

Safety and Health Statement

Treo Port Láirge Ltd.

Unit 2, Block 4
Lacken Road Business Park
Kilbarry
Waterford.

This Document is the Safety Statement of Treo Port Láirge Ltd., (the company), as required by The Safety, Health and Welfare at Work Act 2005 and contains written risk assessments as required under the Act. It has been prepared in November 2018 and shall be reviewed and updated upon any significant changes to work practices, the building or staff or at least annually.

Although every care has been taken to accurately and comprehensively deal with all foreseeable hazards, risks and controls, the details are based on information and instructions given to Brendan O'Connor by the company who cannot and will not be responsible for any omissions which may have taken place.

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SAFETY STATEMENT

for

Unit 2, Block 4
Lacken Road Business Park
Kilbarry
Waterford.

Phone: 051 - 379740

DECLARATION

Treo Port Láirge Ltd. is core funded by the Probation Service and has been running since 2000. Treo provides a community based programme that addresses the need of young people who have demonstrated actual offending behaviour and positively challenged this behaviour through the provision of a structured and supportive mentoring and guidance programme.

This statement has been prepared in accordance with section 20 of the Safety Health and Welfare at Work Act 2005. (See appendix 1 for other Legislation that may be applicable e.g. the Safety Health and Welfare at Work (General Application) Regulations 2007, Construction Reg's. 2013,)

It is our intention to provide a safe and healthy working environment in so far as is reasonably practicable, for all employees and other persons who may be affected by our operations. This Statement will be reviewed on a regular basis, at least annually, and in light of experience, changes in legal requirements, changes in operations and technical progress and may be changed or updated to meet changing circumstances.

In particular, the Company accepts the responsibility to:

- a) Provide and maintain safe and healthy working conditions, taking into account our statutory requirements.
- b) Provide training and instruction, where necessary, to ensure our employees are competent and are able to perform their work safely and effectively.
- c) Make available all necessary safety devices and protective equipment and supervise their use, through our front line managers.
- d) Maintain a constant and continuing interest in health and safety matters pertinent to the Company's activities, to ensure that all our specific safety and health objectives are met at all times.
- e) Keep this Safety Statement and all other Safety Documents under review.

Employees are reminded that they have a legal duty under the **Safety, Health & Welfare at Work Act, 2005** to take reasonable care for the health, safety and welfare of themselves and of other persons who may be affected by their acts and or omissions at work. There is also a specific duty to report to your foreman/supervisor (frontline manager) any defects in plant, equipment or system of work, which might endanger safety, health and welfare.

SIGNED: - _____

DATE: - 1st November 2018

ANTI-BRIBERY & CORRUPTION POLICY

1. Introduction

Treo Port Láirge Ltd. values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Company's staff as well as others acting on the Company's behalf are key to maintaining these standards.

The purpose of this document is to set out the Company's policy in relation to bribery and corruption. The policy applies strictly to all employees, agents, consultants, contractors and to any other people or bodies associated with the Treo Port Láirge Ltd. group of companies, within all regions, areas and functions.

2. Understanding and Recognising Bribery and Corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

3. Penalties

The Criminal Justice (Corruption Offences) Act came into force in July 2018. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the Company is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the Company.

4. Treo Port Láirge Ltd. Policy

Treo Port Láirge Ltd. will not tolerate bribery or corruption in any form.

The Company prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- *to or from* any person or company wherever located, whether a public official or public body, or a private person or company;
- *by* any individual employee, agent, consultant, contractor or other person or body acting on the Company's behalf;
- *in order to* gain any commercial, contractual, or regulatory advantage for the Company in any way which is unethical or *to* gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality, provided that it complies with the Company's Entertainment Policy;
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to the Project Leader.

The Company will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

5. Key Risk Areas

Bribery can be a risk in many areas of the Company. Below are the key areas you should be aware of in particular:

Excessive gifts, entertainment and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they fall within the Company's Entertainment Policy.

Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The Company will not tolerate or excuse such payments being made.

Reciprocal agreements: or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Actions by third parties for which the Company may be held

responsible: can include a range of people i.e. agents, contractors and consultants, acting on the Company's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee Responsibility and How to Raise a Concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Company. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported to the Undersigned.

SIGNED: - _____
Mr Ken Sauvage - Project Leader

DATE: - 1st November 2018

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, Project Leaders, employees, contractors and suppliers.

Treo Port Láirge Ltd. strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

SIGNED: - _____
Mr Ken Sauvage - Project Leader

DATE: - 1st November 2018

DECLARATION of SIGHT

We the undersigned accept that:

- We have been shown the Safety Statement
- We know where it is kept for review
- We will adhere to all safety rules as set out by Treo Port Láirge Ltd. and read the Anti-Bribery & Corruption Policy along with the Anti-Slavery and Human Trafficking Policy.
- We will not act in any way that could be harmful to ourselves or any other person.

