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Health & Safety Manual

Prepared for: All Managers & Supervisors

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Von Dominika Doruch , 06:32, 31.03.2026



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Record of revisions

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| 5.2. | Risk Assessment Form | 12.2018 | 13.03.2024 |
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Change revision summary

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| 0.1. | Health & Safety Policy statement revised |
| 5.2. | Risk assessment forms revised |
| 2. | Legal framework clarified and reference to collective agreement added |
| 5. | Reference to SMS Manual Section 1.2 added as Single Source of Truth for risk assessment methodology; previous 3-level scoring system superseded by IGOM/ICAO 5x5 matrix |



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0 POLICY

0.1. HEALTH & SAFETY STATEMENT





Health & Safety Policy

DHS is fully committed to providing all of its employees, including contractors, a safe and healthy work environment.

The following is our policy:

- Ensure that the health and safety risks associated with our work are adequately controlled at all times;
- Provide advice to our employees regarding matters pertaining to their health and safety;
- Provide and maintain safe equipment;
- Ensure that hazardous substances are handled and used safely;
- Provide information, instructions, and supervision to employees;
- Ensure that all employees are competent to perform their duties and provide appropriate training;
- Prevent accidents and illnesses related to the workplace;
- Maintaining safe and healthy working conditions
- To periodically review and amend this policy as needed.

All employees are required to:

- Work and collaborate with managers and supervisors on matters pertaining to health and safety;
- Maintain the integrity of the precautions taken to safeguard their own health and safety;
- Take reasonable care of their own health and safety; and
- Report any incidents, accidents, or health-related concerns to the manager.

To ensure that DHS is a safe place, we must cooperate at all levels!

Ingo Schnitger
CEO

V2R0_2024

0.2. INTRODUCTION

The purpose of the Health and Safety Manual is to provide a framework of Policies and set standards for each facility to strive to operate. DHS is fully



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committed to a process of continual improvement to ensure safe systems of work are available to safeguard its operational activities, employees, and customers alike.

This manual acts as means of communication throughout DHS and sets out the recommended minimum standard that shall be applied to all locations. This manual will be periodically reviewed to ensure it remains relevant and appropriate.

Local procedures should contain current contact telephone numbers to be used in a health and safety or environmental emergency situations. The procedures should also state who would be responsible, by name or job title for contacting those individuals or agencies in an emergency.

Each member of the staff bears the responsibility for maintaining and continuously improving the safety performance.

Managers are accountable and responsible to provide the necessary resources, ensure operations are supervised, controlled and conducted in accordance to these standards, applicable regulations and requirements of customer airlines.

The responsibility can be delegated but not the accountability.

For an overview of the broader Safety Management System architecture and its operational purpose, refer to Section 0.1 of the DHS SMS Manual.

1 ACCOUNTIBILITIES & RESPONSIBILITIES

Role of the Management Team

Positions within the organization that affect operational health & safety are filled by personnel that possess the knowledge, skills, training, and experience appropriate for the position; and Personnel who perform operationally critical functions are required to maintain competence on the basis of continued education and training. Operations are supervised, controlled and conducted in accordance with applicable regulations and requirements of customer airlines.

1.1. CEO

The key responsibilities with regard to Health & Safety are;

- Develop operational plans and procedures that comply with DHS and local statutory safety standards.
- Control and implementing robust plans to ensure an acceptable level of safety is met.
- Along with the Regional Health and Safety Manager, ensuring all areas within own domain are covered by Safety Officer(s) with the knowledge, skills and time to manage health and safety within the unit.
- Ensure full consideration is given to safety when making changes in internal structure and business processes
- Ensure that DHS's operational process enables the delivery of safe projects from inception, through development to operational and decommissioning phases.



- Support the function to ensure that all improvement work and facilities management work has safety as an integral and priority function.
- Undertake safety risk assessments and directing the safety management programme in all areas, including where subcontracting takes place.
- Ensure safety communications and human factors are a priority in the training and development of staff.
- All ground operations are supervised and controlled
- Operations are conducted in accordance with applicable regulations and requirements of customer airlines in addition to internal standards.
- Ensure that DHS's 'procurement process management controls' treat safety considerations as a priority.
- Work in partnership with local regulatory and industry bodies, partners, and joint venture partners, key competitors, to develop and lead the implementation of industry standards in safety.
- Support the companies Fair & Just Culture

1.2. SAFETY, SECURITY & COMPLIANCE MANAGER

Responsibilities of the Safety, Security & Compliance manager:

- Assist the Station Manager in achieving their responsibilities in respect of managing health and safety within their unit.
- Support corporate compliance with applicable Management of Health and Safety at Work Regulations.
- Support managers in undertaking the protective and preventative measures necessary to achieve compliance with health and safety legislation as it applies to them.
- Co-ordinate the activity necessary to comply with corporate policy as it applies to them.
- Report any breaches of statutory requirements or company best practice to the Station Manager.
- Undertake the training necessary to ensure proper understanding of their responsibilities and relevant policy.
- Participate, with their managers, in safety audits and support the process in a manner consistent with their competence.
- Conduct risk assessments, accident investigations and health and safety inspections as required by the Station Manager.
- Supervise staff to ensure that they are working in a safe manner without risk to themselves or others.
- Ensure the consistent reporting of all accidents, incidents or near misses to the Station Manager.
- All ground operations are supervised and controlled
- Operations are conducted in accordance with applicable regulations and requirements of customer airlines in addition to internal standards.
- Support the companies Fair & Just Culture

For system-wide safety accountabilities and the function of safety managers at each location, see Sections 0.5 and 0.7 of the DHS SMS Manual.



1.3. STATION MANAGER, DEPARTMENT MANAGER, SUPERVISOR ON DUTY

- The majority of risks can most effectively be identified, controlled and managed at operational level. It is therefore essential that the Station and Operational Managers assume the role of Coordinator of Health and Safety and ensure the following:
- Managers under their control understand and put into effect the company health and safety policy.
- Unit Management are fully aware of their safety duties and are acquainted with the types of hazards that may be encountered in the working environment.
- With support from the Regional Health and Safety Manager and General Manager, appoint sufficient numbers of Safety Officers and assess their performance in compliance with the company health and safety policies and best practice.
- They assist managers in the effective resolution of any health and safety problems that may be referred to them, and bring to the attention of higher authority at once such matters that cannot be achieved at their own level.
- Stimulate and maintain interest in health and safety matters throughout area of responsibility and ensure that managers understand that health and safety management should be given foremost priority against any other management function.
- Support the Regional Health and Safety Manager with all the necessary commitment required to ensure corporate health and safety aims are achieved.
- Produce reports and provide information to the Regional Health and Safety Manager as and when required.
- Understand the company health and safety policies and ensure these are implemented within the unit with the same diligence and priority as any other management function.
- Employees under their control receive adequate training, information, instruction and supervision to enable them to conduct their work activities safely and are encouraged to work safely at all times.
- Employees under their control understand and put into effect their own responsibilities and duties detailed in the company health and safety policy.
- Employees know the location of appointed persons to take charge of first aid, first aider's, first aid facilities and fire procedures in case of emergency.
- All accidents, incidents and near misses are properly reported, investigated and recorded, and take
- such measures to prevent a recurrence of the accident/incident/near miss.
- Assist corporate management and Regional Health and Safety Management in their investigations following an accident/incident, and take such measures recommended by them to prevent a recurrence of the accident/incident.
- All machinery or equipment are suitable for the intended task and are maintained in a safe condition, safety rules are observed and high housekeeping standards are sustained.



