



Health, Safety, Welfare, Quality & Environmental Policy

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Amendments & additions to policy

Date:	Amendment No.:	Description:	Completed by:	Authorised by:
1/02/2016	REV 9.0B	Management structure, Environmental Policy, Quality assurance policy	J Borley	B Rees / T Rees
24/03/16	REV 9.0C	Additions to Rs and Rs following ISO 14001 comments	J Borley	B Rees / T Rees
26/04/16	REV 9.0D	Addition of Corporate Social Responsibility Policy	J Borley	B Rees / T Rees
07/07/16	REV 9.0E	Addition of Whistleblowing Policy following Achilles audit	J Borley	B Rees / T Rees
18/08/16	REV 10.0	Full annual review	J Borley	B Rees / T Rees
08/08/17	REV 11.0	Full annual review	J Borley	B Rees / T Rees
01/08/18	REV 12.0	Full annual review	J Borley	B Rees / T Rees
21/11/18	REV 12A.0	Change of address	J Borley	B Rees / T Rees
07/02/19	REV 12B.0	Management structure	J Borley	B Rees / T Rees
12/07/19	REV 13.0	Management structure, addition of new policy statements	J Borley	B Rees / T Rees
1/07/20	REV 14.0	Full annual review	J Borley	B Rees / T Rees
1/07/21	REV 15.0	Amendment to 24.0 Communication & consultation, 33.0 Health surveillance, 34.0 Lone workers 47.4 temporary works. Addition of 12.10 fatigue management policy, 18.3 Expectant Mothers and 18.4 Young person, 32.6 Legionella, 48.0 Premises management, 49.0 Stress management.	J Borley	B Rees / T Rees
01/07/2022	REV 16.0	Amendment to 7.0 with addition of vapes added to smoke free policy, 12.3 whistleblowing policy statement, 27.0 work time policy	J Borley	B Rees / T Rees
01/07/2022	REV 17.0	Addition of 12.11 Anti-Facilitation of Tax Evasion Policy Statement, 12.12 Prevention of Bullying, Harassment & Sexual Misconduct Policy, 32.7 Blood borne viruses, 32.8 controlling exposure to dust. 50.0 Capability procedure.	J Borley	B Rees / T Rees

Additional comments / notes:

Full annual review, addition of GDPR, social media & Modern Slavery Policy statements. 12B change to management structure as Compliance Manager has left company
Review of policy REV 13.0 was brought forward due to changes in management structure, addition of health and wellbeing policy statement and industrial relations policy. REV 14.0 addition of COVID 19 policy statement
and general amendments to COSHH on exposure to diesel, noise and use of earplugs, amendment to Rs & Rs.
REV 15.0 general annual review. For COVID compliance refer to our COVID 19 safe working procedures. Added Fatigue management policy, new information on risk assessments for expectant and new mothers and young persons added to section 18.3 and 18.4 respectively. Addition of new sections on Premises management 48.0 and Stress management 49.0
REV 16.0 amendment to section 7.0 of our smoke free policy to include vaping in the workplace, addition of reference to external advice in the whistleblowing policy section 12.3, amendment to work time policy on further reference to our opt out form and procedure to be applied.
REV 17.0 addition of Anti-Facilitation of Tax Evasion Policy Statement & Prevention of Bullying, Harassment & Sexual Misconduct Policy, change COVID 19 policy to Hygiene Standards Policy Statement. Including removal of unnecessary bold to reduce printing costs. 32.7 Blood borne viruses and 32.8 controlling exposure to dust added under COSHH. Addition of 50.0 Capability procedure

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1.0 Health and Safety Policy Statement

The health, safety and welfare of employees and the environment are of the utmost importance to us and are essential to the efficient operation of our company. The responsibility for safety at work rests upon all sectors of management, and we will ensure that this policy is implemented throughout the company. We will ensure, so far as reasonably practicable the health, safety and welfare of our employees and others that are not in employment that may be affected by our works.

