

Three-Year Health, Safety & Environmental Strategic Plan

Noxdown and Portland Fuel: 2026-2028

Executive Summary

Current Position (January 2026)

- **Site:**
 - Industrial warehouse for AdBlue manufacture with adjacent offices and welfare facilities
 - Refurbished office in the centre of York, with 26 desks available for office staff.
- **Workforce:**
 - 4 warehouse operatives, 5 office staff, drivers and third-party drivers
 - 20 Office staff at city centre office
- **Current HSE Status:** Basic compliance in place with Health & Safety Policy, general risk assessments, and emergency procedures. Training records maintained informally.
- **HSE Competence:** NEBOSH General Certificate in progress (expected completion 2026)
- **Key Challenge:** Need to transition from basic compliance to systematic HSE management with clear understanding of legal requirements, record retention periods, and competent person structure

Three-Year Vision (End 2028)

- **Systematic HSE Management:** Fully integrated HSE management system aligned with ISO 45001/14001 principles
- **Legal Compliance Assurance:** Clear compliance framework with documented evidence and audit trails
- **Competent HSE Leadership:** Qualified internal competent person with external specialist support where needed
- **Proactive Performance:** Leading indicators tracked, continuous improvement embedded in culture
- **Environmental Excellence:** Full compliance with permits and consents, optimized waste and water management

Investment Overview

- **Year 1 (2026): £24,456** - Foundation building and compliance baseline
- **Year 2 (2027): £3,792** - System embedding and monitoring
- **Year 3 (2028): £7,557** - Optimization and performance improvement
- **Total 3-Year Investment: £35,805** (£11,935 average per year)

Year 1: Foundation Building (2026)

Budget: £24,456

Objectives:

1. Complete waste water assessment and implementation
2. Establish systematic training management system

3. Complete fire marshal evacuation plan and fire risk assessments
4. Complete WorkNest H&S Policy
5. Complete NEBOSH and establish competent person structure
6. Implement documented HSE management framework

Q1 (Jan-Mar 2026): Compliance Baseline & Assessment

Waste Water Assessment:

- Engage Yorkshire Water to review waste water discharge specification
- Determine if trade effluent consent can be achieved
- Assess options for waste water management
- Budget: Included in special projects allocation

Training System Implementation:

- Create training matrix spreadsheet/system showing:
 - Who needs what training
 - Current status (valid/expired/required)
 - Renewal dates
 - Training providers and costs
- Conduct training needs analysis for all staff
- Budget: £0 (internal time)

Fire Marshal Evacuation Plan:

- Develop comprehensive fire evacuation plan
- Designate fire marshals and define responsibilities
- Create assembly point procedures
- Budget: £0 (internal time, supported by WorkNest consultancy)

WorkNest H&S Policy Completion:

- Complete Health & Safety Policy documentation with WorkNest support
- Ensure policy reflects current operations and responsibilities
- Communicate policy to all staff
- Budget: £0 (included in WorkNest consultancy)

Fire Risk Assessment - 1 Toft Green:

- Commission fire risk assessment for York city centre office
- Implement identified improvements
- Budget: Included in recurring costs

Recurring Compliance Activities (Q1):

- PAT Testing
- Fire Extinguisher Check
- Budget: Allocated from recurring costs

Action Items:

- [] Engage Yorkshire Water for waste water assessment

- [] Document all current waste streams and contractors
- [] Create comprehensive training matrix
- [] Develop fire marshal evacuation plan
- [] Complete H&S Policy with WorkNest
- [] Commission fire risk assessment for 1 Toft Green
- [] Identify all expired or missing training
- [] Complete Q1 PAT testing and fire extinguisher checks

Q2 (Apr-Jun 2026): Waste Water Planning & HSE Documentation

Waste Water Planning and Implementation:

- Develop detailed implementation plan based on Q1 assessment
- Engage contractors for any required infrastructure work
- Begin implementation of waste water management solution
- Coordinate with Yorkshire Water as required
- Budget: Major allocation from special projects (£15,824)

Health and Safety Management Documentation and Assessment:

- Develop comprehensive risk assessments for all significant activities:
 - Manufacturing operations (urea handling, AdBlue production)
 - Workplace transport (forklift operations)
 - Manual handling
 - Work at height (racking access)
 - Chemical handling and storage
- Create COSHH assessments for:
 - Urea
 - AdBlue (skin/eye contact during filling operations)
 - Cleaning chemicals
 - Lubes and greases
 - Any other chemicals used on site
- Establish document control system
- Budget: £0 (internal time)

Recurring Compliance Activities (Q2):

- Continue routine inspections and maintenance
- Budget: Allocated from recurring costs

Action Items:

- [] Finalize waste water solution design and costings
- [] Engage contractors for waste water infrastructure
- [] Begin waste water system installation
- [] Complete all risk assessments for significant activities
- [] Complete all COSHH assessments
- [] Establish document control and version management system
- [] Review and update emergency procedures

Q3 (Jul-Sep 2026): NEBOSH Completion & Competent Person Structure

NEBOSH Examination:

- Complete NEBOSH General Certificate examination
- Obtain certification
- Budget: £500 (special project allocation)

Implement Internal Competent Person Structure:

- Formally designate NEBOSH-qualified person as internal competent person
- Define competent person responsibilities and authority
- Establish reporting lines and escalation procedures
- Identify areas requiring external specialist support
- Budget: £0 (internal time)

Recurring Compliance Activities (Q3):

- SEMA Rack Inspection
- First Aid at Work Training
- Banksman Training
- Fire Stick Extinguishers (purchase)
- Eye Tests
- Hearing Tests
- Budget: Allocated from recurring costs

Action Items:

- [] Complete NEBOSH examination
- [] Obtain NEBOSH certificate
- [] Formalize competent person appointment with written role description
- [] Define interface with WorkNest consultancy for specialist support
- [] Complete SEMA racking inspection
- [] Deliver first aid at work training
- [] Deliver banksman training
- [] Purchase and install additional fire extinguishers
- [] Arrange eye tests for eligible staff
- [] Arrange hearing tests for exposed workers

Q4 (Oct-Dec 2026): HSE Management System & Monitoring

HSE Management System Framework:

- Develop documented HSE management system structure:
 - HSE policy and objectives
 - Roles and responsibilities matrix
 - Document control and record-keeping system
 - Management review process
 - Monitoring and measurement procedures
 - Incident investigation procedures
 - Corrective and preventive action process

- Align with ISO 45001/14001 principles
- Budget: £0 (internal time)

Compliance Monitoring and Review:

- Implement inspection schedule:
 - Weekly: Fire alarm test, workplace inspections
 - Monthly: Emergency lighting test, toolbox talks
 - Biannually: HSE management review
- Create inspection checklists and assign responsibilities
- Establish KPI dashboard for HSE performance
- Budget: £0 (internal time)

Identify Gaps and Priorities for Y2:

- Conduct comprehensive Year 1 review
- Identify remaining compliance gaps
- Assess effectiveness of implemented systems
- Set priorities and objectives for Year 2
- Budget: £0 (internal time, supported by WorkNest consultancy)

Recurring Compliance Activities (Q4):

- Fire Risk Assessment (second assessment)
- WorkNest Consultancy annual review
- Fire escape Engineer Inspection
- Budget: Allocated from recurring costs

Action Items:

- [] Develop and document HSE management system framework
- [] Implement weekly and monthly inspection routines
- [] Create HSE KPI dashboard
- [] Establish management review schedule
- [] Complete Year 1 management review
- [] Identify gaps and priorities for Year 2
- [] Complete annual fire risk assessment
- [] Complete fire escape engineer inspection
- [] Conduct WorkNest consultancy annual review
- [] Set objectives and review budget for Year 2

Year 1 Budget Summary:

Category	Item	Cost
Recurring Costs (2026)	PAT Testing, Fire Extinguisher Checks, SEMA Rack Inspection, First Aid Training, Fire Risk Assessments, WorkNest Consultancy, Fire Escape Inspection, Banksman Training, Fire Extinguishers, Eye Tests, Hearing Tests	£8,132
Special Projects	Waste Water Infrastructure	£15,824
Special Projects	NEBOSH Examination	£500
Internal Time	Training system, H&S documentation, COSHH assessments, HSE management system	£0
	TOTAL YEAR 1	£24,456

