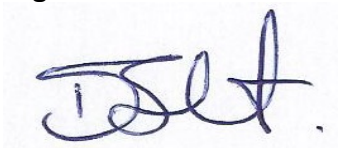


Policy Statement

It is the policy of the company:

1. To promote and encourage high standards of health, safety and welfare (HSW) at work through hazard identification, risk assessment and risk reduction as an integral part of our overall business strategy.
2. To take all reasonable measures to avoid risk to employees and to other persons including the general public who may be affected by our work by:
 - a) Providing and maintaining safe places of work, access and egress.
 - b) Providing sufficient suitable work and protective equipment to carry out the work safely.
 - c) Providing and maintaining plant and systems of work that are, so far as is reasonably practicable, safe and without risk to health.
 - d) Allocating sufficient resources (financial and otherwise) for health, safety and welfare.
3. The Managing Director, Dominic Short, has overall responsibility for the policy and to ensure safety is given proper priority. Managers & others assist through delegated responsibility in issuing instructions and setting a personal example in promoting this policy.
4. Our employees are legally bound to co-operate in executing this policy and ensuring everything reasonably practicable is done to avoid and/or reduce risks and that work is done in a manner not to cause injury to themselves or others. The co-operation of everyone is vital for the success of this policy and peoples well being.
5. That any breach of the policy or any safety requirement by anyone on sites or work areas will be regarded seriously and may attract disciplinary action or the imposition of penalties.
6. To provide information, instruction and training & supervision for work to be done safely and to know hazards & risks and the precautions/control measures to be taken.
7. To seek health and safety advice as necessary.
8. To monitor policy and workplace safety performance regularly.
9. To consult on HSW issues with employees or any other person. To consult and co-operate with others to ensure HSW is maintained to a high standard and that others activities do not prejudice the safety of our employees.
10. To comply with the Health & Safety at Work Act 1974 and all relevant legislation.

Signed:

A handwritten signature in blue ink, appearing to read 'D. Short', is written over a light blue rectangular background.

Dominic Short, Managing Director

Rules

These are general instructions for employees, contractors and others.

Compliance with these rules form part of your contract of employment and are in the interests of safety for yourselves and others.

Failure to work to these instructions may result in disciplinary action or determination of your contract/employment.

1. Safety protective equipment to include helmet, footwear (steel cap), glasses/goggles, hearing protection plugs/muffs, dust mask & high visibility jacket must be worn when required and as required in risk assessments and site rules applicable to the location at which work is being done.
2. Obey all warning signs.
3. Vehicles must be parked so as not to cause risk to others and in designated spaces when on premises/site or the highway. Drivers must obey the Highway Code.
4. Do not take risks and do not work at or gain access to a place where there is a risk of falling e.g. a platform not fully boarded or without guardrail or cross any guardrail.
5. Equipment, plant and apparatus must be properly maintained and used. Records of inspection and maintenance may be required to be produced.
6. Do not operate any plant or machinery unless you are trained so to do.
7. Any person using or under the adverse influence of alcohol or drugs will be suspended from site; especially where safety to others may be affected.
8. Fire extinguishers must not be moved or negligently discharged.
9. Welfare facilities are to be treated with respect and any damage or complaints notified immediately.
10. Waste must be disposed of/recycled in the designated manner.
11. Noise to be controlled as far as possible to minimise nuisance. Radios may not be used if a nuisance may be caused. Ear-phone devices are not to be used where could affect the hearing of alarms and/or warnings.
12. All injuries, however minor, must be reported and an entry made in the accident book.
13. Employees must participate in training where required.

Organisation

Responsibilities

All employees of the company should be aware of their legal and moral responsibilities to maintain safe and healthy workplaces and working environments; not only for themselves but also for others.

Management

Dominic Short is the Director responsible for Health, Safety & Welfare (DHSW) and has an overall responsibility for health and safety within the company. Mr Short also fulfils the role of Safety Officer.

DHSW responsibilities

- To have a policy backed by organisation and arrangements, company procedures, risk assessment and safe working procedures.
- To ensure the policy is brought to the attention of employees and others needing to know.
- To ensure liaison with clients and others affected by our works.
- To ensure that those objectives are understood and implemented by all employees and others as required.
- That policy and arrangements are regularly reviewed (at least annually) and updated when necessary.
- That risk assessment is carried out and recorded.
- That safe working procedures are implemented & maintained.
- That information is communicated to employees and others as required.
- That consultation on health, safety and welfare (HSW) matters takes place with employees and others as required.
- That adequate resources are available to meet HSW commitments.
- That only competent persons are employed.
- That the training needs of employees are regularly reviewed and courses organised as necessary.
- That employees and trainees are adequately supervised.
- That accidents and incidents are properly recorded, reported and investigated.
- That statutory inspections of equipment, when required, are carried out.
- That statutory records are maintained.
- To ensure that personal protective equipment is identified and made available.
- To ensure adequate emergency procedures are in place e.g. fire prevention and precautions.
- To ensure adequate welfare and first-aid arrangements are put in place.
- That the human rights of employees and others are protected and respected.

External Advisor

Shaun Baxter DipNEBOSH, Grad IOSH, MIIRSM
Rawlings Safety and Training Consultancy Services Ltd
T 01514808968 M 07827849743 E shaun@rawlingsrcs.co.uk W www.rawlingsrcs.co.uk

Safety Officer – D J Short

The Safety Officer will have access to an external adviser who will assist with these responsibilities.