- Health and safety procedures, notices and policies are displayed, understood and up-to-date, and any
- additional information received regarding health and safety matters is communicated to employees promptly.
- All new employees undergo induction training in relation to the health and safety policy, unit safety rules and procedures, and written records are kept of such training. Additional and refresher health and safety training should be carried out periodically for all staff.
- Regular inspections of the unit are carried out to assess risk in order to ensure that working conditions are satisfactory.
- Suitable and sufficient risk assessments are carried out regularly of the significant hazards to which any employee, visitor or contractor may be exposed. Records of risk assessments should be kept and reviewed and updated periodically to reflect any significant work changes.
- All members of own management team are fully conversant with their duties to the end that health and safety may be properly maintained during any periods when the manager may be absent.
- Competent managers/supervisors/employees are appointed/nominated to deal with fire, first aid, incident/accident reporting
- Matters of health and safety at work are the subject of regular staff meetings.
- Control all waste in accordance with local requirements.
- At all times the Health and Safety Policy Statement is displayed, and that the policies that form this manual, together with training and maintenance records, are readily available for inspection by local authorities
- Attend such courses as may be arranged for the purposes of further training in health and safety matters.
- Inform the Regional Health and Safety Manager of all incidents, accidents and dangerous occurrences/near misses.
- Inform the regional Health and Safety Manager of all local authority and Fire Authority visits, including all visits from which a written report does not emerge.
- All ground operations are supervised and controlled
- Operations are conducted in accordance with applicable regulations and requirements of customer airlines in addition to internal standards.

1.4. EMPLOYEE RESPONSIBILITY

ALL employees have a responsibility and duty whilst at work to:

- Take reasonable care for the health and safety of themselves and of others who may be affected by their actions or omissions whilst at work.
- Co-operate with their manager / supervisor in order to allow them to perform or comply with any legal requirements imposed on the company.
- Not intentionally or recklessly interfere with or misuse anything provided by the company in the interests of health, safety or welfare reasons.



- Inform their manager / supervisor of any work situation, equipment or activity that represents a serious or immediate danger to health and safety.
- Report any incident, accident or dangerous occurrence to their manager / supervisor, who will then follow the procedures contained in this manual.
- Carry out work in accordance with information and training provided and any specific workplace health and safety rules or procedures.
- Fully understand the company health and safety policy.
- Attend training courses as may be arranged by the Company.

An employee who impedes the implementation of a safe and healthy system of work, or puts themselves or others at risk by not following health and safety procedures or by engaging in horseplay, will face serious disciplinary action. Endangering the health and safety of people, is considered in most Countries and States to be a breach of law, and enforcing officials (e.g. fire officers, local health and safety authority) could bring prosecutions against the Company, Company Directors, Management and employees alike.

DHS Management firmly believe that the full co-operation of all staff in maintaining a healthy and safe workplace is paramount and that progressive improvement in health and safety can only be achieved through constant development, implementation and review of sound policies.

A truly safe workplace, however, will only exist if ALL staff accepts responsibility for their own health and safety and for that of other persons who may be affected by their acts or omissions at work. We must all work as a team to raise the awareness of the need for health and safety at work and to ensure that health and safety procedures are followed.

2 SCOPE OF THE HEALTH & SAFETY MANUAL

Intent

The corporate Health and Safety Manual provides policy and guidance on managing occupational health and safety issues. The manual defines a baseline standard which must be adapted to meet local legislation and operational realities

Purpose

The purpose of this manual is to provide an overview of DHS's hierarchy of occupational health and safety Policies and set parameters and standards that are to be applied, ensuring alignment with applicable national legislation. DHS is fully committed to a process of continual improvement to ensure safe systems of work are available to safeguard its operational activities, employees, and customers alike. It is accepted that legislation relating to occupational Health & Safety varies between Regions, this manual sets out company-wide policies to be implemented in compliance with applicable local laws. Of course full compliance may take differing periods of time dependent upon local conditions and legal requirements.

Legal Framework

DHS complies with the following legal frameworks:

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1. Occupational Health and Safety Act (ArbSchG)

[🔗 https://www.gesetze-im-internet.de/arbschg](https://www.gesetze-im-internet.de/arbschg)

2. Occupational Safety Specialists and Occupational Physicians Act (ASiG)

[🔗 https://www.gesetze-im-internet.de/asig](https://www.gesetze-im-internet.de/asig)

3. DGUV Regulation 1 (Principles of Prevention)

[🔗 https://publikationen.dguv.de/widgets/pdf/download/article/2909](https://publikationen.dguv.de/widgets/pdf/download/article/2909)

Additional legal frameworks relevant for operational settings:

4. Working Hours Act (ArbZG)

[🔗 https://www.gesetze-im-internet.de/arbzg](https://www.gesetze-im-internet.de/arbzg)

5. Maternity Protection Act (MuSchG)

[🔗 https://www.gesetze-im-internet.de/muschg](https://www.gesetze-im-internet.de/muschg)

6. Workplace Ordinance (ArbStättV)

[🔗 https://www.gesetze-im-internet.de/arbst_ttv_2004](https://www.gesetze-im-internet.de/arbst_ttv_2004)

These form the legal basis for all risk assessments, training obligations, and safety procedures at DHS.

Note:

Employment conditions such as working hours, rest periods, compensation, and wage structure are governed by the Collective Agreement (Tarifvertrag) for ground handling services in Germany. This agreement supersedes general statutory provisions like the Minimum Wage Act (MiLoG) or standard working time rules.

Important:

- **Local legislation must be observed in parallel to this document. If, at any time, local legislation is more definitive or stringent, it MUST take precedence and full compliance must be ensured.**



- **Compliance with the manual shall be mandatory, and the specific responsibility of local management. You should therefore familiarise yourself with its key provisions.**

The Health and Safety Manual is designed to be a living document and amendments are issued on a regular basis.

This applies to all employees, including temporary staff and external contractors.

Reference:

Revisions are to be inserted into each manual in a timely manner and are to be implemented in accordance with the prescribed implementation schedule. DHS endorses and approves the operating procedures and standards as set out in the IATA Airport Handling Manual (AHM) and in the absence of DHS policy or procedure it encourages all stations to follow the IATA/AHM guiding principles in conjunction with airline specific procedures or requirements.

3 INFORMATION, TRAINING & SUPERVISION

Purpose

The purpose of this document shall be to ensure employees are informed of employer's responsibilities and their own health and safety responsibilities in the workplace.

