

INTEGRATED MANAGEMENT SYSTEM

OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENTAL POLICY AND PROCEDURES MANUAL

C D FENCING & CONSTRUCTION SERVICES LIMITED

OCCUPATIONAL SAFETY, HEALTH AND ENVIRONMENTAL MANAGEMENT SYSTEM

PROCEDURES MANUAL

- 1. CONTENTS**
- 2. RECORD OF REVISIONS**
- 3. SCOPE**
- 4. OHS SYSTEM ELEMENTS**

General Requirements

Intention and Purpose;
System Contents.

4.2 Occupational Health, Safety and Environmental Policy

4.3 OHSMS Planning

- 4.3.1 Hazard identification, Risk Assessment and Determining Controls;
- 4.3.2 Legal and other requirements;
- 4.3.3 Objectives and Programmes.

4.4 OHSMS Implementation and Operation

- 4.4.1 Resources, Roles, Responsibilities, Accountability and Authority;
- 4.4.2 Competence, Training, and Awareness;
- 4.4.3 Communication, Participation and Consultation;
 - 4.4.3.1 Communication;
 - 4.4.3.2 Participation and Consultation;
- 4.4.4 Documentation;
- 4.4.5 Control of Documents;
- 4.4.6 Operational Control;
- 4.4.7 Emergency Preparedness and Response.

4.5 OHSMS Checking and Corrective Action

- 4.5.1 Performance Measurement and Monitoring;
- 4.5.2 Evaluation of Compliance;
- 4.5.3 Incident Investigation; Nonconformity; Corrective Action and Preventive Action;
 - 4.5.3.1 Incident Investigation;
 - 4.5.3.2 Nonconformity; Corrective Action and Preventive Action;
- 4.5.4 Control of Records;
- 4.5.5 Internal Audit.

4.6 Management Review

APPENDICES

- a) Occupational Health, Safety and Environmental Policy(s);
- b) Master list of single issue policies and general health and safety instructions and records.
- c) Occupational Health, Safety and Environmental Management System Forms.

2. RECORD OF REVISIONS

See single issue policy.

3. Scope

This document is the Occupational Health and Safety Manual for C D Fencing and Construction Services Limited and is operated at all locations where the company has works or offices.

It is also applicable to those personnel whose duties involve them working away from the Company's sites.

4. Occupational Health and Safety Management System

4.1 General Requirements

4.1.1 Intention and Purpose

To provide an Occupational Health and Safety Management System (OHSMS) that enables all personnel working for the Company, whether directly or indirectly, to carry out their duties in a manner which will preserve the health and safety of themselves and the people around them and ensure that the health and safety policy of the Company is conformed to.

It has been developed in accordance with the requirements of BS OHSAS 18001:2007 and the clause numbering of this manual follows as closely as possible the sequence and contents in that document.

4.1.2 System Contents

The OHSMS is made up of the Company's health and safety policy incorporating single issue policies, health and safety objectives, a health and safety manual, workplace rules and safe working practices/method statements.

4.2 Health and Safety Policy.

The Managing Director has defined a policy (appendix A) that is appropriate to the organisation.

A copy of this Policy and all relevant information will be made available to all current employees. New employees will be informed of the Policy as part of their induction training. All employees sign to show they have read and understood the policy and this is kept as part of their normal training records.

The Statement of Intent is also displayed on common notice boards within the Company and is available to external interested parties by request.

The policy is reviewed at the annual Company health, safety and environmental management system review meeting and is amended to reflect any change in circumstances.

4.3 Planning

4.3.1 Planning for Hazard Identification, Risk Assessment and Risk Control

4.3.1.i Legislation Review

The Managing Director and the SHE Advisor review legislation requirements as shown in clause 4.3.2, relative to the operations of the Company. They identify any new perceived risk and take action to ensure that the Company procedures encompass any change to legal obligations. This review is recorded and changes to procedures are shown in clause 4.4.5.

4.3.1.ii Risk Assessment

See single issue policy.

4.3.2 Legal and other Requirements

A number of single issue policy documents have been developed by the Managing Director and the SHE Advisor which relate to the operations carried out by the Company. The policies are available to all managers within the Company.

It is the responsibility of the Managing Director to keep a register of such legislation and to ensure that the single issue policies involving that legislation are maintained in accordance with the latest legal requirements.

The Managing Director obtains information on legal requirements from a number of sources:

- The internet; principally the Health and Safety Executive website
- British Safety Council website
- Institute of Occupational Safety and Health website
- Croner's Health and Safety Publications
- BSI
- CECA
- GB Safety Limited.

4.3.3 Objectives.

The Company has established a procedure given in clause 4.3.4 for determining health and safety objectives.

They are given to all members of staff and are made available to external interested parties such as contractors.

4.3.4 Health and Safety Management Programme

The Company has a list of health and safety objectives (health and safety action plan) which are developed by health and safety meetings, inspections and audits. Objectives are relevant to the company achieving the implementation of the health and safety policy, the Company health and safety plan and are reflective of the continual improvement requirement of that policy.

Specific details are explained in the single issue policy: management review and management action plan. The objectives form part of the minutes to the Health and Safety meetings. (See clause 4.3.3).

4.4 Implementation and Operation

4.4.1 Structure and Responsibilities

4.4.1.a Management Structure

The management structure of the health and safety system is displayed on the Company health and safety notice board.

4.4.1.b Responsibilities

See single issue policy: Duties and responsibilities.

4.4.2 Training, awareness and Competence.

See single issue policy: Training.

The Company has developed a matrix of training/competency needs for each level of employee related to general health and safety requirements:

4.4.3 Consultation and Communication

See single issue policy: Consultation and communication.

4.4.4 Documentation

4.4.4.i General

The Company has established this Occupational Health, Safety and Environmental Policy and Procedures, and is designed to stand alone as well as forming an integral part of the IMS.

As well as meeting BS OHSAS 18001: 2007 requirements, the manual sets out procedures which are common to the various company working activities.

Procedures that are specific to sites and/or departments are written in the form of site specific safe working practices and are controlled and maintained, together with associated documents as necessary by the responsible manager.

Further documentation associated with the manual includes:

- a) Health, Safety and Environmental Policy
- b) Single issue policies and procedures
- c) A register of Health and Safety objectives
- d) A register of relevant legislation
- e) Workplace rules
- f) Site specific safe working practices.

4.4.4.ii Occupational Health and Safety Manual

The Company has established this manual to meet the requirements of BS OHSAS 18001:2007 and, as far as possible follows the clause numbering sequence in that document.

4.4.5 Document and Data Control

Manual

The health, safety and environmental manual is maintained, controlled, issued and approved by the Managing Director.

Procedures within the manual are referenced by clause number and are controlled by issue date.

Where necessary, responsible managers are responsible for issuing to site staff appropriate procedures from the manual applicable to that site at locations relevant to the job. Responsible managers are responsible for ensuring the circulation of the most current revision of the manual or policies.

Revisions to the Health, Safety and Environmental Manual are:

- a) Approved and issued by the Managing Director.
- b) Recorded on a revisions document within the manual.
- c) Notified to relevant managers.

Single Issue Policies

The single issue policies are maintained, amended and issued by the Managing Director or his nominated representative.

Site specific safe working practices

See single issue policy: Risk assessment.

4.4.5.i Control of Records

Records, internal and external, which identify achievements of health and safety and effectiveness of the health and safety system are health and safety records.

Those persons in charge of health and safety records are responsible for;

- The maintenance and storage of records;
- Ensuring records are legible and identifiable to the activity concerned;
- Ensuring records are readily retrievable and protected against damage, deterioration or loss.

4.4.6 Operational Control

The single issue policies contained in appendix B and listed below are the operational requirements covering the whole of the Company.

Not all single issue policies are relevant to all Company sites.

Each single issue policy contains sufficient detail to enable the person responsible for health and safety at each site to define all practical requirements to meet the needs of that policy.

The single issue policies are developed and maintained by the Managing Director and the Safety, Health and Environmental Advisor.

Each single issue policy is relative to all the Company's sites except where noted by each site's health and safety rules.

Site health and safety rules are produced by the responsible manager and address, for that specific site, the requirements of the health and safety single issue policies.

4.4.7 Emergency Preparedness and Response

See single issue policy: Fire and Emergency.

4.5 Checking and Corrective Action

4.5.1 Performance measurement and monitoring

The organisation measures the effectiveness of its occupational health, safety and environmental management system in a number of ways.

i. Accident reporting and recording

See single issue policy: Accident, Incident and Near Miss reporting.

All accidents and the results of consequent investigations are discussed at the monthly management meeting and also at the Health, Safety and Environmental management system review meeting.

ii. Hazard Reporting

See single issue policy: Accident and near miss reporting.

All hazards reported and consequent corrective actions are discussed at the monthly management meeting and also at the Health, Safety and Environmental management system review meeting.

iii. Safety Inspections.

Each day plant and equipment is inspected by the operatives to ensure, as far as is possible that operations are being carried out in accordance with the Company's health, safety and environmental policy and legislative requirements.

A report of each inspection is compiled by the person(s) carrying out the inspections and maintained as part of the health and safety records. The report details any non conformances found and a time scale for corrective action to take place. The responsible manager ensures that such corrective action as required is taken and the completion of that corrective action is noted on the original report.

Site inspection reports are discussed at the health, safety and environmental management system review meeting.

iv. Health and Safety Objectives.

Progress towards site Health and Safety objectives is measured at the yearly meeting. See clause 4.3.4.

v. Equipment Certification

The Managing Director or his nominated representative maintains a register of equipment associated with each health and safety instruction and that is required to be tested/ inspected in order for it to be maintained in an operational condition.

Each piece of equipment has a unique number, a date for inspection, criteria for inspection, name of body responsible for inspection and the result of the inspection. Details of any repair or modification carried out on the equipment are recorded in the register.

Any equipment failing its test/inspection is immediately taken out of use and is either repaired/modified to enable it to pass a test/inspection or is disposed of. Where required by legislation or company policy information about the equipment (i.e. safe working load) is displayed on the equipment.

New equipment requiring certification is purchased only when suitable certification is supplied at the time of purchase.

vi. Equipment Calibration

The Managing Director or his nominated representative maintains a register of equipment associated with each Health and Safety instruction and is required to be calibrated in order to be maintained in an operational condition.

Each piece of equipment has a date for calibration, criteria for calibration and name of body responsible for calibration. Details of any repair or modification carried out on the equipment are recorded in the register.

New equipment requiring calibration is purchased only when suitable calibration is supplied at the time of purchase.

When equipment goes out of calibration it is clearly marked as being out of calibration by the equipment user and is taken out of use. The Managing Director or his nominated representative is informed and he arranges for corrective action to be taken. Such corrective action is entered onto the details of the equipment in the calibration register.

The Managing Director is responsible for ensuring that equipment used by suppliers and contractors complies with the Company policy.

4.5.2 Evaluation of compliance

The Managing Director or his nominated representative shall establish, implement and maintain a procedure for periodically evaluating compliance with applicable legal requirements. Records of the results of the periodic evaluations shall be maintained.

4.5.3 Accidents, Incidents, Non-conformances and Corrective and Preventive action.

See single issue policy: Accident and near miss reporting.

4.5.4 Records and record management

Each single issue policy contains a list of records required to be retained and their retention periods. All records are maintained in a readily accessible location and must be legible. They can be a mixture of written documentation and electronic information.

4.5.5 Audits

An audit of the OHSMS is carried out once per year by the SHE Advisor who has been trained in system audit procedures.

As part of the documentation for this system an audit schedule is prepared once per year showing the timing of audits at company sites. A register of suitably qualified auditors is kept with this audit schedule. The audit schedule and register of auditors form a Health and Safety record.

The audit schedule and auditor register are maintained by the Managing Director or his nominated representative.

Audit reports contain:

An assessment by the auditor that actual procedures undertaken are those required by the Health and Safety system and that the Health and Safety system meets the requirements of OHSAS 18001:1999
An agreed timescale for the introduction of corrective and, where necessary, preventive action leading from non conformances and observations.

They are signed by the auditor and the Managing Director.

The results of audits are discussed at management review meetings.

Audit reports are circulated by the Managing Director or his nominated representative.

4.6 Management Review.

See single issue policy: Monitoring, Inspections and Auditing.

Appendix A:

SAFETY, HEALTH & ENVIRONMENTAL POLICY STATEMENT

Appendix B

Master list of single issue Policies and Safety, Health and Environmental instructions and records:

1. ORGANISATION – DUTIES AND RESPONSIBILITIES
2. INFORMATION, TRAINING, CONSULTATION AND SUB-CONTRACTORS
3. GENERAL SITE SAFETY
4. PERSONAL PROTECTIVE CLOTHING AND SAFETY EQUIPMENT
5. HAZARDOUS SUBSTANCES (COSHH)
6. FIRE AND EMERGENCY PROCEDURES
7. OFFICE SAFETY
8. REPORTING OF INJURIES, DISEASES AND DANGEROUS OCCURRENCES
9. FIRST AID
10. NOISE
11. RISK ASSESSMENT
12. CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2015
13. CONTRACTORS
14. LIFTING OPERATIONS
15. MANUAL HANDLING
16. EXCAVATIONS AND PERMITS TO WORK
17. METHOD STATEMENTS
18. TRAINING AND TOOLBOX TALKS
19. NOTICES AND RECORDS
20. WORK EQUIPMENT
21. CONSULTATION AND COMMUNICATION
22. MONITORING & AUDITING
23. YOUNG PERSONS
24. DISPLAY SCREEN EQUIPMENT
25. COMPANY TRANSPORT
26. ALCOHOL AND DRUGS
27. STRESS AT WORK
28. VISITORS ON SITE
29. HOUSEKEEPING STANDARDS
30. FORKLIFT TRUCK OPERATIONS
31. ASBESTOS AT WORK
32. WASTE MANAGEMENT
33. WORKING AT HEIGHT

- 34. PORTABLE ELECTRICAL EQUIPMENT
- 35. SETTING STANDARDS
- 36. HAND ARM VIBRATION
- 37. RACKING SYSTEMS
- 38. SPECIALIST OPERATIONS
- 39. ADDITIONAL CONTRACT INFORMATION
- 40. SMOKING
- 41. BUSINESS OPERATIONS AND WASTE MANAGEMENT
- 42. SITE ENVIRONMENTAL AWARENESS

Appendix C

Master list of Safety, Health and Environmental Management System Forms:

