

Bespak Contractor EHS Code of Practice



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Welcome to Bepak

Health and safety is our No 1 priority and therefore we will only engage with those contractors who are equally committed.

Contractors are expected to familiarise themselves with the contents of this booklet and strictly adhere to them at all times - they're here to keep everyone safe.

The same goes for contractors' workforce, their sub-contractors and anyone else brought on to any of our sites.

Primarily, contractors are bound by the duties contained within the Health and Safety at Work (HSW) etc. Act 1974. This places duties upon Bepak and contractors to ensure the health and safety of employees and others who may be affected by the work.

Section 3 of the HSW Act places general duties on employers and the self-employed towards people other than their employees so to "conduct their undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in their employment who may be affected thereby are not exposed to risks to their health or safety".

Clearly, this responsibility works both ways; Bepak must ensure you are not exposed to any risks arising from our processes, products or premises. Likewise, you must ensure that your actions whilst on site do not affect the health and safety of our employees or visitors.

You'll see many references to health and safety legislation in this document and it's your responsibility to keep track of any changes to legislation and take them into account in your work. We keep up to date with our legal duties and current best practice, and we expect you to do the same. We expect you to work in accordance with the written arrangements and the suitable and sufficient risk assessments you carry out in relation to your work activities.

Failure to comply could result in your company being removed from our approved list of contractors.

It is the contractor's responsibility to make their employees read and understand these rules before undertaking any work on site.



Safe By Choice, Not By Chance Lifelines

Colleagues, contractors and visitors must always:

- **Reverse Park**
- **Hold the Handrail**
- **Heads Up, Phones Down - texting and talking!**
- **Wear high viz in most external areas**
- **Keep walkways clear**
- **Keep to dedicated walkways/paths**
- **Wear correct PPE for the task**
- **Report all accidents/near misses - SEE IT SORT IT REPORT IT**
- **Don't take shortcuts**
- **If in doubt...ask**
- **Don't do it/use it if you're not appropriately trained**

Who the Code Applies To

This Code of Practice applies to all contractors including their:

- employees
- suppliers and the employees of the suppliers
- sub-contractors and the employees of sub-contractors

Your Bepak Host

Whilst working at Bepak, you will have a Bepak host, i.e. a named person who will be your main point of contact. Your host is responsible for ensuring you receive any site orientation relevant to the work activity you are carrying out on site.

If you have any questions, issues or concerns you should discuss them with your host immediately.

Public Liability Insurance

Contractors will be liable for and shall indemnify Bepak against any expense, liability, loss claim or proceedings, arising under any statute or at common law in respect of personal injury or to death of any person or any injury or damage to property, which may arise out of the carrying out of any work.

Contractors must have a minimum of **£5 million** cover. Proof of this insurance will be required before commencing any work. Cover in excess of £5 million may be required for larger projects.

Approved List of Contractors

Bepak will only permit contractors to work on its sites if they are listed on our approved list of contractors.

A company may be removed from the approved list for any of the following reasons:

- If they are responsible for causing an accident or serious incident
- If they demonstrate inadequate safety performance
- If they fail to adhere to agreed method statements or safe systems of work
- If they fail to comply with company policy and site rules
- If the standard of work is poor

Note: This list is not exhaustive

Any decision made by Bepak regarding the removal of a contractor from the approved list is final.

Red/Yellow Warning Process

Bepak has zero tolerance to unacceptable behaviours and practices when it comes to health, safety and the environment.

If a contractor is found to be behaving in an unsafe manner, working outside of the agreed working conditions in such a way that would create a risk to themselves or anybody else, failing to comply with company policies and procedures, the standard of their work is unacceptable or for any other reason as deemed unreasonable the approved status will be reviewed and the contractor and contracting company may be issued with a Yellow or Red Card warning.

Generally Yellow card warnings are for first incidents and Red card warnings for second incidents.

Depending on the nature of the incident, Bepak may issue a Red card warning immediately.

