

**SPOTLESS COMMERCIAL CLEANING LTD**

**HEALTH & SAFETY POLICY**

**JUNE 2026 TO JUNE 2027**

**Version 1.8**

## Introduction

This document sets out the Health & Safety policy of Spotless Commercial Cleaning Ltd (Spotless) in relation to its delivery of commercial cleaning services & related services.

This document sets a base level of Health & Safety awareness, and outlines a commitment by Spotless to effectively manage, develop and improve the overall Health & Safety knowledge & standards embedded in the delivery of its services.

## PART1 – General Statement of Policy

- 1.1 The Company acknowledges and accepts its legal responsibilities for securing the health, safety, and welfare of all its employees, of sub-contractors working on its behalf and all others affected by their activities, including our client's employees and the general public.
- 1.2 The Company recognises and accepts the general duties imposed upon the company as an employer under the Health & Safety at Work Act and subsequent Health & Safety regulations appertaining to its operation.
- 1.3 As CEO I remain committed to continuing to improve the following aspects of Health & Safety within our organisation, in the following ways:
  - To ensure there is a high level of engagement with all colleagues on Health & Safety management that will assist in its ongoing development
  - To add value to our client base by supporting their own Health & Safety responsibilities
  - To ensure safe methods and systems of work are in place and regularly reviewed
  - To ensure any equipment used in the delivery of service is well maintained and fit for purpose
  - To ensure all our colleagues are issued with appropriate Personal Protective Equipment relevant to their working tasks
- 1.4 This policy will be reviewed annually or sooner following significant changes in legislation, operations or incidents.

## PART 2 – Organisation and Responsibilities

### 2.1 CEO

The CEO is responsible for setting the overall Health & Safety Policy statement and also responsible for the associated Health & Safety sub policies of the company. In particular the following falls within this remit:

- To ensure suitable systems and procedures are in place to record, monitor and improve the overall Health & Safety within the company
- To promote effective Communication of the Health & Safety Policy to Senior Staff, Managers, and all employees of the company

## 2.2 Directors

The Directors are responsible for the delivery of the Health & Safety Policy statement, sub policy statements and collation of relevant data required to effectively manage and enhance the overall Health & Safety within Spotless. In particular the following falls within this remit:

- Ensure suitable financial investment is made for adhering to the Health & Safety obligations of the company
- Promote an effective and compliant Health & Safety culture throughout the organisation.
- Review accident, incident and near-miss trends regularly.
- Ensure corrective actions are completed within agreed timescales.

## 2.3 Regional and Senior Account Managers

The Regional and Senior Account Managers have overall responsibility for administrating and delivering the various Health & Safety policies of the company and will:

- Actively promote at all levels the company's commitment to effective Health & Safety management through the company values:

Values	Expected Behaviour
Trust	We are Self-reliant. We aim for peak performance and talk about our mistakes. We have open and honest conversations even if it's difficult.
Support	We collaborate with care, striking the right balance between empathy and business requirements. We ask for help when we need it and offer help where we see its needed.
Respect	We treat everyone like we'd like our own family member to be treated at work. We are patient and tolerant. We encourage confidence in people.

- Provide appropriate and effective information, training and instruction to managers and employees
- Ensure work is planned to take into account Health & Safety issues and legislative obligations
- Monitor and assess any relevant risks to Health & Safety
- Understand the company policy for Health & Safety and ensure it is readily available for managers and employees
- Assist in the promotion of an effective and compliant Health & Safety culture throughout the organisation
- Collate and report any accidents reportable under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR) 2013

## 2.4 Account Managers

- Actively promote with colleagues the company's commitment to effective Health & Safety management.

- Managers are responsible for assisting their line managers with the delivery of the Health & Safety policies and procedures to all employees
- Managers are responsible for the day-to-day monitoring of Health & Safety amongst the staff and reporting issues and problems through the TimeGate Service Portal.
- Managers are responsible for assisting in implementing the annual Health & Safety plan and meeting the various Health & Safety objectives set.
- Managers will ensure that all staff are made aware of and trained on the contents of the Employment Guide and understand them and any other Health & Safety information (in particular COSHH and RAMS).

