

HEALTH & SAFETY POLICY



SAMSON
SECURITY | FIRE | FACILITIES

Name: Zara Richards
Position: Managing Director
Date: 1st May 2024

*Requests or suggestions for amendment to this procedure
should be submitted to the owner of the process*

PROCESS OWNER: MANAGING DIRECTOR

FORWARD BY ZARA RICHARDS – MANAGING DIRECTOR

This is your Company Health and Safety Policy and it is essential you read and understand what part you have to play in the Company's health and safety arrangements. This is important not just for your own safety but also the safety of others around you at work.

This policy is not a document that should be kept on a shelf in case anyone asks to see it, but a vital part of the Samsons operating processes that should be used and constantly referred to in conjunction with the company Health and Safety Manual.

Please remember, every single one of us has duties under health and safety law, and specific objectives set by Samson in this policy.

Good leadership is essential to the success of this policy and I expect all Samson Directors and Managers to set the example for others to follow and be proactive in controlling risk.

The key to a positive health and safety culture within Samson is good communications. Those with specific responsibilities should consult widely to ensure that they have the fullest possible understanding of the risks and how to control them.

At Samson we strive to go above and beyond mere compliance with the law to achieve a positive health and safety culture genuinely adding value to the services we supply to our Customers, as well as safeguarding the health and safety of all of you, our employees, the Samson family. To that end it is important we maintain a regular dialogue with our Customers and employees on health and safety matters to ensure we keep their needs in mind.

Zara Richards
Managing Director
1st May 2024

Section 1 Statement Of Policy

1.0 General Policy Statement

Samson Security aims to set the benchmark standard for health and safety in the Security Services Sector. This is not only our moral and legal duty, but it is commercially important for the success of the Company.

Our employees are our prime resource and work in a demanding and sometimes uncertain environment. Therefore we have to protect their well-being and provide safe systems and methods of work. Our Customers rely on us to provide trained and competent staff, in some case as part of their own overall health and safety arrangements. We recognise that this places a special responsibility on Samson Security and extends our duty of care to our Customers' staff, visitors and members of the public. Thus we seek not just to comply with the Health and Safety at Work Act and other relevant legislation but also to provide a health and safety framework that is genuinely supportive of our Customers' own arrangements, as well as safeguarding the health and safety of our own employees. We also aim for continual improvement by using the channel of communications with our employees and our Customers to regularly review our performance.

To ensure we meet all of our health and safety obligations, Samson will:

- Allocate sufficient resources to meet our health and safety objectives.
- Provide adequate control of health and safety risks arising from our work activities.
- Consult with our employees and Customers on matters affecting health and safety.
- Provide and maintain safe plant and equipment.
- Ensure safe handling of substances.
- Provide information, instruction and supervision for employees.
- Ensure all employees are competent to do their tasks, and to give them adequate training.
- Prevent accidents and cases of work-related ill-health.
- Maintain safe and healthy working conditions.
- Review and revise this policy as necessary at regular intervals.

Zara Richards
Managing Director
1st May 2024

Section 2 Organisation and Responsibilities

2.1 Operating Departments

This policy refers to 'operating departments'. For the purposes of this policy, the operating departments are as follows:

Department	Department Head
Head Office Staff – Admin	Zara Richards – Managing Director
Jan Rutherford	Operational Staff - COO
Andie Fessey	Training and QA Executive

2.2 The Managing Director

Ultimate responsibility for health and safety rests with the MD. The Management Board, who have a collective responsibility as well as their individual departmental responsibilities, support him.

2.3 Competent Advice and Safety Representatives

The MD is responsible for Health and Safety. She is responsible for the direction of the Company's overall health and safety strategy and ensuring that the SMT is kept informed on health and safety matters.

The Company has the ability to seek advice from external Health and Safety Consultants, Peninsula Business Services.

Each Office must have its own competent advisor, who will be the Safety Representative for that office and must be trained to the level commensurate with its scope of operations.