The implementation of the policy will be done by providing:

- A safe working environment by the design, construction, operation and maintenance of all our plant, equipment and facilities, in particular to the processes of asbestos removal;
- Safe working procedures that are set out within our policy;
- Adequate information instruction and training to our employees;
- Appropriate systems that are developed and maintained for the effective communication of health and safety matters throughout our company;
- Adequate resources in the form of finances, equipment, time and personnel to ensure health and safety is maintained;
- Adequate procedures for the consultation with employees regarding health and safety;
- Systems to ensure accidents/incidents are fully investigated and implementing necessary measures to prevent the likelihood of a reoccurrence.


The policy will be monitored and reviewed on an annual basis or more frequently if required. We expect our employees and subcontractors to comply with the policy and to take reasonable care for their own health and safety and that of others who may be affected by their acts and omissions. Health and safety and that of others who may be affected by their acts and omissions.

As the Managing Director I will appoint a Health and Safety Advisor to assist in the company's duties with regards to health and safety, and this person shall have sufficient training, experience, and qualifications to undertake their role.

The Managing Director will ensure the implementation of the companies Equal Opportunities policy, including the Disability Discrimination Act and Rehabilitation Policy, the Quality Assurance policy, Smoke Free policy, Environmental policy, and Training policy throughout the company. With our continuous compliance with the requirements of ISO 14001 and ISO 9001 ensures the full commitment of our Managing Director to his Health and Safety duties.

Under the Employers Liability (Compulsory Insurance) Regulations 1998 as an employer and the Managing Director I will take out and maintain an insurance policy with an authorised insurer against bodily injury or disease sustained by our employees arising out of and in the course of our employment.

As Managing Director, I have the ultimate responsibilities for health and safety, and to ensure that this policy is brought to the attention of all personnel within the company structure. The responsibilities for health and safety have been delegated to the Operations Manager who has the responsibility for the undertaking of this task as defined in their specific roles and responsibilities.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

2.0 Environmental Policy Statement

Consideration of the environment is of great importance to us, not only the global concerns, but also those of our own local environment. Along with our ISO 14001 system manual and our company commitment to the environment we will implement a controlled procedure of planning our works taking into consideration effects on the environment, checking our environmental systems are being complied with, and ensuring that the following policy statement is implemented in its completeness.

As members of the community, we also share its concerns and will make every effort to ensure that we minimize any adverse effects our operations may have on the environment by applying as far as possible, our reduce, remove, recycle and reuse policy. We will achieve this commitment of safeguarding the environment by undertaking the following:

- Implement procedures to prevent pollution to land, air or water;
- Take environmental factors into consideration in any new developments or contract works;
- Improve the environmental impact of the company's activities;
- Collect and monitor information regarding the environmental impact and record of the company;
- Implement an energy monitoring and reduction programme, monitoring of emissions (if necessary) and discharges, recycling and environmental awareness campaigns;
- Respond to the needs and concerns of the community promptly and ensure good communication with our neighbours and others who may be affected environmentally by our company undertakings;
- Contact the local Environmental Agency to report any incidents that have occurred and co-operate in any investigations concerning hazardous emissions or incorrect disposal of hazardous waste;
- Reduce waste and consumption of natural resources wherever possible;
- Be amongst the leaders in environmental sensitivity;
- Be aware of the COSHH Regulations 2002 (as amended);
- Be in compliance with the Environmental Protection Act 1990 and all other relevant legislation as detailed in our Environmental System Manual;
- Work within the Control of Asbestos Regulations 2012, ACOP L143 second edition and the relevant guidance;
- Dispose of all electrical waste in accordance with the Waste Electrical and Electronic Equipment regulations 2013;
- Dispose of all hazardous waste in accordance with The Hazardous Waste Regulations 2005 and carry it in accordance with the Carriage of Dangerous Goods Regulations 2009.