Scope

This document shall encompass all employees (temporary, permanent or 3rd party agency) employed or contracted by DHS and sets out their Health and Safety accountabilities.

Employer Responsibilities

All employers must take all practicable steps to ensure that every employee who works with or uses plant or deals with a substance of any kind:

- Has the knowledge and demonstrates competency of the workplace, plant and substances or is supervised by a competent person
- Or is adequately trained and is competent in the safe use of all plant, objects, substances and the protective clothing and equipment he or she may be required to use or handle
- And that competent trainer provide training Employees must also be provided information in a form and manner that they can reasonably understand about:
 - Identified hazards they are likely to face or may create whilst at work
 - What they should do in an emergency
 - Where all the necessary safety clothing, devices, equipment and materials are stored.

Employees have:

- A duty to protect their own health and safety and that of others



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- To practice safe work habits at all times
- To ensure that they will not act in any way that could bring harm to any other person.
- If an employee is unsure of any work practice then they must not continue until they seek advice from their supervisor.
- To report all hazards/near misses or incidents within their work area.

Employee Induction/Training

All operational staff must complete a structured Health & Safety training program and instruction consisting of:

1. Initial Induction Training: Mandatory before starting any operational tasks. Covers general safety rules, airport-specific risks, PPE requirements, emergency procedures, and safe behavior in landside and airside areas.
2. Annual Refresher Training: Mandatory once per year for all operational staff. It serves as the required safety instruction (“Unterweisung”) under DGUV Regulation 1. Participation is documented.
3. Safety Representative Training: Every appointed Safety Representative receives an internal role-specific briefing on their duties, legal context, and reporting responsibilities. Their participation is documented.
4. Role-Specific Training for Managers**: Supervisors, Duty Managers, and Station Managers receive additional training covering inspections, reporting procedures, risk assessments, and staff communication.

All training sessions are recorded and centrally archived for verification and audit purposes.

All employees are introduced to their work area by their supervisor or manager and are where practical allocated a ‘buddy’ to work with (no new employee shall be left unsupervised).

- As the new employee becomes more competent, training can be completed and records completed.
- The employee must view, understand and sign off their training record card that the content of risk assessment’s and/or hazard register/list has been communicated to them.
- The employee is aware of the PPE (personal protective equipment) requirements for their work environment.

4 PARTICIPATION & COMMUNICATION

Purpose

The purpose of this document shall be to outline the involvement of employee’s in all Health and Safety aspects of the DHS Business.

Scope

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This document shall apply to all employees of DHS.

Responsibility

It shall be the responsibility of all personnel engaged by DHS.

Safety Reporting

DHS operates an anonymous reporting channel via the Safety Culture QR Code. Reports are evaluated by the Health & Safety Manager.

Employee's involvement

Employees will be involved but involvement will not be restricted to the Following:

- Review of policies and procedures
- Development and review of operating procedures
- Hazard identification
- Health and Safety Committee
- Risk Assessment

Health and Safety Committee

A Health and Safety committee shall be set up to monitor the Station health and safety programme and have involvement in enhancements to the system. It should consist of an equal representation across all areas of the Station and involve all levels of employee i.e. Management, administration, and other nominated area Employee Involvement.

- The selection of this committee will be reviewed annually.
- Staff will be selected informally by verbal agreement.

The committee shall review their performance annually.

They shall also:

- Set objectives for the following twelve months.
- The Health and Safety committee should meet regularly.
- Each meeting shall be recorded.
- An internal review shall be conducted annually to ensure that continuous improvement is achieved.

The committee shall have the following responsibilities:

- Receiving details of department initiatives and reporting committee initiatives and good H&S ideas to their representative departments.
- Reviewing H&S Rules, policies, training programmes and audits and discussing possible initiatives and possible changes to current programmes.
- Review H&S consequences to ensure we are providing best in class programmes and facilities.
- Monitor the identification, assessment and control of Station risks by all departments.

Health and Safety Communication examples



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The following forums are used to disseminate information and data acquired from risk management and hazard identification programmes to appropriate employees. It provides as a link from management to front-line employees.

- Team briefs
- Face to face presentation
- Notice boards
- Departmental meetings
- Safety Alerts and Posters

It is management responsibility to ensure that employees are given health and safety training and risk communication in a manner which they can understand.

Management must also;

- Consider the needs of workers who may not speak or read English, well, if at all, or do not understand the primary language of the Country where they are employed, or who are seconded as part of a support team, and whether you need to consider translation services;
- Make sure workers have received and understood the information, instruction and training they need to work safely and consider how to ensure it is acted upon;
- Make sure workers are adequately supervised and can communicate with their supervisors;
- Make sure workers know where and how to raise any concerns about their health and safety and about any emergency arrangements or procedures

4.1. AWARENESS & SAFEUP! POSTER

To promote continuous awareness and foster a proactive safety culture, DHS regularly publishes SafeUP! Posters in all operational areas.

These posters are used to:

- share key safety messages and reminders,
- communicate learnings from incidents or near misses,
- highlight best practices or current focus topics.

SafeUP! Posters are updated on a regular basis, particularly in response to actual incidents or safety observations. They are an essential part of DHS's preventive safety communication strategy.

4.2. WORKPLACE INSPECTIONS

Monthly workplace inspections are conducted by Station Managers.

They cover:

- General tidiness



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- Lighting
- Slip/trip hazards
- Signage
- PPE use

Findings are documented and followed up by local management.

Operational Health & Safety Inspections

These quarterly inspections focus on occupational safety aspects in operational areas (Check-in, Boarding, Turnaround).

They are performed by trained managers or Safety Representatives.

Additional ad-hoc inspections may be conducted after incidents, complaints, or significant operational changes.

4.3. H&S COMMITTEES

Policy

It is the policy to recognise appointed Safety Representatives and to hold safety committee meetings.

Safety Committees

Composition of committees

The membership and structure of the safety committee should be decided in consultation between management and the Safety Representatives. The aim is to keep the size of the committee as small as possible but at the same time ensuring adequate representation of all interests of the employees and management. The number of management representatives should not exceed that of employee representatives.

Management representatives should include a manager with adequate authority to give proper consideration to all views, make decisions and approve spending. Safety advisers, occupational hygienists or other specialists should be ex-officio members of the committee or be brought in as required.

Objectives

To facilitate co-operation between management and staff in ensuring the health and safety at work of all staff and anyone else who may be affected by the work activity.
To act as a focus for employee participation in the development, promotion and implementation of measures to prevent accidents and industrial diseases.

Functions

- To assist in the development of departmental health and safety policies.
- To consider the hazards in areas covered by the safety committee and assist in developing the measures necessary to avoid them.
- To consider and assist in the development of local safety rules and safe systems of work.