Yellow Card

Following an incident and subject to investigation, the contractor will be requested to leave site and a Yellow card warning will be issued to the contracting company.

This is a formal notification advising them of the incident, stating that the actual contractor will not be permitted to return to site for a period of time determined by Bepak.

The contracting company will be invited to respond to Bepak as they deem appropriate.

A general rule is that the Yellow card will remain on their records for a period of 6 months. Exceptions to this shall be granted by EHS only.

Red Card

If a second incident by the same contracting company is reported whilst a Yellow card is still on record, the contracting company will be formally notified of this through a Red card warning letter.

They will be advised that their contract is under review and alternative contractors may be sought to perform the activities.

Again the contracting company will be invited to formally respond with their corrective actions.

Bepak will work with the contractors to offer any support in enabling the contracting company to perform to the required standards.

Upon review of all the information, Bepak may conclude that the contractor is permanently removed from the Approved Contractor Register.

Red cards may remain on record indefinitely depending on the nature of the incidents.

General Conduct on Site

Horseplay, practical jokes and discrimination (of a sexual, racial or any other nature that may cause offense) will not be tolerated.

Do not enter any manufacturing, workshop or technical areas without permission.

Equipment and materials should not be left unattended in corridors, staircases etc.

Never obstruct emergency exits, access points, firefighting equipment, sprinkler valves or electrical control cabinets.

Defined walkways must be kept free from work equipment and obstructions.

Cables should not be allowed to trail over the floor, especially near staircases; where they are unavoidable, they must be secured down with cable trunking or tape.

Do not work on or behind doors without taking the appropriate controls to prevent collision injuries with the door.

Driving & Parking on Site

There is a strict low speed limit in force on all roads and car parks on Bepak site - this limit is clearly displayed around site.

Contractor vehicles must:

- be parked sensibly and within the white lines
- reverse park
- not block the roadways, entrances and exits
- not cause obstructions or create hazards for pedestrians by parking on pavements

Contractors must be vigilant when reversing and must ensure that sufficient warning is given. Ensure that ignition keys are removed from vehicles, plant and equipment when left unattended.

Booking In & Out

All contractors must book in before starting work. We have to know who is on site at any one time and this is particularly important for emergency situations.

Likewise you must always book out when leaving the site regardless of the amount of time you are going to be away for.

The contractor booking in point is indicated on the map in appendix 1 of this booklet.

Working Times

Standard contractor working times are Monday – Friday 7.30am to 5pm.

Changes to these times must first be discussed with the contractor host and or the Facilities department to ensure that necessary arrangements can be made. Contractors are forbidden to work **anywhere** on site outside of the specified days and times unless these prior arrangements have been made.

Dress Codes & Personal Hygiene

Contractors must wear garments which are clean and in a good state of repair. Bepak has strict dress codes for some areas; you must comply with these additional dress codes when working in our manufacturing areas. Your host will explain these requirements to you.

Contractors are only permitted to wear one plain ring (no stones) when working in a manufacturing area. Watches, other types of jewellery (including earrings, nose/eyebrow/lip rings) and make up are prohibited. We advise you to remove all such items before arriving on site.

Personal Protective Equipment

As standard you will be expected to wear safety shoes when working on site along with any other PPE requirements as identified on your own risk assessments. We will provide you with any PPE we require you to wear/use, in order to protect you from risks arising from our processes or equipment.

Product Contamination

We are a regulated industry working under strict Good Manufacturing Principles (GMPs). Breakages or spillages must be reported to your host or the area team leader immediately. Please remember that the majority of our products are for use in the medical industry where our products are used by people with medical conditions. Even small amounts of contamination can cause a serious quality or device failure.

Smoking (including e-cigarettes)

Neither smoking nor vaping is permitted on site.

Eating & Drinking

Food may only be consumed in the cafeteria. Contractors are welcome to use the cafeteria; the hours of business are listed below:

Breakfast 10.30 to 11.30

Lunch 13.30 to 15.00

The chewing of gum or eating of sweets is not permitted on site for product contamination reasons.