The Environmental Protection Act 1990 imposes statutory requirements to protect our local and surrounding Environment and to assist us in complying with our legal requirements we will apply the following procedures:

- Strictly control measures of dust, noise, emissions and vibration will be implemented;
- Ensure no trees or hedges will be cut down, burnt or removed without written permission from the Environment Agency;
- Ensure no waterways, streams or ponds will be excavated, blocked or back filled without written authority from the Environment Agency;
- Ensure correct disposal of fuel oils, chemicals, asbestos or acids to the right facilities;
- Maximise the recycling of all glass, glass fibres or metal fibres, tires, plastics or manmade products where facilities exist;
- Security measures will be taken to prevent fly-tipping by others;
- To keep aware of all new environmental legislation and regulations and comply with all environmental legislation and regulations;
- Minimise our energy use and its associated CO² emissions and maximise the use of renewable energy sources where possible;
- Maximise the re-use of materials and products and recycling of materials and products where possible;
- Minimise polluting emissions to air, land and water and minimise the use of polluting transport.

To assist with the above, we will implement the financial resources to maintain an environmental training program to ensure our employees are made aware of their environmental duties and ensure that we assess all our suppliers with regards to their environmental performance. Within our System Manual we will set out our environmental targets and action plans and monitor our goals. We will encourage all levels of employees to be actively involved in the implementation of this policy and welcome any comments and feedback.

This policy may require periodic review as and when required to ensure continuous improvement to maintain and enhance our environmental performance.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

3.0 Rehabilitation Policy Statement

Treating injured employees in a progressive, caring fashion makes commercial sense for our company.


It ensures compliance with relevant legislation, improves the possibility of swift return to normal working conditions, minimizes insurance claims and therefore helps control premiums, boosts workforce and helps individuals cope with his or her medical condition.

It does not require significant financial investment, intrude unduly on management time, or lead to the disruption of established routines.

We recognise the importance of rehabilitation and intend to implement the following policy:

- To adopt a sympathetic and caring attitude throughout any period of disability. This relationship is the most crucial piece of the rehabilitation jigsaw;
- To maintain close contact with the employee and ensure they realise that they are valued and will not be abandoned;
- To keep the employee involved. To arrange regular contact visits and phone calls and try and arrange for the employee to attend the workplace as often as possible, during the recovery period. We will ensure the employee is involved and this will lead to opportunities to discuss plans to rehabilitate them;
- We will aim to return the employee to an active role, in the workplace, as soon as they first feel able. The company will consider "light" duties or look at opportunities to accommodate their capabilities by being more flexible. A return to work in capacity can be a tremendous morale booster and that is just as important as the physical recovery. If necessary medical advice will be sought;

We will make allowances during the recovery period. The employee may still be capable of contributing fully. However, some change in the process of modification of equipment maybe needed to achieve this.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

4.0 Equality Policy Statement

We have committed to the policy of equal treatment of all our employees, applicants and others who may be involved in our company undertakings, and we require all our employees, of whatever grade or authority, to abide by and adhere to the requirements of the Equality Act 2010.

The following specific discrimination is prohibited within our company:

- Treating any individual on grounds of sex, colour, marital status, race, nationality or ethnic or national origin, religion, sexual orientation, disability or membership or non-membership of a trade union, less favourably than others;
- Expecting an individual solely on the grounds stated above to comply with requirement(s) for any reason whatsoever related to their employment, which is different to the requirements for others;
- Imposing on individual, requirements that are in effect more onerous on that individual than they are on others. For example this would include applying a condition (which is not warranted by the requirements of the position), which makes it more difficult for members of a particular race or sex to comply than others not of that race or sex;
- Victimisation of an employee including acting against any form of discrimination or harassment, or instructed or put under pressure to discriminate against someone on the above grounds;
- Harassment of an employee (which for the purpose of this policy is regarded as discrimination);
- Any other act or omission of an act, which has as its effect the disadvantaging of an employee or applicant against another, or others, purely on the above grounds. Thus, in all disciplinary matters, as well as consideration for training, promotion etc. - it is essential that merit, experience, skills, and temperament be considered as objectively as possible.