- To consider the training and communication requirements and to monitor their effectiveness.
- To examine the Safety Audit reports.
- To study accident, incident and notifiable disease statistics and trends. To consider individual incidents/accidents where these reveal a breach of existing health and safety arrangements.
- To facilitate health and safety inspections by management and Safety Representatives in the workplace.

Reports and Information

- To consider reports and information concerning new legislation or new developments affecting work conditions.
- To consider reports and factual information provided by the Inspectors of the enforcing authorities insofar as these affect health and safety at work.
- To consider reports and findings of management, DHS Health & Safety Standards, or Safety Representatives on matters not dealt with satisfactorily at local level.
- To consider reports of inspections made by management, DHS Health & Safety Standards, or Safety Representatives.

Procedures

- All meetings should be recorded. The minutes must be signed by nominated representatives of both management and staff.
- The minutes should assign actions to individuals with timescales.
- Copies of the minutes should be distributed to all members of the committee, all relevant notice boards and any addressees as agreed by the committee.
- The timescales for the frequency of meetings must be established and agreed with the station or business unit manager, usually bi-monthly meetings are considered appropriate, however the DHS minimum period (frequency) should not exceed quarterly meetings.

For safety promotion and communication measures defined within the SMS structure, see Section 3.2 of the DHS SMS Manual.

5 HAZARD IDENTIFICATION & RISK ASSESSMENT

The risk assessment methodology, including the risk matrix, tolerability zones, and scoring system, is defined in Section 1.2 of the DHS SMS Manual. All DHS risk assessments, including those for occupational health and safety, shall use the standardised 5x5 Risk Matrix (Severity A-E x Probability 1-5) as described therein.

This section of the H&S Manual provides additional guidance on workplace-specific hazard identification, including manual handling assessments, display

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screen equipment (DSE) assessments, fire risk assessments, and other occupational health hazards. For the scoring methodology and tolerability zones, refer to SMS Manual Section 1.2.4-1.2.5.

Note: The previous 3-level scoring system (High 17+, Medium 8-16, Low 1-7) with Controllability as a third factor is superseded by the IGOM/ICAO 5x5 matrix defined in the SMS Manual.

6 TRAINING

6.1. TRAINING AND NEED ANALYSIS

Policy

The provision of training and information is a requirement of legislation, management systems, and the corporate Statement of Health and Safety Policy. Training must be supported by the provision of such *information, instruction and supervision* as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of all employees and the protection of the environment. This policy must be read in conjunction with the DHS 'Training Policy Manual.

UNDER NO CIRCUMSTANCES ARE INDIVIDUALS PERMITTED TO UNDERTAKE TASKS FOR WHICH THEY HAVE NOT BEEN TRAINED!

Scope and Depth

Managers should give careful consideration to the operation and provide suitable training at induction, also timely recurrent refresher training, with a specific training frequency for work requiring specialist knowledge.

A 'training needs' analysis approach is essential and should result in the clear identification of individual training needs and ensure that only useful and meaningful training is undertaken. The extent to which training and information are necessary will vary, depending on the complexity and performance of systems and equipment, and the existing competence of the persons concerned. Clear aims and objectives should be set for the training. Their validity should be checked and reviewed after the training has been completed and regularly thereafter.

Management Training in Health and Safety

Managers need to undertake adequate and suitable training in order to ensure that they fully understand their legal responsibilities. They must have sufficient knowledge of the activities undertaken by all employees for whom they are responsible. All managers are required to complete Management Health and Safety Training and the appropriate Safety Management Course. Managers must source locally one or both of the following course types:

Induction Training (Health & Safety)

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Full or Part Time, including all Temporary or Agency Workers

Induction training is a mandatory requirement for all new employees, irrespective if full or part time, temporary or agency employees. And must take place immediately prior to, or when starting, the undertaking of employment, or a new role and tasks. It must be designed with consideration to the shortfall between the individuals existing competence and that necessary to follow safe systems of work, to supervise, or to use new equipment. Additional training must be given to people with special needs, e.g. young persons, disabled persons, pregnant women.

Content of a typical induction programme for new starters is outlined below:

- Requirements of the Corporate Health and Safety Policy
 - ▶ Organisation for Health and Safety
 - ▶ Security Training
 - ▶ Ergonomic (Manual Handling)
 - ▶ Injury Prevention
 - ▶ Legislative Responsibilities
 - ▶ Risks of Workplace Activities and Basic Skills Training
 - ▶ Procedural Compliance
 - ▶ Human Factors / Error Risks
 - ▶ Fire Training and Emergency Procedures
 - ▶ Arrangements for First Aid
 - ▶ Reporting/Disciplinary Policy (Just Culture)
 - ▶ Defect and Fault Reporting
 - ▶ Accident, Dangerous Occurrences and Environmental Incidents Reporting
 - ▶ Fatigue/Situational Awareness

Refresher Training

Training must be updated at appropriate frequencies to ensure that performance levels remain high, that systems of work are safe and that emergency response procedures are, and continue to be, effective.

Refresher training must be considered for people who have been absent from work for an extended period, e.g. due to ill health or on maternity leave.

Records

Accurate and complete records should be kept of all training, planned and undertaken, the subject matter covered, who attended and the validity time period of the training. Records are vital for reasons of quality control, effective administration of training programmes and to serve as evidence to the Enforcing Authorities of measures taken in this regard. Records shall be stored and maintained so that they are readily retrievable for audit or inspection purposes and in a suitable environment to minimise deterioration or risk of loss or damage.

6.2. HUMAN FACTORS

Policy

Humans play a central role in the business activities of the company. They do a wide variety of jobs that are necessary for DHS to operate responsibly, safely



and effectively. Occasionally our employees will make mistakes and these human failures can result in a number of undesirable consequences, such as personal injury, aircraft, property and equipment damage, or flight delays.

This section recognises that you already know the importance of human factors, a science that pays attention to physical, psychological, and other human attributes to ensure that tasks are completed safely and efficiently with minimal risk to personnel and equipment.

This section also contributes to our number one core value where our employees, at all levels of the business consistently practice safe habits and behaviours.

Why is Human Factors important to our operations?

- ▶ 80% of accidents and incidents involve some type of human error or violation of a company policy, process or procedures.
- ▶ Accidents and incidents are costly and can have damaging effect on the company reputation.
- ▶ An effective human factors training improves work performance and promotes a safety first culture.
- ▶ Traditionally we learn from our actions, errors and experiences and establishing the Safety Culture reporting system allows us to track, address and identify trends and errors which is the essence of a safety management system.
- ▶ Comprehensive event and near-miss investigation that identifies causal and influencing preconditions is essential to improving human factors management and the companies specific needs.
- ▶ Auditing human factors programmes ensures accountability and effectiveness of company needs and requirements.

For SMS-related training structures, competency requirements, and refresher cycles, refer to Section 3.1 of the DHS SMS Manual and the Training Policy Manual.