The responsibilities include ensuring:

- Promotion of safety practices to employees, clients and others affected by our operations.
- Preparation and issue of the HSW policy.
- Preparation and implementation of the arrangements and procedures to the policy.
- That all employees and others are aware of the HSW arrangements including risk assessments and safe working procedures and awareness of statutory responsibilities.
- That health, safety & environment training requirements are assessed.
- That monitoring HSW arrangements and compliance with statutory requirements and relevant codes of practice and guidance takes place.
- That accidents and incidents and cases of industrial disease are properly reported and investigated; and reported as required by RIDDOR.
- The acceptance/approval of risk assessments and safe working procedures.
- Liaison and consultation with employees, self-employed, contractors and others.

Manager responsibilities – Dominic Short

- To understand the company policy and procedures on health, safety and welfare (HSW).
- To carry out their duties according to the policy and procedures.
- To co-operate in ensuring and maintaining a safe workplace and environment for each project.
- To ensure employees and trainees are adequately supervised.
- To carry out risk assessments (with assistance and approval from others).
- To ensure that PPE is issued to employees and used correctly.
- Accidents and incidents are properly recorded, reported and investigated.
- To ensure adequate first-aid arrangements and welfare facilities are maintained.
- To ensure that employees know about actions to be taken in an emergency situation.
- That HSW information is communicated to employees and others.
- That consultation with employees and others takes place.

Employee responsibilities

- To understand the company policy and procedures on health, safety and welfare (HSW).
- To carry out their duties according to the policy and procedures and as given in instruction and training.
- To co-operate in ensuring and maintaining a safe workplace and environment for each and every job.
- To properly use, maintain and store Personal Protective Equipment (PPE). Misuse of PPE will be regarded as misconduct and disciplinary action may be taken against offenders.
- To maintain in good and serviceable condition PPE and other equipment and tools and to report defects.
- To work in a safe manner at all times and not to take risks.
- To report any unsafe conditions or substandard practices affecting the safety of themselves or others.
- To report any shortcoming in the HSW management system.
- To report any accident (however minor), incident or near miss.
- Not to use equipment for purposes for which it was not intended.
- Not to use equipment, tools, vehicles, machines, for which they have not been trained or authorised by the company.
- Not to engage in horseplay.
- Not to be at work under the influence of alcohol, drugs or other substances, that could adversely affect safety.
- To report the taking of any prescribed medication which they have been notified could affect their performance or safety in carrying out their duties e.g. could cause drowsiness and not to operate machinery.
- Those employees designated as drivers to abide by the requirements set out in the use of vehicles risk assessment as well as the Road Traffic Act and highways legislation and the Highway Code. The use of a mobile phone (unless hands free & no hazard is created) in a 'moving' vehicle is prohibited.

Employee Consultation

The Health and Safety (Consultation with Employees) Regulations requires an employer to consult with employees on health and safety matters. The method of consultation with employees, under the regulations, is by direct consultation.

The Manager is appointed as the Representative of Employee Safety (ROES). Employees will:

- Receive updated information on HS&W.
- Refer concerns on HS&W to the DHSW.
- Be free to talk to visiting safety officers and/or enforcement officers.

Employees are encouraged to talk with the DHSW regarding any HS&W concerns e.g. an "open door" policy.

Elements of safety briefings and team briefings are regarded as consultation meetings. Minutes may not necessarily be taken. Appropriate notes must be made on the briefing record by the presenter and reported back to management.

Employees, Contractors & Recruitment

There are occasions when others are employed or used e.g. self-employed or specialist contractors.

These persons must:

- Declare any disabilities or any adverse health condition that may affect safety, e.g. occupational asthma or dermatitis, vertigo from work at height, claustrophobia that may affect safety in restricted or confined spaces, previous back condition that may be affected by manual handling.
- Declare any previous adverse exposure e.g. hazardous substances, noise or asbestos.
- Read the safety policy and agree to be bound by it (and where appropriate receive a copy and sign a receipt for it or sign that they understand the requirements).
- Give details of any H & S certificates or registrations they may hold.
- Have received a HSW induction on the policy and working procedures of the company.
- Agree to participate in skills and safety training as required for their well being, others and the business.
- Participate in any health surveillance as set out in the Management Regulations.

No declaration under this section is meant to affect the human rights of any person under that legislation or affect employment under disability legislation (unless employment will lead to the person or others being put at unacceptable risk).

Internal employees

The DHSW and Manager will carry out the recruitment of employees.

The education, experience, training and other qualities of candidates will be considered against the criteria required to perform the tasks required by the job profile and the safety considerations required by the job.

Safety considerations are important in employee selection where employees are likely to be required to work in hazardous conditions and high risk areas.

Contractors and the self-employed

The DHSW will carry out the selection of contractors. The DHSW makes the final decision for appointment.

A contractor safety assessment and/or interview and/or other appropriate method of selection may be used. The methods will depend on the scope and extent and the technical requirements of the works to be contracted.

The experience, qualifications, training, resources, references, reputation, safety record will be considered. For the purposes of HSW the responsibility for employees actions apply to sub-contractors and the self-employed and specialists that they employ.

Disabled Persons

It is company policy not to disadvantage any person from work within the business providing that for health and safety reasons (either physiological or psychological) it would not be appropriate because of the danger to themselves, work colleagues or others.

Reasonable arrangements/modifications, where practicable, will be carried out to allow a disabled person the opportunity of work; and to the extent of modification required by legislation to accommodate disabled employees.

Employment will be considered on a case by case basis taking into consideration disability and the type and environments of the work required to be carried out. A major consideration will be the ability to work safely both to themselves and others.

There is no intention to infringe the Human Rights of any person disabled or otherwise.

General Conduct and Disciplinary Procedures

We expect all employees and others employed to comply with the safety policy and company rules, and arrangements & procedures including risk assessments and method statement.