We will commit our company to the immediate investigation of any claims of discrimination on the above grounds, and, where such is found to be the case, a requirement that the practice cease forthwith, and to the investigation of any employee accused of discrimination. The Managing Director may be contacted directly if the discrimination is being undertaken by their immediate manager or supervisor; further information can be found within our disciplinary procedure.

Any employee, no matter what level, found guilty of discrimination will be instructed to desist forthwith. Since discrimination in its many forms is against our company policy and any employee offending will be dealt with under the disciplinary procedure. Unless assurances of future non-discriminatory actions are forthcoming, an employee repeating any act of discrimination may be dismissed.

We recognise the right of an employee to belong to or not to belong to, a trade union, and membership or non-membership of such a union will not be considered in any way during the career of the employee.


We will commit our company to the employment of disabled personnel whenever possible and will treat such employees in aspects of their recruitment and employment in the same manner as other employees, the difficulties of their disablement permitting to the job position. We are aware that the disability discrimination under the Equality Act 2010 gives disabled people rights in the way they receive goods, service, or facilities.

As service providers

- We must not treat disabled people less favourably because of disability;
- We must make "reasonable adjustments" for disabled people, such as giving extra help or changing the way services are provided;
- We must make necessary "reasonable adjustments" to our premises so that there are no physical barriers stopping or making it unreasonably difficult for disabled people to use the services.

All employees will receive equal value of pay and benefits relevant to the position within the company regardless of their sex, level of education and understanding and their nationality. All employees will be checked to ensure their eligibility to work in the UK at the end of any interview process to prevent against discrimination. All interview processes will be advertised in a non-discriminatory way to ensure that it can be viewed by a wide range of people and open to all candidates regardless of sex, racial group, disability, age, sexual orientation, religion or beliefs.

This policy will be displayed at the company office and has the full backing of the Managing Director and made available at all major places of work for reference. Clients will be contacted for customer feedback on a random basis to monitor site-based employees, to ensure that our policy is being adhered to. Feedback will be discussed at monthly meetings to ensure that our targets are being met.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

5.0 Sustainability Policy Statement

This part of our policy sets out the various methods and management procedures which will be put in place to create a sustainable work environment. It has been created to minimise the detrimental social, economic, and environmental impacts of our works. This sustainability policy aims to reduce the pressure which our actions put upon the local community, contractors, our supply chain, and the planet.

- A major focus of this policy is to measure and reduce our CO² emissions and therefore our carbon footprint by applying the following points;
- To recognise our sustainability obligation to staff, visitors, communities and stakeholders both locally and globally;
- To commit to implementing the requirements of all relevant sustainability regulation, legislation and where possible to exceed any relevant minimum requirements;
- To manage activities which impact upon the environment in accordance with the principals of sustainable development;
- To raise the sustainability awareness of all employees, visitors, communities and stakeholders;
- To promote the concept of sustainable development and by openly recognising the on-going need to move towards a more sustainable future;
- To monitor energy usage and maximise efficiency and effectiveness with a view to minimising environmental impacts;
- To foster and promote research into sustainability via meetings, workshops, publications and collaborative work;
- To provide appropriate sustainability training and development for our Employees and encourage them to apply sustainable practices to work, at home and within the wider community.

Where possible we will seek to source sustainable and fairly traded goods from our supply chain, including the use of Forest Stewardship Council (FSC) timber sources and British Plastic Foundation (BPF) suppliers.

We will continue to amend this section of our policy as better equipment, methods of work and understanding of ways to minimise our effects are developed. Sustainability affects us all now and in the foreseeable future and we must act.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

6.0 Quality (Business) Assurance Policy Statement

It is the policy of T&S Environmental Ltd to provide a full, comprehensive, and unrivalled asbestos removal service. We constantly aim to provide a service that fully satisfies our customers' requirements within quick response and delivery. We are all committed to this Quality Statement that defines our commitment to quality throughout the Company.