7 INCIDENT REPORTING AND INVESTIGATION

Policy

It is DHS's primary concern, in the interest of safety, to ensure the full, free and uninhibited reporting of any incident / accident, which might affect the health and safety of DHS employees or any other person who may be affected by our undertaking, including aircraft handling and flight safety. It is, therefore, the responsibility of every employee to report any incident affecting safety and to cooperate fully throughout any subsequent investigation.

All incidents, including near misses and unsafe occurrences must be investigated; the level of investigation will be dependent upon the severity of the incident. The purpose of an investigation is not to apportion blame but to establish the facts, to understand the root cause(s) of the incident, and to develop the appropriate actions necessary to eliminate or reduce the likelihood of the incident recurring.

All investigations should generally be completed within seven days of the incident with findings recorded using the Safety Culture investigation tool, only in the case



of exceptional or complex investigations can this seven day reporting period be extended.

Managers must ensure that the recommendations arising from an accident investigation are evaluated and fully implemented.

Reporting Guidelines

Scope

All accidents and near-miss incidents involving employees and non-employees that arise out of or in connection with DHS business activities are to be reported with all relevant information recorded using the Safety Culture reporting tool.

Purpose

It is our goal to continuously improve the safety of our operation. We realise that accidents and incidents can happen however we see it as every employee's duty to report them and create a safe working environment at all times. This is key to ensure that we have the opportunity to resolve them, learn about the contributing factors and implement strategies, procedures and policies to eradicate or reduce the likelihood of future occurrences.

To achieve this we must develop and foster a culture that encourages the reporting of accidents without fear of disciplinary action being the key concern. This policy is not intended to replace, but should be read in conjunction with, the requirements outlined in the remaining section of policy 7 (Incident reporting and Investigation).

This policy is intended to provide visibility to those employee errors that go unreported, including near miss incidents. DHS operates in a complex and time sensitive environment. To underpin our core values of Health & Safety, it is imperative that we learn from our mistakes, strive to reduce human error, and develop adequate safety systems to ensure the highest level of safety is maintained.

While employment with DHS is "at-will", disciplinary action for damage (suspected or actual) to our equipment or property or our customer's equipment or property will generally be limited to the following circumstance:

- ▶ An employee has *failed to immediately report* an accident or incident covered under this policy.
- ▶ An employee has failed to fully and *honestly participate in investigations* covered under this policy.
- ▶ An employee demonstrates negligence or an intentional *disregard* for the safety of our employees and assets as well as our customers, and their respective assets.
- ▶ An employee has committed a *series of errors* that demonstrate a general lack of due care and attention.
- ▶ The employee's actions involve *criminal activity, substance abuse, controlled substances, alcohol, violation of regulatory authorities or airport regulations or intentional falsification*.

The decision as to whether an employee's actions fall in the circumstances noted above will be in the sole discretion of management.



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The MANDATORY reporting standards are:

- ▶ All 'Category A' Occurrences (Accidents/ Incidents) are to be logged and reported (details entered into the Safety Culture Reporting Tool) within 4 hours of the incident
- ▶ All 'Category B' Occurrences are to be entered within 24 hours of the incident.
- ▶ All 'Category C' Occurrences are to be entered within 7 Days of the incident.
- ▶ All 'Cat D - Near Miss / Dangerous Occurrences' are to be entered within 7 Days of the incident.
- ▶ All 'Category E' Occurrences are to be entered within 7 Days of the incident.

Incident Types & Glossary

Safety, Security & Environment can be reported under the five incident broken down into five types of incidents:-

- ▶ **Personal** Any incident resulting in personal injury or had the potential to cause personal injury
- ▶ **Aircraft** Any incident resulting in Aircraft damage or had the potential to cause Aircraft damage
- ▶ **Vehicle/GSE** Any incident resulting in GSE/vehicle damage or had the potential to cause GSE/vehicle damage
- ▶ **Property** Any incident resulting in building & fixtures damage or had the potential to cause buildings & fixtures damage
- ▶ **Security** Any incident resulting in or had the potential to breach security protocols

Investigation level

The extent of the investigation will depend on the categorisation, circumstances of the occurrence and the actual or potential injury, loss or environmental impact.

For aligned SMS investigation processes and categories (A–E), including Safety Culture integration, refer to Sections 0.8 and 0.11 of the DHS SMS Manual.

For structured investigation steps, categorisation logic, and analysis tools supporting Policy 7, refer to the DHS Investigation Principles Manual.

Further details regarding Safety Culture incident classification, investigation categories can be found in the Safety Culture User Guide, available on AvBIS.

8 SAFETY PROCEDURES AND POLICIES

8.1. SMOKING POLICY

Purpose and Scope

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This is a high level document defining the Smoking policy and management procedures. It acts as a guide to Management of the desired policy of DHS. Managers are expected to take all reasonable steps to ensure compliance with this policy and local regulations.

Policy Statement

DHS has a ZERO TOLERANCE policy applicable to Smoking in prohibited areas, including DHS rented offices and facilities.

Objectives

- ▶ To ensure that the health and safety of all DHS employees, customers and third parties is not compromised, either potentially or directly, by the action of smoking.
- ▶ To prevent the exposure of non-smokers at work to environmental tobacco smoke through "passive smoking", given the growing scientific evidence of the adverse effects of tobacco smoke.

Methodology

- ▶ Ensure a total ban on smoking in airside areas
- ▶ Ensure a total ban on smoking in all DHS facilities.
- ▶ Designate all offices non-smoking areas.
- ▶ Consider designated smoking areas if facilities or local regulations allow.
- ▶ Where possible, ensure smoke-free eating areas / rest rooms.
- ▶ Comply with relative local government regulations.

Definitions

- ▶ All DHS facilities, including airport restricted / prohibited areas.
- ▶ *Smoking – the action or habit of inhaling and exhaling the smoke of tobacco, emitting smoke or visible vapour, including the use of electronic cigarettes.*

Responsibilities

Operational / Station Management

It is the responsibility of the Station Manager to ensure that a Zero Tolerance Smoking Policy is in place at station level, capable of meeting the objectives.

Compliance Assurance

The Smoking Policy effectiveness and enforcement will be part of the Health and Safety Programme.

8.2. HAND ELECTRONIC DEVICES – MOBILE/ CELL PHONES, RADIO AND PORTABLE ELECTRONIC DEVICES / PORTABLE MEDIA PLAYERS

Purpose and Scope

Employers have both common law and statutory duties towards their employees and members of the public.

This is a high level document defining the use of Mobile/Cell Phones and other portable electronic devices/portable media players (PED/ PMP) policy and



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management procedures. Station Managers are expected to take all reasonable steps to ensure compliance with local government regulations.

Policy Statement

DHS has a ZERO TOLERANCE policy applicable to the use of personal mobile/cell phones whilst on duty and the use of any 'handheld' mobile/cell phone or other PED/PMP whilst driving or operating equipment.