NAME (PRINTED)	SIGNATURE	DATE
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EXTRACTS FROM ACTS / REGULATIONS

Non – exhaustive list of Health and Safety Legislation, which may be applicable:

- The Safety, Health and Welfare at Work Act, 2005
- The Safety, Health and Welfare at Work (General Application)(amendment) Regulations, 2007
- Safety, Health and Welfare at Work (General Application) Amendment) Regulations 2016
- The Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016
- The Safety, Health and Welfare at Work (Construction) Regulations 2013
- Safety, Health and Welfare at Work (Exposure to Asbestos)(Amendment) Regulations 2010 (S.I. No. 589 of 2010)
- The Safety, Health and Welfare at Work (Chemical Agents) Regulations 2002
- The Safety, Health and Welfare at Work Chemicals Act 2008 (No. 13 of 2008) and Chemicals (Amendment) Act 2010 (No 32 of 2010)
- The European Communities (Classification, Packaging, Labelling and Notification of Dangerous Substances) (Amendment) Regulations 2015
- Criminal Justice (Corruption Offences) Act 2018 (New anti-corruption legislation)
- And all other associated health and safety legislation.

REVISION DETAILS

Management at Treo Port Láirge Ltd. intends, annually, to review this Safety Statement in order to ensure its suitability, adequacy and effectiveness.

This review will address the possible need for changes in policy, objectives, inclusion of new hazards or other elements of the Safety Statement in the light of the previous years' experience.

Date	Changes made to document
Nov. 2013	Original
Sept. 2015	Update for change of address
Sept. 2016	Annual Update including Workshop
Nov. 2018	Update including the Anti-Bribery & Corruption Policy along with the Anti-Slavery and Human Trafficking Policy.

IDENTIFICATION OF HAZARDS & ASSESSMENT OF RISKS

A Hazard is anything that can cause harm -a wet or slippery floor, lifting of food deliveries in kitchen, unguarded woodworking machinery, aggressive trainees, stressful work etc.

A Risk is the likelihood that someone will be harmed by a hazard and the severity of that harm.

Critical Incident is an unexpected occurrence resulting in death or serious physical or psychological injury. Serious injury is specifically the loss of limb or function. Such events are called critical because they signal the need for immediate responses and investigation.

The Centre undertakes to carry out Risk Assessments of all its activities on an on-going basis to determine what poses a risk to employees, trainees and others and to decide on appropriate control measures. We will enlist the help of competent consultants to assist with risk assessments if and when necessary.

In identifying hazards, we will consider Physical Hazards, Chemical Hazards and Human Factor Hazards. We will determine the level of risk, who is at risk and how hazards will be eliminated or controlled. All risk assessments will be written down and a record kept of them for review purposes.

In certain cases, the output of a risk assessment may be new controls, new procedures, re-training etc.

Risk assessments are reviewed if:

- (a) There has been a significant change in activities, systems of work, personnel or premises
- (b) We have reason to believe that they are no longer valid.

Following the review, we will amend the risk assessment as appropriate and implement any improvement considered necessary relating to safety, health and welfare of employees.

Critical Incident Procedures

Stage 1: Activation of Response

If a critical incident occurs, the witness should immediately alert a member of staff, who will then make an immediate assessment of the incident and alert the Centre Manager and emergency services (Fire Brigade, Ambulance Service or An Garda Síochána).

Stage 2: On Scene Management of Incident

The Centre manager or nominee will take charge of management of the scene of the critical incident. He/she will ensure the provision of emergency first aid as appropriate and evacuation of premises if necessary. He/she will ensure the provision of appropriate information and relevant details to members of the emergency services on arrival.

Stage 3: Demobilisation Procedures for Large Scale Incidents

Where an incident is of sufficiently large scale to warrant complete evacuation of the Centre, the centre manager or nominee will ensure that an alternative premise is set up as a temporary headquarters and will ensure all personnel are accounted for. He/she will ensure that no personnel return to the Centre premises for any reason until and unless permitted to do so by emergency services.

Stage 4: Provision of Information to Relevant Parties

The centre manager or nominee will ensure that emergency service personnel are alerted to details of any personnel not accounted for, any medical conditions of injured personnel, and where possible the nature of any injuries. Any other information sought from relevant authorities (emergency service personnel or management), for the purpose of handling the incident will be provided.

Stage 5: Debriefing of Affected Personnel

The centre manager will ensure that all personnel participate in a debriefing session. This may be attended by emergency service personnel and other parties associated with the incident. Counselling facilities will be made available if required. If anyone is suffering from shock, he/she should be medically treated for the condition.