It is the policy of the management and staff of T&S Environmental to:

- Provide a customer focussed Service at all times;
- Aim for customer satisfaction at all times by continuing to satisfy our customers' requirements;
- Adhere to the procedures and instructions in our management system and work in a safe manner;
- Strive to do everything at T&S Environmental Ltd. right first time every time;
- Continually improve on the effectiveness of our management system, through our key goals, built around our key processes;
- Develop employee's skills to ensure succession plans are in place for the continued management of the business;
- Grow the business at a steady rate and apply additional resources where required so that service is not compromised;
- Work as a team;
- Identify our customer requirements and ensure that these are met at all times;
- Abide by all applicable statutory, regulatory & other compliance requirements

This Policy shall be made known to and understood by all employees and necessary contractors and will be reviewed as part of our Management Review Process. The System will be audited on a regular basis to ensure it's continued effectiveness.

We at T & S Environmental Ltd are a provider of services concerning the asbestos removal industry and ancillary works which we undertake for several concerned parties. The creation of this statement is a strategic decision for our company. The design and implementation of our quality & business policy is influenced by the varying needs and objectives of our clients and the regulatory environment in which we operate.

We are committed to the provision of a professional, competent, committed, and measurable quality service to our clients and customer base to ensure that our business is delivering the highest standards possible and in keeping within the legal and regulatory environment in which we operate.

This service is to be provided by the satisfaction of the established requirements and expectations of customers for quality, cost, performance, safety and reliability and the maintenance of the legal and regulatory requirements of quality, performance and safety.

We intend to maintain this service by adopting a total commitment to the provision of a quality service by the setting of and compliance with standards of service and performance, codes of practice and utilisation of systems and specific work procedures.

We will continue to maintain our quality system through monitoring both the services provided and the customer's perception of our business and provide continuous improvements to comply with our policy.

We will create and maintain a system to ensure the continuous development of products and services to comply with the developing requirements and expectations of our customers and the regulatory bodies.

All employees will enter a continuous training programme for the achievement of the quality goals of our business and to ensure the maintenance of our quality programme. We recognise that quality is an essential part of our strategy for the maintenance and growth of the profitability of T & S Environmental Ltd and for the achievement of the strategic and financial aims of our business.

Quality cannot be achieved without the commitment, training and co-operation of all employees and officers of the company. The person with ultimate responsibility for the implementation and maintenance of this quality policy and strategy is the Managing Director and he ensures that all persons are aware of the responsibilities towards this policy.

We will continue to comply with all the requirements of our professional qualification's requirements (e.g. CHAS, Construction Line, Exor, Safe Contractor, Achilles) and membership of our industry recognition bodies (e.g. ACAD).

T & S Environmental Ltd

With our continuous commitment to ISO 9001 and the monitoring of our quality system manual ensures that compliance with the standards required are maintained to a high standard.

This statement is to provide confidence to our customers that implementation of the Quality (Business) Assurance Policy is mandatory on all employees and that they understand the meeting of all our customers, statutory and regulatory requirements to ensure compliance.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

7.0 Smoke Free & Vape Free Policy Statement

This policy applies to all employees and personnel employed by or working on behalf of our company. Section 2(2) (e) of the health and Safety at work act 1974 places a duty on employers to:

'Provide and maintain a safe working environment which is, so far as reasonably practical, safe, without risk to health and adequate as regards to facilities and arrangements for welfare at work.' Therefore, the following policy has been adopted concerning smoking and vaping whilst on company premises and commercial vehicles operated by our company.

Under the Health and Safety at Work Act 1974, employees have duties to take reasonable care for the Health and Safety of themselves and others and to co-operate with the employer as far as is necessary to enable the employer to comply with the requirements of the Act.

