the OH&S management system;
- The implications and potential consequences of not conforming with OH&S requirements;
- Incidents and outcomes of investigations relevant to them;
- Hazards, risks, and controls relevant to their work;
- Their ability to remove themselves from work situations they consider present an imminent and serious danger to life or health.

Communication processes ensure health and safety information flows effectively between all levels and functions, with external parties where relevant, and includes both proactive communication and response to relevant communications.

Documented Information

Documented information required by ISO 45001 and determined by Promont Limited as necessary for the effectiveness of the OH&S management system is created, updated, and controlled. This includes policies, procedures, risk assessments, training records, incident reports, audit reports, and management review records. Documents are identified, format-controlled, version-controlled, reviewed, approved, accessible, protected, and retained as per our integrated management system document control procedure.

Sector-Specific Operational Controls

Violence and Aggression Management

Recognising that security personnel face significantly elevated risk of violence and aggression, Promont Limited implements:

- **Risk assessment** for all assignments considering location, time, client/customer profile, and historical incident data;
- **Environmental controls** including adequate lighting, CCTV coverage, alarm systems, secure barriers, and clear visibility;
- **Staffing levels** appropriate to the assessed risk, with paired officers where single deployment creates unacceptable risk;
- **Training** in verbal de-escalation, conflict resolution, and where justified by risk assessment, physical intervention techniques;
- **Body-worn cameras** deployed as deterrent and evidence-gathering tools where risk assessment justifies;
- **Communication systems** enabling immediate contact with supervision and emergency services;
- **Post-incident support** including immediate welfare checks, structured debriefing, access to counselling services, and liaison with police where criminal offences occur;
- **Reporting** all incidents of violence, threats, and abuse to enable trend analysis and control improvement, with RIDDOR notification where legally required.

Lone Working

Where operational requirements necessitate lone working, Promont Limited implements controls including:

- **Risk assessment** determining suitability for lone work considering violence risk, medical fitness, task complexity, environment, and communication availability;
- **Personal safety devices** compliant with BS 8484 featuring GPS tracking, panic alarm, man-down/fall detection, and automated welfare check-ins;
- **Monitoring procedures** with defined response protocols and escalation procedures;
- **Buddy systems** where lone workers have regular contact with a designated colleague;
- **Safe arrival and departure** confirmation protocols;
- **Medical assessment** ensuring lone workers have no conditions that could pose risk when working alone;
- **Training** on personal safety awareness, emergency procedures, and lone worker device operation.

Night Working and Fatigue Management

In compliance with the Working Time Regulations 1998, Promont Limited implements:

- **Night worker health assessments** offered free of charge before assignment to night work and at regular intervals (normally annually), covering gastrointestinal, cardiovascular, respiratory, metabolic, neurological, and mental health conditions;
- **Working time limits** ensuring night workers average no more than 8 hours in each 24-hour period over a 17-week

reference period, with absolute limits where special hazards or heavy strain are identified;

- **Shift design** preferring forward-rotating patterns (mornings → afternoons → nights), limiting consecutive night shifts, ensuring adequate recovery time between shift changes, and providing short frequent breaks rather than long infrequent breaks;
- **Fatigue risk assessment** considering shift length, rest breaks, work intensity, time of day, and cumulative fatigue;
- **Monitoring** for signs of fatigue-related performance degradation;
- **Transfer arrangements** where health assessments identify that night work is causing or likely to cause health problems, workers are offered transfer to day work where reasonably practicable.

Driving and Occupational Road Risk

For mobile patrol operatives and all workers who drive as part of their duties, Promont Limited manages occupational road risk through assessment of:

- **The driver:** Valid driving licence verification (every 6 months minimum), driver assessment, fitness to drive declarations, fatigue management, distraction prevention (no mobile phone use while driving), substance misuse policy compliance;
- **The vehicle:** Roadworthiness checks, maintenance schedules, MOT and insurance currency, vehicle suitability for purpose, safety equipment provision (hi-visibility clothing, warning triangles, first aid kit), telematics consideration for fleet management;
- **The journey:** Route planning, scheduling allowing adequate time without excessive speeding, weather considerations, rest break requirements (minimum 15 minutes every 2 hours), emergency procedures.