Risk Assessments & Method Statements

You will be required to provide method statements and risk assessments, which you must adhere to. You must inform your host of any significant changes.

Verbal assessments or method statements are not permitted.

It is acceptable to use generic risk assessments and method statements; however, the onus is on the contractor and the Bepak host to review them first to ensure that they are still relevant and that there have been no significant changes.

Risk assessments must give consideration to environmental issues such as waste (creation, removal and disposal), nuisance to neighbours (e.g. noise, dust), appropriate spill response etc.

Authority to Work

Before starting work, your host will complete an 'Authority to Work' form. Contractors are not allowed to carry out any work unless they have a valid authority to work document.

Contractors found working on site without a valid authority to work will be instructed to stop work immediately – their status on the approved list of contractors will be reviewed.

The contractor in charge will sign his/her name to acknowledge responsibility for completing the work in a safe manner and in accordance with the authority to work.

Permit to Work

We operate a Permit to Work system for high hazard operations. Tasks likely to require a permit to work are: *working at height, hot working, electrical work (live testing), working in confined spaces and excavations.*

Permits are valid for one day only and for a set number of hours within the day. If the job is unlikely to be finished by the time specified on the permit, you must obtain another permit from your host.

Contractors are not allowed to carry out any work until the permit has been completed fully and have all the appropriate signatures.

The contractor in charge will sign his/her name to acknowledge responsibility for completing the work in a safe manner and in accordance with the permit to work.

Contractors found working on site outside the conditions of the permit to work will be instructed to stop work immediately – their status on the approved list of contractors will be reviewed.

Lone Working

The host is responsible for making regular contact/checks on any contractor working alone in remote areas. Please ensure your host is aware if you are working alone.

Electrical Work

Electrical work must always be planned ahead and a risk assessment completed. The host will supply the contractors with adequate information about the electrical system(s) involved in order that an effective risk assessment can be completed. Following the risk assessment a Safety Method Statement/Safe System of Work must be prepared.

When planning the work, it is recognised that some decisions on the extent of the work may not be possible until part way through the job i.e. fault-finding. However, this is not an excuse to ignore safe practices. Contractors must recognise the changed circumstances and that it may be necessary to stop and review the work with their host before continuing.

Only contractors who possess the necessary knowledge, ability, training and experience are permitted to work on specified electrical systems and voltages. The contractor must be able to provide proof of competence for working on electrical systems.

The only live working permitted is live testing (with an adequate justification for the equipment to be live) and dead working up until the point of proving dead. Contractors will be required to read and comply with the Bepak Electrical Dead/Live Working procedure (GS SWP 080); your host will provide you with a copy of this procedure prior to work starting. **Live working is NOT permitted on site.**

Working on Uninterruptible Power Supply (UPS)

Always adhere to manufacturers recommendations with regard to safety and dissipation times before attempting to start work. Additional information can be found in INDG 139 Using Electric Storage Batteries Safely.

Electrical Equipment

Cordless tools or tools which operate from an 110V supply system are to be used in preference of 240V. If you have no option but to use 240V equipment, it must be protected by an RCD (rated at 30mA with no time delay).

Any electrical equipment used on site must be in good condition with no damage to the plug, cable, outer casing or RCD. There must be no visible sign of overheating or burning and no taped or other non-standard joints in the cable. Electrical equipment should be regularly checked and tested by a competent person. Proof of these checks should be available, if required by your host.

Work at Height

Work should not be carried out at height unless it is essential. When it is unavoidable to work at height, a safe, stable workplace must be created.

A risk assessment must be carried out prior to any work taking place and a permit to work may be required, depending upon the nature of the risks involved.

Appropriate access equipment must be used for work at height, such as scaffolds, mobile elevated work platforms. Only those persons who are formally trained may use such equipment on site and evidence of the relevant PASMA or IPAF cards will be required to prove competence.

Crawling boards must be used on fragile roof surfaces and care should also be taken to ensure that skylights are adequately protected to avoid the dangers of people and objects falling through.