Any member of staff located in a regional office may be nominated as the local safety representative in consultation with all concerned. A detail of each representative is held in each office.

2.4 Leadership and Management by Example

Leadership from the top is fundamental to our approach and this must be reflected at all levels so that directors, managers and supervisors take a clear lead by setting the example for their staff to follow. Managers at all levels will be assisted by competent staff but the duty of care for staff and anyone who may be affected by their acts or omissions rests with the Senior or General Manager for each operating department and their subordinates within the scope of their responsibilities.

The style of management is also important. Credit must be given to individuals who make a positive contribution to health and safety and, conversely, behaviour that compromises the control of risk must be dealt with quickly and firmly to ensure that it is not repeated.

2.5 Specific Responsibilities

2.5.1 Person Responsible for Health and Safety

The role is essentially to champion the cause of health and safety at a senior managerial level. The COO specifically is responsible for:

- The overall direction of health and safety policy and strategy.
- The setting of Company health and safety objectives.

- Ensuring the SMT allocates adequate resources to achieve Company health and safety objectives.
- Monitoring the Company to ensure it is achieving its health and safety objectives.
- The sourcing of competent advice.
- Advise on the preparation and review of the Company Safety Policy for Health, Safety and Welfare, including the organisation and arrangements for carrying out the policy.
- Give advice to management as requested on:
 - a. Legal requirements affecting health, safety and welfare.
 - b. Prevention of injury and damage.
 - c. Provision, selection and use of protective clothing and equipment.
 - d. New working methods, equipment or materials, which would reduce risks.
 - e. Proposed changes in legislation.
 - f. Potential hazards on new sites before work starts, and safety factors affecting the selection of plant or equipment, contractors and so on.
- Carry out site safety inspections and audits to monitor compliance of work being undertaken with the company health and safety policy.
- As requested, carry out investigations of serious accidents in accordance with Company Policy and assist with subsequent reporting as required by RIDDOR.
- Provide advice on training requirements and carry out or arrange training courses where required.
- Ensure that an assessment has been carried out of any noisy process or plant hazardous to health and that appropriate control measures, training, instruction, protective clothing etc. have been provided.
- Set a personal example when visiting site by behaving professionally and wearing all suitable protective clothing.
- If requested attend contractors site meetings to advise / review safe working procedures.

2.5.2 Directors

Essentially the role is to ensure the Company's health and safety strategy is implemented. Specifically, the SMT are responsible to the Managing Director for:

- Achieving the Company's health and safety objectives.
- The safety and health of their staff and others who may be affected by the acts and omissions of their staff.
- Ensuring that departments comply with the Company Health and Safety Policy in all aspects.
- Ensuring proper monitoring of departments including regular audits.
- The promotion of a positive health and safety culture within their sphere of influence.

2.5.3 Heads of Operating Departments

Essentially the role is to ensure the management of risk within the department. Specifically heads of operating departments are responsible to the Directors for:

- The safety and health of their staff and others who may be affected by the acts and omissions of their staff.
- Ensuring that their departments comply with the Company Health and Safety Policy and achieve Company health and safety objectives.
- The assessment and control of risk within the bounds of their responsibility.
- Ensuring proper monitoring of their department including regular audits.
- Regular consultation with Customers and staff representatives on health and safety issues.