SHECD 00	Index of Forms
SHECD 01	Safety Audit Report.
SHECD 02	Site Inspection Form.
SHECD 03	Plant Equipment Inspection Form.
SHECD 04	Control of Substances Hazardous to Health Assessment.
SHECD 05	Risk Assessment Form.
SHECD 06	Permit to Work.
SHECD 07	Induction/Toolbox Talk Register.
SHECD 08	Display Screen Equipment Analysis.
SHECD 09	Asbestos Register.
SHECD 10	Fork Lift Truck Daily Check List.
SHECD 11	Manual Handling Assessment.
SHECD 12	Personal Protective Equipment Record.
SHECD 13	Warehouse & Yard Inspection Form.
SHECD 14	Risk Factors – Work Related Stress.
SHECD 15	Accident/Incident Tracker.
SHECD 16	Ladder/Access Equipment Register.
SHECD 17	Racking Inspection Form.
SHECD 18	Rules for Fork Lift Truck Operatives.
SHECD 19	Chemical Manifest Form
SHECD 20	Accident / Incident / Near Miss Report Form
SHECD 21	Method Statement Register
SHECD 22	Risk Assessment Register
SHECD 23	COSHH Register
SHECD 24	HAVS Assessment Form
SHECD 25	Portable Electrical Equipment Register
SHECD 26	Site Waste Management Record
SHECD 27	Excavation Thorough Examination
SHECD 28	Accident Reporting Procedure
SHECD29	Near Miss Reporting Procedure
SHECD 30	Railway Working Hours Record
SHECD 31	Railway Working Hours Exceeded Record
SHECD 32	Waste Management Procedure (Site)
SHECD 32	Waste Management Procedure (Office)
SHECD 33	Waste Transfer Note
SHECD 34	Equipment Issue Record
SHECD 35	Drug and Alcohol Testing Procedure
SHECD 36	First Aid Site Assessment
SHECD 37	Battery Inspection Register
SHECD 38	2 Way Radio Inspection Register
SHECD 39	Tools & Equipment Log
SHECD 40	Lifting Plan
SHECD 41	Pre-Use Harness & Lanyard Inspection Record
SHECD 42	Traffic Light Check Sheet
SHECD 43	Service Strike Contingency Plan
SHECD 44	Waste Transfer Note (External use)
SHECD 45	Weekly AED Operational Check Register

APPENDIX A

SAFETY, HEALTH AND ENVIRONMENTAL POLICY STATEMENT

GENERAL POLICY ON SAFETY, HEALTH AND THE ENVIRONMENT

1 INTRODUCTION

This is a Statement of Policy by C D FENCING & CONSTRUCTION SERVICES LIMITED (hereinafter called the Company) confirming its intentions, organisation and arrangements for ensuring the health and safety at work of its employees, visitors and contractors, whilst on premises or sites under the control of, or occupied by the Company. It is also the policy of the Company to adopt business and operational standards to ensure suitable and sufficient protection of the environment from its work activities. This Policy Statement has been developed by the Company and reflects the principles and commitments contained within the Company Procedures Manual. This Manual contains details of the arrangements and management system in place to ensure the objectives outlined below are met.

2 STATEMENT OF INTENT

The directors accept the importance of a robust management system and its positive benefits to the business. It is the policy of the Company to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees while they are at work and of others who may be affected by their undertakings, and to seek to ensure acceptable standards of protection of the environment from its work activities. The Company will provide adequate resources (including financial) to ensure all necessary arrangements are in place to secure the objectives outlined below:-

3 OBJECTIVES

In order to achieve compliance with this Statement of Policy, the Company has set the following objectives to:

- **ensure safety, health and environmental management is a key element of control within the business.**
- **maintain high management and supervision values to ensure effective management of the business activities.**
- **maintain high standards for health, safety and the protection of the environment at its premises and sites.**
- **identify risks and set in place programmes to remove or reduce these risks.**
- **ensure that these standards are communicated to all employees, contract staff, temporary workers and members of the public and other third parties, as appropriate.**
- **ensure that all personnel are given the necessary information, instruction and training to enable them to work in a safe manner.**
- **actively encourage participation and consultation with employees and their elected representatives (where applicable) to improve compliance and standards.**
- **ensure the dissemination and discussion of relevant information on safety, health and environmental issues.**
- **make provision of adequate financial resources to enable managers to properly implement the policy and monitor its effectiveness.**
- **monitor and evaluate the effectiveness of the management system to ensure continuing improvement.**

4 DISTRIBUTION

A copy of the Policy, including this Statement, will be made available to all employees. The Company's health and safety arrangements are more fully described in the Health and Safety Procedures Manual; relevant extracts of which along with additional local guidance will be issued to employees accordingly.

5 REVIEW

The content and effectiveness of the Policy will be reviewed and revised as necessary to take into account any legislative or other relevant changes, and details communicated to all staff accordingly. The review frequency will be at least annually.

Signed:



Chris Davies
Director responsible for Safety,
Health and the Environment

Date: 22nd January 2018

Next review: June 2018

APPENDIX B:

Master list of single issue Policies and Safety, Health and Environmental instructions and records:

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31. ASBESTOS AT WORK
32. WASTE MANAGEMENT
33. WORKING AT HEIGHT
34. PORTABLE ELECTRICAL EQUIPMENT
35. SETTING STANDARDS
36. HEALTH MONITORING AND SURVEILLANCE

- 37. RACKING SYSTEMS
- 38. ADDITIONAL CONTRACT INFORMATION
- 39. SPECIALIST OPERATIONS
- 40. SMOKING
- 41. BUSINESS OPERATIONS AND WASTE MANAGEMENT
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APPENDIX B

POLICIES, GENERAL HEALTH AND SAFETY INSTRUCTIONS AND RECORDS

1. POLICY - ORGANISATION – DUTIES AND RESPONSIBILITIES

1.1 The Managing Director recognises that he holds the ultimate responsibility for all matters relating to the Company's legal obligation for the health, safety and welfare of the company's employees and others, who may be affected by the company's business activities.

1.2 The following describes the organisational arrangements adopted by the Managing Director through which health and safety responsibilities are delegated.

1.3 CRITERIA FOR DELEGATION OF RESPONSIBILITIES

The delegation of responsibilities for health, safety and the environment will extend through all levels of the organisation to individuals who will be responsible on a day-to-day basis for the implementation of the Company's Safety, Health and Environmental Management System (Policies and Procedures).

In order to achieve a satisfactory organisational arrangement, the following criteria have been applied:-

- The term "responsible" has not been used unless commensurate authority has also been delegated.
- The person to whom responsibilities are delegated will, in all cases, be competent to carry them out through training and/or experience or a combination of both.
- Responsibilities will be clearly defined and understood by those who carry them out.
- In order to avoid frequent changes and revisions of the organisational arrangements, responsibilities are delegated to job positions rather than named persons.

1.4 LIAISON

While responsibilities are delegated to job positions, arrangements are in place for liaison between disciplines where appropriate.

1.5 RESPONSIBILITIES

1.5.1 Directors

The Directors have established the overall Safety, Health and Environmental Policy of the Company and have responsibility for implementing, monitoring and ensuring the reviewing of the policy principally through the Company managers

1.5.2 Line Management

Every member of line management is responsible for:

- the practical implementation of the health, safety and environmental policy, the Health and Safety at Work etc; Act 1974 and other relevant legislation.
- ensuring that the operations under their control are, as far as is reasonably practicable, conducted without detriment to the health and safety of employees or others who may be affected by their activities.
- ensuring that their area of responsibility is subject to risk assessment, regular inspections and audits.
- reviewing as necessary reports on accidents, incidents and near misses and to ensure, where necessary, that a full investigation is carried out and appropriate remedial action taken.

1.5.3 Individual Responsibilities

All employees are required to:

- co-operate in implementing the requirements of all safety, health and environmental legislation, including related codes of practice and safety instructions.
- refrain from doing anything, which constitutes a danger to themselves or others.
- immediately bring to the attention of their line management/supervisor any situations or practises that are noted which might lead to injuries or ill health.
- ensure that any equipment issued to them or for which they are responsible, is correctly used and properly stored.
- be responsible for good housekeeping in the area in which they are working.

1.5.4 Contractors/ Sub-Contractors

All Contractors/Sub-Contractors working on the Company sites are required to comply with appropriate rules and regulations governing their work activities. Contractors are legally responsible for their own workforce and for ensuring that their work is carried out in a safe manner and without risk to the Company staff and others who may be affected.

1.5.5 Communication

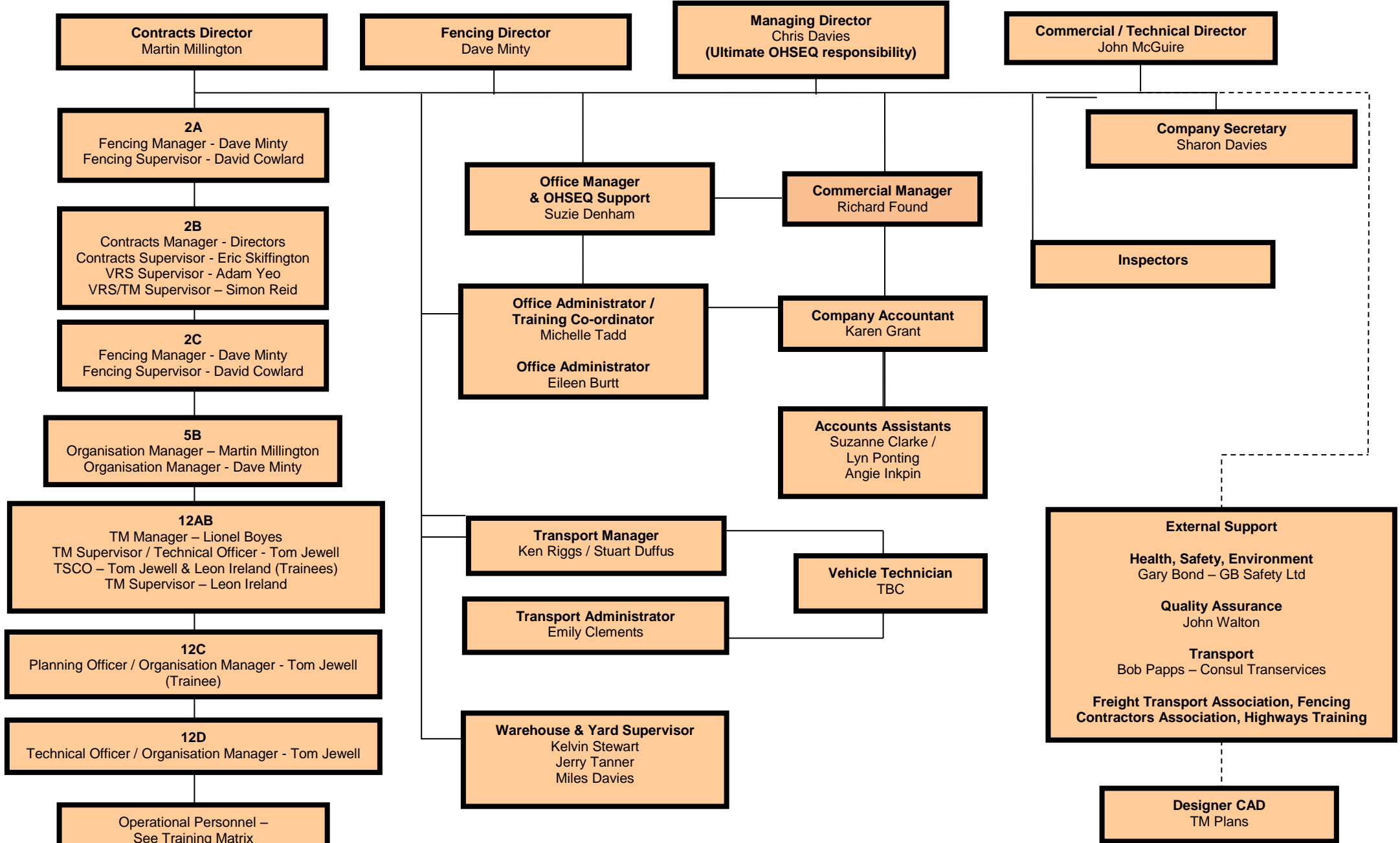
The name of the person designated with the responsibility for safety, health and the environment on each site is to be prominently displayed.

1.5.6 The Safety, Health and Environmental Advisor

The Safety, Health and Environmental Advisor will provide support and advice to the Managing Director by identifying training needs and maintaining the Company's Safety Management System (Policy and Procedures) so that they reflect United Kingdom legal requirements at all times. GB Safety Limited provides an occupational safety, health and environmental service under contract with the Company and acts as their "Appointed Competent Person" from who further expert advice can be requested as and when required. The Safety, Health and Environmental Advisor will provide on request, advice and technical support to all levels of the company's management and he will prepare – with input from the appropriate managers – an annual safety programme, covering all on-going safety requirements and monitor progress towards completion.

Organisation chart and functional responsibilities

Appendix B1



2. INFORMATION AND TRAINING

2.1 POLICY

2.1.1 Safety, Health and Environmental Information

2.1.2 Copies of this Policy are held by the Directors and managers and available for reference by all employees. Relevant elements of the Policy will be issued to all employees and the contents explained to them by their respective manager and supplemented by instruction and training as necessary. For their part, each employee will be requested to sign for receipt and confirmation that they understand the contents of those elements. Additional information is contained in the various supplementary documents referenced in the elements issued. Where this occurs employees will be advised of the necessary detail to ensure they are able to work in a safe and healthy manner.

2.2 Training

2.2.1 Suitable training will be provided to ensure employees at all levels are:

- aware of their safety, health and environmental responsibilities;
- competent to carry out their duties;
- competent to operate specialist tools, plant and equipment;

2.2.2 Training needs will be identified by the Directors and managers who will arrange suitable induction training for new starters, to familiarise themselves with the hazards and precautions relevant to their work and any further identified training to enable a safe working environment etc. In order to manage training needs a Training Matrix has been implemented to record all training carried out or recognised by the Company.

2.2.3 Training provided to be consistent with industry standards.

2.2.4 Records of training provided are to be maintained by the Managing Director or his nominated representative and attached to personnel records as appropriate.

3. GENERAL SITE SAFETY

3.1 POLICY

This element on general site safety is contained in the **Employee Health & Safety Rules** issued to all employees on appointment. It should be noted that some of this guidance might not apply to certain work situations. **Employee Health & Safety Rules** (or extracts of) may also be issued to contract personnel on site through the induction process. The Depot Foreman is to ensure that the warehouse remains a safe environment and that inspections are conducted weekly and recorded on the (Warehouse & Yard Inspection Form SHECD 13) and any issues or concerns are resolved or reported to the management for action as necessary.