Year 2: System Embedding (2027)

Budget: £3,792

Objectives:

1. Driver H&S review and compliance
2. Embed HSE management into daily operations
3. Implement proactive monitoring and leading indicators
4. Maintain annual compliance activities
5. Review and refine HSE management system

Key Activities

Driver H&S Review:

- Review health and safety arrangements for visiting third-party drivers
- Assess site induction procedures for drivers
- Review loading/unloading safety procedures
- Evaluate driver welfare facilities
- Implement improvements as identified
- Budget: £0 (internal time)

Embed HSE Management into Daily Operations:

- Integrate HSE considerations into all operational procedures
- Establish near-miss reporting system
- Implement HSE observation program (safety conversations)
- Launch HSE improvement suggestion scheme
- Develop HSE performance culture through visible leadership
- Track leading KPIs:
 - Near-miss reports per month
 - HSE observations completed
 - Training completion rates

- Inspection completion rates

- Budget: £0 (internal time)

Proactive Monitoring:

- Conduct biannually HSE management reviews
- Analyse trends in incidents, near-misses, and observations
- Review effectiveness of control measures
- Monitor training compliance
- Assess contractor HSE performance
- Budget: £0 (internal time)

System Refinement:

- Update risk assessments based on operational experience
- Refine inspection schedules and checklists
- Optimize training matrix and scheduling
- Enhance document control based on Year 1 lessons learned
- Budget: £0 (internal time)

Annual Recurring Compliance Activities:

- PAT Testing (2x)
- Fire Extinguisher Checks (2x)
- Forklift Truck (FLT) Training refreshers
- Electrical Safety Inspection
- WorkNest Consultancy annual review and support
- Hearing Tests
- Budget: £3,942 (from recurring costs table)

Year 2 Management Review:

- Review performance against Year 2 objectives
- Analyse incident/near-miss trends
- Assess HSE culture development
- Evaluate training effectiveness
- Set Year 3 objectives and priorities

Action Items:

- [] Complete driver H&S review and implement improvements
- [] Launch near-miss reporting system with staff training
- [] Implement HSE observation program
- [] Establish leading indicator dashboard
- [] Conduct biannually management reviews
- [] Update risk assessments based on operational changes
- [] Complete all annual recurring compliance activities
- [] Conduct WorkNest consultancy annual review
- [] Hold Year 2 management review meeting
- [] Set Year 3 plan and priorities

Year 2 Budget Summary:

Category	Item	Cost
Recurring Costs (2027)	PAT Testing, Fire Extinguisher Checks, FLT Training, Electrical Safety Inspection, WorkNest Consultancy, Hearing Tests	£3,942
Internal Time	Driver H&S review, system embedding, proactive monitoring	£0
	TOTAL YEAR 2	£3,792

Year 3: Optimization & Performance Improvement (2028)

Budget: £7,557

Objectives:

1. Occupational health assessment and enhancement
2. Review HSE culture within company
3. Review of waste volumes and environmental optimization
4. Review of WorkNest partnership effectiveness
5. Achieve HSE performance excellence

Key Activities

Occupational Health Assessment:

- Review health surveillance requirements based on COSHH assessments
- Assess need for occupational health screening programs
- Consider periodic health checks for at-risk roles
- Engage occupational health provider if required
- Implement health promotion initiatives
- Budget: £0 (internal assessment, external costs if required would be additional)

Review HSE Culture within Company:

- Conduct comprehensive HSE culture survey across all staff
- Analyse 3-year incident, near-miss, and observation trends
- Assess effectiveness of HSE communication and engagement
- Evaluate management commitment and visible leadership
- Identify cultural strengths and improvement opportunities
- Implement culture enhancement initiatives
- Budget: £0 (internal time)

Review of Waste Volumes:

- Benchmark waste volumes and disposal costs over 3-year period
- Identify any further waste reduction opportunities
- Assess waste segregation effectiveness
- Review opportunities for recycling and reuse
- Evaluate effluent quality trends (if applicable)

- Budget: £0 (internal time)

Review of WorkNest Partnership:

- Evaluate effectiveness of WorkNest consultancy support over 3 years
- Assess value for money and service quality
- Review scope of services and alignment with needs
- Consider alternative providers or service models
- Determine future consultancy requirements
- Budget: £0 (internal review)

HSE Performance Excellence:

- Review 3-year HSE performance data
- Celebrate achievements and recognize contributions
- Identify remaining gaps or improvement areas
- Consider ISO 45001/14001 alignment or certification path
- Implement continuous improvement initiatives
- Budget: £0 (internal time)

Annual Recurring Compliance Activities:

- PAT Testing (2x)
- Fire Extinguisher Checks (2x)
- Forklift Truck (FLT) Training refresher
- FLT Instructor Training (develop in-house capability)
- Emergency First Aid Training (5 persons)
- First Aid at Work Training (2 persons)
- Electrical Safety Inspection
- WorkNest Consultancy annual review
- DSE Training
- Manual Handling refresher training
- Eye Tests
- Hearing Tests
- Budget: £7,707 (from recurring costs table)

Three-Year Strategic Review:

- Comprehensive review of 3-year plan achievements
- Assess progress against original vision
- Evaluate return on HSE investment
- Document lessons learned
- Develop next 3-year strategic plan (2029-2031)

Action Items:

- [] Complete occupational health needs assessment
- [] Conduct comprehensive HSE culture survey
- [] Analyse 3-year HSE performance trends
- [] Complete waste volume review and implement improvements
- [] Conduct WorkNest partnership review

- [] Deliver FLT instructor training (develop in-house capability)
- [] Deliver emergency first aid training
- [] Deliver first aid at work training refreshers
- [] Deliver DSE and manual handling refreshers
- [] Complete all annual recurring compliance activities
- [] Arrange eye tests and hearing tests
- [] Hold 3-year strategic review meeting
- [] Develop 2029-2031 HSE strategic plan

Year 3 Budget Summary:

Category	Item	Cost
Recurring Costs (2028)	PAT Testing, Fire Extinguisher Checks, FLT Training, FLT Instructor Training, Emergency First Aid Training, First Aid at Work Training, Electrical Safety Inspection, WorkNest Consultancy, DSE Training, Manual Handling Training, Eye Tests, Hearing Tests	£7,707
Internal Time	Occupational health assessment, culture review, waste review, WorkNest review, strategic planning	£0
	TOTAL YEAR 3	£7,557

Three-Year Budget Summary

Year	Total Budget	Key Focus
Year 1 (2026)	£24,456	Foundation building, waste water compliance, NEBOSH completion, competent person structure
Year 2 (2027)	£3,792	System embedding, driver H&S, proactive monitoring, cultural development
Year 3 (2028)	£7,557	Performance excellence, occupational health, culture review, waste optimization, strategic review
3-Year Total	£35,805	Average £11,935/year

Budget Breakdown by Category (3 Years)

Category	Total	Notes
Recurring Compliance Activities	£19,481	PAT testing, fire safety, electrical inspections, training, consultancy
Waste Water Infrastructure	£15,824	One-time capital investment (Year 1)
NEBOSH Examination	£500	One-time investment (Year 1)
Internal Time Activities	£0	Risk assessments, system development, reviews, culture initiatives
TOTAL	£35,805	

Key Success Factors

1. **Waste Water Compliance:** Successful implementation of compliant waste water management solution
2. **NEBOSH Completion:** Foundation for internal competent person capability
3. **Systematic Approach:** Move from reactive compliance to proactive management
4. **WorkNest Partnership:** Effective use of external consultancy for specialist support
5. **Training Investment:** Ensure all operatives competent for their roles, develop in-house training capability where applicable
6. **Record Keeping:** Implement robust system for retention and retrieval
7. **Cultural Development:** Embed HSE into daily operations through leadership and engagement
8. **Continuous Improvement:** Use near-miss data and leading indicators to drive improvement
9. **Environmental Optimization:** Monitor and reduce waste volumes, maintain discharge compliance
10. **Management Commitment:** Visible leadership support for HSE objectives and resources

Document Control:

- **Version:** 1.0
- **Date:** January 2026
- **Review Date:** December 2026 (or following significant changes)
- **Owner:** HSE Competent Person (post-NEBOSH completion)
- **Approved by:** [To be completed]