Fall restraint/fall arrest systems are only to be used as a last resort and by people who have completed the appropriate training. Contractors must be able to provide proof of competence (i.e. PASMA/IPAF/CSCS card) when using specialist equipment (e.g. harnesses or mobile elevated work platforms) or when erecting scaffolding.

Working platforms must be safe, secure and capable of supporting the weight of workers and equipment. The platform should be fitted with the appropriate guard rails and toe boards.

Before working at height, check that there is adequate clearance for equipment and note the location of any overhead power lines.

For specific guidance on roof working, you are advised to read the Work at Height Regulations.

Scaffolding & Scaffold Towers

When work involves the erection of scaffolding or any structure for access above ground level, the contractor is responsible for its safety.

Scaffolding may only be erected and dismantled by a competent person and must be inspected upon completion and weekly thereafter. Records of inspections must be entered into an inspection register or log to be kept by the company or person using the scaffolding.

Under PASMA "tower scaffolds" should be inspected after every move.

A Scaffold Tag (*Scafftag*) should also be attached at all times to ensure the latest status is instantly visible at the point of use. This includes Tower Scaffolds.

Scaffold equipment should be in good condition, free from any bent or twisted sections and properly maintained. Guard rails, toe boards and other appropriate means should be provided to prevent people or materials falling from the platform.

A safe means of access should be provided; it is not acceptable to climb up the frame if it has not been designed to be used in that manner.

Equipment and materials must be safely lowered to the ground and not *thrown* down.

Work must not be carried out over the heads of passers-by, employees, roadways, or gangways until all precautions have been taken to ensure the safety of persons and property below and a suitable 'safe zone' has been established.

Ladders, Steps & Trestles

Ladders, steps and trestles must be maintained in good condition.

Ladders Class 1 or EN 1314 only permitted on site. We do not allow domestic (Class 111) ladders to be used on site; the use of painted ladders and steps is also prohibited as paint may hide defects.

If using a ladder, ensure it can be secured by tying both stiles bottom and top. If this is not practicable, an effective ladder stability device must be used, or the ladder wedged against a wall or other heavy object. Having a second person foot the ladder must only be used as a last resort.

Make sure ladders project at least 1.05 metres (3ft 6in) above the platform level, where used for access.

Deny access or use of ladders to trespassers (See "A Toolbox Talk on Leaning Ladder & Stepladder Safety" (HSE; INDG403).

For further guidance on the use of ladders, steps and trestles, refer to the HSE publication 'Safe Use of Ladders and Stepladders' LA455.

Mobile Elevated Work Platforms (MEWPs)

Mobile elevated work platforms may only be used on site by fully trained and competent persons.

Contractors must be able to provide proof of competence (i.e. IPAF card) when using MEWPs. Contractors using untrained persons will have their status on the approved list of contractors reviewed.

MEWPs may only be used on firm level ground and must not be operated close to overhead power lines.

Cranes, Hoists & Lifting Equipment

It is the contractor's responsibility to ensure that any of the above items brought on site are tested, inspected and maintained in accordance with the appropriate legislation.

Every lift should be planned and carried out by trained and competent people. One person should take charge of the lift and give instructions to ensure the lift is properly slung, controlled and safe.

Contractors must ensure the area where the lifting is taking place is cordoned off and supervised to ensure unauthorised persons do not enter.

Hot Working

A permit to work will be issued for any work that involves cutting, welding, brazing, soldering or using equipment that produces heat or naked flames.

Contractors are not allowed to carry out any hot work until the permit has been completed fully and has all the appropriate signatures.

Your host will ensure that the smoke/heat detectors in the vicinity of the working area are isolated to prevent the fire alarms being activated.

Contractors must ensure there are no combustible liquids, vapours or gasses or materials within 10 metres of the work area and that ample fire fighting equipment is available. The area should be suitably protected to prevent sparks injuring other persons in the area.