All workers, working directly or indirectly under the control of the Company shall be required to work to the general safe industry standards. These standards also apply to the Contractor employed and self-employed. Where there is a failure to employ the good work practices described, managers should give consideration to necessary remedies and/or contracts being determined, or other sanctions being employed by the Company to restore the requisite safety standards to the site. Equally there may be some work situations having hazards not covered by this guidance, in which case, it may be necessary to carry out an assessment of those hazards and associated risks and introduce any additional control measures. Managers/Supervisors are required to seek to ensure the general guidance contained therein is followed so far as is reasonably practicable with due regard given to the management / procedural information contained in this Section.

4. PERSONAL PROTECTIVE CLOTHING AND SAFETY EQUIPMENT

4.1 POLICY

Managers and Supervisors shall ensure that suitable and sufficient Protective Clothing and Equipment (PPE) is available on site, and worn wherever appropriate by employees, contractors and others under their control. Employees shall look after such items, report defects and use them as required. The provision of PPE will be in line with the general guidance provided separately by the Company SHE Advisor. The provision of PPE is at no cost to the employee, although complex/expensive PPE such as harnesses, respiratory protection will require an acknowledgement of receipt by employees concerned.

4.2 PROCEDURE

PPE is to be regularly inspected for damage etc and replaced where necessary. Due to the difficulty in keeping routine PPE such as eye, hand and ear protective equipment clean at all times, it is common practice on our sites to issue new equipment as necessary on a more frequent basis than if in a clean environment. Recording the issue of PPE is available on Form SHECD 12.

4.3 GUIDANCE

Safety Helmets

Safety helmets shall be worn at all times when carrying out all operational activities. Sufficient helmets shall be provided to each site for use by visitors etc. Generally helmets will be kept available for use up to 3 years of age. Thereafter they will be discarded and replaced. Helmets that have been subjected to a sharp blow or, where cracks or deep scratches are evident in the shell, are to be removed from use and destroyed immediately.

Eye Protection

Eye protection shall be worn wherever there is a foreseeable risk of eye injury e.g. for work with abrasive wheels or discs, the striking of masonry nails, use of cartridge tools and welding etc. Sufficient goggles and/or visors to the relevant BSEN Standard 166 Grade 2 General, 3 Chemical Splash, 4 Impact (A4-Low, B4 Medium, C4-high) and Dust, shall be provided for use on each site.

Ear Protection

Hearing defenders shall be supplied and worn in accordance with the detailed arrangements for controlling noise. The single noise reduction shall be high enough to ensure that the tenable noise is below the exposure threshold, but not so much that all noise is removed.

Gloves

Gloves shall be provided and worn to protect hands during the handling of abrasive, corrosive or other harmful skin agents.

Respiratory Protection

Respiratory protection shall be worn wherever there is a foreseeable risk of significant exposure to airborne harmful agents or the absence of adequate oxygen, and in compliance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH). Suitable equipment to the relevant BSEN Standard shall be provided to each site, and workers comply with the requirements of any Site Rules determined by assessment or Client. Nuisance dust masks shall only be issued in the absence of toxic dusts, fumes or vapours. Employees required to wear respiratory protection shall be trained in its use. For non-disposable items, a system for inspection and maintenance will be established.

Safety Harnesses

Safety harnesses shall conform to the appropriate BSEN Standard and, as necessary, may be used together with a fall arrest device conforming to BSEN 360. Harnesses shall be carefully inspected prior to each use. Employees shall be instructed in the use of safety harnesses. All safety harnesses are to be inspected by a competent person every 6 months and tagged to show the next inspection.

Safety Lanyards

The appropriate lanyard shall be used, either a work placement lanyard of a fixed length or a fall arrest lanyard. Whenever fall arrest equipment is used a rescue plan must be in place prior to the start of the work.

N.B. There are several EN Standards applying to safety harnesses and fall arrestor equipment and therefore it is important to contact supplier &/or SHE Advisor on intended use to ensure correct equipment provided and training given as necessary.

Protective Clothing

Suitable items of protective clothing shall be provided to employees as necessary. If such items are not disposable, arrangements shall be made for such items to be regularly laundered. Overalls should preferably be made of cotton, particularly where employee is carrying out "Hot Work".

Footwear

Employees shall be encouraged and advised to wear suitable footwear, such as safety boots or shoes, to avoid serious foot injuries. The footwear should be a minimum of S3, ie with mid sole protection.

5. COSHH (CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH)

5.1 POLICY

The Control of Substances Hazardous to Health Regulations 2002 require that an assessment is made of each chemical and substance which may be used, which fall into the categories of irritant, corrosive, toxic and/or harmful or chemicals and substances which have a workplace exposure level. Any material, purchased or otherwise encountered, having the potential for harming health. Dusts, fumes, vapours, gases, micro-organisms, whatever the route of entry to the body (eyes, skin, cuts and abrasions, breathed in or swallowed) is likely.

It is the policy of the Company that no hazardous substance shall be used until an assessment has been undertaken and suitable control measures implemented.

5.2 ASSESSMENT PROCEDURE

If the material can harm health, it is classified as hazardous. The elimination of the use of the material or its substitution by a safer product shall be investigated. If use is confirmed, an assessment shall be carried out. For most the substances currently in use reference should be made to the Assessments appended to this Policy. Additional assessments can be requested using (Form SHECD 04).

All chemicals/substances that are in use must be listed in a register, which includes a Safety Data Sheet and details of emergency procedures upon spillage or accident in usage. Each site shall where possible use chemicals/substances of the lowest risk for the work required.

5.2.1 Copies of Data sheets shall be provided and retained on site for all products to be used.

5.3 GUIDANCE

Suppliers

The Buyer shall ask suppliers of materials to the Company to provide details of hazards of use and the appropriate precautions to taken. This information is known as a Safety Data Sheet.

Tender Preparation

COSHH Assessments shall be taken into account when preparing tenders, to ensure that due allowance is made for control measures required.

Pre-Contract

Clients and design teams shall be requested to review materials and techniques, where specifications conflict with best current practice concerning hazardous substances. If there is evidence of residual hazardous substances on site, e.g. contaminants in the ground or in existing buildings, further information shall be sought.

Contract

Relevant assessments for purchased materials should be kept on site and appropriate control measures put in place for the substances.

Equipment

Any equipment preventing or controlling exposures to hazardous substances shall be maintained and tested periodically as required. Employees are required to make appropriate use of such equipment and report any defects without delay.

Sub Contractors

All sub-contractors must provide valid assessments for substances hazardous to health, which are to be used. The implications shall be discussed, as necessary, at a pre-contract meeting.

Main Contractors

The Main Contractor/Client shall be requested to provide assessments of materials to be used by others on site where such use affects the Company's personnel and activities, also to provide information regarding residual hazards.

Staff and Employees

Employees shall be provided with information as to the hazards of materials to be used or encountered, instructed in safe working methods and be trained to be able to follow the instructions. Employees shall comply with the instructions issued and co-operate with any monitoring exercises.

Health Surveillance

Health surveillance may be undertaken for specified employees. The staff concerned will be identified on merit and be required to co-operate in any surveillance provision.

Record Keeping

Records shall be kept of:

- Information, instructions and training provided (Training File)
- Employees trained (Training File)
- Monitoring data (Head Office. Minimum 30 years)#
- Health surveillance (Head Office. Minimum 30 years)#

May only affect small number of employees required to use high risk products.

6. FIRE AND EMERGENCY PROCEDURES**6.1 POLICY**

The Company recognises the dangers that can arise in the event of fire. In order to discharge its responsibilities towards protecting the health and safety of personnel from fire hazards and in order to comply with the Regulatory Reform (Fire Safety) Order 2005, fire risk assessments will be conducted and recorded to ensure compliance wherever the Company is obligated.

The Company policy is that all employees will receive induction training that includes fire and emergency procedures. Ongoing training will be provided such as is required to ensure that personnel are fully aware of actions to be taken in the event of fire. Strategically placed notices and instructions describing the actions to be taken in the event of a fire and to clearly indicate emergency exit routes will be provided.

6.2 PROCEDURE

A fire risk assessment must be conducted in order to identify where fires may start in the workplace and who may be put at risk from that fire as follows:-

- Identify any sources of ignition that may cause fire.
- Identify any combustible materials in the workplace.
- Identify those people who are at significant risk.
- Identify any structural feature that could promote the spread of fire.
- Take steps to monitor the introduction of sources of heat or combustible materials to the workplace.

Waste products and general waste should not be allowed to accumulate to levels that could present a risk of fire.

Adequate fire fighting equipment is to be provided in accordance with the requirements of the fire risk assessment. Fire fighting equipment will be subject to annual inspection. Records of all equipment, its location and the findings of inspections will be maintained.

Emergency lighting will be fitted throughout all areas, such as is required to facilitate the safe evacuation of all personnel in case of power failure resulting from fire or other causes. It may be appropriate to provide torches for such occasions.

Emergency lighting will be maintained and tested in accordance with the manufacturer's instructions, records of maintenance and testing will be maintained.

The use of candles, cigarette lighters or matches as emergency lighting must not be considered.

The company will have trained a suitable number of employees in the duties of the Fire Marshal and such training will include emergency procedures in general and the company procedure.

Fire Assembly areas will be identified and located in areas beyond any danger of fire. Every employee will be aware of where they report to in the event of any emergency evacuation of the workplace.

In order to test the efficiency of fire evacuation procedures, a practice evacuation will be carried out annually, and failure or improvements rectified immediately afterwards.

6.3 GUIDANCE

Site

All employees are required to make themselves familiar with any site procedures including fire alarms and safe exit points.

Sub Contractors and Occupied Premises

Wherever the Company is acting as sub-contractor or working in occupied premises, the emergency procedures of the Main Contractor or occupier shall be ascertained and followed. The manager/supervisor in charge shall ensure that employees are familiar with and understand the procedures.

Company Controlled Premises

Wherever the site is under the control of the Company, the Manager / Supervisor shall ensure, where appropriate, that adequate fire precautions are taken and that emergency procedures are established. They also ensure that employees are familiar with and understand the procedures.

Head Office

All staff are required to make themselves familiar with the following procedure:

Any person discovering a fire, however small, shall:

- shout "Fire" and sound the Alarm;
- attempt to extinguish the fire with a fire extinguisher only if this does not place them in personal danger.

On hearing the warning:

- A designated member of staff shall call the Fire Brigade, state the emergency to be fire, give the Company telephone number and location of the fire;
- Leave site / office and go to safe area away from fire and not on trafficked carriageway.
- Liaise with the Fire Brigade on arrival and follow any advice given.
- The offices / site shall not be re-entered until advised by Fire Brigade that it is safe to do so.

MANDATORY INSTRUCTION

Employees are instructed that under no circumstances must they place themselves or others at risk in a fire situation.

IF IN DOUBT, GET OUT!

7. OFFICE SAFETY

7.1 POLICY

The Company recognises the hazards that can be created by poor housekeeping standards and its legal obligations towards providing a safe and healthy working environment. All office employees have a duty to assist in minimising the risk of accidents, ill health and fire.

7.2 PROCEDURE

A detailed risk assessment will be conducted and recorded for all office and associated areas. The completed risk assessment including the findings will be communicated to all office employees and copies displayed in prominent locations.

7.3 GUIDANCE

The following guidelines should be followed as much as possible:

- tripping hazards will be minimised by properly storing materials, limiting trailing electrical cables, closing filing cabinet drawers, keeping staircases and fire exits clear;
- manual handling and other risks will be minimised by using safe methods of lifting, and for access, and avoiding opening more than one drawer of filing cabinets at a time;
- chemical hazards will be minimised by correctly storing cleaning and other harmful materials;
- fire hazards will be minimised by keeping fire doors closed, fire extinguishers in place, paper and other flammable materials tidy, use of ashtrays in smoking areas;
- electrical hazards will be minimised by ensuring that all cables and connections are sound, equipment earthed and correctly fused, sockets are not overloaded and that water is kept away from all electrical installations;
- portable electrical equipment shall be subject to regular checking, typically annually, and taken out of service if a fault is identified or suspected.

8. REPORTING OF INJURIES, DISEASES AND DANGEROUS OCCURRENCES

8.1 POLICY

Details of all injuries, however, minor, incurred at work shall be entered in the Accident Book held on the site of the accident or communicated to Head Office for entry into the Company Accident Book. As necessary, such entries shall be made in the Main Contractor's/Client's Accident Book. All employees must obtain treatment for all injuries when they occur and must ensure that these injuries are entered in the Accident Register at the time.

8.2 PROCEDURE

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 will be undertaken by the Managing Director or his nominated representative.

The F2508/F2508A forms will be kept in the main office area with the Accident Book.

How to make a RIDDOR report

Who should report?

Only 'responsible persons' including employers, the self-employed and people in control of work premises should submit reports under RIDDOR.

Reporting online

Responsible persons should complete the appropriate online report form listed below. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

Report of an injury

The following should be reported using the HSE on line system

- Report of a dangerous occurrence
- Report of an injury offshore
- Report of a dangerous occurrence offshore
- Report of a case of disease
- Report of flammable gas incident
- Report of a dangerous gas fitting

If you have problems accessing a form, this may be due to the (Internet) security settings on the PC that you are using. A series of frequently asked questions is available to help you complete your online form.

Telephone

All incidents can be reported online but a telephone service is also provided for reporting fatal/specified, and major incidents only - call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

8.2.1 Notification from Sites

Notification via the most senior employee available on site is to be made to Head Office by the most practical means using a combination of accident report form and telephone. Telephone communication to the office must be made immediately in the event of a serious accident or incident. Additionally, the SHE Advisor is to be advised by quickest appropriate means.

8.2.2 What must be Reported

All injury accidents, even minor ones.

Some accidents need to be reported to the Health & Safety Executive (or local Environmental Health Authority if head office only related) and these include:

- a) Any injury accident that results or is likely to result in an employee or self-employed person working under the Company's control being absent from work for more than 7 days following an accident.
- b) Serious injury, such as a broken limb, requires immediate notification to the Enforcement Authority.
- c) Any prescribed disease contracted by an employee
- d) Any incident that is deemed a notifiable dangerous occurrence.

8.3 GUIDANCE

Statutory Notifications

The Office Administrator shall take the following reporting action in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

- **Death, Specified Injury, Dangerous Occurrence**

For accidents on site the area office of the Health & Safety Executive shall be informed immediately by telephone, and a written report on form F 2508rev. submitted within 10 days.