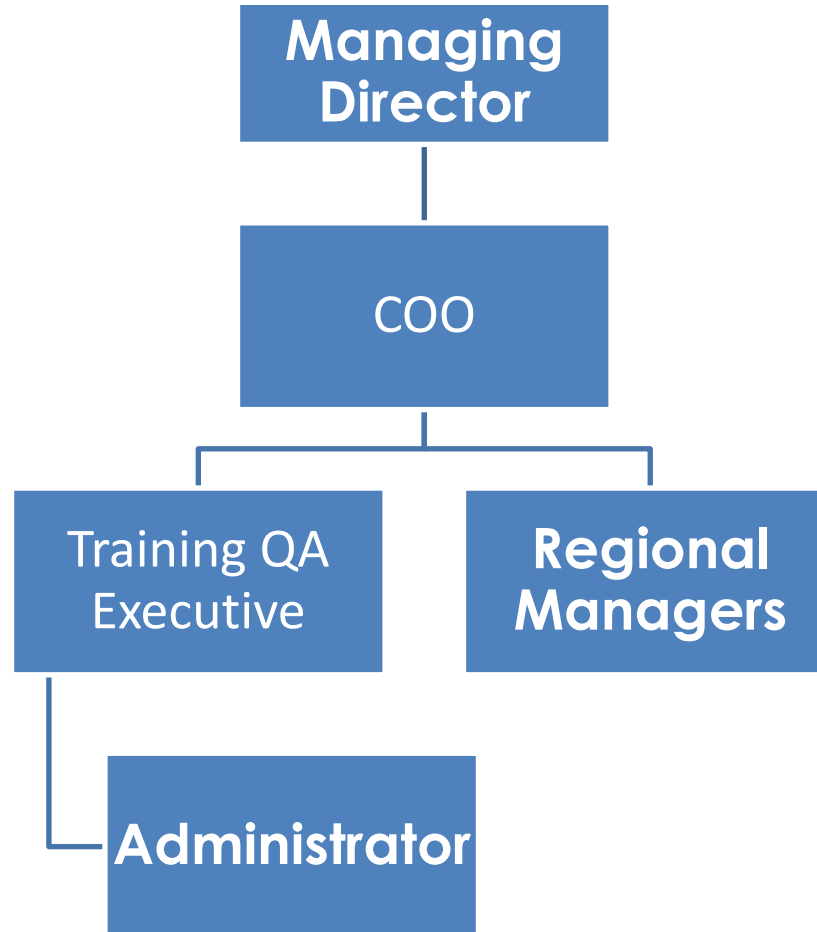
2.5.4 Staff Responsibilities

All members of staff have a responsibility to:

- Read and comply with the Company Health and Safety Policy.
- Cooperate with the Company on all health and safety matters.
- Not interfere with anything provided to safeguard their health and safety.
- Take reasonable care of their own health and safety.
- Report all safety concerns to the appropriate person such as a manager, supervisor or staff safety representative.
- Report all accidents and near misses however small.

2.6 Health & Safety Management Structure

The structure for health and safety management is illustrated below:



Section 3 Competency

Competency is a mixture of relevant experience and formal training. All staff will receive health and safety training commensurate with their duties and will have access to competent advice where they need it. The arrangements for formal health and safety training are as follows: -

Training Matrix

Position	Training
COO	NEEBOSH
Training and QA Executive	IOSH
Operational Managerial grades	Internal Training in Supervisory Health and Safety
All staff	Company Induction on Health and Safety

3.1 Training

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

Induction training for new employees (Health and safety awareness, company procedures etc)

The introduction or modification of new / existing machinery or technology

A change in employee position / work activity or responsibility.

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the company will be formally recorded with a hard copy kept on file.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

The Company has the ability to seek advice from an external Health and Safety Consultant, Peninsula Business Services when necessary.

Section 4 Communication

4.1 Consultation with Staff

The Company's prime commercial asset is its staff, and regular consultation is particularly important as they are spread widely on Customers' premises or in on and off-street parking operations. To that end, a Health and Safety Forum for each operating department, chaired by the department head, will meet quarterly.

The forum will comprise at least three representatives from uniformed staff plus one additional manager. Any issues that cannot be resolved are to be passed onto the Health and Safety Committee.

The name of the Staff Safety Representatives and their contact details will be circulated to all employees in their Operating Department so that they are able to bring issues to their attention for discussion at each meeting.

All staff are to be advised of the dates of each meeting in order to give them time to raise any issues. It should be noted that this system is not designed to circumvent normal management processes.

Day to day safety issues or defects must be brought immediately to the attention of the relevant manager or supervisor.