## 2.5 Health & Safety Advisor

Competent Person for Health & Safety: **Alan Laing**

Experience / qualifications of above person: NEBOSH, Chartered Member of IOSH, University of Aston Diploma

The Health & Safety Advisor will undertake and be responsible for:

- Advising the Directors of Spotless on the relevant Health & Safety Policies, practises and procedures which should be adopted by the company, to include relevant Risk Assessments and Method Statements
- Assisting in the implementation of the Health & Safety Policy
- Monitoring the implementation of the Health & Safety policy throughout the company and reviewing its appropriateness by regular safety audits/inspections carried out in various workplaces
- Assisting where required on investigating accidents and implementing associated corrective action
- Reviewing Health & Safety legislation and recommending/implementing any new requirements pertaining to the company's undertaking
- Liaising with managers, employees, sub-contractors, and specialists as and when appropriate
- Delivering relevant Health & Safety training workshops to Directors and Rhiannon Abbott, HR, and Health & Safety Manager as appropriate

## 2.6 Admin

Rhiannon Abbott, HR and Health & Safety Manager, is responsible for collating data from the TimeGate Service Portal and completing the spreadsheets on accidents and near misses.

Rhiannon Abbott, HR and Health & Safety Manager, is to ensure that all Health & Safety alerts are followed up, closed off and suitable training has been delivered around them where required.

## 2.7 Employees

Section 7 of the Health & Safety at Work Act 1974 states the following:

It shall be the duty of every employee while at work –

- (a) to take reasonable care for the Health & Safety of himself and of other persons who may be affected by his acts or omissions at work; and
- (b) as regards any duty or requirements imposed on his employer or any other person by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with.

For all employees to comply with their legal duties, they will undertake and be responsible for:

- Reading and understanding the Company's Health & Safety policy and carry out their work safely and in accordance with its requirements.
- Ensuring that all protective equipment provided under a legal requirement is properly used in relation to any instruction / training given and in accordance with this Health & Safety policy.
- Reporting any defects to work equipment immediately to the Site Supervisor or Account Manager.
- Reporting any accidents, incidents, ill health or near misses however minor to the Site Supervisor or Account Manager.
- Using the correct tools and equipment for the job in hand and in accordance with training and instructions.
- Co-operating with any investigation, which may be undertaken with the objective of preventing reoccurrence of incidents.

In addition, as and when routine conversations with managers occur, an employee should highlight any issue with skin irritations or breathing issues and confirm understanding of PPE requirements, Formal Visual Inspection (FVI) protocol, COSHH & RAMS, and Working at Heights.

## Part 3 – Arrangements and General Policy Statements

### 3.1 Communication

In order to meet the legal requirements of the Safety Representatives and Safety Committees Regulations and the Health & Safety (Consultation with Employees) Regulations, the company will communicate with all employees on the following issues:

- The content of this policy.
- Any rules specific to a site or job.
- Changes in legislation or working best practice.
- The planning of Health & Safety training.
- The introduction or alteration of new work equipment or technology.

This communication and consultation will take place directly with the employees via induction, our staff Engagement portal, regular training sessions, emails, postcards, and an abbreviated version of the Health & Safety Policy (available in the Communication Diary & Employment Guide).

### 3.2 **Training**

All employees are given training appropriate to their responsibilities in accordance with the Management of Health & Safety at Work Regulations. Training will be provided for the following situations:

- Induction training for new employees (Health & Safety awareness, company procedures and values etc).
- The introduction or modification of new / existing machinery or technology.
- A change in employee position / work activity or responsibility.
- Ongoing re-enforcement of the Health & Safety policies of the company.

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the company will be formally recorded via the TimeGate Service Portal.

### 3.3 **Risk Assessments**

Spotless will prepare written risk assessments for all reasonably foreseeable risks that may affect Spotless staff and others who may be affected by the company's activities. Managers are trained to identify new hazards on Client sites and seek advice and support if unable to control risks.

Risk Assessments and COSHH Assessments, where applicable, will be used to determine the appropriate control measures for hazards, and to ensure that appropriate information, instruction, training, and supervision is available to allow Spotless staff to carry out their jobs as safely as possible, and without risks to their health. Training will be given to allow managers to undertake risk assessments on behalf of the company.