- **Seven Day Accidents**

Accidents, which incapacitate from work an employee or self-employed person working under the control of the Company for more than 7 days (excluding the day of the accident) a written report to the HSE or Local Authority (as above) shall be submitted on form F2508(rev.) within 15 days.

- **Notifiable Diseases**

A written notification that an employee, or self-employed person working under the control of the company, is suffering from a notifiable disease and where that person is currently employed on work associated with a risk of that disease then a formal report on form F2508a shall be submitted to the HSE.

8.4 Record Keeping

Written records and copies of F2508 forms submitted should be carefully maintained by the Office Manager.

8.5 Procedure for Accident / Incident / Near Miss Investigation

All accidents/Incidents/Near Misses are to be investigated by the Managing Director or his nominated representative. All relevant information is to be recorded on a database to assist in identifying trends and possible areas for improvement.

The investigation process is to be conducted with an open mind and not to identify a “scapegoat” by adopting a “no blame approach”. Once the investigation has been completed the documentation is to be secured in a suitable location by the Managing Director.

8.6 Near Miss Incident

A near miss incident represents an event that does not cause injury or damage to property, but has the potential to cause significant injury or property damage.

8.7 Procedure for managing Accidents, Ill Health and Incidents.

8.7.1 The Event:

- Details of any injured person, including age, sex, experience, training.
- A description of the circumstances including the place, time and conditions.
- Details of the event including:-

Any actions which led directly to the event.

The direct causes of any injuries, ill health or other loss.

The immediate causes of the event.

The underlying causes e.g. failure in workplace precautions, risk control systems, management arrangements.

- Details of outcomes, including in particular:-
- The nature of the outcome e.g. injuries or ill health to employees, members of the public; damage to property; process disruptions; emissions to the environment; creation of hazards.
- The severity of the harm caused, including injuries, ill health and losses.
- The immediate management response to the situation and its adequacy:-
- Was it dealt with promptly?
- Were continuing risks dealt with promptly and adequately?
- Was the first aid response adequate?
- Were emergency procedures followed?
- Whether the event was preventable and if so how.

8.7.2 The potential consequences:

- What was the worst that could have happened?
- What prevented the worst from happening?
- How often could such an event occur (**recurrence potential**)?
- What was the worst injury or damage which could have resulted (**severity potential**)?
- How many people could the event have affected (**population potential**)?

8.7.3 Recommendations:

- Prioritised actions with responsibilities and targets for completion.

9. FIRST AID

9.1 POLICY

The Company recognises its responsibilities towards its employees to provide treatment to preserve life and to minimise the consequences of illness or injury until medical or nursing help is available in accordance with the requirements of the Health and Safety (First Aid) Regulations 1981. Wherever the Company is acting as sub-contractor or is otherwise working on occupied premises, arrangements shall normally be made with the Main Contractor and/or occupier to share First Aid facilities. Selected employees will be trained as "First Aid Appointed Persons", and the training will be conducted by a Health and Safety Executive approved organisation.

9.2 PROCEDURE

First Aid facilities.

Where it impractical to appoint a first aider on site, arrangements will be made to provide emergency first aid training to all operatives.

All employees will be informed of the arrangements made for the provision of first-aid, including facilities available the names of first-aid providers and location of first-aid containers. First-aid providers and/or appointed persons will maintain a record of incidents that require their attendance. It is recommended that where practicable, a central record be kept.

The information entered would include:-

- Date, time and place of incident.
- Name and job of the injured or ill person.
- Details of the injury/illness and what first-aid was given.
- What happened to the person immediately afterwards (e.g. went home, attended hospital or went back to work).
- Name and signature of the first-aid provider or person dealing with the incident.

The information recorded can assist in identifying trends and possible areas for improvement in the control of health and safety risks.

9.3 GUIDANCE

The minimum level of first-aid equipment is a suitably stocked and properly identified first-aid container. The first-aid container will be of sound structure, clean and easily accessible and, as a minimum, will contain the following:-

- A card / leaflet giving general First Aid guidance.
- 20 individually wrapped sterile adhesive dressings (assorted sizes).
- Two sterile eye pads.
- Four individually wrapped triangular bandages (preferably sterile).
- Six medium sized individually wrapped sterile un-medicated wound dressings approximately (12cm x 12cm).
- Two large sterile un-medicated wound dressings (18cm x 18cm).
- 6 safety pins.
- Individually wrapped moist clean wipes.
- One pair of disposable gloves.

9.3.1 HIV (Aids) and Hepatitis B

It should be noted that there are diseases that may be transmitted through body fluids, including HIV virus (Aids) and Hepatitis B. During any first aid treatment, care should be taken to avoid the injured person's blood entering into a cut or abrasion (waterproof plasters provide an adequate barrier) and first aiders should wash their hands after providing any treatment. Appropriate equipment is to be contained in the first aid kit to deal with this possibility. Suppliers will advise on suitable provision such as aprons and surgical gloves.

10. CONTROL OF NOISE AT WORK

10.1 POLICY

The Noise at Work Regulations 2005 require that an assessment be made of anticipated noise levels where workers are expected to be exposed to noise levels of 80 decibels (dB (A)) or more. Noise can induce deafness or persistent ringing in the ears (tinnitus). Once damage is done it is permanent, and may affect quality of life; but it can be prevented.

10.2 PROCEDURE

Measures must be adopted to reduce noise levels at their source to the lowest levels reasonably practicable by:

- Substituting noisy machines for quieter ones.
- Situating noisy machines away from main areas of work wherever possible.
- Ensuring machines are regularly serviced and maintained.
- Checking that all bolts, fixings, removable covers on equipment are kept tight to prevent unnecessary vibration and noise.
- Switching off machines when not in use.
- Providing acoustic enclosures around machines to contain and absorb noise.

10.3 GUIDANCE

The Regulations impose duties on employers and on self-employed persons to protect both employees who may be exposed to risk from exposure to noise at work and other persons at work who might be affected by that work:-

- Reduced threshold for hearing protection and training.
- Reduced threshold for introducing noise control.
- Introduce daily exposure limit value.
- Permit weekly average.

Emphasis on consultation between employers, employees and representatives.

Requirements for health surveillance and hearing testing (at 85dB).

- Lower exposure action level = 80dB(A)
- Limit value = 135dB(A)

- Upper exposure action level = 85dB(A)
- Limit value = 137dB(A)

- Peak value = 87dB(A)
- Limit value = 140dB(A)

10.3.1 At and above a lower exposure action value:-

Suitable hearing protection must be made available to any employee who requests it (1st levels)

Information and training in:

- Nature of risks from exposure to noise.
- Organisational and technical control measures.
- Exposure limit values and action values.
- Findings of risk assessment.
- Availability of personal hearing protection and current use.
- Why and how to report signs of hearing loss.
- Entitlement to health surveillance.
- Safe working practices.
- Results of health surveillance.

Noise samples can be taken with personal protective equipment (PPE) on at 'point of ear'.

10.3.2 At and above an upper exposure action value:-

Reduce exposure to as low a level as possible by organisational and technical measures, excluding provision of hearing protectors:

- Other working methods which reduce exposure.

- Choice of appropriate work equipment.
- Design and layout of workstations.
- Suitable and sufficient information and training.
- Reduction of noise by technical means.
- Appropriate maintenance programme.
- Limit duration and intensity of exposure.

Appropriate work schedules and adequate rest periods.

11. RISK ASSESSMENT

11.1 POLICY

The Company recognises its legal obligations to assess the hazards contained within or created by its business activities, and to reduce risk to an acceptable level. In order to meet its responsibilities under the Management of Health and Safety at Work Regulations 1999 and to achieve a low risk working environment, the company will ensure that all its business activities are subjected to thorough workplace risk assessments. It is the responsibility of Company managers and supervisors to ensure that the assessments are brought to the attention of all employees.

11.2 PROCEDURE

The Management of Health and Safety at Work Regulations 1999 requires that a suitable and sufficient assessment of:

- The risks to the health and safety of his employees to which they are exposed whilst they are at work.
- The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking.

These are to be assessed by referring to hazards and evaluating the risks that arise from them.

The assessment shall take account of the type and competence of the workforce and whether it includes groups of people who may be especially at risk from the activity e.g. young and/or inexperienced people.

The assessments shall be recorded and communicated to the relevant group of employees or others who are at risk using Form SHECD 05.

Control measures to combat the identified risks are to be detailed on the assessment. The following principles must be applied in deciding the appropriate control measures to be used:-

- If possible avoid the risk altogether.
- Where possible combat the risk at source.
- Give priority to measures which protect the whole workforce.
- Wherever possible adapt work to the individual.
- Take advantage of technological and technical progress.

The technique of risk assessment should not be a complex bureaucracy of paperwork but should be a positive management tool to change working procedures and concentrate on active measures to promote safe working conditions.

The responsibility for completing risk assessments will usually be the manager or supervisor responsible for the area in which the work is carried out, after they have received some training in risk assessment techniques before they perform them.

It is important that the workforce should be involved in the risk assessment process.

Risk Assessments dealing with general repetitive activities will be contained in the Risk Assessment Register annexed to this Policy. These assessments will be added to from time to time and be

reviewed on a regular basis. All assessments will be issued to affected personnel as necessary. Site-specific assessments may also be required using the Company Risk Assessment Form SHECD 05 and will be maintained in the Register. Risk Assessment Review Form in the IMS/SCD.

11.3 Review of risk assessments.

The Company will review and revise as necessary, any risk assessment;

- on a biannual basis or;
- when there is reason to suspect the assessments are no longer valid. This may be apparent through accidents, complaints or ill health or;
- when there has been a significant change to matters to which the assessment relates. This could be by the introduction of a new or revised process or by the introduction of new equipment;

Any changes or amendments made to the assessments are to be brought to the attention of all concerned.

11.4 GUIDANCE

The risk assessment will be conducted using the following criteria:

- i) Qualify Operation/Task to be assessed.
- ii) Identify relevant location/area.
- iii) Determine persons at risk
- iv) (Ref.) Annotate activity to be assessed.
- v) (Activity) Detail specific activity within the operation/task to be assessed.
- vi) (Hazard) Indicate significant (ignore trivial) hazard(s) relating to the activity.
- vii) (Risk) Indicate risk(s) relating to hazard(s) identified.
- viii) (Pre-Control Risk Rating) Using key at bottom of form indicate rating based on no control measures in place.
- ix) (Control Measures) Indicate all current control measures in place to deal with identified hazards/risks. This list is to contain any additional control measures that are to be put in place before work commences.
- x) (Post-Control Risk Rating) Using key at bottom of form indicate revised rating based on identified control measures being in place. This Rating should show a significantly lower figure and should be at least 10 or below.
- xi) (Comment) Indicate any supporting information that may help interpreting information in other columns. A cross-reference to relevant general assessments can be used if appropriate to avoid duplication.

Explanatory Note

Before carrying out a risk assessment it is necessary to take account of as much background information as possible. All risk assessments benefit from consideration of factors beyond the task itself. Factors which should be considered where applicable include:

- i) Legislation; Acts, Regulations, Approved Codes of Practice,
- ii) British EN Standards,
- iii) HSE Guidance Notes,
- iv) CITB/FDCA/CPCS/CSCS or similar trade association guidance,
- v) Client procedural issues,
- vi) experience from other sites or elsewhere in the company, including lessons learned from accident investigation and recommendations to avoid accident recurrence,
- vii) experience and training of all persons involved,
- viii) Influence of factors such as weather.

12. CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2015

12.1 POLICY

The Company recognises its legal obligations under the Construction (Design and Management) Regulations 2015. Individual contracts will be subject to specific individual procedures.

The Construction (Design & Management) Regulations 2015 require, amongst other things, the appointment of various parties to effect suitable arrangements for implementing good health and safety management and control measures on a construction project.

12.2 PROCEDURE

When working on a project for another Principal Contractor (i.e. as a subcontractor/contractor) then the Company will:

- co-operate with the Principal Contractor;
- provide the Principal Contractor with information, which might affect the health and safety of any person at work (e.g. provision of risk assessments etc);
- comply with reasonable directions given by the Principal Contractor under the requirements of CDM;
- comply with any rules applicable which are contained in the Health and Safety site plan;
- promptly inform the Principal Contractor of any death, injury, condition or dangerous occurrence to a Company employee or representative;
- provide the Principal Contractor with information which may be required by the Principal Designer (e.g. for inclusion in the health and safety site plan or file);
- provide all Company contract personnel with:
 - name of the Principal Designer;
 - name of the Principal Contractor;
 - relevant information contained within the health and safety plan.

12.3 Small Contracts where the Company is the Principal Contractor

For contracts where the CDM Regulations apply it will be necessary for the Company to develop a Contract Health and Safety Plan commensurate with the size of the contract. Such a Plan will comprise of essential information relating to the contract and will amongst other things:

- Method Statements.
- Risk & COSHH assessments.
- Indication of labour plant & material requirements.
- Competencies.
- Contract & Communication details including for emergencies.
- Programme of works where necessary.

13. SELECTION OF CONTRACTORS

13. POLICY

The Company employs the services of other companies to carry out work on its behalf. Prior to awarding work to new companies, the Company will require potential contractors to provide evidence that they are aware of their legal obligations towards health and safety.

In cases where there is a requirement for a new contractor to be employed to carry out work on any of the Company's sites, potential contractors will be required to complete a questionnaire relating to health and safety issues and where appropriate, provide a Safety Policy including risk assessments and method statements, which must be approved prior to the commencement of work.

Contractors may be employed on all the sites operated by the Company. The Site Manager/Supervisor on any site managed by the Company has a responsibility to ensure that all persons on site, including contractors, work safely including safe guarding the environment. It therefore follows that it is vitally important to ensure that all activities undertaken by contractors working for the Company are undertaken in accordance with the same standards of safety that are demanded of the Company's personnel.

13.2 PROCEDURE

13.2.1 Contractors Selection

Selection of contractors can be influenced by the willingness to provide basic health, safety and environmental information at the outset. Therefore, as part of the selection process, a relevant pre-qualification questionnaire (Form IMS Approved Contractor Assessment KSQ**) will be sent to prospective contractors.

13.2.2 Assessment of Contractor Competence

In general, the Company only use contractors it knows has the ability to carry out works in a safe manner consistent with industry good practice. It is important to remember that many of the contractors to be appointed may only be small organisations having minimal administrative and technical support. Therefore, it is likely that the Company will need to demonstrate a higher level of control over their activities than would otherwise be necessary. However some contractors may have more than 5 employees and in these instances a more comprehensive assessment of their competence and compliance will be required prior to them being included on the approved contractor database.