The use of PED/PMP (Portable Electronic Devices/Portable Media Players) for taking photographs, filming, viewing images or listening to music is prohibited. Unless company provided PED/PMP have been authorised for use in the work environment (for example as part of an accident investigation) the use of PED/PMP within landside/airside areas, warehouses and restricted/controlled areas of airports is strictly forbidden. For any use prior permission must be sought from the relevant designated Airport Authority and the DHS Senior Manager. In addition taking pictures, filming, recording audio sounds or sharing images of DHS, customers and 3rd party property, equipment or personnel is also strictly forbidden unless prior approval, as stated above, is sought.

An employee found contravening this policy may be subject to disciplinary action under the Company's Disciplinary Procedure, up to and including dismissal.

Objectives

The objective is to ensure that the health and safety of all DHS employees, customers and third parties is not compromised by the use of mobile/cell phones and PED/PMP. No **Hand-held** communication equipment will be used whilst operating vehicles / machinery unless an appropriate hands-free module is fitted.

Responsibilities

It is the responsibility of the Manager to ensure that this policy is implemented and fully complied with.

Rationale

For the safety of airside and landside operations this Policy provides guidance on the use of portable electronic devices (PED) / portable media players (PMP) whilst driving or operating equipment and / or machinery.

There are two main areas of concern in relation to using this type of equipment; driving safety and ignition source.

1. Driving Safety (Loss of Concentration)

- ▶ Personnel must not operate motor vehicles or equipment whilst using a hand held mobile phone or radio and PED/PMP.
- ▶ Hands free devices for mobile phones and fixed position two-way radios are to be used.
- ▶ The carriage and use of personal mobile phones, PED and PMP at work is strictly forbidden.

2. Ignition Source (Risk of Fire)



Mobile phones / radios / PED /PMP introduce three potential risks when used in areas where a flammable atmosphere may be present i.e. Radio-Frequency Induced Ignition, Sparks from the Battery and Electrostatic Discharge.

All PED/PMP must be designed and intrinsically safe for use in fuelling zones and suitably covered to prevent accidental shorting or detachment of the battery from the unit.

Staff to who use of a mobile phone/radio/PED/PMP is essential and who work on the airport ramp near refuelling aircraft should be provided with information relating to the safe use of such equipment.

reason to believe that any person, or any equipment, is causing, or is likely to cause, a safety hazard in relation to the fuelling operation.

Use of PED in Aircraft Cabins Whilst on the Ground

Company mobile phones, two way radios and paging devices may be used by ground staff when carrying out duties in aircraft cabins on the ground. They may be used during aircraft fuelling and whilst passengers are on board but should not be used in sight of passengers where possible to avoid conflict with existing passenger use restrictions. PED must not impair the use of PPE, especially hearing protection.

Records

Records shall be stored and maintained so that they are readily retrievable and in a suitable environment to minimise deterioration or damage.

8.3. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Policy

Where it is not possible to eliminate or reduce risk by any other measures, personal protective equipment (PPE) should be issued when deemed necessary and in accordance with the local legislation.

Any PPE will be allocated to staff member at the start of the employment contract.

The equipment (PPE) should be designed to protect the individual from risks to health and safety, which have been identified by risk assessments.

Responsibility

It shall be the responsibility of all DHS management personnel.

Definitions

PPE:

Personal Protective Equipment is all equipment or clothing, which is designed and intended to be worn or used by a person at work to protect against risks to health and safety

Company Requirements

1) Issuing PPE

The line department must select an approved standard of PPE that best suits the employee's requirements and the task for which it will provided and used.

PPE should be issued following a full risk assessment of the tasks and must be regarded as the last resort to protect against risks to health and safety. Before issuing



any PPE, an assessment must be conducted by a competent person to ensure that it protects against the risks for which it is provided.

All staff must receive adequate information, instructions and training in the use of PPE. Training should include the reasons for issuing PPE and its limitations, how to inspect the condition of PPE, how to obtain replacement PPE and practical training on how to wear/use it. Manufacturers can often assist in this.

2) Managers' Responsibilities

Managers have a duty to enforce the use and wearing of PPE.

Managers must ensure that PPE meets the current legislative and design requirements. Any PPE used in Europe must meet the appropriate European Standards. If more than one item of PPE is worn, the different items must be compatible.

PPE must be maintained to ensure that it continues to give the degree of protection for which it is designed. Maintenance includes cleaning, examination, testing, repair and replacement. Regular inspections must be carried out on all re-usable respiratory equipment and records kept of these checks.

Managers must make arrangements for employees to be able to report defective or lost PPE. These arrangements should also ensure that defective PPE is repaired or replaced before the employee needs to use it.

3) Employees' Responsibilities

Employees must take reasonable care of PPE and report any loss or apparent defect immediately. They must also know how to obtain PPE, and always wear and use the PPE in accordance with the appropriate procedures and instruction.

4) Contractors

All contractors must wear appropriate PPE when required by the task. The contractor's employer must provide PPE.

5) High Visibility Clothing Policy

All DHS staff working airside should wear high visibility clothing at all times, this is a mandatory requirement when moving around airside, aircraft stands, traffic areas and inside operational warehouses and hangars. Line Managers are responsible for carrying out risk assessments for their staff that are required to wear PPE.

White overalls or white shirts are not considered to be high visibility clothing.

Types of Personal Protective Equipment

Hearing Protection. Hearing protection around aircraft manoeuvring or operational airside areas will be ear-defenders designed to meet the standard of exposure exceeding 83 dB(A) all environments require a hazard risk assessment.

Safety Footwear can be boots or shoes with industrial protective toecaps. They may also have other safety features such as slip resistant soles, steel mid-soles, anti-static properties, oil resistance and extra insulation. Processes and activities that will require the use of safety footwear are construction, work in flammable atmospheres, handling chemicals, cargo and baggage handling, and work on the ramp. The selection of footwear will depend on an assessment of the hazard and user requirements, but should comply with local regulatory standards.



For emergency preparedness and operational readiness requirements, see Section 4 of the DHS SMS Manual.

8.4. WORKING HOUR POLICY

Policy

In order to ensure that the Company fully complies with the requirement to have a safe system of work, limitations must be set by each business unit to ensure all employees fully comply with local working time legislation, systems must also be in place to ensure close monitoring and control of individuals working time, to ensure excessive hours are not worked. Local management must also ensure that adequate rest (off) days are scheduled into an employees work plan (roster).

1. No single shift will exceed 10 hours*
2. Minimum 12 hours rest break between each working day / period

*The above limitations can only be exceeded as a result of major operational or staff disruption and Aircraft on the Ground (AOG) events and must be approved by designated Senior Managers.

Risks

DHS has a duty to ensure as far as reasonably practicable the health, safety and welfare of its employees. When excessive hours are worked with inadequate rest breaks, physical and mental fatigue can develop. As a result, loss of concentration or errors in judgement can occur. This can increase the risk of accidents or near misses.

Legislation: Comply to ArbZG

It should be noted that there is specific legislation to control the working hours of certain occupations, such as Large Goods Vehicles (LGV) / Passenger Service Vehicles (PSV) driver–operators. Consideration should also be given to other categories of worker where working time directives may apply e.g. young workers, nights shift workers etc.