The contractor should make regular checks of the working environment for sparks and smouldering fires during the work and for at least 60 minutes after completion where automatic fire detection is in place are present and a further 120 mins where no automatic fire detection is in place.

Enclosed or confined spaces such as tanks or vessels must be tested and known to be free of flammable vapours or dusts before any hot work commences.

Hot work in the Ethanol Extraction plant is strictly prohibited unless formal controls and supervision are in place; ethanol is highly flammable. Any tools and equipment used in this area must be intrinsically safe.

Excavations

The permission of the host is required before ground is broken on Bepak premises. Excavations in open access areas must be adequately protected when not in use and trench supports/barriers installed to prevent the risk of collapse or materials falling and endangering people.

Appropriate checks should be made for possible underground services and standard precautions such as reference to the Facilities Department, building plans, consultation with local gas, water, electricity boards taken. Cable/pipe locating devices should also be used as necessary.

Rigid barriers, warning signs and lamps must be used to make the site safe.

Working in Confined Spaces

A confined space is a place that is substantially (although not always entirely) enclosed and there will be a reasonably foreseeable risk of serious injury from hazardous substances or conditions within the space or nearby.

Some confined spaces are easy to identify e.g. closed tanks, vessels and sewers; others are less obvious such as open-topped tanks, silos, unventilated or inadequately vented rooms.

Work in confined spaces should be avoided unless it is absolutely essential.

When it is unavoidable to work within a confined space, an assessment must be conducted and measures must be taken to secure a safe system for working and emergency rescue.

Contractors must not enter any confined space, especially if there may be toxic or flammable fumes or a lack of oxygen, unless the appropriate assessments, method statements, supervisory control and permissions are in place.

A permit to work will be issued for any work in confined spaces; contractors are not allowed to carry out any work until the permit has been completed fully and has all the appropriate signatures.

Any such approval that is granted will necessitate compliance with the Confined Spaces Regulations.

Hazardous Substances

Contractors are required to inform their host of any hazardous substances or processes, which may present a risk to the health of our employees, visitors and any other persons.

Contractors are required to comply with The Control of Substances Hazardous to Health Regulations. These regulations require the contractor to assess the health risks involved when using or exposed to hazardous substances and to prevent or adequately control exposure.

Asbestos

Contractors are asked to note that some Bepak premises contain asbestos. We have a comprehensive asbestos survey; the Facilities team will provide advice around its location or if you believe that asbestos has been or may be disturbed.

Anyone engaged to work on site (including sub-contractors) should have been provided with asbestos awareness training from a competent training provider in the last 12 months. Any certification issued in recognition of the completion of such training must be in date (not expired) for the duration of the on-site works.

Any work that is required on known asbestos-containing materials must be undertaken by a licensed asbestos removal contractor and will be carried out in accordance with the requirements of the Control of Asbestos Regulations 2012.

Asbestos waste is defined as 'hazardous waste'. Waste containing asbestos must be consigned under the relevant waste rules which include a "duty of care". That duty of care means, amongst other things, that duty holders prevent escape of the waste whilst it is in their control. All movements must be accompanied by a hazardous/special waste consignment note. The Control of Asbestos Regulations 2012 (CAR2012) applies.

If a material has been discovered which is thought to contain asbestos, you must stop working immediately and contact your host.

Bepak will arrange for analysis of a sample and any subsequent environmental monitoring. The work must not re-start until authorised by your host.

Storage & Use of LPG and Other Flammable Liquids

Quantities of flammable materials used on site must be kept to a minimum and never left on the premises overnight.

Contractors are responsible for the removal of empty containers, cylinders or flammable waste. Flammable waste is classed as 'hazardous waste' and must not be placed in normal waste bins.

Gas cylinders must be secured safely to prevent them falling. Gas lines must be fitted with spark arresters.

Building Services

Contractors must not interfere with any fire alarms, alarm wiring, fire equipment or any other safety installation provided to protect building occupants without specific permission from your host.

Similarly, permission must be obtained prior to the connection of or breaking into any equipment to the gas, electrical, water or any other service.