Any contractors used will be required to provide information such as:

- Safety, Health and Environmental Policy
- Risk Assessments
- COSHH assessments
- Method Statements for high risk activities
- Competencies.

Etc, as indicated in Form IMS/SRMR Assessment KSQ**.

13.2.3 Approval of Contractor's

- a) After placing successful Contractor's on the Approved Contractor Register but prior to commencement of work with the contractor the Managing Director or his nominated representative will ensure that the contractor has been made fully aware of all aspects of the Company's activities that may affect the management of health and safety by the contractor.
- b) The Managing Director or his nominated representative shall, as part of sub-contract conditions, include the issue of the Health and Safety Rules for Contractors and ensure the appropriate documents requested therein are returned by the Contractor to the satisfaction of the Company before work commences.
- a) The Managing Director or his nominated representative will ensure that every contractor is inducted in accordance with the Company's Health and Safety Management System.

13.2.4 Induction of Contractors

The Managing Director or his nominated representative must ensure the induction process and paperwork is completed by all individuals in accordance with Section 2 of the Company Health and Safety Management System.

- a) Including Company/Site Induction – Site rules and risk information.

13.2.5 Contractors' Responsibilities

Contractors are subject to the Company's Health and Safety Management System as contained in the Site Installation Operations Manual.

13.2.6 Supervision and Inspection of Contractors

The Managing Director or his nominated representative will monitor Contractors' performance for compliance with Safe Systems of Work, Method Statements and the Company's Health and Safety Management System.

14. LIFTING OPERATIONS

14.1 POLICY

The Company recognises its legal obligation towards protecting the Health and Safety of its employees from the hazards relating to the operation and use of lifting equipment in the workplace, and will comply with the Lifting Operations and Lifting Equipment Regulations 1998.

14.2 PROCEDURE

In order to meet its obligations and responsibilities, and to contribute to a safe working environment, the company has adopted the following procedure:-

Any lifting equipment purchased will be covered by an appropriate Certificate of Inspection and marked as to safe working load, and unique identifier.

No lifting equipment will be taken into use for the first time unless it meets the criteria laid down above.

A register of all lifting equipment will be maintained by the Managing Director.

All lifting equipment will, when not in use, be stored in a dry place away from heat sources. Metal lifting equipment will be lightly oiled to prevent corrosion.

Operators will receive such training as is required to ensure their own safety and that of others who may be put at risk from lifting operations.

Operators are instructed to inspect lifting equipment for damage each day before use and are to report any damage or defect to their manager or supervisor immediately.

Upon receipt of the reported damage or defect the supervisor or manager will immediately remove the piece of equipment from service pending formal inspection or disposal.

All lifting equipment will be subject to formal examination by an independent competent person, after a period of not more than 6 months and the record of examination will be retained for inspection for a period of not less than 2 years.

14.3 GUIDANCE

14.3.1 Planning Lifting Operations

All lifting operations involving lifting equipment require an assessment of how the lift is to be carried out. An assessment of the proposed lift operations is normally made beforehand to determine the various risks and necessary control measures. In order to carry out an assessment the following issues are to be considered:

- What is to be lifted;
- How is it to be lifted;
- What lifting equipment is to be used;
- Where is it to be used;
- Is equipment adequate for size and weight;
- Are operators competent to use the equipment;
- How is it to be supervised
- Is equipment tested and certificated and are certificates available
- Who is to act as the "Appointed Person", to supervise the lifting operation.

For routine lifting operations the planning of each individual lifting operation will be a matter for the operators who have the appropriate knowledge, training and expertise. Only trained operatives will participate in Lifting operations. All our operatives are competent to supervise lifting operations directly to the movement of barrier components. Refer to Form SHECD 40 Lifting Plan.

Specialist crane operations will usually be carried out by specialist contractors under contract. These specialist contractors may also provide the “Appointed Person” and the relevant assessments etc.

15. MANUAL HANDLING

15.1 POLICY

The Company will endeavour to provide its employees and sub-contract personnel with a safe and healthy working environment and recognises the importance of implementing the Manual Handling Regulations 1992. Therefore, managers will need to assess all handling activities to determine whether it is possible to utilise mechanical handling techniques/resources for each task.

15.2 PROCEDURE

15.2.1 Manual Handling Assessments

Manual handling precautions will be assessed in accordance with the normal risk assessment process giving priority to mechanical handling wherever this is deemed more reasonably practicable. A hierarchy of controls measures will be followed incorporating:-

- TASK – the task or activity to be undertaken;
- INDIVIDUAL – the physical capabilities of the individual involved in the task;
- LOAD – the description of the load e.g. weight, size, etc;
- ENVIRONMENT – the type of environment e.g. indoors, outdoors, weather conditions, etc.

15.2.2 Manual Handling Assessment Principles

The requirements of the Regulations are consistent with the principle that work processes should:

- avoid the need to undertake manual handling activities that involve the risk of injury wherever it is reasonably practicable to do so.

This can be achieved through avoiding the manual activity itself, mechanising it so that there is no chance of injury or, where necessary introducing work practices, and training to minimise manual handling as much as possible. Minimisation techniques may involve e.g. lighter components, reduction in lift heights, task rotation and use of handling aids. It is normal practice to utilise forklifts for movement of all heavy components into location etc.

Additionally, reference should be made to the risk assessments, which have identified activities involving manual handling, and the necessary control measures required to be complied with, in order to either remove or reduce risks associated with manual handling activities. Detailed Manual Handling assessments can also be conducted using the Manual Handling Assessment Form HSCD 11.

15.3 GUIDANCE

To avoid back injuries, which form the largest category of work injury, mechanical lifting and handling equipment must be provided and used wherever possible.

Information, instruction and training must be given in the correct methods of lifting and handling.

A back injury once sustained frequently causes permanent weakness. Where avoidance of heavy handling is impossible the following simple rules can prevent years of suffering:

- If the load is too awkward or too heavy – GET HELP.
- If mechanical aids are available USE THEM to move the load, providing that full instruction in their safe use has been received.
- Check in advance that there is adequate room to lift the object, a clear path is available to the destination and there is adequate room for putting it down.
- Check for sharp edges, wear protective gloves if necessary.
- Wear suitable footwear.

When lifting an object remember these points:

- Keep the back straight.
- Keep arms close to the body.
- Keep chin in.
- Stand with feet slightly apart and one foot slightly in front of the other.
- Bend knees and lift by straightening the legs.
- Grip with the palm of the hand, not just the fingers.

16. EXCAVATIONS AND PERMITS TO WORK

16.1 POLICY

The Company recognises its legal obligation towards protecting the Health and Safety of its employees from the hazards relating to working in excavations and will comply with the Health and Safety at Work Act 1974 and all other relevant regulations to ensure safe systems of work are implemented.

16.2 PROCEDURE

16.2.1 The Site Manager or Supervisor will ensure that the requirements of HS (G) 47 “Avoiding Danger from Underground Services” and HS (G) 185 “Health and Safety in Excavations” is complied with and that operatives working in excavations have the necessary competency skills to work safely. Prior to digging any trenches or excavations the Site Manager, Supervisor or competent person will ensure the following precautions are available to protect against:-

- Collapse of the sides;
- People and vehicles falling into the excavation;
- Materials falling onto people in the excavation;
- Undermining nearby structures;
- Underground and overhead services; and
- The inflow of ground or surface water.

16.2.2 Excavation Safety

- A safe means of access and egress must be provided and the risk assessment will identify the safest method;
- Ensure petrol and diesel engines are not used in or sited near excavations because of the hazardous fumes that can build up in confined spaces.

16.2.3 Inspections of Excavations

- Excavations that need to be battered back or supported to prevent danger of collapse are to be inspected by the Site Manager, Supervisor or competent person on a regular basis.
- At the start of the shift before work starts;
- After any event likely to have affected its stability;
- After any fall of rock, earth or other material.
- If the Inspector is not satisfied that work can be done safely, work will not start until the defects have been rectified.
- Inspection reports will be retained on site until construction work is completed and retained for three months afterwards.

16.2.4 Underground Services

The most obvious example of underground services are those used to carry electricity, gas, water and telecommunications. Before work starts check the following:-

- Existence of service plans for electricity, gas, water and telecommunications;
- It is essential that service locating devices are used continually such as Cable Avoidance Tools (CATS);
- Trial holes should be dug to confirm the exact location and depth of the service;
- Excavators or power tools are not to be used within 0.5 metres of the indicated line of a service;
- All operatives involved will be competent to undertake the works and will be properly supervised at all times.

16.3 PERMITS TO WORK

16.3.1 POLICY

The Company recognises its legal obligations towards the Health and Safety of employees through the provision of safe systems of work. Where known hazardous work is to be undertaken, a Permit to Work system will apply. The Permit to Work (PTW) is a document detailing the work to be done and the precautions to be taken, to prevent danger arising, during the course of the task being undertaken. Any precautions specified to prevent danger must be in place prior to commencement of work. Under no circumstances will the PTW system be used to sanction unsafe activities or compromise safety standards such as operating equipment without adequate guarding. The PTW will describe the precautions required to protect persons from injury during certain maintenance operations on equipment or buildings. Both company employees and contractors may use the PTW.

PROCEDURE

16.3.2 When a Permit to Work is required:

- a) The Site Manager or Supervisor will ensure that, wherever a written authorisation is specified in their General or Site-Specific Rules, this authorisation is provided by means of an approved Permit to Work.
- b) The Site Manager or Supervisor will ensure that whenever a risk assessment identifies the need for a Permit to Work to be used that the document is issued prior to allowing the job to start. Responsible Site Managers or Supervisors must use their judgement when deciding whether or not a Permit to Work should be used.

16.3.3 Hot Works Procedure

Only persons who are competent, trained and authorised by management are allowed to use oxyacetylene welding and disc cutting equipment.

Naked flames must be extinguished when not in use. Never put down or leave a lighted torch.

A suitable fire extinguisher must be available whenever hot works activities are taking place.

Suitable goggles must be provided and must be worn at all times by persons when engaged in oxyacetylene welding and disc cutting, chipping and grinding and in other operations whereby any dust, chemical or other material could prove hazardous to the eyes. Full compliance with the Personal Protection Regulations 1992 must be undertaken.

Oxyacetylene welding and disc cutting operations produce fumes which can be harmful and are subject to the COSHH Regulations; therefore, an assessment must be made prior to carrying out any work to establish control measures which may be necessary to avoid exposure to excessive fume levels.

After work is completed the work area must be checked to ensure that there are no materials smouldering. Further checks are to be made one hour after work ceases and before the end of the working day.

16.3.4 Permit to Work Issue Procedures

- a) The Site Manager, Supervisor or competent person authorised to issue the Permit to Work will complete the Permit and issue it to the person in charge of the job as specified on the Permit.
- b) The person issuing the Permit to Work will satisfy himself that the person receiving the Permit has read it and understood its contents.
- c) The person receiving the Permit to Work is then responsible for ensuring that all of the conditions and instructions contained in the Permit are observed and complied with whilst the Permit remains active.

16.4 GUIDANCE

Permits to Work will normally be required in the following situations:

- Live Electrical work
- Entry into Confined Spaces
- Hot Work
- Excavations in vicinity of Underground & Overhead Services
- Deep Excavations
- Work on Hazardous Machinery

Many of the above items do not normally apply to the Company operations, but covers the typical activities whereby close control will be necessary. A Permit to Work (Form SHECD 06) covering most activities is to be completed and issued to control the task.

17. METHOD STATEMENTS

17.1 POLICY

The Company recognises its responsibility to provide adequate training and safe systems of work in order to protect employees from the hazards and associated risks they may be exposed to during the course of their duties. In order to discharge its responsibilities, it will be necessary with the more complex activities to develop a method statement that clearly outlines the manner in which the work is to be carried out.

17.2 PROCEDURE

Safety method statements will cover all operations and certain tasks considered by the Managing Director or his nominated deputy to require a formal, laid down system of work.

Based upon the findings of risk assessments, the knowledge of experienced personnel and observation of the task itself, a safety method statement will be formulated and the findings recorded in writing.

The safety method statement will cover each step of the operation to be undertaken, the hazards contained within that operation and the measures to be taken to reduce risk.

Such method statements will be made available to all appropriate employees and adequate resources put in place to ensure control measures identified are implemented. Method Statements will be maintained in a Register. Refer to Method Statement Review Form in the IMS/SCD.

17.3 GUIDANCE

Method Statements have proved to be an effective and practical management tool, by taking account of the risk assessment and communicating a safe system of work for those employees involved in the work activity.

Method Statements are especially important for higher risk or unusual work such as:-

- Steel erection
- Formwork erection
- Demolition
- Use of Hazardous Substances
- Confined spaces
- Deep excavations (over 2 metres) deep

18. TRAINING AND TOOLBOX TALKS

18. POLICY

The Company recognises its duties as an employer to ensure that its employees are provided with adequate health and safety training. This applies to both when they are being recruited and on them being exposed to any new increase in risk or being transferred to a new area or process.

18.1 PROCEDURE

Health and Safety training must be relevant to the Company operations.

Whilst some general training such as health and safety awareness is to be commended, potential employees need to demonstrate adequate knowledge of the health and safety arrangements needed for the work for which they are being employed.

The Managing Director will determine training needs.

To assist in this process, a training matrix is established to identify current skills and competencies. In turn this matrix provides a basis for identifying training needs.

The Managing Director is responsible for ensuring that the training matrix and related employee training records are properly maintained.

To enhance the level of safety awareness and promote a positive safety culture for employees involved in site operations, Toolbox Talks are an effective means of focusing on particular safety related issues.

18.1.1 Toolbox Talks

Toolbox Talks are short talks delivered usually by managers or supervisors that address basic safety points on a range of safety issues. Toolbox talks will normally comprise an element of the health and safety rules delivered by a manager on a one to one basis or one to a group.

18.1.3 Toolbox Talks Delivery

It is intended that these Talks should be delivered to all site personnel on a regular basis on a frequency of one talk per month. All Toolbox Talks are recorded and signed for by employees on the Register Form SHECD 07 contained in the Reference Manual annexed to this Policy.

Some discretion by the manager will be needed in determining which talk to deliver at any one time with known skills and competencies of employees being a contributory factor in this determination.

18.1.4 Inductions

Similarly, it will be necessary to advise all site personnel of any site-specific risks and procedures. This will be done during an initial Site Induction and recorded in the Induction Register.

18.5 GUIDANCE

Health and Safety inspectors will want to see arrangements for the provision of safety training in the company's Safety, Health and Environmental Policy.