Rest day: A period of 24 hours from midnight to midnight.

Records: Records shall be stored and maintained so that they are readily retrievable and in a suitable environment to minimise deterioration or damage.

8.5. COMPUTER USAGE (DISPLAY SCREEN EQUIPMENT)

Purpose

Tasks should be designed to offer Users variety and natural breaks away from the display screen. Ideally the work should be designed to consist of a mix of screen based and non-screen based work to prevent fatigue and to vary visual and mental demands. If the work requires intensive use of the VDU (Visual Display Unit –computer, there should be plenty of pauses away from the screen.

Responsibility

It shall be the responsibility of all personnel engaged by DHS.

Laptops

A laptop should not be used for longer than one hour without a break or change in activity. When using a laptop at the office, a docking station, equipped with a screen and mouse should be used.



Users of laptops should be trained on how to minimise risks, including sitting comfortably, angling the screen to minimise reflections and taking frequent breaks. The laptop should be placed on a firm surface at the right height for keying. When choosing a laptop, it is essential to ensure that an external monitor and keyboard and mouse can be attached. The total weight of the laptop and any peripherals to be carried must be considered as carrying a heavy weight can cause muscle strain.

9 PERSONNEL WELFARE

9.1. WORKPLACE DRUG AND ALCOHOL POLICY

Introduction

DHS is committed to maintaining a drug and alcohol free workplace and a Zero Tolerance attitude towards drugs, alcohol and psychoactive substances to safely achieve business objectives and meet health and safety legal obligations. This commitment:

- ▶ Supports the Company values
- ▶ Is part of the way we work
- ▶ Achieves a healthier and safer workplace and workforce

Responsibility

It shall be the responsibility of all managers engaged by DHS to implement and enforce this policy.

Purpose

The purpose of this policy is to improve safety across our workplaces and to ensure that employees, customers, contractors or invitees of the Company are not exposed to unacceptable risk in the workplace.

The policy has been developed as people that have unacceptable levels of drugs and/or alcohol in their system while they are at work place themselves and others at risk.

Aims and Objectives

The aim and objectives of this policy is to:

Achieve a drug and alcohol free workplace and workforce.

- ▶ Maintain a focus on eliminating the unacceptable risks that drug and/or alcohol abuse brings to the workplace.
- ▶ Achieve improved safety and operational performance across the Company.
- ▶ Ensure that the Company complies with its legal obligations.
- ▶ Support Company values.
- ▶ Consider support and/ or the potential rehabilitation of staff with drug and/or alcohol problems if they make that choice.
- ▶ Treat all staff consistently across the Company, in testing, selection, and in the application of procedures.



- ▶ Protect the privacy and confidentiality of all staff in the operation of the policy.
- ▶ Ensure that the procedures and requirements for the policy are cost effective.
- ▶ Ensure that all drug and/or alcohol tests administered under the policy are legally defensible.

To achieve a drug and alcohol free workplace and workforce the Company strictly prohibits the following:

- ▶ The use, sale, transfer or possession of drugs while on Company property or within work time.
- ▶ The reporting to or being at work under the influence of drugs and/or alcohol (defined by this policy).
- ▶ The consumption of alcohol while on company property
- ▶ While involved in Company duties or on Company property, a level of illicit or prescribed drugs in one's system that exceeds the accepted international standard.

Definitions

"Drugs"

The term "drugs" refers to drugs that may affect the employees' ability to do their job. This includes illicit drugs such as opiates (e.g. heroin and morphine), cocaine, LSD, methadone, cannabinoids and amphetamines (e.g. speed and ecstasy). It also includes the misuse of prescription drugs such as benzodiazepines (tranquillizers and sedatives), which are sometimes abused. This may also include psychoactive substances that may interact with other substances.

"Alcohol"

The term "alcohol" refers to any beverage that contains ethyl alcohol (ethanol), including but not limited to beer, wine and distilled spirits.

9.2. MANAGEMENT OF STRESS

Policy

DHS is committed to recognising and introducing effective systems to ensure the management of stress in the workplace is addressed. DHS will develop its management of people so that potential excessive pressures on individuals are identified and develop managers with the prerequisite skills so they are able to recognise and manage workplace stress.

The Company will; at its complete discretion provide appropriate support to employees who have been identified as suffering from stress.

Scope

This document shall apply to all employees of DHS.

Responsibility

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It shall be the responsibility of all personnel who manage or supervise staff engaged by DHS.

Objectives

- ▶ To ensure potentially harmful stress is identified and effectively managed.
- ▶ To ensure that identified stress related problems are managed confidentially.
- ▶ To address stress related illness with the same level of commitment as other health issues.

Definitions

'Stress' - is people's natural reaction to excessive pressure - it isn't a disease. But if stress is excessive and goes on for some time, it can lead to mental and physical illness' (For example, depression, nervous breakdown, heart disease)

Examples of Workplace Stress

The causes of stress are complex and they may arise from work related and/or domestic issues. The list below is not exhaustive.

- ▶ Factors intrinsic to the job, for example, poor working conditions, hours of work, new technology, work overload or under load.
- ▶ An individual's role in the organisation, for example, role ambiguity, role conflict and the degree of responsibility.
- ▶ Career development, for example, over promotion, under promotion, lack of Job security.
- ▶ Relationships at work with superiors, colleagues and subordinate.
- ▶ Organisation structure and climate, for example, culture and management style, lack of effective consultation and office politics link between home and work, for example, domestic pressure financial.
- ▶ Worries and bereavement.

The Symptoms of Stress

It is helpful to be able to recognise changes in performance and ability.

Examples are below:

- ▶ Physical signs, for example, headaches, fatigue, unexpected weight loss or gain.
- ▶ Changes in emotional outlook, for example, intolerance, irritability, low self-esteem, mood swings.
- ▶ Behavioural changes, for example, smoking-increasing or starting after successfully stopping, changes in eating or alcohol drinking habits, evading deadlines, loss of motivation and commitment, tension and conflict between colleagues.

9.3. VIOLENCE AT WORK

Policy

DHS will comply with all Health and Safety Legislation to ensure, so far as is reasonably practicable, the health, Safety and welfare at work of their employees. The company will also comply with any related legislation where it refers to violence in the workplace.

The company will not tolerate any acts of violence or aggression against staff by customers or other members of the public.

Purpose



The following guidance to managers defines 'violence at work' and gives advice on what is expected of Managers. This includes the requirement to carry out risk assessments, introduce preventive measures and ensure the provision of care and support for victims of assault.

Responsibility

It shall be the responsibility of all personnel engaged by DHS.

Definitions

Violence at Work:

As any incident in which a staff member is abused, threatened or assaulted in circumstances relating to their work. This includes verbal abuse, threats and intimidation. This document does not address the problem of violence between employees of DHS or between staff and employees of other organizations whilst at work. This would normally be dealt with through the Human Resources or Personnel Department for that station. In such cases managers must also conform with local reporting procedures as may be defined.