These requirements apply equally to company-provided vehicles and grey fleet (personal vehicles used for work purposes). Workers must notify Promont Limited immediately of any driving convictions, licence endorsements, or medical conditions affecting driving ability.

Construction Site Operations

When providing security services on construction sites subject to CDM 2015, Promont Limited ensures:

- **Principal contractor liaison** establishing clear communication, understanding of the Construction Phase Plan, participation in site inductions, and co-ordination of activities;
- **CSCS certification** all operatives hold minimum CSCS Green (Labourer) card or equivalent demonstrating health and safety competence;
- **Personal protective equipment** as determined by site-specific risk assessment, typically including hard hat (EN 397), safety boots with steel toecaps and mid-sole protection, high-visibility clothing (Class 2 minimum, Class 3 near traffic/plant), eye protection, and gloves;
- **Site-specific hazards** addressed including falls from height, struck-by incidents, vehicle/plant movements, excavations, temporary works, hazardous substances, confined spaces, and adverse weather;
- **Patrol routes** planned in liaison with the principal contractor to ensure routes are safe and segregated from active construction operations;
- **Permit systems** compliance with any site permit-to-work systems for access to restricted or high-risk areas;
- **Welfare facilities** access to appropriate welfare facilities including toilets, washing facilities, drinking water, rest areas, and facilities for eating;
- **Emergency procedures** understanding of site-specific emergency arrangements including assembly points, first aid provision, and emergency contact details.

CCTV Operations and Display Screen Equipment

CCTV control room operatives and monitoring personnel are classified as DSE users. Promont Limited implements:

- **Workstation assessments** using the HSE DSE assessment checklist covering equipment, furniture, environment, and working practices;
- **Planned breaks or activity changes** with short frequent breaks more effective than long infrequent breaks, typically 5-10 minutes per hour of continuous monitoring;
- **Eye tests** provided free of charge on request, with provision of special corrective lenses if needed specifically for

DSE work;

- **Ergonomic workstation setup** including adjustable chairs, appropriate screen positioning, adequate lighting, suitable temperature and humidity, minimal glare and reflections;
- **Task rotation** between monitoring, patrols, and administrative duties where operationally feasible;
- **Training** on correct workstation setup, importance of breaks, and recognising symptoms of DSE-related problems (eye strain, headaches, back/neck pain).

Manual Handling and Physical Tasks

Where manual handling cannot be avoided through task redesign or mechanisation, Promont Limited provides:

- **Risk assessment** considering the task, individual, load, and environment (TILE);
- **Training** in safe manual handling techniques;
- **Mechanical aids** where reasonably practicable (trolleys, sack trucks, etc.);
- **Team lifts** for loads exceeding individual safe handling limits;
- **Medical pre-screening** where frequent or heavy manual handling is required.

Working at Height

Where working at height cannot be eliminated (for example, CCTV installation or maintenance), controls include:

- **Risk assessment** and method statements before work commences;
- **Competent personnel** with appropriate training and certification;
- **Equipment selection** following the hierarchy: avoid work at height, use existing safe places of work, prevent falls through collective protection (guardrails, working platforms), mitigate falls through personal fall arrest systems;
- **Inspection** of equipment before use and periodic inspection as per manufacturer guidance;
- **Weather conditions** assessment with suspension of work in high winds or adverse conditions;
- **Fragile surfaces** identified and protected;
- **Emergency rescue** plans in place before work commences.

Personal Protective Equipment (PPE)

In accordance with the Personal Protective Equipment at Work Regulations 2022, Promont Limited:

- Provides all necessary PPE **free of charge** to all workers including agency and subcontracted personnel;
- Assesses PPE requirements through risk assessment;
- Selects PPE appropriate to the risks, ergonomically suitable, and CE/UKCA marked;
- Provides information, instruction, and training on PPE use, storage, and maintenance;
- Ensures PPE is properly maintained, cleaned, and replaced when damaged;
- Monitors and enforces PPE use through supervision and disciplinary procedures where necessary.