19. NOTICES AND RECORDS**19.1 POLICY**

The Company recognises its responsibilities under the Health and Safety at Work Act 1974 and associated regulations to provide notices and maintain records relating to their business activities that affect health, safety and the environment.

19.2 PROCEDURE

The Managing Director will ensure that statutory notices are displayed and that records are maintained in compliance with the requirements of the Health and Safety at Work Act 1974. The list relating to Notices and Records to be maintained is on the next page and available on Saset system.

19.3 Notices

The following Notices should be displayed at each worksite and available on Sasets system where applicable.

Title	Where to be Displayed
Health and Safety Law "What you need to know" Poster. HSE (or HSE approved equivalent	On site or at the office or yard <i>This notice may be already displayed in the general workplace by Client/Occupier</i>
Notice giving information on First Aider or Appointed Person and first aid available	Where employees are working who are affected by the arrangements. <i>These facilities may well be made available by Client/Occupier</i>
Company Safety, Health and Environmental Statement of Intent and Policy document	Copies provided to all employees and contractors advised of those elements affecting their activities.
Fire Procedures	In site offices. For most contracts, compliance with Client / Occupier fire precautions arrangements are more usual.
Employer's Liability (Compulsory Insurance) Certificate	Site or Office (must be renewed annually)
Form 10(Rev)	On sites where the Construction (Design and Management) Regulations 2015 apply.

19.4 Records

Title	Form Number	Where to be kept
Accident Book (to be kept for three years after date of last entry)	BI510	Site or Head Office
Register of persons trained / assessed to operate work equipment such as mobile construction plant	Any reasonable format containing details of training / assessment dates and competencies	Site or Head Office
Records of inspections, examinations of working platforms / work areas and excavations/cofferdams etc.	As per Company Inspection Form	Site
Ditto lifting equipment including any special tests	Ditto	Site/Head Office
Routine Inspections of work equipment	As per Company Inspection Form	Site and sent to Head Office
Records of reports on thorough examination of lifting appliances, hoists, chains, ropes	Approved records by testing company copied to the Company	Site/Head Office
Reports of notifiable injuries(1), diseases(2) and dangerous occurrences(1) gas related dangerous occurrence(3)	1=F2508, 2=F2508A, 3= F2508G	Head Office
Competencies of operatives		Head Office

20. WORK EQUIPMENT

20.1 POLICY

The Company recognises its responsibilities under the Provision and Use of Work Equipment Regulations 1998 to ensure all work equipment supplied for use by its employees is suitable and sufficient for the purpose. The term Work Equipment applies to any machinery, appliance, apparatus or tool for use at work. Under no circumstances will any person carry out any work, repair or testing on work equipment unless having received appropriate training and having been deemed competent by their manager or supervisor.

20.2 PROCEDURE

When determining the need for work equipment, the Directors will make an assessment of the nature of the work to be carried out and reconcile that assessment with the performance and design criteria of the equipment to ensure suitability for purpose.

They will liaise as appropriate with the SHE Advisor to ensure compliance with the relevant statutory provisions.

Work equipment such as mobile construction plant and other such as compressors, drills, breakers etc. is purchased or hired to carry out works for which that equipment is designed to do. Only those operatives who have been trained or suitably assessed as to their competency and authorised may operate any mechanised work equipment.

Each operator of mobile plant which is either owned or hired, will be required to carry out regular checking of the equipment to ensure safe operation at all times. The Company Form SHECD 03 will be used for this purpose by all operatives.

Service records for equipment will be held at the head office except hired plant, which will be held by the hire company.

All work equipment will be maintained in an efficient state, in working order and in good repair.

Where machinery has a maintenance log, this will be kept up to date.

Any new equipment purchased will be suitable for the purpose of intended use and will incorporate such features that are required to protect the health and safety of both users and others who might be affected by the equipment's operation.

20.3 GUIDANCE

As far as mobile construction plant is concerned, the competency / training / assessment standards are those identified in the CITB CTA Scheme or those of a similar standard.

Records will be kept relating to the competencies held and relevant details made available to clients on reasonable request.

21. CONSULTATION AND COMMUNICATION

21.1 POLICY

The Company recognises the requirement to consult, either directly or through elected representatives, with those employees currently outside the existing statutory arrangements for trade union representation, on all questions relating to health and safety at work, in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.

21.2 PROCEDURE

All employees have direct access to their immediate manager or supervisor to discuss any area of health and safety they feel is of concern to them.

All managers and supervisors are required within the limits of their normal responsibility or authority to deal with such concerns in a sympathetic and practical manner having regard to the Company's policies and legal requirements.

Similarly all managers and supervisors are able to consult with the Managing Director to seek a remedy.

Other consultation arrangements include:

- Yearly Management meetings.
- Regular Manager/Supervisor meetings.

These meetings deal with many issues with health and safety as a separate agenda item.

The meetings are all minuted with details of any agreements or proposals to deal with addressed health and safety issues made available to the relevant staff for information, comment or approval as appropriate.

21.3 GUIDANCE

The principles contained in the Health and Safety (Consultation with Employees) Regulations 1996 and the Safety Representatives and Safety Committees Regulations 1977 are followed and in particular, such consultation includes:

- Introduction of measures likely to affect employees health and safety,
- Arrangements for the appointment of "competent person/s" in accordance with the Management Regulations to:
 - a) assist the employer on health and safety matters, and
 - b) take charge of measures to combat identified serious and imminent danger at the workplace,
- Statutory information he has to provide,
- details of any relevant training to be provided, and
- introduction of new technology into the workplace that may affect health and safety.

22. MONITORING, INSPECTIONS AND AUDITING

22.1 POLICY

The Company have adopted the organisational arrangements, policies and procedures contained within this document in order to ensure that the measures described in their Safety, Health and Environmental policy statement are complied with. It is recognised that having made organisational arrangements and established standards, it is necessary to provide assurance that those standards are effectively applied. The Managing Director or an independent competent person nominated by him will carry out a Management Review involving a comprehensive audit of the health and safety standards, and their effectiveness on the Company's operations on an annual basis.

22.2 PROCEDURE

22.2.1 Monitoring

Each manager or supervisor should regularly monitor health and safety arrangements in place having regard to the Company policy and significant risks present by walking around the work area,

observing work practices and working environment, noting any concerns and seeking a remedy consistent with both good practice and policy standards.

In addition to routine observations, formal inspections of plant and equipment can help to identify defects as they occur and suitable remedies put in place. Inspections may be required by statute; these include:

- Working Platforms
- Lifting and Appliances, etc
- Work Equipment

Details of these statutory inspections will be held at head office.

22.2.4 Inspections

In addition to routine monitoring, all sites will be regularly inspected on a formal basis in two ways:

- a) By Managers or Supervisors using the Company Form SHECD 02 and.
- b) By the SHE Advisor using the Company Form SHECD 01/their own external form.

Form SHECD 02 is to be completed on site and kept with the Site File and made available for inspection by the Managing Director or the SHE Advisor.

The SHE Advisors Inspection Report will be issued to the Site Manager or Supervisor having first discussed the contents and agreed necessary remedial actions where shown. A copy of this report will also be issued to the Managing Director. The respective Site manager or Supervisor will liaise as necessary to ensure remedial actions identified are taken and confirmed.

22.2.5 Auditing

Auditing is used to compare what is happening on site (or indeed within the Company) to what should happen. Usually a formal approach is needed and a record of findings and remedial actions taken both recorded. Auditing is to be carried out by the Managing Director, Site Manager and the SHE Advisor at an agreed frequency and the following list identifies some of the areas to be addressed:

- Management arrangements
- Risk assessment provision and required control measures
- Training
- Method statements
- Contractor assessment and control
- Legal compliance issues
- Personal protective equipment
- Emergency arrangements
- Legal compliance issues
- Provision of suitable assessments of any hazardous materials on site and related control measures
- Competencies and qualifications of personnel
- Statutory inspections and associated records
- Welfare arrangements
- Permits to Work
- Accident reporting and first aid arrangements

22.3 GUIDANCE

The audit will comprise of a formal review of the existing Occupational Health and Safety Management System to ensure it reflects current United Kingdom legal requirements.

On completion of the step described, the auditor will examine the health and safety related records and activities against the standards described in the appropriate policies and procedures.

After the audit a verbal report of findings will be given to the Managing Director. A comprehensive written report identifying any deficiencies, together with recommended actions required to achieve compliance will follow up the verbal report.

Appropriate records of amendments to the Occupational Health and Safety Management System are to be maintained as and when they occur and recorded on Form SHECD 15.

23. YOUNG PERSONS

23.1 POLICY

The Company recognises its duty under the Health and Safety (Young Persons) Regulations 1997 to protect the health and safety of young workers employed or on work experience within the company. The law requires an employer to assess risks to all employees, including young workers and to do what is reasonably practicable to control those risks. Young workers are a risk, therefore children between 13 and minimum school leaving age (MSLA) are prohibited from being employed in industrial undertakings such as factories, construction sites etc, except when on work experience schemes approved by the local education authority. Children on work experience are designated as employees for health and safety legislation.

23.2 PROCEDURE

Where it is envisaged that a person under 18 years of age is to be employed at any Company location, it is essential that a full assessment is carried out to determine any hazards and risks that he or she may be exposed to whilst at work. The employing manager will carry out this assessment **before** the Young Person starts work and the following issues are to be considered:

- Where to be employed.
- Supervision.
- Capabilities and existing skills.
- Personal disabilities.
- Exposure to environmental conditions (heat, cold, wet / dry, dust, hazardous substances etc.).
- Equipment to be used (Note: mechanical equipment may only be used under supervision unless previously trained and deemed competent.

A mentor is to be appointed and be responsible for the supervision of any young person.

The Company Risk Assessment Form SHECD 05 is to be used for the assessment process.

The contents of the assessment and any control measures put in place are to be fully discussed with the young person before he or she commences work.

23.2. 5 Restrictions

No person under the age of 18 years is allowed to:

- Work with woodworking machinery.
- Drive or operate mobile construction plant & equipment.
- Operate lifting equipment (Cranes, lorry loaders, forklifts etc.)
- Acting as a slinger / banksman for lifting operations.
- Supervise construction operations.

23.3 GUIDANCE

Parents or guardians of young workers under the MSLA will be informed of key findings of the risk assessment and the control measures taken. This information will be provided to parents or guardians **before** employment or work experience commences.

Young workers will undertake such training under proper supervision by a competent person until such times as the young worker is deemed safe in the workplace.

Every employer who employs young workers has a duty of care to ensure that no harm comes to young workers who are in their employment.

24. DISPLAY SCREEN EQUIPMENT

24.1 POLICY

The Company recognises the potential of display screen equipment operations to cause work related upper limb disorders, and its legal obligations under the Display Screen Equipment (DSE) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002, to take such action as required to prevent this type of injury.

24.2 PROCEDURE

All employees who are required to operate display screen equipment as part of their normal work routine will be required to complete a workstation analysis, (DSE Analysis Form SHECD 08).

All display screen equipment operated by employees will be subject to analysis that will be carried out by a suitably trained and experienced person.

The display screen equipment analysis will involve the completion of a questionnaire.

On completion of the analysis, the assessor will discuss the findings with each employee individually, record the findings and implement any recommendations to reduce the risk.

The findings of display screen equipment analysis will be subject to continuous review, in order to identify potential problems relating to the transfer of any employee with special needs to a new or different workstation.

24.3 GUIDANCE

Employees operating display screen equipment will not be subject to any targets or incentives based on keystroke operated within a given period, nor will the number of keystrokes operated within a given period be recorded.

All employees are encouraged to structure their day to day work in such a way as to avoid long period of continuous display screen operations.

25. COMPANY TRANSPORT

25.1 POLICY

The Company recognises the danger to employees and others in relation to operating Company vehicles. To meet its obligation to minimise the risks of accidents, the Company policy is that only employees selected as Company drivers will be authorised to drive Company vehicles following approval by the Managing Director.

25.2 PROCEDURE

Prior to approval, drivers will be required to produce a current driving licence covering the class of vehicle to be driven, for checking by the Managing Director.

All company personnel who are selected as company drivers will be registered on an approved drivers list held by the managing director or his nominated deputy.

Vehicles will be maintained in compliance with the manufacturer's instructions (i.e. the servicing schedule). The managing director or his nominated deputy will ensure that such maintenance is carried out as and when required.

Prior to vehicles being driven, drivers will carry out a safety inspection of lights, brakes, tyres, oil levels, etc. Any faults or defects are to be rectified before the vehicle is driven or faults of a less serious nature reported for corrective action as soon as possible by completing the daily Company Vehicle Defect Book.

The managing director or his nominated representative will keep a register of all current vehicle documentation, including road tax details and insurance expiry dates.

All company drivers are prohibited from using mobile phones whilst driving unless the vehicle is fitted with a "Hands Free" device.

All company drivers will drive company vehicles within the rules of the Highway Code and observe other company's rules (i.e. speed limits) when visiting client premises.

The vehicle will be equipped with a first aid kit, fire extinguisher and work related equipment as authorised by the managing director or his nominated representative.

All company drivers will take a break of 45 minutes after 4½ hours cumulative or continuous driving, or alternatively 2 or 3 breaks of no less than 15 minutes which total 45 minutes during or immediately after the driving period.

All company drivers will be made aware of their responsibility of driving with due care and attention and to acknowledge the risk assessment for driving company vehicles (RA V OWA 11).

26. ALCOHOL AND DRUGS

26.1 POLICY

The Company recognises the hazards created by alcohol and/or substance abuse where strict standards are needed because of safety-critical jobs. Notwithstanding any health assessment procedures or requirements, the Company endeavours to ensure any employee's use of alcohol, prescribed drugs or "abuse" drugs does not adversely affect the healthy and safe operation of the Company's activities.

26.2 PROCEDURE

The following procedure is to be followed in all cases where a Manager or Supervisor identifies or suspects that an employee is under an adverse influence from alcohol or drugs.

If any employee shows signs of intoxication at work, the Manager or Supervisor must swiftly investigate the situation and make arrangements for the employee to be escorted from Company premises immediately to a place of safety, e.g. home.

Alcohol or drug abuse may influence work performance even if the abuse takes place outside the workplace.

26.3 GUIDANCE

Establishing the Problem.

The following signs may be indicators to Managers that an employee may have a problem.