### 3.4 **Method Statements**

Data from risk assessments will be incorporated into Spotless's recommended methods of working. These will form the RAMS (Risk Assessment and Method Statement)

The RAMS forms combine both the risk assessment and method statements required for each task.

### 3.5 **Co-operation with Clients**

Employees will always familiarise themselves with client procedures when attending site, in particular general site access, security, emergency procedures and high-risk work activities, including permit to work systems.

Clients site procedures and specific instructions will always be followed.

All employees complete and sign an Induction form when signing up to Spotless employment via our onboarding tool. An induction 2 for existing staff working on a new client site should be

completed through the TimeGate Service Portal, to demonstrate understanding of site-specific requirements.

### 3.6 **Welfare Facilities**

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of Welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet / washing facilities accessible on site.
- Eating / rest facilities accessible on site.
- Storage for cleaning equipment and PPE

### 3.7 **Work Equipment**

The procurement and use of all work equipment (including Electrical equipment) used by Spotless staff as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations (PUWER).

Before new equipment is introduced into the working environment, an assessment will be made by the relevant Manager in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

Employees will respect all work equipment and be responsible in the way they use it which will minimise a specific risk.

### 3.8 **Electrical Equipment**

Spotless recognise that working with mains-powered electrical equipment may pose a risk of harm to its staff. Spotless recognise the requirements of the Provision and Use of Equipment Regulations 1998 and the Electricity at Work Regulations and will provide and maintain electrical equipment that is suitable for purpose at all times.

Electrical equipment will be procured that is strong enough, of good construction and durability and quality to take into account the foreseeable use and conditions that it might encounter whilst in use by Spotless staff.

Spotless staff will carry out user checks on all items of electrical equipment prior to each use of that equipment. Cleaning staff will be trained to carry out these basic checks for condition of plugs, cables and equipment and this training will be refreshed as appropriate.

Spotless's Account Managers or onsite cleaning operatives will undertake an FVI of all items of electrical equipment used by Spotless staff once per month. All staff will receive appropriate training to allow them to undertake these checks with the required level of competency. In addition, all cleaning colleagues are encouraged to carry out an FVI prior to use of electrical equipment.

Where electrical equipment is used with liquids such as water or detergents or is used in environments where water or other liquids may be encountered, that equipment will be subject to an annual check using specialist equipment to ensure that the earth continuity, and other safety features of the equipment, are in good condition and fit for purpose. A person competent in the use of the test equipment will be employed to undertake this work.

It is Spotless's express policy that any member of staff who feels a piece of electrical equipment is not fit for purpose for any reason may refuse to use that equipment, take it out of use and contact their Line Manager as soon as possible. Spotless will replace that piece of equipment until it is checked and deemed fit for use by a competent person.

All items of electrical equipment belonging to Spotless will be identified by either a sticker recording the regular FVIs and/or detailed test, whichever applies.

### 3.9 **Personal Protective Equipment (PPE)**

Appropriate personal protective equipment, based on a risk assessment of each task/substance as appropriate, will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage, and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment. This is recorded on the TimeGate Service Portal and kept on the HR file for that worker.

Employees have a legal duty to wear PPE as specified by company policy, in relevant site rules, risk assessments and methods statements. Any defects or malfunction of PPE must be reported immediately to their line Manager.

### 3.10 **Hazardous Substances**

The risks associated with hazardous substances are assessed for all work activities.

The majority of our products come from the Biohygiene range, these have been COSHH-assessed, and COSHH assessment sheets distributed to all client sites via the Communications Diary.

An inventory of all substances and materials hazardous to health used is kept on the companies' data base and any member of staff can gain access to this.

Any new products that are required for use should have a COSHH assessment completed and saved in the company data base for review by Graeme Wilson, Consumables & Equipment Manager, before use may commence.

Colleagues with any skin or breathing issues are encouraged to report this to their manager immediately so that these conditions can be assessed.

### 3.11 **First Aid**

Spotless endeavours to provide a level of First Aid protection to staff wherever this is possible. In the majority of client sites, agreement has been reached that the client's First Aid box is available to Spotless staff as needed. Where no agreement can be reached Spotless will provide Spotless staff with a First Aid box. A First Aid Kit is also provided to any person driving a vehicle on behalf of Spotless.