Psychosocial Risk and Mental Health

Recognising that security work involves elevated psychosocial risks including violence exposure, trauma, shift work, and isolation, Promont Limited manages mental health and wellbeing through:

- **Risk assessment** addressing the HSE Management Standards for work-related stress (Demands, Control, Support, Relationships, Role, Change);
- **Workload management** ensuring working time limits are respected and excessive overtime is avoided;
- **Role clarity** with clear job descriptions, expectations, and reporting lines;
- **Support systems** including line manager availability, peer support, and Employee Assistance Programme providing confidential counselling;
- **Post-incident support** following violent or traumatic events, including structured debriefing and access to professional trauma counselling;
- **Mental Health First Aiders** trained and available within the workforce;
- **Culture of openness** where mental health is discussed without stigma and workers feel able to raise concerns;
- **Reasonable adjustments** for workers experiencing mental health difficulties;
- **Return-to-work support** following mental health-related absence;

- **Monitoring** of sickness absence data to identify stress-related trends.

Emergency Preparedness and Response

Promont Limited plans for potential emergency situations including:

- Fire and evacuation procedures at all Promont Limited premises;
- Client site-specific emergency procedures understood through site induction;
- First aid provision with adequate numbers of trained first aiders and appropriate equipment;
- Serious injury or medical emergency response including summoning emergency services;
- Violent incident response including police liaison and scene preservation;
- Bomb threat and suspicious package procedures;
- Terrorist incident response aligned with ACT training;
- Severe weather and environmental emergency procedures;
- Lone worker emergency response with defined escalation timescales.

Emergency procedures are tested through drills and exercises, reviewed following actual emergencies or near misses, and updated as necessary. All workers receive emergency response training appropriate to their role.

Workplace Health Surveillance

Where risk assessment identifies the need, Promont Limited implements health surveillance programmes including:

- Night worker health assessments before assignment and periodically thereafter;
- DSE eye tests for CCTV operatives and control room staff;
- Fitness assessments for roles with significant physical demands;
- Mental health screening for high-risk roles;
- Audiometry where noise exposure warrants;
- Respiratory assessment where dust or fume exposure occurs.

Health surveillance records are maintained confidentially, with aggregated data analysed to identify trends and inform control improvements. Workers are informed of surveillance results and any necessary actions are taken to protect health.

Contractor and Visitor Management

Where Promont Limited engages contractors or receives visitors, we ensure:

- Contractors are competent and comply with applicable health and safety requirements;
- Work is co-ordinated to avoid creating additional risks;
- Site-specific hazards are communicated;
- Visitors receive appropriate safety briefings;
- Emergency procedures are understood by all;
- Incidents involving contractors or visitors are investigated and recorded.

Performance Evaluation and Improvement

Monitoring, Measurement, and Analysis

Promont Limited monitors and measures OH&S performance using both leading and lagging indicators:

Leading indicators (proactive):

- Training completion rates and competence verification;
- Risk assessment completion and review currency;
- Safety inspection completion rates;
- Near-miss reporting volumes and trends;

- Safety toolbox talk delivery;
- PPE compliance observation scores;
- Health surveillance completion rates;
- Lone worker check-in compliance.

Lagging indicators (reactive):

- RIDDOR reportable incidents (fatalities, specified injuries, over-7-day injuries, occupational diseases);
- Lost-time injury frequency rate (LTIFR);
- Total recordable incident rate (TRIR);
- Days lost due to work-related injury or ill health;
- Sickness absence rates and reasons;
- Violence and aggression incident rates;
- Vehicle incident rates;
- Enforcement action (improvement notices, prohibition notices, prosecutions).

Performance data is analysed to identify trends, root causes, and opportunities for improvement. Monitoring equipment is calibrated and maintained where applicable.

Incident Investigation and Reporting

All incidents, near misses, and dangerous occurrences are reported immediately to line management. Promont Limited investigates to determine root causes using appropriate methodologies (5 Whys, Fishbone Analysis, Root Cause Analysis). Investigation findings inform corrective actions to prevent recurrence.