All company premises and company owned commercial vehicles will be designated smoke-free and vape free with adequate signage complying with government regulations to inform employees and visitors of the smoke-free and vape free status of the work area.

Employers responsibilities include:

- To ensure both our premises and commercial vehicles comply with all statutory regulation in respect to this policy;
- To identify those areas where smoking and vaping are not permitted;
- To provide adequate ashtrays and bins in the designated smoking areas and to ensure that these are emptied regularly.

Employees responsibilities:

- All to be familiar with this policy in order to contribute towards its application;
- To remind visitors politely of our policy, if in their opinion they consider them to be in breach of the policy;
- Not to smoke or vape at entrances in view of the public;
- Smoking and vaping is not permitted anywhere on premises either wholly owned or rented by our company.


Visitors and temporary staff are expected to abide by the terms of this policy. The following arrangements must be made for informing them of its existence:

- Signage and associated information;
- Employee Induction.

The smoke free and vape free policy will be communicated throughout our company physically and electronically.

Breaches of the policy will be managed in a fair but effective manner in the spirit of the act. It is the responsibility of all employees to ensure that visitors are aware of the smoke free policy. If visitors continue to breach the policy, they may be asked to leave the premises. We will monitor this policy to ensure that all personnel and visitors are aware of its contents and abide with it.

As the Managing Director I will set a personable example of maintaining compliance and ensure that employees know our commitment to promoting a healthy workforce.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

8.0 Corporate Manslaughter Policy Statement


We recognise the importance of the Corporate Manslaughter & Corporate Homicide Act 2007 and we will implement it into our policy. We recognise that the statutory offence will be against the organisation itself. If failure of our procedures results in death due to a gross breach of our relevant duty of care to the deceased, then the organisation will be held accountable.

We will ensure that all our activities are well managed and organised and that the Managing Director and all managers are aware of their corporate responsibilities with regards to health and safety.

We understand that the Act is intended to compliment other forms of accountability such as health and safety legislation and that the new offence builds on the responsibilities that we already owe to our employees. We understand that the Act does not change the possible prosecution of individuals for health and safety offences, but that they will continue to be taken where there is sufficient evidence and it is in the public interest to do so.

All our employees and managers are to be informed that they may be called as witnesses if the organisation is to be prosecuted and that they will be expected to attend as required.

As a company we will take all reasonable steps to comply with our duty of care to protect all person's safety, including implementing safe systems of work, maintaining safe working conditions at our office, on the public highway, at working sites, and maintaining a safe and healthy environment.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

9.0 Company Training Policy Statement

We are fully committed to providing all employees and sub-contractors employed by us with the relevant training, subject and particular to the work and location of the work being undertaken.

We recognise that successful implementation of this policy requires total commitment from all Employees; from the Managing Director right through to the operatives, and that everyone has a legal obligation to be responsible for their own, as well as others who may be affected by their actions.

To achieve successful implementation of this policy, full details of the organisation and arrangements for training are set out in this company policy document.

All persons associated with our company, including employees and sub-contractors will be given all information and training considered necessary to ensure that all processes and systems of work are designed and continually enhanced with the safety of all, an important consideration.

The responsibility of arranging training has been designated to the Office Manager who will liaise with me when required as I have the overall responsibility for the implementation of any training undertaken by our company or its representatives. We must ensure they receive the correct level of training and competency specific to the works being undertaken and we will use approved providers for all levels of training.

Training for operatives can range from short internal review meetings to external courses, with the common purpose of informing the personnel safety, technical and other specific requirements.

In some instances, in-house training will provide us with the necessary information and detail. For the specific courses listed below we will use a recognised and approved training provider:

- Asbestos;
- Fire;
- First Aid;
- Work at height;
- Confined spaces;
- Lead works;
- COSHH;
- Plant and transport.

In conclusion, the health, safety, and welfare of all must be our first priority. All systems, procedures and working practises will be rigorously enforced and re-appraised, on an ongoing basis. Everyone will be encouraged to own and participate in this process.