The company expects all persons representing the company to behave in a reasonable and proper manner at all times.

Disciplinary Procedure

There is an overall company disciplinary policy - this procedure relates to safety.

The elements relating to safety are that all employees must:

- Comply with the company policies and act in accordance with safety information, instruction and training.
- Report any circumstances where serious injury may occur or there are shortcomings in the working of the safety systems.
- Not misuse or interfere with anything provided in the interests of health, safety or welfare.

The disciplinary procedure will follow the general guidelines of ACAS.

Firstly: Verbal warnings given by a Manager or manager.

Secondly: Verbal warning confirmed in writing by a manager.

Thirdly: Written warning as a final warning i.e. that a further incident could lead to dismissal, by a director.

Fourthly: Written dismissal notice by the managing director.

At each stage the employee will be advised that they have the right to an appeal and appeal interview and that they may bring a supporter/representative with them.

Gross Misconduct

Some elements of safety are regarded as gross misconduct and are outlined in various policy arrangements e.g. interfering with fire extinguishers.

Where the performance/action of the employee is deemed to be gross misconduct they will be informed in writing in addition to any other warning and suspended from duty (with pay) pending an enquiry. The person will be interviewed by directors and they will be entitled to a supporter/representation as above.

The circumstances of the case will determine the eventual outcome which could be dismissal after the interview.

Drugs & Alcohol

No person will be permitted to be at work if believed to be incapable of working safely or maintaining safety from the influence of drugs & alcohol.

Employees taking prescription drugs or proprietary medication (e.g. cough and flu remedies) should notify the company of any side effects notified to them by the doctor or dispensing chemist. Where described as "may cause drowsiness" do not drive or operate machinery.

Where any person is identified as incapable as above the person will be immediately removed from the work area and suspended from work until an enquiry is held by the company and it may be treated as gross misconduct, which could lead to disciplinary action and possible dismissal. For a contractor this could mean termination of their contract.

Note: Where a person remains at the workplace consideration will be given to their safety e.g. put in a place of safety & accompanied until assessed as capable of remaining safe for themselves or others.

Where a person is asked to leave site due consideration will be given to their safety e.g. transport home arranged.

Our employees will comply with the requirements of client/premises/site on which they may be working. Requirements communicated at specific induction(s).

Smoking Policy

The Health Act (UK law) prohibits smoking of any substance in any enclosed premises, fixed or temporary – includes marquees.

Smoking is also prohibited in any area where there may be risk of fire or explosion e.g. areas signed as "No Smoking – Highly Flammable Liquids" (gas cylinder storage, paint stores).

Smoking will be allowed in designated smoking areas external to our building. This policy will be brought to the attention of all employees and visitors (as appropriate).

The normal disciplinary procedure will be applied to any employees not complying with this policy.

No smoking signs will be affixed at the entrances to enclosed workplaces as required by the UK Health Act and Regulations.

Arrangements

Accidents/Incidents and Reportable Occurrences - RIDDOR

Unsafe situations

Any situation leading to an accident or a potential accident is immediately made safe, as far as possible, to enable work to continue. The senior person present is the responsible person to ensure that unsafe situations are effectively managed.

Where a situation cannot be made safe for work to continue, work will be suspended and the area demarcated as hazardous until it can be made safe.

The Manager will immediately notify the DHSW of the event and make a preliminary investigation.

Personal injury

Any accident, near miss, injury (no matter how small) or damage caused to or by any employee or others must be reported at once to the Manager.

All accidents and injuries shall be entered onto a company accident/Incident report pro-forma. This report must be given immediately to the DHSW who will organise an investigation.

The company accident book is available for employees to have entries made as requested.

If possible the name and address of any witness should be obtained and recorded on the accident/incident report.

When on site/premises () the person in charge (occupier/main contractor) must be informed and a record made in their accident book as appropriate.

Occupational disease

When the company is notified of a case of industrial disease (substantiated by a medical certificate or report) by an employee or their representative, it will be recorded and investigated and be referred to the company's insurers.

Statutory reporting

Only fatalities and major incidents may be reported directly to the HSE (by telephone/see below) - all others to be reported via the internet (HSE website) using www.hse.gov.uk/riddor/report

Where required under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR) a report is required to be made to the enforcing authority. This will be done by the DHSW or his appointed external adviser.

Major injury or death

In the event of a fatal or major injury, as defined in RIDDOR, the DHSW will immediately inform the relevant enforcing authority (Local Authority for works in occupied premises) by calling via the National reporting system Tel: 0845 300 99 23 Fax: 0845 300 99 24 weekdays 8.30am to 5.00pm only.

Out of hours call the duty officer can be contacted on 0151 922 9235.

7 day time off injury – (changed from former 3 day)

Where time off from normal work (i.e. unable to carry out their normal duties/job) because of an accident exceeds the seventh day (including normal days off) the DHSW will make a report in the prescribed form (Form F2508) within fifteen days (of the date of the accident) via www.hse.gov.uk/riddor/report

Accident & incident investigation

All accidents & incidents will be investigated. The result of investigations and the actions taken or to be taken to prevent recurrence will be recorded on the pro-forma.

The investigation will determine and record the causes of the accident and any remedial actions to prevent recurrence and the record signed and dated to that effect.

Any RIDDOR reportable event, accident, dangerous occurrence or occupational disease will be fully investigated by the DHSW or his appointed external adviser and records of the investigation maintained.

The DHSW will ensure that investigations are carried out by an appropriate person (depending on the seriousness of the event).