<p>Physical signs</p> <ul style="list-style-type: none"> • Smell of alcohol etc. on breath • Bloodshot or dilated eyes • Slurred speech • Shaking hands • Erratic behaviour (hyperactive) • Loss of appetite • Lowering of personal standards 	<p>Absenteeism</p> <ul style="list-style-type: none"> • Instances of unauthorised leave • Frequent Friday and/or Monday absences • Leaving work early • Poor time keeping • Excessive levels of sickness absence • Unusually high level of sickness from colds, flu, stomach upsets.
<p>Mood Swings</p> <ul style="list-style-type: none"> • Irritability • Depression • General confusion 	<p>High Accident Levels</p> <ul style="list-style-type: none"> • At work • Elsewhere e.g. driving, at home
<p>Work Performance</p> <ul style="list-style-type: none"> • Difficulty in concentration • Work required increased effort • Individual tasks take more time • Problems with remembering instruction or own mistakes. 	<p>Misconduct/Self Referral</p> <ul style="list-style-type: none"> • In some instances, employees may seek help or advice themselves.

27. STRESS AT WORK

27.1 POLICY

The Company acknowledges that bullying, inter-personal conflict at work, racial and sexual harassment is unacceptable behaviour that causes unnecessary stress in the workplace. The company recognises that people encounter stress in their lives and are as committed to managing work-related stress as any other health and safety risk.

27.2 PROCEDURE

Through the risk assessment process the Company will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, so far as is reasonably practicable, whilst creating a working environment in which all employees have the confidence to seek help for and discuss any work-related problem they may have.

The company recognises the importance of management and employees making a commitment to manage work related stress effectively and to minimise harmful stress levels by:-

- Identifying specific stress hazards.
- Recognising symptoms of unhealthy stress.
- Monitoring performance.
- Acting promptly to provide support once stress is identified.
- Taking appropriate preventative action.

27.3 GUIDANCE

It is the responsibility of all managers to develop, implement and monitor appropriate management strategies to reduce levels of occupational stress within the areas of their responsibility.

It is the responsibility of all managers to adopt a style conducive to the achievement of the Company objectives without putting unnecessary, excessive and undue pressure on employees.

Employees also have a responsibility for themselves and to take appropriate action to manage their stress levels and identify pressure points from their home and/or working life.

Anyone experiencing harmful work related stress levels should refer to their immediate supervisor or contact their line manager directly. In all cases, the matters raised will be treated sensitively and confidentially.

28. VISITORS ON SITE

28.1 POLICY

The Company recognises its responsibility towards protecting the health and safety of persons visiting the Company's premises. Visitors are considered to be those persons who are not employed by the Company but enter the company's premises.

28.2 PROCEDURE

Visitors will report to the receptionist who will ensure that details of their name, vehicle and who they are to visit are entered into the Visitors Book.

The receptionist will inform the visitor's host, and he or she will meet the visitor in the reception area.

Under no circumstances will unaccompanied visitors be allowed to enter beyond the reception area.

Visitors are the responsibility of the person with whom they have an appointment. This person, or a second competent person, will accompany the visitor at all times and ensure that the visitor is issued with and wears the appropriate personal protective equipment where required.

The Company's representative will also ensure that visitors obey the company's health and safety rules at all times.

On leaving the site, visitors will be escorted back to the reception area where they will book out prior to departure.

29. HOUSEKEEPING STANDARDS

29.1 POLICY

The Company recognises the hazards that can be created by poor housekeeping standards and its legal obligations towards providing a safe and healthy working environment. The Company policy is to encourage all employees to contribute towards achieving and maintaining a low risk working environment.

29.2 PROCEDURE

Managers and supervisors will carry delegated responsibility for achieving and maintaining high housekeeping standards in the areas over which they control ensuring that the measures described below are carried out:-

- Gangways and walkways will be available at all times and free from obstruction.
- In the event of gangways or walkways being temporarily obstructed, clearly identified safe alternate routes will be provided.
- Floors and stairs will be cleaned, properly drained and not slippery.
- Sufficient identified scrap bins will be provided in all areas.
- The bins will be emptied at routine intervals and at any time they become full.
- Bins carrying flammable materials or those that may ignite spontaneously will be made from metal and fitted with a lid.
- Materials will be stored in designated areas, in a safe manner, and will not interfere with emergency exits, fire fighting equipment etc.

The above standards will, where appropriate, apply to all external areas.

In order to ensure that the above standards are maintained, regular inspections will be carried out by managers and supervisors.

30. FORK LIFT TRUCK OPERATIONS

30.1 POLICY

The Company recognises its responsibility to protect the health and safety of employees, visitors and others from the hazards associated with fork lift truck operations.

30.2 PROCEDURE

Any person operating lift trucks will have received training and passed an appropriate examination. 30.2.2 Provision of training and examination will be carried out by Road Transport Industry Training Board Services (RTITB) accredited personnel. A basic set of safety rules for lift truck operatives will be issued to each driver. (Form SHECD 18).

Lift trucks will be inspected prior to use by operatives.

The results of the inspections will be entered into a log that will remain on file for a period of not less than three months (see Form SHECD 10).

Lift trucks will be subject to periodic preventative maintenance as specified by the manufacturer.

Where reasonably practicable, lift truck operations and pedestrians will be segregated.

In addition to this, clear and unambiguous signs will be posted which will inform visitors and remind employees that lift trucks are operating in the workplace.

These signs will be posted at each entry to areas where lift trucks are in operation.

30.3 GUIDANCE

Refresher Training will normally be required under one or more of the following conditions:

- An operator's competence or safety performance gives cause for concern.
- The operator is an infrequent user, e.g. electrician, who may only drive for a short period, half a dozen times a year. **In this case**, basic training will need to be given every three years.
- A variant of the truck or handling attachment is introduced or some other significant changes takes place in the operator's working conditions.
- A trained and experienced operator who has not operated a FLT for some time, is about to take up full-time FLT operation.

31. ASBESTOS MANAGEMENT

31.1 POLICY

The Company recognises its legal obligations under the Control of Asbestos Regulations 2012. In order to meet its obligation to provide a safe and healthy workplace, the company has adopted the following procedure. Regulation 4 also requires:

- taking reasonable steps to find asbestos-containing materials in premises and checking their condition;
- presuming materials contain asbestos unless there is strong evidence to suppose they do not;
- keeping an up-to-date written record of the location and condition of asbestos-containing materials;
- assessing the risk of exposure to asbestos-containing materials;
- and preparing and putting into effect a plan to manage the risk.

31.2 PROCEDURE

In order to meet its obligation to provide a safe and healthy workplace, the company has adopted the following procedure.

The responsible person will ensure that for all buildings and equipment for which there is not a clear report indicating that they are asbestos-free (particularly for buildings built or refurbished between 1950 and 1980) a detailed survey will be carried out to establish the location, form, type and condition of any asbestos together with an evaluation of the likelihood of the material being damaged or worked on in the future.

The results of the surveys will be recorded in an asbestos register for each work-area, and this register will be consulted whenever maintenance, repair or alteration works are considered.

Asbestos-containing materials shall be labelled and subject to regular and documented inspections and any maintenance carried out to minimise the risk of fibre release.

All works on asbestos except for very small quantities of asbestos cement, pump seals, valve seals or flanges, shall be carried out by licensed contractors under the independent supervision of an accredited monitoring agency.

In addition to removing asbestos identified as representing a significant risk (because of its condition, location, etc.) the opportunity shall be taken during any maintenance or refurbishments to gradually remove all asbestos from the company sites.

Non-asbestos materials shall always be specified for works. Waste contaminated by or containing asbestos shall be double bagged, labelled and disposed of in a licensed site as special waste and the disposal paperwork retained in the Company records.

Employees must not at any time, work with, remove materials containing asbestos, this includes the stripping of lagging or any type of material which may have an asbestos content.

31.3 GUIDANCE

Where it is known or suspected that the materials to be removed, or worked with contain asbestos, then the person responsible for co-ordinating safety arrangements must be informed. A specialist company should then be commissioned to remove asbestos.

32. WASTE MANAGEMENT

32.1 POLICY

The Company recognises its obligation under the Environmental Protection Act 1990 and the danger to health and the environment from waste generated during all its yard, site installation and office processes not being properly managed.

32.2 PROCEDURE

In order to comply with the Environmental Protection Act 1990 the company have adopted the following procedure.

In simple terms, waste is classified as any object, material or substance that the company owns or produces and wishes to dispose of or have recovered.

To identify what is waste and to take the appropriate action to manage it the company will implement the following measures:-

- prevent any other person treating, keeping or disposing of waste other than in accordance with waste management licensing legislation;
- prevent the escape of waste – both on site and during onward transfer;
- ensure that waste is only transferred to an authorised person or to a person for authorised transport purposes;
- complete a transfer note which must be signed and kept for a minimum of two years by the parties involved when waste is transferred.

32.3 GUIDANCE

Additionally the Hazardous Waste Regulations 2005 provide simpler procedures covering the movement and consignment of hazardous waste. These regulations also:-

- replace the term special waste with hazardous waste to more closely reflect the European Hazardous Waste List;
- place a legal duty on hazardous waste producers to ensure that consignment notes are completed;
- require operators of waste management sites to provide hazardous waste producers with regular summaries of the type and quantities of waste they have sent for treatment or disposal. This is designed to provide companies with written proof that their waste has been disposed of correctly.

32.4 Oil storage on Site.

The Control of Pollution (Oil Storage) (England) Regulations 2001 state that oil must be stored in a container that is of sufficient strength and structural integrity to ensure that it is unlikely to burst or leak in its ordinary use. The container must be situated within a secondary containment system, more commonly referred to as catchpit, or bund. Under the regulations, a bund must comply with the following minimum requirements:

- It must have a capacity of not less than 110% of the container's storage capacity, or not less than 110% of the largest container's storage capacity if there is more than one container within the bund, or 25% of their aggregate storage capacity, whichever is the greater.

- The bund must be positioned, or other steps must be taken, so as to minimise any risk of damage by impact, so far as is reasonably practicable.
- Its base and walls must be impermeable to water and oil.
- Its base and walls must not be penetrated by any valve, pipe or other opening that is used for draining the system.
- If any fill pipe, or draw-off pipe penetrates its base or any of its walls, the junction of the pipe with the base or walls must be adequately sealed to prevent oil escaping from the system.

33. WORKING AT HEIGHT

33.1 POLICY

The Company recognises its responsibilities to protect the health and safety of its employees and do all that is reasonably practicable to prevent anyone falling whilst working at height. The company will, in compliance, with the Work at Height Regulations 2005 provide work equipment or other measures to prevent falls where working at height cannot be avoided; and where it cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

33.2 PROCEDURE

33.2.1 Employer's Responsibilities.

The Company will ensure that:-

- all work at height is properly planned and organised;
- all work at height takes account of weather conditions that could endanger health and safety;
- those involved in work at height are trained and competent;
- the place where work at height is done is safe.
- equipment for work at height is appropriately inspected;
- the risks from fragile surfaces are properly controlled;
- the risks from falling objects are properly controlled.

33.2.2 Planning the Work at Height.

The Company will ensure that:-

- no work is done at height if it is safe and reasonably practicable to do it other than at height;
- the work is properly planned, appropriately supervised and carried out in as safe a way as is reasonably practicable;
- plan for emergencies and rescue;
- the risk assessment for the activity is read and acknowledged by all those involved in the work.

33.2.4 Weather conditions.

If it is deemed that the weather conditions on site will endanger health or safety, then the work will be postponed until the situation improves.

33.2.5 Employee Training.

Employees involved in work at height will be trained and competent, or if being trained, supervised by a competent person. The content of the training will include the organisation, planning, supervision and the provision and maintenance of access equipment.

Training will also be provided in how to avoid falling and how to avoid or minimise injury to employees should they fall.

33.2.6 Equipment, temporary structures and safety features.

When selecting equipment for work at height, the Company will:-

- use the most suitable equipment;
- give collective protection measures (e.g. guard rails) priority over personal protection measures (e.g. safety harnesses);
- take account of the working conditions and the risks to the safety of all those at the place where the work equipment is to be used.

33.2.7 Inspections.

Inspection criteria:-

- All access equipment will comply with the relevant British Standard or EN (European equivalent);
- All access equipment will be subject to a pre-use check each working day;
- All access equipment will be inspected and maintained in accordance with the manufacturer's instructions;
- All access equipment will be suitable for the work intended e.g. Class 1 Ladders or Step Ladders are appropriate, but not Class 3 Ladders or Step Ladders which are for domestic use;
- All access equipment will be numbered, entered onto an Access Equipment Register and subject to regular inspection by a competent person. (Ladder/Access Equipment Register SHECD 16).

33.3.8 Fragile surfaces.

The Company will ensure that:-

- employees working on or near a fragile surface will be provided with suitable platforms, coverings or guard rails to minimise the risk of a fall;
- everything reasonably practicable, if any risk of a fall remains, will be done to minimise the distance and effect of a fall.

33.3.7 Falling Objects.

The Company where necessary will do all that is reasonably practicable to prevent anything falling. Employees must not:-

- throw or tip materials, equipment from height if it is likely to injure anyone;
- store materials and equipment in such a way that it's movement is likely to injure someone.

Working areas will be clearly indicated to prevent unauthorised access and prevent injuries from falling objects.

34. PORTABLE ELECTRICAL EQUIPMENT

34.1 POLICY

The Company recognise the danger that can arise from the use of portable electrical equipment, and its legal responsibilities under the Electricity at Work Regulations 1989 to ensure all portable electrical equipment is maintained in a safe condition to minimise any risk to users and others. In order to meet its legal obligations and to achieve and maintain a low risk working environment, the following procedure has been adopted.

34.2 PROCEDURE

All portable electrical equipment is defined as any piece of electrical equipment connected to the mains power supply by means of a detachable plug.

All office equipment will be registered in the Portable Appliance Register using Form SHECD 25.

All portable electrical equipment will be subject to periodic inspection and testing. A competent person using approved test equipment will carry out these operations. Results of inspections and tests will be recorded.

Employees are requested to co-operate with the company's management by carrying out a visual inspection of portable electrical equipment prior to use.

Users of portable electrical equipment are also encouraged to report any incident that could have resulted in damage to the equipment which may not be identified by visual inspection.

35. SETTING STANDARDS

35.1 POLICY

The Company is committed to ensuring that all work activities shall be carried out at all times in accordance with the Company's Occupational Health and Safety Management System, Client specific requirements and, amongst others, the following legislation (as amended).