Published guidance can be found in "A Guide To Health And Safety (Consultation With Employees) Regulations" - L95 – HSE Books.

4.2 Consultation with Customers

The Company will consult (in person or by survey) with its Customers at least twice a year. The aim is to expose Samson Security to issues, opinions and ideas in the wider market, such as the impact of new legislation, and not to focus on specific site issues that should be dealt with by routine Customer liaison. Significant items should be reported to the Health and Safety Committee for discussion.

4.3 Co-operation

A positive health and safety culture cannot be achieved in isolation; it must be the product of co-operation at all levels. This is not just good practice; all members of staff have a legal duty to co-operate with the Company, each other, our Customers and other contractors with whom we work on health and safety issues.

4.4 Management Performance

All managers are to have specific health and safety objectives set for them by their line manager as part of the overall management process. Review of their performance is to include their contribution to a positive health and safety culture within their area of responsibility. Credit should be given where individuals have done more than simply complied with the policy and have managed to achieve positive improvements.

Section 5 Health And Safety Arrangements

5.1 Management of Risk

The Company has a clear and specific duty under the Management of Health and Safety at Work Regulations to carry out a suitable and sufficient assessment of all significant risks and to mitigate those risks to the lowest reasonably practicable level. It is also key to our overall policy to proactively manage risk.

5.2 Statement of Risk Assessment

The Company's operations give rise to particular safety risks. The majority of our staff interface with the public to one degree or another. Those in uniform are particularly likely to be exposed to a greater risk of confrontation and even violence.

Operational (uniformed) staff are assigned specific duties in respect of the site to which they are deployed. These will be set out in the Assignment Instructions relevant to their particular site and may include, but not necessarily be limited to dealing with:

- Emergencies.
- Intruders.
- Fire.
- Explosion.
- Medical emergency.

Safety risk assessments will be carried out in respect of the specific duties to be performed and the environment in which staff are working.

By way of overview the following activities indicate the health risks to which our staff may be exposed:

- Working with display screens and keyboards.
- Working shifts with a mixture of work patterns (days and nights).
- Administering first aid.
- Work related stress.

Every situation must be assessed separately and reviewed regularly. Managers should remember that in identifying hazards, staff, Customers and anyone with relevant experience should be consulted to ensure that risk assessments meet the legal standard of being 'suitable and sufficient' by identifying all significant risk.

The Management Regulations also require that risk should be mitigated with a view to achieve maximum reduction in the level of risk within the bounds of practicability.

In general terms emphasis should always be placed on eliminating or reducing risk at source. It must be remembered that personal protective equipment is a control of last resort. The hierarchy of risk controls is explained in the Health and Safety Manual.

5.3 Risk Assessment Procedure

All risk assessments are to be documented and filed.

5.4 Review

Specific risk assessments are to be reviewed as follows;

- Following an accident or incident.
- Following any changes to the process or operation.
- Following changes to applicable legislation.

- at least annually.

Guidance can be found in 'Five Steps to Risk Assessment' HSE Books, also available free from the HSE Website, HSE Direct.

5.5 Safety of Equipment

The Company will comply with the requirements of the Provision and Use of Work Equipment Regulations as follows:

5.6 Purchasing and Selection

Managers are to ensure that all equipment purchased is suitable and fit for the purpose intended. Safety and health must be a consideration when purchasing all new equipment.

5.7 Information Instruction and Training

All equipment supplied to staff must be accompanied by the manufacturer's safety instructions where appropriate and operators must be properly trained in the safe use of equipment.

5.8 Manual Handling

Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by;

- Reducing weights.
- Reducing the frequency of manual handling.
- The use of additional manpower.
- Through the provision of suitable equipment to assist in the operation.

The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

5.9 Personal Protective Equipment (PPE)

Appropriate personal protective equipment will be issued to employees as and when necessary for work activities.

Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue, and a written record detailing what PPE has been issued will be signed by the employees on receipt of the equipment and the hard copy kept on file.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements.