A nominated responsible person will be appointed by the DHSW to develop and implement an appropriate action plan to prevent recurrence.

Enforcement notices investigation

Any enforcement notices or other action issued against us by an enforcing authority will be investigated by a specially convened panel under the auspices of the DHSW.

As required the DHSW will formulate and implement an action plan to fully address and ensure compliance with notice requirements.

Statistical analysis

Historically it has not been practical to analyse accidents statistically.

Note: sub-contractors and self employed usually used on priced works, therefore, numbers of employees used and total hours worked not tracked.

Should analysis be done in the future the analysis will take the form as presented in the HSE publication "Successful Health and Safety Management" HSG65.

Calculation of injury incidence rate:

Number of reportable injuries in scope year X 100000
Average number of employees during scope year

Calculation of injury frequency rate:

Number of injuries in the scope year X 1000000
Total hours worked during the scope year

Data protection

The Data Protection Act requires that personal information should not be able to be viewed by persons making entries.

Completed company report forms and/or the tear out page from the HSE pro-forma accident book (if used) are to be given, immediately, to the DHSW for safekeeping.

The DHSW is responsible for data protection in these matters.

Asbestos

The law prohibits the use or installation of asbestos or asbestos containing products into a building/premise or product.

The company **does not** carry out Asbestos work where a license is required i.e. control limit may be exceeded.

Disclosure of the presence of asbestos containing materials (ACM)

Where asbestos (ACM) is known it is expected that a 'notification' will be issued by us confirming the location, type, quantity and condition as required by the Regulations and approved code of practice (ACOP).

Where it has been recently removed and the area made safe a "clearance certificate" must have been issued confirming decontamination (after the appropriate clearance test has been passed) i.e. clear for reoccupation.

The client, premises operator, main contractor or the site safety plan has a duty to make us aware of the presence of known ACM.

This is a requirement of case law under the CDM Regulations and a statutory requirement under the Control of Asbestos at Work Regulations 2012.

Where ACM is known it is expected that a 'notification' will be issued confirming the location, type, quantity and condition, as required by the Regulations and Approved Codes of Practice.

Where it has been recently removed and the area made safe a "clearance certificate" must be issued confirming decontamination (after the appropriate clearance test has been passed) i.e. clear for reoccupation.

An assessment, as required by the Regulations, will be made to ascertain whether any planned works, in a known ACM area, will exceed any action or control limit. In such cases a contractor licensed to do that class of work is required to carry out the work.

Auditing & Inspection

The company will carry out regular inspections of the work place. A report should be completed by the Manager ensure that the premises are safe for employees.

Example of report content:

- Safe segregation of materials.
- Safe access and egress.
- Site tidiness.
- Availability of safety aids and equipment.
- Erection of safety signs and notices.
- Tools.
- Health hazards.
- PPE.

Records will be kept. These show that procedural checks and safety inspections are carried out and that safety requirements and needs are being met.

Control of Substances Hazardous to Health (COSHH)

A COSHH risk assessment is made where a substance may give rise to injury, disease or illness. The DHSW is responsible for them and ensuring they are kept up to date.

Hazardous substances are not to be used without a COSHH assessment having been carried out. Where a new substance is introduced the relevant COSHH assessment will be made and the relevant training carried out.

Included as part of COSHH assessment are those relating to exposure to biological hazards e.g. Weil's disease, which may be encountered in the building.

Assessments will be used in the on-going training of employees who will be expected to become familiar with them.

Substances are grouped into assessments that require similar controls and precautions allowing for simplicity in understanding the requirements and in the issue and use of Personal Protective Equipment.

Electrical

Portable electrical equipment is defined as electrical equipment not hard wired, but excluding equipment that is not easily moveable (as set out in HSE guidance).

230v may be used e.g. in offices where appropriate, RCD protection device must be used at the socket outlet.

The user must inspect electrical equipment each time it is used e.g. visual check.

- Inspected/tested annually by a competent 'person' (Electricity at Work Regulations).
- Visually inspected quarterly by the responsible Manager or competent person.
- Class 1 equipment (with an earth wire) is PAT 'tested' 6 monthly or as assessed.
- Records of formal inspection is maintained (on the company pro-forma, or as supplied by the tester).

Environment

- a) **Air Pollution:** Not generally applicable to our activities, in our building and type of operations there may be localised dust created.
- b) **Waste Pollution:** No activity will result in pollution where the proper disposal routes are observed.
Only licensed waste disposal companies/local authority will be used to remove waste.
- c) **Noise Pollution:** Our works will not cause unacceptable noise pollution to others outside our building to any great extent.

The overall environmental impact of works we are involved with could therefore be classified as low.

Equipment

Procedures & risk assessment

There are specific and general hazards and risk associated with tools and equipment.

The use of tools, equipment is dealt with in specific risk assessments and safe working procedures where there is more than a significant risk.

Where equipment is hired it must be ascertained that it is suitable and sufficient for the work i.e. the right equipment is being hired and that it is fit for use (e.g. tested and inspected).

It must also be confirmed that any operator supplied with equipment is competent.

No employee under the age of 18 years may use plant or equipment without being trained and passed as competent and be under supervision.

Hazards

Specific sections of the policy should be referred to in order to identify the hazards applicable to any particular plant item used in an activity.

Hazards associated with the use of tools, equipment and plant arise out of:

- Unskilled operation & incorrect use.
- Poor installation & maintenance.
- Defects unchecked.
- Noise & vibration.

Each employee must check plant and equipment daily and report any defects to their Manager. Defective equipment shall be removed from service until repaired by a competent person or replaced.

Eye protection must be used when using power tools safety glasses/goggles to minimum BS EN 166 – medium impact resistant.