Entry to substations and switchgear rooms is prohibited unless your host has given permission.

If a job requires the interruption of electrical supplies, contractors must obtain permission from their host before the disconnection of any supplies takes place. Work that may require a shutdown of power is normally conducted at weekends to minimize disruption.

Emergency Preparedness

When on site at Bepak, please ensure that you are familiar with local emergency arrangements i.e. emergency exits, spill kits, fire alarms etc.

Accident & Near Miss Reporting

If you sustain an injury as a result of an accident whilst working on site, report it to a first aider and to your host. We may carry out an investigation into the accident, not to apportion blame, but to take steps to minimise the risks of a recurrence to you or others.

If you or your employees are absent from your work as a result of an accident on our site, you need to advise Bepak of this along with advising the enforcing authorities.

If you have or see a near miss, whilst on site, report it to your host and complete a near miss report.

Remember - the aim is to keep you and others safe from harm whilst on site at Bepak.

See It, Sort It, Report it!

First Aid

First Aiders will administer basic first aid treatment to you should you require it whilst on site. Lists of first aiders and their contact numbers are displayed in many areas across site. Please inform your host if you do not wish for this facility to be provided. For serious incidents: dial 9 999 from any internal landline.

Fire Fighting

Contractors are not permitted to operate company fire extinguishers unless in a real emergency i.e. escape is hindered by fire or method statements state the requirement for fire extinguishers to be present etc.

Discovering a Fire

If you discover a fire on site, raise the alarm immediately by hitting one of the red break glass call points and leave the building by the nearest fire exit. These break glass call points are located by all final fire exits.

If you have sounded the alarm either on purpose or accidentally, please ensure you inform the Bepak contact at the contractor fire assembly point.

Fire Evacuation

We have two different types of fire alarm signals on site **continuous bell/claxon** (solid ringing) and **pulsing bell /claxon** (ring - stop - ring - stop)

Contractors are required to evacuate the building and report to the contractor fire assembly point for both alarm signals.

If you hear the fire alarm:

- Evacuate the building immediately, leaving by the nearest fire exit.
- Do not stop to collect your belongings.
- Report to the contractor fire assembly point (see map in Appendix 1 at the back of this booklet).

Environmental Awareness & Waste Management

Pollution prevention is the number one priority when we consider the Environment.

Contractors must ensure that any waste generated as a result of their activity is identified on their risk assessments including information on what will happen to that waste i.e. how will it be disposed of.

For small quantities of waste, or with pre-agreement from Bepak, contractors may dispose of waste using Bepak waste streams. Any relevant disposal procedures will be explained by your host.

Contractors must **not** dispose of any waste, chemicals or any other material down the drains or water courses.

Where hazardous/controlled waste is being removed from site, the contractor must supply the Bepak EHS team with copies of all documentation such as waste transfer notes/hazardous consignment notes.

Bepak reserves the right to charge contractors for any cleaning/decontamination necessary as a result of a contractor's failure to comply with correct waste management.

It is everyone's responsibility to follow procedures for the correct transportation, storage, identification, usage and disposal of chemicals and substances such as oils, which pose a risk to the environment.

If it is necessary for you to store materials on site during the duration of work, you must store it safely, securely and appropriately. Consideration must be given to the risk of contamination or pollution in the event of an unexpected release. All liquids must be stored on an appropriate bund.

Appendix 1 - Site Map



Contractor Fire Assembly Point

Cafeteria

Contractor entrance and booking in point

Declaration

Please complete the declaration below and return at your earliest convenience:

This is to confirm that I have received, read and understood the Bepak Contractor Code of Practice and will ensure that any employee or sub-contractor sent to work on one of Bepak's sites will have also read and understood this code of practice.

Company: _____

Signature: _____

Print Name: _____

**Position in
Company:** _____

Date: _____

Please return completed declaration to:

EHS Team
Bepak
Bergen Way
Kings Lynn
Norfolk, PE30 2JJ

HSE.kingslynn@bespak.com