Basic training will be given to all staff on the contents of the First Aid box at their location, and on what actions to take should an incident requiring First Aid take place.

Where appropriate, body fluid containment kits and sharps kits are also issued to Spotless Account Managers.

### 3.12 **Mental Health First Aid**

Spotless provides trained Mental Health First Aiders for any employee that requires additional support or guidance in relation to any Mental Health issues they may suffer from during their employment with Spotless.

Spotless is committed to promoting positive mental wellbeing and reducing workplace stress through appropriate support, communication and employee assistance resources.

The Mental Health First Aiders provide a confidential support service for our employees. The contact details for all of our trained Mental Health First Aiders can be found by scanning the QR code below:



### 3.13 **Accident Reporting**

All accidents will be reported to the relevant Manager and captured via the TimeGate Service Portal so that appropriate review and modification to working practices and the surrounding environment can be made.

Certain accidents are reportable to the HSE's Incident Contact Centre. It is the responsibility of Rhiannon Abbott to lodge such an event:

- Any work-related injury that leads to an employee being unable to do their normal work (absent or otherwise) for 7 days or more, not including the first day of injury.
- Fracture other than to fingers, thumbs or toes.
- Amputation.
- Dislocation of the shoulder, hip, knee or spine.
- Loss of sight (temporary or permanent).
- Chemical or hot metal burn to the eye or any penetrating injury to the eye.
- Injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- Any other injury: leading to hypothermia, heat-induced illness, or unconsciousness, or requiring resuscitation, or requiring admittance to hospital for more than 24 hours.
- Death.
- Certain illnesses, e.g., occupational dermatitis or occupational asthma, as diagnosed by a GP, must also be reported to HSE.

### 3.14 **Manual Handling**

Spotless has a policy of discouraging significant Manual Handling wherever possible. Staff receive basic training in Manual Handling techniques and the use of relevant equipment and aids. Whenever possible, when moving heavy equipment from floor to floor within a building a lift should be used. All staff moving equipment must be trained on RAMS39- Manual Handling.

### 3.15 **Fire Safety & Emergency Procedures**

It is the Company's policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with the Company's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Managers and, where applicable, Site Supervisors are responsible for keeping their operating area safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

The person in Spotless local offices with responsibility for the maintenance and testing of fire alarms and firefighting equipment is the Managing Director, Regional Manager or Senior Account Manager.

Spotless managers should make best endeavours to make sure that all fire exits on clients' sites are free from hazards and are freely accessible for use at all times.

### 3.16 **Sub-Contractors and Suppliers**

Spotless may engage sub-contracting companies to undertake specialist activities. The Sub-contractors Questionnaire must be completed prior to any engagement with a new contractor or supplier. This form is to be completed annually.

Contractors are monitored, where possible, by Spotless's Account Managers, and any discrepancies between declared risk assessment/method statements and observed activities are dealt with.

All contractors must provide evidence of:

- Public Liability Insurance
- Employers Liability Insurance (where applicable)
- Relevant Risk Assessments and Method Statements
- Competence and training records

Contractors will be monitored and may be removed from the approved supplier list where standards are not maintained.

### 3.17 **Public Safety**

The safety of members of the public and other contractors is considered at all times whilst on site. Any work area that could place others at risk due to the Company's activities will be closed off by appropriate means (e.g., safety signage, bollards, tape, hoarding) in order to restrict access.

### 3.18 Lone Working

Spotless will, through the TimeGate Service Portal Health & Safety Audit, identify any work situations where staff are considered to be Lone Working. Lone Working situations are deemed to be those where staff will work on client premises when there is no other person on that site, nor likely to be on that site for a significant period of time after the Spotless member of staff is scheduled to leave that site.

Spotless will strive at all times to have an out-of-hours contact name and telephone number and spare keys for each of its sites to allow timely entry to premises where Lone Workers may have become incapacitated. However, it is recognised that this may not be possible in all situations.