Planning

Ensure that equipment available is in good order and has been fitted with all necessary safety devices, guards and noise control measures and that any necessary testing and thorough examination is carried out at the prescribed intervals.

Where we supply equipment to site ensure copies of necessary test and thorough examination certificates and instructions for the safe use of the equipment where applicable are available with it on site.

Determine whether any preparatory work is required for the use of equipment on site and ensure that requirements are planned.

Training

To ensure that operators are trained and experienced to competently operate the equipment and to carry out any appropriate inspections and routine maintenance.

Training will be provided to all operators and, where relevant, only holders of an approved Certificate (e.g. IPAF, CTA, FCEC or CITB) will operate plant. Where appropriate the operator should possess an operator's certificate.

Abrasive wheels

Only trained and authorised staff is allowed to change Abrasive Wheels.

Operators of abrasive wheels must wear protective equipment at all times during use, especially impact resistant goggles of BS EN 166 – Grade medium for impact resistance.

Explosive impact tools

Only trained and authorised staffs are allowed to operate this equipment.

Operators must use the required Personal Protective Equipment (PPE) e.g. Impact resistant goggles of at least BS EN 166 – Grade high for impact resistance

Electrical

The main controlling regulations are the Electricity at Work Regulations (EAW) & the Provision and Use of Work Equipment Regulations (PUWER).

Within the European Union safety requirements are made through European Directives on Health and Safety at Work and our procedures meet the UK requirements of the directives.

The company will provide suitable equipment meeting the standards required by the regulations.

Where hired equipment is used the required certification must be issued at the time of hiring, otherwise the equipment will not be accepted for use.

Equipment will be maintained fit for use and regularly inspected. See section Electrical page 14.

Fire

It is essential for all employees and others to be vigilant with regard to the prevention of, and precautions relating to fire. The DHSW takes responsibility for fire issues.

The RRO – Fire Safety Order sets out the requirements to deal with fire and for fire risk assessment.

Assessment of fire risk

The following is useful in determining the extent and significance of the risk from fire:

- The general environment.
- Whether flammables are in proximity to the work and can they be moved.
- Other persons in the area who may be affected.
- The availability of fire fighting equipment.
- The proximity of fire alarms or means of raising an alarm or calling assistance.

Precautions

Precautions such as the following must be taken. This should not be considered as a definitive list (circumstances and conditions being variable):

- General environment condition (wind, type of building, escape routes).
- Move flammables away, if this cannot be done ensure they are covered with flame retardant sheeting.
- Ensure fire fighting equipment is available.
- Know the position of fire alarms and telephones.
- Maintain awareness in restricted and confined spaces, fire can spread very quickly, do not get cut off from your escape route.
- Where others are creating a fire hazard employees may retire until safe conditions restored.

General procedures

Employees coming across a fire must immediately raise an alarm and call assistance (this is the priority) using our procedures as appropriate.

An employee may attempt to fight a fire; they must not put themselves in any danger, but should preferably withdraw and let other trained persons tackle it.

An employee may take emergency action as required to save life or to avoid serious personal injury to any party and/or to protect our assets.

First-aid

In our operations there is the possibility of serious personal injury.

Responsibility is to ensure that all first aid kits are kept stocked and contain the relevant leaflets. On site/vehicles () the person in control becomes the “site” appointed person.

The appointed person should ensure that trained assistance is called, as required, and to liaise with the emergency services.

Guidance is that appointed persons should be emergency first aid trained.

First aid kits

First-aid kit will be kept at the head office and in company vehicles and/or at the point of work.

It is the responsibility of the appointed person/first aider to ensure they are maintained. Employees must inform the appointed person of any use of the kit and when replenishment of items is required.

A list of emergency contact numbers should be kept with the first-aid kit. Where there is no running water eye-wash bottles must be with/adjacent to the kit.

Treatment

Where there is any doubt about the condition or treatment to be given medical assistance is called using the public emergency services by dialling 999 on any telephone (but see below for 'sites').

Emergency telephone 999 & 112 on mobiles

Employees are expected to make themselves familiar with site emergency procedures and use them when required, i.e. where the first-aid box is located and how to contact a first-aider and how to contact the emergency services (some sites have specific arrangements through their security employees/reception).

Employees are expected to make use of the facilities provided. Employees must not feel constrained in calling assistance from the emergency services if in their opinion any delay could result in a serious or life threatening condition.

Site authorities must be told immediately of any such action (by appointed person) so that reception arrangement can be made for ambulance.

Manual Handling

The activities for manual handling in our business are general and non-specific. Manual handling assessment is included in the general works activities and on site risk assessment.

Where a more specific activity is identified then a stand-alone assessment is made.

The Manual Handling Operations Regulations control the moving of loads by persons at work and requires:

1. **Avoidance** - The Company aims to avoid manual handling tasks wherever possible.
2. **Risk assessment** - where unavoidable and there is the likelihood of risk of injury. See risk assessments for manual handling. Under the Regulations Guidance (parameters given) and/or where a task is not complex and is easily explained the assessment need not be written down.
3. **Provision of mechanical aids** - wherever possible mechanical aids will be employed to minimise the risk of injury to employees. On sites and where there are unmade paths/roads it may not be possible or practical to use wheeled mechanical aids. Where site equipment is available it will be used e.g. fork lift truck/tele-handler, hoist, conveyor, chain block & pulley systems.
4. **Minimisation of the risk** of injury as far as reasonably practicable.
5. **Assessment of individuals** – see below.

The requirement of the regulation is to avoid manual handling wherever possible and make an assessment of the manual-handling task through a hierarchy of provisions to minimise the risk of injury.