Groups of staff defined as 'at risk':

Those who provide care, information and advice, handle money or valuables, or work in isolation.

Company Requirements

1. Risk assessments

These must be carried out to establish the extent and nature of the problems with which staff have to deal. Assessments should be based on informal discussions with staff and a review of preventive measures.

2. Record Keeping

All incidents, no matter how minor, should be recorded. These will then be included in analysis to determine how further preventive measures can be introduced.

3. Preventive Measures

Risk assessments should generate a range of measures.

These should include:

Information and Training: Training should be provided to every staff member whose job has been identified as possibly 'at risk' from violence at work. Training would include advice on how to identify situations, which could lead to violent or aggressive behaviour. New staff will be trained on induction while current staff will receive training as part of their recurrent refresher training.

Attitude: All staff are expected to behave in a way, which does not exacerbate a difficult situation. Whenever possible they should act to calm any potentially aggressive situation and prevent an incident occurring.



Environment: If assessments identify specific risks, physical security measures should be considered. These may include video cameras, which are clearly evident to members of the public, alarm systems, and security locks, which prevent public access to staff areas. Consideration should be given to personal attack alarms for staff working alone. Check in desks and ticket counters should be designed to take into consideration the possibility of aggression.

4. Support for staff after an incident

Support can be provided in a number of ways for staff that have been the victims of violence or serious verbal abuse, or witness to significant accidents with loss of life these may include:

Counselling: talking about the experience can reduce the risk of long term trauma.

Following an incident the manager may arrange for any victim of violence to be seen by a trained counsellor from a credible employee assistance programme (or other local counselling provider) who will provide a completely confidential service. To assist in recovery, staff should be encouraged to attend counselling and consideration should be given to allowing the employee time off to attend.

Victim Support: Further support if considered appropriate may be available from credible local victim support schemes, which operate in many areas.

Prosecution of the assailant: The decision to prosecute is always at the discretion of the Police, and the incumbent victim involved after they have considered the evidence.

5. Reporting procedures

The incident should be immediately reported to the injured person's supervisor and line manager. He or she will then call the police, if appropriate.

Records

Records shall be stored and maintained so that they are readily retrievable and in a suitable environment to minimise deterioration or damage.

10 MEASUREMENT & MONITORING

AUDITING & INSPECTION

Purpose

In order to assess the extent of compliance with legislation and DHS policy our Health and Safety organisation must be subject to periodic audit. This procedure defines the framework and procedures to be followed as a means of assessing DHS's performance in compliance with the legal and regulatory requirements.

Responsibility

It shall be the responsibility of all personnel engaged by DHS.

Frequency

At DHS audits are to be carried out by the Health & Safety Manager/General Manager selected management and Site personnel.

The frequency of these audits is as follows:

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- ▶ H&S Manager/General Manager annually.
- ▶ Departments continuous pro-active Monitoring.
- ▶ Monthly by Station Manager
- ▶ Daily hazard spotting
- ▶ Regular Fire Safety Checks. ALL areas.

Objectives

The objectives of the audits can be summarised as:

- ▶ To review implementation of DHS health & safety, fire safety policies.
- ▶ To verify compliance with legal requirements, policy standards, procedures and systems of work.
- ▶ To identify needs for new or improved standards, procedures and systems of work.
- ▶ To promote awareness of health & safety, fire and environmental protection.
- ▶ To assess performance in avoiding ill health, injury and environmental pollution incidents arising from activities.

Audit Team

Internal Audit – Health & Safety Manager and General Manager or staff delegated as competent to undertake audits.

Documentation

The following documentation is to be requested prior to or during the audit sessions: (Note some of this documentation may not be applicable to the area being audited)

Prior to Audit:

- ▶ Health & Safety Policy Statement
- ▶ Safety & Fire Orders
- ▶ Risk assessment programme
- ▶ Accident/incident reporting records (6 months)
- ▶ Training records, staff rosters
- ▶ Site H&S risk assessments
- ▶ Internal audit records

During Audit:

- ▶ Airport Emergency orders
- ▶ Risk assessment records
- ▶ Department safe systems of work
- ▶ Portable electrical equipment test records
- ▶ Records of inspection of & PPE

Audit Process

The audit is to be conducted using the following steps:

- a) Audit team to inform department to be audited of intended audit/requirements and request the required documentation prior to audit.
- b) Audit teams to produce audit plans and forward them to the Department
- c) Audit team to hold a pre-audit meeting with Station Management and focal points who are to be appraised of the scope and content of the audit process.
- d) The audit team is to visit the focal points most closely aligned with the area of audit being assessed.



Note: This may result in more than one member of the audit team interviewing the same person, but this is to be minimised as far as possible by prior planning.

- ▶ The audit to concentrate on management of relevant facilities and will require verification of compliance and understanding at various levels. It will thus be necessary to interview a random selection of the workforce on an ad-hoc basis.
- ▶ The audit scope and interview requirements are to depend largely on the completeness and effectiveness of the pre-audit documentation.
- ▶ Station and Senior Management are to be appraised of any processes breaching legislation or DHS policy when they are identified.
- ▶ On completion of the audit the Station Manager is to be appraised of initial findings and of any process breaching legislation or DHS policy.
- ▶ The main audit plan is for guidance only, except where specific times are identified. Adherence to the programme is to depend on the audit findings and availability of personnel and documentation.

Audit Reports

- ▶ At the time of audit completion a summary debrief should be provided to the Station Manager and/ or Departmental Heads.
- ▶ Written audits reports are to be raised which should assess the overall performance, identify inadequacies and make recommendations on action for improvement. The report should also identify the observed strengths and suggest how they can be built upon.
- ▶ Details of any follow-up actions must be included in the reports together with any necessary monitoring

arrangements.

- ▶ A draft report should be forwarded to the Station Manager 1 week after debrief. The Station Manager/Departmental Head should review the report to verify the factual content is correct and respond to the Audit team within 1 week.
- ▶ On receipt of the audit report, Departments are to produce within 4 weeks an Action Plan, which addresses all the main points raised.
- ▶ A progress report will be required on the action plan within the Periodic Status Review.

Safety Inspections

Regular scheduled inspections of the workplace must be carried out. The inspection process will consist:

- ▶ Monthly Managers Check
- ▶ Weekly Supervisors Check

Daily Hazard Spotting:

A regular inspection of the workplace, focusing on high risk items.

Safety Inspection

A regular Monthly scheduled inspection of a workplace completed by the Manager, periodically, accompanied by appointed Safety Representative.

Records



Records shall be captured in Safety Culture or stored and maintained so that they are readily retrievable in a suitable environment to minimise deterioration or Damage.

11 DOCUMENTATION & EVIDENCE

All training, inspection and incident records are archived in digital form and stored centrally. SharePoint is used as primary platform for documentation and audit trails.

For the strategic integration of inspections and SPI-based performance monitoring, refer to Section 2.1 of the DHS SMS Manual.