Any defects or malfunction of PPE must be reported to your line Manager.

5.10 Maintenance

All equipment must be properly maintained as per the manufacturer's instructions or as required following a risk assessment. Any safety defects are to be immediately reported to the appropriate manager or supervisor.

5.11 Portable Electrical Equipment

The management of portable electrical equipment shall be in accordance with the Electricity at Work Regulations. A register of portable electrical equipment owned and/or issued by the Company (including equipment issued to site) must be maintained by each office. All portable electrical equipment is to be subject to an inspection and testing regime (PAT) in accordance with the procedure in the Health and Safety Manual. Personal electrical equipment (brought from home) in use at company premises must also be inspected and tested.

Guidance can be found in 'Maintaining Portable Equipment and Transportable Equipment HSG 107 – HSE Books

5.12 Company Drivers

It is often forgotten that a company car is an item of work equipment. Staff required to drive on Company business must comply at all times with the Company Vehicle Policy.

Published guidance to the Provision and Use of Work Equipment Regulations can be found in 'Safe use of Work Equipment' L22 - HSE Books.

5.13 Display Screen Equipment

The Company has a legal requirement under the Health and Safety (Display Screen Equipment) Regulations to assess and control risk to operators. It must be remembered that this applies not just to office staff but also to uniformed operators employed on site for example in control rooms or parking offices monitoring CCTV. Details of requirements can be found in the Health and Safety Manual. Display Screen Equipment (DSE) assessments are to be carried out where required for all operators.

Published guidance can be found in 'Display Screen Equipment at Work' L26 – HSE Books.

5.14 Control of Substances Hazardous to Health

The Company will comply with the requirements of The Control of Substances Hazardous to Health Regulations (COSHH). In general, the use and handling of such substances does not fall within the day-to-day operations of a security services company. Our policy is therefore to avoid such risks by using alternative methods or substituting for a safer substance where at all possible. Where it is not possible to avoid such risks the following will apply:

- On sites where employees come into contact with such substances, this must be reflected in the site risk assessment and relevant information made available to employees including visiting supervisors and managers.
- Particular attention must be paid to the possibility of exposure to such substances in an emergency.
- Where employees are directly involved in handling such substances a COSHH assessment must be carried out by a competent person.

Published guidance can be found in 'COSHH Essentials' from HSE Books (also available free from HSE Website, HSE Direct)

5.15 First Aid

5.15.1 Company First Aiders

The provision of trained first aiders on Company premises will be determined by risk assessment as required by the First Aid at Work Regulations. Unless deemed unnecessary by a risk assessment, there shall be at least two designated first aiders at each company location and these persons must have successfully completed, as a minimum, an Appointed Persons authorised first aid course with a refresher course where relevant.

Account must be taken to provide first aid cover during holidays, for periods of absence and where night working is required. The names of the designated first aiders shall be displayed prominently on notice boards at each location.

5.15.2 First Aiders Deployed on Site

In some cases, either as a result of a Samson Security site risk assessment or as a result of the Customer's own risk assessment, a trained first aider may be specified as part of the contract. Managers must ensure that trained first aiders provide cover for absence, and that refresher courses are booked when relevant.

5.16 Emergency Procedures

It is a legal requirement for every premises to have a procedure to deal with serious and imminent danger. The procedures themselves will be specific to each premises and are included as part of the Health and Safety Manual. As a matter of policy the following will apply:

All Samson Security personnel deployed to sites must be fully conversant with the Customer's own emergency procedures and where appropriate the part that they play in executing them

All Company premises must have procedures to deal with the following:

- Fire and explosion.
- Bomb threat.
- Emergency evacuation.
- Fire alarms must be tested monthly and records kept.
- Emergency evacuation drills must be conducted every six months and records kept.
- All new employees must receive instruction in what to do in the event of an emergency on the day of their arrival either on site or in the office.
- emergency procedures must be reviewed at least annually and updated as required.