The last level in a hierarchy for manual handling is training. All employees will receive suitable training as required.

Employees should follow a simple procedure (or refer to Kinetic Manual Handling training information available) to minimise strain in lifting and moving items:

- Do not lift or move items beyond your personal capability.
- Think about the task to be done - can it be avoided or done more easily?
- Keep a straight back.
- Ensure firm grip.
- Vision not obstructed.
- Avoid twisting, bending and stretching and move in straight lines.
- Use mechanical aids whenever possible.
- Use team lifting.
- Use PPE (gloves) when handling rough items.

Noise

Thorough noise assessments are to be carried out on a regular basis.

Assessment has shown that for the type of tools used and length of time of use it has been assessed that some employees would be exposed to over the Personal Daily Exposure Limit; 87dBA(Lepd)8hrTWA.

Employees are instructed to wear hearing protection (ear-muffs or ear plugs – normal commercial standard) at all times when using equipment emitting loud noise i.e. not able to hear a person talking normally at 1m from the ear (above the Upper Action Value of 85dBA8hrTWA).

Personal Protective Equipment (PPE)

PPE as appropriate will be supplied to employees and casual visitors as required to comply with statutory requirements and where the Manager feels it is necessary and where risk assessment deems it to be required.

PPE will be worn as the site/premises rules require.

All employees issued with PPE will inspect it before every use, wear and/or use it properly and keep it clean and in serviceable condition. Misuse will be regarded as misconduct and may result in disciplinary action.

Fit, comfort, choice and co-ordinated use

Employees will be consulted as to the wear-ability for them of the PPE, as required by the regulations. Consideration will be taken of; personal preference (reasonable choice), fit and comfort, co-ordination with other PPE required to be worn/used.

Maintenance and storage of PPE

Employees must inspect PPE before each use. Where found unserviceable it will be replaced before work is continued.

For non disposable PPE defects must be reported to the Manager.

PPE is required to be inspected by Manager at intervals of not more than 1 month and this is a part of the normal workplace inspection routine.

Issue

PPE is issued to individuals. Recognised disposable PPE will be recorded at the first issue only e.g. ear plugs and nuisance dust masks.

This is to prevent sharing and cross-contamination. It also reinforces the duty of the individual to look after and maintain PPE and to store it correctly. These issues are dealt with within employees training.

Risk Assessment

Under the Health & Safety at Work Act an employer must assess the risks their activities present to employees and others.

The significant findings (including controls and precautions) and any groups especially at risk must be recorded. Assessments must be kept up to date and be readily available.

These assessments are made to satisfy the requirements of legislation and may not prevent liability at Common Law; but the basis of acting within a duty of care to others is a common precept of both systems of law.

Risk assessment is carried out for all activities and where the risk outcome is regarded as significant a written record is made and kept available for reference.

An overall assessment of activities is done to identify those activities that have "significant risk" and have to be recorded in writing.

Only those risks identified as being significant or worthy of note have been recorded in writing to comply with the Management of H & S at Work Regulations (MHSWR).

Risk assessments are reviewed to confirm existing and/or assist in up-dating as required.

The generality of employing young persons has also been considered in our risk assessments and they have been considered to be suitable and sufficient for tasks involving young people.

For the employment of a particular young person a check review of existing assessments will be made.

Persons under 18 years are considered to be trainees and will be under competent supervision.

Generic

Generic risk assessments where appropriate are used/made. They are reviewed and confirmed or changed for specific site/job conditions.

The management regulations allow for generic assessments where the work is similar e.g. operating and working on machinery.

Where the generic assessment is suitable for particular a site/job conditions, no further action need be taken.

Where conditions are such that there is a significant risk to be dealt with then an addition to the risk assessment, specific for the site/job, is added or amended.

Methodology

The objective of risk assessment is to achieve a "picture" of the consequences or outcomes in any given situation and is based on:

1. The likelihood or frequency of an event occurring.
2. The severity of the outcome.

Controls can then be identified and measures prioritised and actions taken to meet relevant statutory provisions i.e. minimise the risk by working through a hierarchy of control measures and precautions.

It can be relevant to use simple numerical systems to produce risk ratings or indices which can help greatly in the consideration of factors making up the whole, or elements of, an assessment.

Procedure

Identify the hazards defined as “the potential to cause harm”.

List those which could reasonably be expected to result in significant harm such as:

Slips, trips, falls (poor flooring)	Fire (from flammable materials)
Chemicals (solvents)	Moving parts of machinery
Projectiles (chipping)	
Electricity	Dust
Fumes	Manual handling
Noise	Poor lighting
Low temperature	Vehicles/Plant (fork-trucks, cranes)

Identify who may be harmed

Office employees	Machine Operators
Maintenance personnel	Cleaners
Contractors	Members of the public
Employees with disabilities	Inexperienced employees
Visitors	Lone worker

Identify other applicable legislation and regulations

Such as COSHH, Noise, Asbestos, Manual Handling for example. These do not have to be repeated but should be incorporated into the overall assessment or suitable reference made to where the information can be found.

- Refer to or incorporate other authoritative methods/systems of work materially affecting the assessment into the assessment such as safety rules, permit to work systems, codes of practice, management instructions and code of practice, work instructions, safety cases. Do we meet the standards? Do our practices represent best practice?
- Determine the likelihood of the harm being realised such as:
Who might be affected (machine operator, repair person). How many & how often.
- Severity of the consequences to them such as:
The categories of injury, industrial disease or dangerous occurrences set out in the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR) can be used as a guide.
- Use a comparative method to assess the overall risk - this can vary from:
Intuitive (assessed by experience).
Simple numerical classification.
Quantitative.
- Identify control measures and/or precautions to reduce or eliminate the risk such as.
New methods of work.
Last resort suitable PPE.