Spotless has an emergency phone number for out-of-hours issues that any employee or client can call that will be forwarded to the most senior staff member in their area. If no one is available the call will be forwarded through to Nicola Barbour, Managing Director, or Carron Henley, CEO

The emergency phone number is – 07511 000 201

### 3.19 Driving for Work

Employees who drive on company business must:

- Hold a valid driving licence
- Notify the company of any endorsements or restrictions
- Ensure vehicles are roadworthy and maintained
- Not use handheld mobile phones whilst driving
- Report any driving-related accidents immediately

The company will undertake periodic licence checks and ensure suitable motor insurance is in place.

### 3.20 Work at Heights

It is Spotless' policy that any work at height must be carefully controlled and carried out only where appropriate risk assessments and safe systems of work are in place.

While most routine cleaning tasks are completed at ground level, there are exceptions—such as kitchen deep cleans—where general cleaning operatives may need to access elevated surfaces (e.g. canopies, high-level shelving or pipework).

Where this is required:

- Only trained operatives may undertake the task
- A task-specific Risk Assessment and Method Statement (RAMS) must be in place
- Only approved low-level access equipment may be used, such as:
  - Three-step “librarian-type” steps with integral handrails
  - Lightweight ladders, correctly positioned and secured

All working at height must be:

- Risk assessed
- Carried out using properly maintained equipment
- Supported by relevant training and PPE
- Supervised or reviewed where required

Overreaching, makeshift elevation or unauthorised equipment use is strictly prohibited. Staff must not proceed with any task where safe access cannot be clearly established.

### 3.21 **Special Works Team**

Spotless operates a trained and competent Special Works Team, authorised to carry out carpet (& upholstery) cleaning work, jet-washing work and window cleaning. This is beyond the scope of routine daily tasks.

The team supports client requirements across a range of specialist activities, including:

- Carpet & upholstery cleaning
- Jet-washing
- Window cleaning

Members of the Special Works Team receive enhanced training in:

- COSHH awareness and chemical safety
- Manual handling of heavier or awkward equipment
- Safe use of ladders and low-level access tools

All Special Works activities are:

- Covered by task-specific RAMS
- Undertaken only by trained staff
- Supported by suitable PPE and equipment checks

General cleaning operatives are not permitted to carry out Special Works tasks unless formally inducted and trained.

### 3.22 **Environmental Responsibility**

Spotless recognises the close relationship between effective Health & Safety management and environmental responsibility.

The Company is committed to minimising the environmental impact of its activities whilst maintaining safe systems of work for employees, clients, contractors and members of the public.

To support this commitment, Spotless will:

- Promote the safe use, storage and disposal of cleaning chemicals and hazardous substances.
- Seek to reduce waste and encourage recycling wherever practical.
- Select environmentally responsible products and equipment where operationally appropriate.
- Promote efficient use of water, energy and other resources.
- Encourage employees to identify opportunities for environmental improvement.
- Comply with all relevant environmental legislation and client environmental requirements.

Environmental considerations will be incorporated into operational planning, risk assessments and working practices where appropriate.

### 3.23 Display Screen Equipment

All users and computer workstations in Spotless offices will receive a DSE assessment based on the DSE Assessment Checklist held in the S Drive. All new starters in Spotless offices will receive this assessment within their first week of employment.


Staff who feel they need an eye test for DSE work (this includes laptop and iPad users) will be encouraged to attend Opticians. Spotless will cover the cost of the eye test up to £25. The sum will be paid upon receipt of the eye test from the Optician. Prior approval must be sought from, Rhiannon Abbott, HR and Health and Safety Manager before attending an Opticians for DSE eye test.

Anyone requiring visual correction to work with DSE will be entitled to a £49 contribution to the cost of appropriate eyewear. This sum will be paid upon receipt of a written recommendation from a practicing Optician.

<http://www.hse.gov.uk/pubns/indg36.pdf>

### 3.24 Other Important Health & Safety Information

All Health & Safety queries may be made to the Health & Safety Team on 0330 094 7733, or by emailing [hands@spotlessclean.co.uk](mailto:hands@spotlessclean.co.uk)

Signed: 

Name: Carron Henley

Date: 30<sup>th</sup> June 2026

Position: CEO