- Health and Safety at Work etc. Act 1974.
- Control of Vibration Regulations 2005
- Construction (Design and Management) Regulations 2015.
- Management of Health and Safety at Work Regulations 1999.
- Provision and Use of Work Equipment Regulations 1998.
- Manual Handling Operations Regulations 1992.
- Workplace (Health, Safety and Welfare) Regulations 1992.
- Personnel Protective Equipment at Work (PPE) Regulations 1992.
- Health and Safety (Display Screen Equipment) Regulations 1992; as amended 2002.
- Control of Substances Hazardous to Health (COSHH) Regulations 2002.
- Health and Safety (First Aid) Regulations 1981.
- R.I.D.D.O.R. 2013.
- Electricity at Work Regulations 1989.
- Lifting Operation and Lifting Equipment Regulations 1998.
- Noise at Work Regulations 2005.
- High Inflammable and Liquefied Petroleum Gas Regulations 1982.
- Chapter 8 Traffic Signs Manual 2008.
- Control of Asbestos Regulations 2012.
- Environmental Protection Act 1991.
- Safety Signs and Signals Regulations 1996.
- The Health and Safety (Consultation with Employees) Regulations 1996.
- Regulatory Reform Fire Safety Order (RRFSO) 2005.

36. HAND ARM VIBRATION

36.1 POLICY

The Company recognise its responsibilities to protect their employees from exposure to hand / arm vibration in accordance with the Control of Vibration at Work Regulations 2005. In order to meet its obligation the Company will conduct and record a specific risk assessment in all instances where the HSE Action level of 2.5m/s² for a working day might be exceeded and where necessary maintain a register to monitor individual exposure times (Form SHECD 24 - HAVS Assessment Form) to ensure compliance with current HSE legislation.

36.2 PROCEDURE

Responsible Directors / Managers will seek to ensure the following is applied to all operations involving equipment that generate vibration likely to affect the operator:

- reduce vibration exposures to the HSE action limit or below, so far as is reasonably practical,
- control all vibration exposures to below the HSE Action Level of 2.5m/s^2 for a working day,
- ensure adequate instruction and awareness training is provided on the subject,
- review periodically the availability and suitability of alternative power tools to reduce exposure to vibration such as use of anti-vibration handles and task rotation,
- ensure provision and encourage the wearing of anti-vibration gloves,
- prohibit any person from using vibration equipment if they are identified through any health screening process as being at risk from further exposure to vibration,
- review and make appropriate changes to control measures to prevent or eliminate increases in risk resulting from deficiencies identified by monitoring.

36.3 GUIDANCE

Regular servicing of power tools and other work equipment will often help keep vibration magnitudes down to the minimum necessary, so:

- keep cutting tools sharp;
- dress grinding wheels correctly by following the manufacturer's recommendations;
- lubricate any moving parts in accordance with manufacturer's recommendations
replace worn parts;
- carry out necessary balance checks and corrections;
- replace anti-vibration mounts and suspended handles before they deteriorate (look for deterioration or cracking, swelling and softening, or hardening, of rubber mounts);
- check and replace defective vibration dampers, bearings and gears;
- sharpen chainsaw teeth and keeping the correct chain tension;
- tune engines.

36.4 Information from Manufacturers and Suppliers

Tool and machine manufacturers and suppliers are obliged by the Supply of Machinery (Safety) Regulations 1992 (as amended) to design equipment which will reduce vibration risks to as low a level as possible, making use of the latest technology. The equipment should be CE-marked to show that it complies with these requirements, and health and safety information should be provided in an instruction book. This should include:

- warnings about any vibration-related risk from using the equipment;
- information on safe use and, where necessary, training requirements;
- information on how to maintain the equipment;
- a statement of the vibration emission (or a statement that the vibration test has produced a vibration emission of less than 2.5 m/s^2) together with information on the test method used.

The following guidelines reflect the Company policy to reduce exposure to the lowest practical level by introducing maximum use times in any one day shift and encouraging task rotation. These times may be reduced by advice from an Occupational Health Consultant resulting from any Health Screening process.

The times shown are based on typical equipment in use by the Company. Managers and those responsible for procurement of subject equipment, whether for hire or purchase, must seek to ensure vibration levels of actual equipment obtained is at or below the figures shown. Where vibration levels exceed these figures, then further assessment will be required.

These times may be reduced by advice resulting from any Health Screening process.

Hand Arm Vibration (average day/shift exposure time table):

Equipment	Type/Power	Average Vib: Level m/s ²	Suggested Exposure Time day/ shift
110v Heavy-duty breaker	Bosch 11304/USH27	13	18 mins
110v Medium-duty combi hammer	Hilti TE55	11	25 mins
110v Metal nibbler		<2.5	8 hrs
Pneumatic breakers (vibrations reduced)	Heavy / medium	6	1hr-20 mins
Floor grinder	110v/petrol	4	3 hrs
Floor planer/scarifier	110v/petrol	11	25 mins
Floor saw	Petrol/diesel/air	<2.5	8 hrs
Forward/reverse plate	Petrol	2.5	8 hrs
Heavy duty combi hammer	Hilti TE75	11	25 mins
Medium powered plate one-way	Petrol/diesel (various)	2.4	8 hrs
Medium heavy rotary hammer drill	Makita 2510 – 110v	8	45 mins
Petrol / diesel powered breakers	Various	8.5	40 mins
Pneumatic/flex pokers air 50mm.		8	45 mins
Pneumatic/flex pokers air 75mm.		12	20 mins
Portable cut-off saw (Disc cutter)	Stihl TS400	9	37 mins
Rotary petrol powered plate narrow	Various	2	8+ hrs
110 volt Breaker	Hilti TE 905	8	45 mins
CP9 Handrill / Rockdrill	Various	12	20 mins
Demo Pick (FL22)	Various	13	18 mins
Hydraulic Hand Operated Breaker	Various	4	3 hrs
Air Impact Wrench	Ingersoll-Rand	4.7	2 hrs
Honda Post Knocker	Honda	9.24	35 mins

Note:

Where this equipment is fitted with anti-vibration handles, the level of vibration experienced by the operator is significantly reduced. These levels will tend to be (although not exclusively) lower than those shown above but the use of gloves should be part of a continuing reduction in exposure than a proportionate increase in usage time.

The online HSE HAVS calculator should be used to calculate daily exposure.

37. RACKING SYSTEMS

37.1 POLICY

The Company recognises the potential of racking systems to cause injury if not correctly specified and used. In order to meet its obligations towards protecting the health and safety of its employees and others, the company has adopted the following procedures:-

37.2 PROCEDURE

These procedures cover racking defined as a skeleton framework of fixed or adjustable design to support loads without the use of shelves (e.g. pallet racking, tyre racking, drum racking etc) they do not cover shelving.

- Racking systems will be of good mechanical construction, sound material and adequate strength for the purpose intended. The maximum load for any installation will be conspicuously marked on it.

- Consideration will be given to the type and size of the system and the nature of the building or area for which it is intended.
- **Racking will be installed in accordance with the manufacturer's instructions.**
- Racking will have already securely fixed to it a clear, unambiguous note stating its maximum load together with any necessary specified load configuration.
- Racking will be protected from being struck by lift trucks or other vehicles by means of column guards or guide rails. Corner uprights will be protected and painted in a conspicuous colour.
- Racking will subject to regular, planned inspection by a competent person and, where damage is detected, remedial action will be taken immediately.

37.3 GUIDANCE

The content of the maximum load notice will be strictly adhered to.

- The manufacturer of racking will be contacted for advice, should there be any uncertainty as to the integrity of the racking system.
- Where damage is identified that affects the safety of the racking system, the racking will be off loaded and controls introduced to prevent it being used until remedial repair work has been carried out.
- A record of inspections, damage reports and repairs will be maintained on (Racking Inspection Form SHECD 17).

38. SPECIALIST OPERATIONS

38.1 POLICY

The Company specialises in the installation and replacement of various safety barrier components to national standards. It also provides Traffic Management and Boundary Fencing.

The risks associated with this work are varied and the skills needed to carry out the work are to national standards. Risk assessments specific to this work are contained within the section "Risk Assessments" within the Reference Manual annexed to this Policy.

39. ADDITIONAL CONTRACT INFORMATION

39.1 POLICY

Any contract with the Company, (whether or not the Principal Contractor) requires the (sub)-contractor to:-

- co-operate with the Company;
- provide the Company with information in its possession which might affect the health and safety of persons affected by the sub-contract works;
- comply with the rules set out in the Health and Safety Plan;
- promptly provide information to the Company on any matter normally reportable under RIDDOR;
- promptly provide information to the Company for inclusion in the Health and Safety File;
- inform employees of name of Planning Supervisor and Principal Contractor for the contract;
- provide to employees the relevant parts of the Health and Safety Plan and ensure arrangements identified therein are both understood and implemented;
- provide employees with information about risks and hazards involved in the construction activities that affect them;
- provide health and safety training to their employees to enable them to carry out their respective tasks in a healthy and safe manner and without risk.

The following items identify *some* of the areas to be considered by the contractor as it affects their works:

Training	Statutory Undertakers Services - Overhead and Underground
Safety Meetings	Isolation / Lock-off Procedures
Safety Representatives	Installation, commissioning and maintenance
Young Persons	Temporary Electrical Installations
Accidents and Dangerous Occurrences	Lifting Appliances
Welfare	Abrasive Wheels, Grinding and Disc-Cutters
First Aid	Scaffolding
Fire Precautions	Falsework
Liquefied Petroleum Gas (LPG)	Asbestos
Statutory Registers and Reports	Cartridge Tools
Substances Hazardous to Health	Permit to Work
Personal Protective Equipment	Portable Electric Tools
Noise & vibration	Confined Spaces
Site Plant and Equipment	Alcohol and Drugs
Work at Height	Emergency Procedures/Site Rules
Vehicle and Plant Movements on Site	Hazardous Substances
Excavations	

40. SMOKING

40. POLICY

The Company recognises its responsibilities to protect the health and safety of its employees and do all that is reasonably practicable to prevent anyone suffering from conditions and/or diseases associated with the effects of inhaling cigarette smoke. The company will, in compliance, with The Smokefree (Premises and Enforcement) Regulations 2006, provide a work environment free of risks associate with cigarette smoke and second-hand cigarette smoke.

40.1. PROCEDURE

- Staff smoking shall only be permitted in designated areas. All staff will be informed of the location of designated smoking rest areas. Staff are confined to smoking within the enclosures provided.
- Company vehicles are classed as places of work therefore smoking is prohibited in all company vehicles.

40.2. GUIDANCE

The regulations impose duties on employers to protect employees from the effects of cigarette smoke. When visiting premises where smoking is permitted staff might be exposed to passive smoking. To ensure the safety and wellbeing of its employees CD Fencing & Construction Services Ltd advises its staff to avoid areas where smoking is permitted in any premises or place of work.

41. BUSINESS OPERATIONS AND THE ENVIRONMENT

41.1 POLICY

The Company recognises the importance of sustainable development and the protection of the environment and has identified areas in which improvements can be made:-

41.2 PROCEDURE

41.2.1 Transport:-

- The Company recognises the damage caused to the environment by exhaust emissions and therefore when purchasing new vehicles, consideration will be given to fuel economy and efficiency.
- In order to maximise fuel economy the Company will encourage the use of smaller petrol engines or their diesel alternatives.

41.2.2 Products in Use (Installation/Maintenance Operations):-

- When purchasing equipment and supplies, environmentally friendly products will be given preference, and wherever possible use will be made of materials from sustainable sources and those that can be re-used or re-cycled.
- Production of waste materials will be minimised. High risk areas, e.g. diesel storage/use will be effectively bunded and drip trays used when necessary.
- Re-cycling waste materials produced through normal activities will be considered and carried out when viable.

41.2.3 Tendering for Contracts:-

- The Company strives to be aware of all new technical developments in its business activities. Every effort will be made to inform clients of viable and cost effective alternatives to those stated in specifications which would be more environmentally friendly and reduce energy consumption.

41.2.4 Workplaces:-

- The Company will seek to minimise the environmental impact of its work activities on the local community and those who may be affected.
- All practicable actions will be taken to safeguard those who may be adversely affected.

41.2.5 Waste Management and Disposal:-

- It is Company policy to minimise the generation of waste and reduction of waste is considered a high priority (re-cycle, re-use or reduce) before transporting to landfill.
- A full list of waste material will be made available to enable the appropriate waste transfer note to be completed.
- Only approved, authorised waste contractors will be used by the Company.
- The Company will monitor and record waste generated from its workplace activities on Form SHECD 26 Site Waste Management Record.

41.2.6 Housekeeping:-

- Working areas must be kept clean and tidy. Scrap and rubbish must be removed regularly into proper containers or disposal areas.
- Spillage's of oil or other substances must be contained and cleaned up immediately. Ground contamination must be prevented.
- All flammable liquids, LPG, and gas cylinders must be stored properly in accordance with the relevant legislation.

41.2.7 Energy Use:-

- Operate plant and other equipment only when needed.
- Turn off plant / building lights and heaters when not required.
- Keep doors shut to maintain heat in offices.
- Set heater controls at the minimum required to maintain a comfortable environment.

42. SITE ENVIRONMENTAL AWARENESS

42.1 POLICY

The Company is committed to adopting “industry best practice” in maintaining a safe working environment. When working on site everyone is reminded of the importance of environmental awareness and contributing towards it.

42.2 PROCEDURE

42.2.1 Gas

- Always run bottles down until empty wherever possible.

42.2.2 Spray Paint

- Do not throw part used cans away. Use until empty and return cans to the depot for disposal. Do not throw into verges, etc.

42.2.3 Cutting Tools Return saw blades and chisel points to the scrap container.

42.2.4 Fuel

- Fuel containers in excess of 200 litres should be in double skinned or banded to contain leaks. When refuelling plant and equipment use drip trays or buckets to contain spills. Do not refuel next to watercourses or over drains.

42.2.5 Equipment Preparation

- Use designated areas for vehicle maintenance and works preparation; this will restrict any contamination to one area. Use the minimum amount of diesel in hoppers and on tools.

42.2.6 Spills & Leaks

- Use spill kits, sand or earth to absorb spilt hazardous substances such as fuel, oil or chemicals. The contaminated absorbent material should be placed in bags, returned to the depot and placed in the hazardous waste skip. All spills and leaks should be reported to the supervisor and details entered in the environmental log.

Remember!

Diesel oil can cover a large area when spilt, always:-

- Close containers when finished.
- Use a drip tray or bucket and funnel when topping up equipment.
- Clear up spills quickly and report them to your supervisor.
- Return containers to storage bund.
- Don't leave equipment unattended whilst refuelling.
- Don't throw rubbish or empty containers into fields, etc.
- Don't ignore leaks or spills.
- Don't refuel over drains or watercourses.

APPENDIX C

SAFETY MANAGEMENT SYSTEM

FORMS SHECD 1 -33