Recording

The significant findings of assessments will be recorded. These may be as stand alone assessments or integrated into procedures, as required.

Implementation

The results of assessments will be implemented.
The findings and results of assessments will be communicated to all as required.

Monitoring

After control measures and/or precautions have been taken the assessment will be monitored in practice to ensure it is suitable and sufficient. Where adjustments are required these would be done and the assessment monitored again.

Review

Assessments will be reviewed annually or when required (change of legislation, ACOP, Guidance).

If required they will be re-done to ensure that the risk(s) have been reduced and that no new hazards have been introduced.

Where appropriate due cognizance will be taken of judgements given in court cases (criminal and common).

Safe Working Procedures

These are developed to give guidance on the set up and execution of site work. They may take the form of specially developed statements for specific complex work or standard generic procedure/work instruction for routine works.

Within the company these are kept to a minimum and that employees are competent and trained in the classes of works that they will be required to undertake.

Relevant risk assessments, required for the activity, may be brought together with generic and specific assessments to form a cohesive working safety document.

Generic risk assessments and safe working procedures are reviewed for each job and where required amended to be made site/job specific.

The DHSW/Manager is responsible for ensuring that this procedure is complied with; normally at pre-contract and pre-work stages. The DHSW and Manager all participate in developing safe working procedures. The External Adviser may assist in this process.

Stand alone and specific

The company has developed stand alone risk assessments and safe working procedures.

Risk assessments are available for specific higher risk or specific activities.

Incorporated into procedural documents

The company also has risk assessment and safe procedures incorporated into procedural safety documents (in policy arrangements section, appendices).

Some of these are formally attached to the safety policy as appendices and these must be considered as an integral part of the company's safe systems of work.

Risk Rating Matrix

Likelihood

Index	Description
5	Almost certain
4	More than even chance
3	Even chance
2	Less than even chance
1	Almost impossible

Severity

Index	Description
5	Permanent total incapacity. Death.
4	Permanent partial incapacity / disabled
3	RIDDOR reportable. Absent from work more than 7 days but with subsequent complete recovery.
2	Absent less than 7 days with complete recovery.
1	Minor injury with no time lost and complete recovery.

Likelihood						
		5	4	3	2	1
S e v e r i t y	5	High	High	High	High	Med
	4	High	High	Med	Med	Low
	3	High	Med	Med	Low	Low
	2	High	Med	Low	Low	Low
	1	Med	Low	Low	Low	Low

High Needs to be addressed quickly and the risk factor reduced.

Medium Needs to be given attention and risk factor reduced where possible.

Low Can be regarded as acceptable.

Note: Some interpretation of the matrix needs to be done as blind use can give misleading information. The matrix can be regarded as a useful management tool in achieving a measurable risk assessment "as far as reasonably practicable".

Safety Performance

To comply with requirements to monitor and review safety performance in the company the following arrangements are made;

Management review

A review of the company safety policy and arrangements and safety management system will be carried out annually and as required e.g. should legislation or an Approved Code of Practice (ACOP) or HSE guidance change significantly.

This may be carried out in consultation with the external adviser.

Any shortfall in the system or changes identified e.g. changes in law of HSE guidance will be made and the changes briefed to employees.

It is anticipated that at the same time as the above an audit of the safety systems and arrangements will also be carried out.

Audit

An annual audit of the safety management system and policy and arrangements will be carried out. The DHSW, assisted by the safety adviser, will do this.

A comparison will be drawn on current compliance and performance. The targets and objectives for the future will then be established.

Training

The Management of Health and Safety at Work Regulations require an employer to ensure that an employee is competent through experience or training to carry out the duties assigned, without danger to themselves or others.

Our employees will receive training in the skills required to carry out their duties for the company. Records of training will be kept including the company safety induction.

Employees must not attempt to carry out any activity for which they have not been trained or authorised to carry out by the company; unless under training and close supervision. This includes training in the results of risk assessments including those for hazardous substances under (COSHH).

Refresher training should be carried out as required and at intervals not less than those recommended by certification bodies as appropriate or as assessed by the company.

Note: All employees under 18 years of age will be regarded as 'trainees'. Young persons under training will be closely supervised and be under close personal supervision if training on high hazard tasks e.g. machinery with dangerous parts.

Induction

The Induction syllabus includes safety issues such as:

- Company policy, organisation and arrangements including consultation.
- Site instruction and rules.
- Risk and COSHH assessments and safe working procedures.
- Emergency procedures e.g. first aid and fire.
- Reporting of accidents and incidents.

- Use of tools and equipment and electricity.
- Use and care of Personal Protective Equipment (PPE).

Team briefing

The company briefs employees at regular team briefings and/or Safety Briefings. Safety issues are always an agenda item and this forms part of the consultation process.

All employees are given a team briefing/ induction before commencing work.

Vehicles

Only licensed and/or certificated employees authorised by the DHSW (or nominated officer of the company) may drive company vehicles or plant.

The nominated driver will carry out a user safety check of the vehicle/plant at the start of each working day and before driving off. The driver will report any defects. The driver will not drive a defective/un-roadworthy vehicle.

Vehicles will be regularly maintained and serviced and kept roadworthy. Maintenance of vehicles will be carried out, according to the requirements of the road traffic legislation and PUWER and the results recorded (e.g. servicing and MOT records maintained).

Drivers must comply with the requirements of the Highway Code (and any laws of a host country) and of the premises rules when on a site/premises. This is especially relevant when on sensitive premises e.g. hotels, multi occupied exhibition halls where extra care must be exercised.