9.1 Health and Safety Training

A copy of our policy will be made available to all our employees and our subcontractors.

All employees will attend a meeting with the Operations Manager, to explain and discuss the Policy, responsibilities to themselves and others with specific emphasis on your location of work, i.e. Office, Sites, etc.

Overall and final responsibility for all health and safety training matters in the company is that of the Managing Director.

The Health & Safety Advisor will be responsible for notifying the Managing Director of the level of training required and suitable establishments that can provide the necessary training to ensure this training policy can be implemented for our employees.

All employees have the responsibility to co-operate with the Health & Safety Advisor and comply with our training policy to achieve a healthy and safe working environment and to take reasonable care of themselves and others.

All Employees must attend training courses as instructed by the company

External agencies may be used to provide specific training as required to ensure compliance with our legal requirements.

All employees will be trained in the operation of machinery and equipment specific to their function, before using machines or equipment, employees are to be informed of the hazards that are likely to occur and the correct methods of operation.

All Contractors, their employees, visitors, and others will be given any necessary training or instructions required before commencing any work or activity on the company's premises or on any of our sites.

All Employees will be required to attend company inductions to be carried out by the Operations Manager before commencing work and attend relevant toolbox talks at regular intervals.

9.2 Sub-contractor training

Asbestos works cannot be undertaken by subcontractors, but we may need to appoint other suppliers of services such as scaffolding or plant operators and they will be made aware of the requirements of our Health and Safety Policy including this Training Policy.

All sub-contractors will be requested to issue the following information to us:

- Their own health and safety policy;
- Their own training policy;
- Declaration that they will attend training and induction courses as required.

Before any works are undertaken all sub-contractors will need to attend our company induction which will be carried out by a designated person.

The induction process will comprise of:

- Familiarisation with the locations of all fire exits, emergency call points and telephone systems;
- Names of key personnel;
- Awareness of all Safe system of work/s and risk assessments;
- Awareness of security requirements;
- COSHH assessments;
- Toolbox training as required;
- Specific hazards;
- First aid location and designated persons;
- Speed limits and traffic/pedestrian management plan;
- Drugs, smoking and alcohol policy;
- PPE policy;
- Welfare;
- Asbestos risks;
- Other hazardous waste risks;
- Machine and plant movements;
- Permit to work procedure.

9.3 General

Our training will be designed to provide the right information to assist our overall development within our company. The Company then benefits in the same way, thus providing an important element to the success of our employment and the protection of our workforce and others who may be affected by our works.

After consultation with The Managing Director training courses are arranged at approved and competent establishments. All asbestos training will be carried out in accordance with chapter 4 of the HSG 247 Licensed Contractors Guide, at an approved training provider.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

10.0 Working at Height Policy Statement

Due to the nature of our works and the need to undertake a vast majority of our works at height we will take all reasonable steps to provide a safe working environment for our employees and uphold the hierarchy of requirements implemented by the Work at Height Regulations 2005.

We shall provide the necessary preventive and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity.

All our employees and any other person involved in the work activity shall cooperate in the implementation of this Policy.

The responsibility for the implementation of this policy lies with me as the Managing Director. The company will, in consultation with our employees and their representatives:

- Carry out an assessment of the risks involved in work at height and take steps to eliminate or control them;
- Provide all the necessary equipment to allow safe access to and egress from the place of work;
- Provide suitable plant to enable the materials used in the course of the work to be safely lifted to, and stored if necessary, at the workplace;
- When working in an open environment, assess the effect of weather conditions on the type of work being undertaken and, if necessary, halt work temporarily (once the work, plant and equipment have been left in a safe condition) until such time as it is safe to continue;
- When working at dusk, night or dawn, provide sufficient local lighting, so that work can be carried out safely and access and egress are easily visible;
- Arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so;
- Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of equipment used in work at height;

We will prepare a safety method statement/plan of works, incorporating the results of any risk assessments made, for work at height, to be followed by all involved in such work.