Section 6 OPERATIONS ON SITE

This is the focus of the Company's operational activities. It includes security contracts and on and off-street parking operations. Samson Security has a duty of care to its employees. This also extends to anyone who may be affected by the actions or omissions of those employees i.e. the Customer's own staff, visitors to the premises or the general public.

Most importantly of all it must be remembered that in many security and parking operations our employees are part of the Customer's own health and safety arrangements.

Our Customers also have a duty of care to our staff as they are in control of the premises on which our staff are based or may visit (ie in providing a keyholding/mobile patrol service) or have overall responsibility for a parking operation which is conducted in a public environment.

All companies have a specific duty under the Management of Health and Safety at Work Regulations to co-operate with each other on sites or undertakings where there is more than one employer.

Each contract will have its own specific arrangements, but the following will apply to all contracts:

6.1 Safety of Samson Security Personnel

A risk assessment must be carried out covering all aspects of the activities of Samson Security's employees in accordance with the risk assessment requirements outlined above. This applies not only to uniformed operatives deployed as part of the contract but also to any supervisor, manager or director who may have cause to visit as part of their duties. Safety standards on site are not to compromise the safety of Samson Security personnel. If they are not acceptable it is to be brought to the attention of the Customer and the matter resolved before staff are deployed.

6.2 Dealing with Accidents

All accidents at work must be immediately reported to the NCC, as specified in the Accident Reporting procedure, summarised below:

- If a Samson Security employee is either injured or involved in any accident it must be reported as per the accident reporting procedure contained within the Company's Business Compliance Manual (HEALTH & SAFETY).
- If a Samson Security employee is injured, the incident must be immediately reported to the Samson Head Office at The Vaults, recorded on an incident report form and the accident investigation procedure initiated.
- If Samson Security staff are not directly involved in the accident but have assisted as part of their duties e.g. administering first aid, a report of the incident is to be made to the relevant Samson Security manager by the next shift.
- The accident should also be reported in the Customers Accident Book

6.3 Welfare

The welfare of our employees is important, as it should be for any responsible employer. Staff who have adequate working conditions will perform better for our Customers. Managers are to ensure that as a minimum, conditions where staff are deployed comply with the Workplace (Health Safety and Welfare) Regulations and specific requirements in the Health and Safety Manual.

Guidance can be found in the Approved Code of Practice to the Workplace Regulations – HSE Books.

Section 7 Proactive Monitoring - Auditing

The aim of proactive monitoring is to deal with health and safety issues before accidents occur. Such activities include audits, safety inspections and safety tours. All managers are responsible for and have a duty to monitor the activities for which they are accountable.

Published guidance can be found in 'Successful Safety Management' HSG 65 – HSE Books

7.1 Annual Health & Safety Audit

An audit is a systematic and critical examination of the Company's effectiveness in managing risk and identifying both strengths and weaknesses. The following annual audits will take place:

Department	Responsible
Whole Company	Managing Director
Head Office	COO
Operations	Training and QA Executive

All staff located in regional offices will be included in the regional audit programmes. Findings and recommendations must be published within 30 days of completion of the audit and sent to the General Manager (copy to HR Manager) for action as necessary. On completion of the Company audit the findings are to be published and made available to the Management Board within 30 days.

The audit format is contained in the Business Compliance Manual.

7.2 Site Audits

From time to time our Customers will carry out their own audits that will include the activities of our staff. Extracts of the relevant findings and recommendations should be obtained by the department head and reported to the Health and Safety Committee.

7.3 Company Offices

Regular housekeeping rounds are to be carried out to ensure the safety of occupants. Particular attention is to be paid to the following:

- Fire risks, combustible materials and ignition sources.
- Electrical equipment and cable management.
- Means of escape.
- First aid firefighting equipment.
- Safety notices.
- Trip hazards, safe access and egress.
- Safety defects of any kind.
- Welfare facilities, toilets etc.