Employees using own vehicles on the business of the company

Employees using their own vehicles on the business of the company:

- Must be authorised by a responsible Director and must have a valid licence to drive the class of vehicle concerned.
- Must ensure that the vehicle is roadworthy.
- Must ensure that they have insurance to cover business use.
- Must ensure that a daily check/inspection of the vehicle before driving off.
- Must be aware of the requirements of the vehicles risk assessment.

Rescue services

Drivers should use the facilities of a convenient rescue service in the event of an accident or breakdown.

Emergencies

The driver or others must ensure the safety of people as their first priority. Response to emergencies is set out in the vehicles risk assessment.

Mobile Phones

The use of hand held mobile phones is prohibited by a driver whilst the vehicle is not parked. The use of a hands free phone installation is allowed provided that this does not give rise to any hazard.

Vibration

The operation of tools can transmit vibrations to the hands and upper limbs of the holder. In the work that our contractors carry out there is some use of power tools.

They can be managed administratively e.g. job rotation, so that the action value (EAV) is not exceeded and detailed health surveillance/monitoring is not required, or the Limit Value (ELV) is not exceeded.

The use by our employees is transient and the risk is assessed as low. Health surveillance is not required in most circumstances.

Note: Battery equipment does not exceed the Upper Vibration Exposure Value, even if used throughout an 8hr working day.

Visitors & the Public

The business, in recognition of our responsibilities to the general public and others, is committed to ensuring that none of our operations present hazard or risk to them.

This applies especially where work takes place on our premises where this is taken account of in the way in which our risk assessments and safe working procedures are compiled.

It is our intention to minimise any impact by maintaining for example safe access and egress, and ensuring warning and other explanatory and safety signs are posted. Pedestrians may have to be controlled whilst loading or unloading vehicles or gaining access to our premises.

Where in control of a 'site' after hours or at weekend unauthorised persons will be excluded and the site secured after work.

Typical precautions may include:

- Protection from falls of materials (e.g. safety netting or plastic sheeting)
- Public footpaths/highways, stairs, corridors, vestibules etc maintained in a safe condition.
- Installation of temporary lighting.
- Maintenance of access for emergencies e.g. fire, first aid.
- Protection against damage to third party properties.
- Protection against contamination from site operations (spread of solvent vapour, dust, sprays).
- Minimisation of nuisance from noise.

Welfare

Facilities are provided as required by the Workplace Regulations.

Young Persons & Vulnerable Adults

The requirements of the Management Regulations in relation to Children, Young Persons, women of child bearing age and pregnant ladies and nursing mothers are acknowledged.

Children

The company does not employ children for work experience.

Young Persons

See trainees/apprentices in training section - regarded as a trainee until reaching the age of 18 years. While under training the person will be under competent supervision and mentoring/monitoring.

Women

When notified that a lady is pregnant a risk assessment is carried out to ensure that there are no significant risks to which the lady will be exposed and consideration of any health damage to the unborn child is considered.

CDM - Construction (Design and Management) Regulations 2015

Principal Contractor

The business may operate as a Principal Contractor under these Regulations.

We may assume the CDM responsibilities of the Client providing that we have been appointed in writing by them to carry out those duties on their behalf (as allowed for in the Regulations).

Where conducting works for a Domestic Client, where there is “more than one contractor” (Regulation 7 of CDM 2015 will apply) we will automatically be charged with carrying out this duty, on behalf of the client.

We will adhere fully to the requirements of the Regulations.

Further information can be found in the Information Folder in the HSE Management System.

As a Contractor

We may work on a CDM Notifiable project, where we are a contractor, and we will liaise, as required, with the Principal Contractor and comply with the requirements of the Construction Plan.

On receipt of job plans, or if a tender response is required, then an appropriate response is compiled.

For the pre-tender requirements this answer will be developed as needed; including safety issues.

A Client, Principal Contractor, Principal Designer, CDM information pack, plan or preliminaries must inform us of any significant hazards about which they should reasonably have knowledge e.g. asbestos, structure details, information contained in the structure Safety File and any that may affect our activities on site.

Our response to notification of these hazards is to review our safety arrangements. Where not already adequately covered, for the project, amendments will be made and/or added to our risk assessments and/or safe methods of work. Amendments addenda will be communicated to our staff before work starts.

We will ensure that we co-operate with the Client/Principal Contractor/Principal Designer in meeting his and our legal responsibilities.

This will be done through reference to our safety policy and general safety method statement and procedures/arrangements.

We will comply with the site rules and/or construction plan of the Client, premises operator and/or Principal Contractor.

We will supply the Principal Contractor or any other persons with information regarding the risks, especially unusual risks, which our activities may present. This may take place through formal means or at pre-contract meeting, where minutes would be taken.

Where we are the single contractor of a project we will prepare a construction phase plan which includes (but is not limited to) management of the following;

- The health and safety aims for the project.
- The site rules.
- Arrangements to ensure cooperation between project team members and coordination of their work e.g. Regular site meetings.
- Arrangements for involving workers.
- Site induction.
- Welfare facilities.
- Fire and emergency procedures.
- The control of any of the specific site risks listed in schedule 3 where they are relevant to the work involved.

Sub-Contractors

Sub-contractors and the self-employed will be selected for their overall experience, education and training for the tasks to be undertaken and their ability to recognise hazards and to be safe on premises and sites.

See Employees, Contractors & Recruitment section for selection process and the Contractor Management procedures in Procedures Folder in the HSE Management System & questionnaire in the Forms & Records Folder.