RIDDOR Reporting:

- **Deaths and specified injuries** reported to HSE without delay (within 10 days) by the quickest practicable means (online or telephone 0345 300 9923);
- **Over-7-day injuries** where a worker is incapacitated for normal work for more than 7 consecutive days (not counting day of incident) reported within 15 days;
- **Occupational diseases** reported when diagnosed by a doctor;
- **Dangerous occurrences** reported even where no injury resulted;
- **Records** retained for at least 3 years from the date of the incident.

The duty to report lies with the employer, not the injured person. Assaults on security guards resulting in specified injuries or over-7-day incapacitation are RIDDOR reportable where they arise out of or in connection with work.

Internal Audit

Promont Limited conducts planned internal audits at defined intervals to determine whether the OH&S management system:

- Conforms to the organisation's own requirements and to ISO 45001:2018;
- Is effectively implemented and maintained;
- Achieves its intended outcomes.

Audits are conducted by competent personnel independent of the area being audited. Audit programmes are planned considering the importance of processes, changes affecting the organisation, and results of previous audits. Audit findings and corrective actions are reported to top management. Audit records are retained as documented information.

Management Review

Top management reviews the OH&S management system at planned intervals (minimum annually) to ensure its continuing suitability, adequacy, and effectiveness. Management review considers:

- Status of actions from previous management reviews;
- Changes in external and internal issues relevant to the OH&S management system including needs and expectations of interested parties, legal requirements, and risks and opportunities;
- The extent to which the OH&S policy and objectives have been met;

- Information on OH&S performance including trends in incidents, nonconformities, corrective actions, monitoring and measurement results, audit results, and worker consultation and participation outcomes;
- Adequacy of resources;
- Relevant communication with interested parties;
- Opportunities for continual improvement.

Outputs from management review include decisions related to continual improvement opportunities, changes needed to the OH&S management system, resource requirements, and actions if needed. Outcomes are communicated to relevant workers and documented information is retained.

Continual Improvement

Promont Limited continually improves the suitability, adequacy, and effectiveness of the OH&S management system to enhance OH&S performance. This includes:

- Promoting a culture of proactive improvement where workers identify and report hazards and suggest improvements;
- Involving workers in identifying opportunities for improvement;
- Learning from incidents, near misses, and industry best practice;
- Implementing technological improvements including personal safety devices, telematics, body-worn cameras, and monitoring systems;
- Benchmarking performance against SIA ACS scores and sector peers;
- Setting and reviewing annual improvement objectives;
- Implementing corrective actions following nonconformities;
- Acting on outcomes from internal audits and management reviews.

Nonconformity and Corrective Action

When nonconformities occur, Promont Limited:

- Reacts to the nonconformity and takes action to control and correct it;
- Evaluates the need for action to eliminate root causes using appropriate investigation methods;
- Implements corrective actions;
- Reviews the effectiveness of corrective actions taken;
- Updates risks and opportunities determined during planning if necessary;
- Makes changes to the OH&S management system if necessary.

Corrective actions are appropriate to the significance of the effects of the nonconformities encountered. Documented information is retained as evidence of the nature of nonconformities, actions taken, and results of corrective actions.

Integration with ISO 9001 and ISO 14001

This Health and Safety Policy operates as part of Promont Limited's Integrated Management System, combining ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental), and ISO 45001:2018 (Occupational Health and Safety). Integration is achieved through:

- **Unified document control** with single procedures for creation, approval, distribution, and revision of documented information;
- **Combined risk assessment** addressing quality, environmental, and OH&S risks simultaneously;
- **Integrated audit programme** covering all three standards in combined audit activities;
- **Single management review** addressing quality, environmental, and OH&S performance together;
- **Unified corrective action process** with shared registers and tracking;
- **Combined training matrix** addressing competence requirements across all three standards;
- **Shared communication processes** and consultation mechanisms;
- **Integrated objectives** where quality, environmental, and OH&S goals align and reinforce each other.

This policy demonstrates Promont Limited's commitment to the health, safety, and welfare of all persons affected by our operations and our determination to achieve continuous improvement in occupational health and safety performance through systematic management aligned with ISO 45001:2018, ISO 9001:2015, and ISO 14001:2015.



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