7.4 Reactive Monitoring – Dealing with Accidents

Reactive monitoring involves analysis and review of accident reports and investigations. It is an essential part of the overall process so that lessons can be learned to avoid failure being repeated. The accident reporting procedure is in the Business Compliance Manual. The overall policy is as follows:

7.5 Accident Handling

Every situation that presents itself will be different. In general the following principles will apply:

- Make the situation safe to prevent further injury or damage.
- Help treat and if necessary, rescue an injured party.
- Where possible preserve the scene to enable investigation.

7.6 Accident Reporting

The Accident Reporting procedure is set out in the Business Compliance Manual (Accident Reporting Procedure). Its main provisions are as follows:

- All accidents are to be reported.
- Where there is a reportable accident under The Reporting of Incidents Diseases and Dangerous Occurrences Regulations (RIDDOR), these are to be reported to the HSE by the Company HR Department. The Company Safety Representative and head of the operating department will also be informed by the next working shift. In cases where incidents need to be reported they follow the same procedure. Note: The police are always to be called in the event of a death.
- All accidents and incidents (including near misses) are to be reported as they occur to the local manager. A monthly report of all such accidents must be given to the head of the operating department who is to review the figures with the other managers.
- Each operating department is to include accident statistics in its quarterly report to the Health and Safety Committee.

Published guidance on RIDDOR can be found in 'RIDDOR Explained' HSE 31 – HSE Books.

7.7 Accident Investigation

All accidents, however small are to be investigated. It will be up to the responsible manager to determine the scale of the investigation relative to the severity or unrealised potential severity of the accident. The aims of accident investigation are as follows:

- Identify reasons for sub-standard performance.
- Identify underlying failures in health and safety management systems.
- Learn from events.
- Prevent re-occurrences.
- Satisfy legal reporting requirements.

Any accident involving death or serious injury as defined by RIDDOR must be immediately escalated through to the relevant management levels. The duty manager will inform the applicable member of SMT and a member of the Management Board. The HR Manager will be informed of the circumstances at the earliest opportunity as relevant to the incident, who will ensure that this is referred to the HSE within the applicable timescale. An individual will be appointed by the Management Board to investigate the accident.

Any accident where there is a potential for a civil claim against Samson Security must be immediately referred to the Managing Director who will inform the Company's insurers.

The findings of accident investigations are to be included with the quarterly report to the Health and Safety Committee, and all RIDDOR accidents are to be reported to the Board.

Published guidance can be found in Successful Safety Management HSG 65 - HSE Books.

7.8 Involvement of Outside Agencies – Health and Safety Executive, Local Authority and Police Service

The powers of enforcement authorities with regards to health and safety are extensive. It is the policy of the company that they are to be given all reasonable assistance as required under section 20 of the Health and Safety at Work Act. Whenever an outside agency becomes involved directly in an incident on site or any aspect of the Company's operations this must be reported to the Head Office. The duty controller will then escalate details through to the relevant management levels.

Once the duty manager has established the details, they will report as appropriate to the relevant Manager and a member of the Management Board.

7.9 Major Incidents

A major incident is any emergency that cannot be handled by the site operations team or the office management team alone and so requires rapid mobilisation of Company resources as a whole. For the Company offices, it involves loss of all, or a substantial part of the office facilities for more than 48 hours. Typically, it will involve serious threat to life, property, business continuity or the Company's business reputation. The Company's procedure for handling major incidents is contained in the Health and Safety Manual.

7.10 Summary Of Review Processes

The Company has a duty to review its performance and this has been built into the policy. The review processes are designed to ensure the following:

- The Company can learn from experience.
- Improve performance.
- Develop health and safety management systems and respond to change.

This is a summary of the review processes described in the policy above.

Level	Review	Responsible
Company	Annual review as part of annual audit	COO
Company	Quarterly Health and Safety Committee Meeting	COO
Operating Department	Quarterly Consultation with Customers (as appropriate)	Managing Director
Operating Department	Quarterly Consultation with Employees	Managing Director
Operating Department	Monthly Review of Accident Statistics	COO