Where it is not possible to follow the safe system of work:

- No further work must be undertaken;
- A responsible person must be informed;
- Alternative procedures outlined and workers advised of these following appropriate consultations.

We shall provide any information, instruction, and training that an employee may require to carry out his or her trade or skill in a safe manner when working at height.

We shall ensure that persons responsible for ancillary plant and equipment used for the work are suitably and adequately trained and capable of providing the correct information on its use.

We will continue to review our work at height policy as technology advances with safer methods of work and equipment.

Where safety harnesses are to be used as a last resort our employees will be trained in the correct use and inspection of such items, and undertake daily checks before each use and 3 monthly checks undertaken by our competent and trained person to be defined in their roles and responsibilities.

Further reference must be made to our Special Works Procedures section SWP 1.0 for undertaking works on site or within our office and warehouse facilities.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

11.0 Anti-Fraud & Bribery Prevention Policy Statement

Our Anti-Fraud and Bribery Prevention Policy sets down our approach to preventing, detecting, and reporting fraud and bribery within our company. We are fully committed to minimising our exposure to fraud, corruption, and bribery. Fraud and bribery are crimes, and we are committed to eradicating the risk of fraud and bribery.

This policy will assist in raising awareness both to the risk of fraud and bribery and the means of preventing it, as well as identifying existing procedures for reducing the likelihood of such events occurring.

The Managing Director has the overall responsibility for delivering and understanding this policy and the controls needed to ensure it is implemented throughout.

Under the Fraud Act 2006 Act, any individual who dishonestly makes a false representation to make a gain for himself or another, or dishonestly fails to disclose to another person information which they are under a legal duty to disclose, or commits fraud by an abuse of position, may be found guilty of the offence of fraud. Such elements of fraud will be taken to include theft, the removal of cash or assets to which the fraudster is not entitled to or giving false documentation or alteration of any accounting records.

The Bribery Act 2010 creates four offences, such as offering, promising, or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribing a foreign official to retain business; and the failure of an organisation to prevent a bribe being paid on its behalf.

A function or activity to which a bribe relates includes any function of a public nature and any activity connected with a business. Organisations are therefore expected to ensure that appropriate procedures are in place for bribery prevention.

We will operate a zero tolerance to fraud and bribery and whilst we do not anticipate that fraud or bribery will occur within our company, any suspected cases of fraud or bribery will be investigated and pursued, with the maximum penalties being sought through criminal/civil and employer disciplinary actions.

Under the Bribery Act 2010, six key principles have been identified to help inform an organisation in establishing procedures to prevent bribery and we will also adopt these to assist in preventing fraud. The main principles are outlined below and are proportionate to the size of our company, together with the procedures which sit under them to prevent fraud and bribery. The main aim of the Bribery Act 2010 relates to those who conduct business in foreign markets. In view of our limited exposure outside the UK, the procedures primarily reflect the need to mitigate domestic bribery.

Full commitment from all management must be implemented and persons will be made aware of this policy and that disciplinary action will be taken. Proof of fraud or bribery may result in criminal proceedings.

The procurement of goods and services are maintained at the office level only to ensure control of the provision of our services and ensure they are not outsourced to others. We will ensure our internal procedures are adopted to guard against fraud and bribery.

All staff will be made aware of our intolerance to any fraud or bribery, and their own individual personal responsibilities. We will be alert to opportunities for improving our procedures to minimise the risk of fraud and bribery and ensure financial management controls are maintained and that financial reporting is monitored.

Ensure that all employees are aware of our commitment to our whistle blowing policy and that we welcome persons to report any concerns, including potential cases of fraud and or bribery and ensure their contracts of employment are completed. All persons are to be made aware of this policy and that they must complete an Expenses Claim Policy with the relevant receipts attached.

Our policy on accepting gifts and hospitality and that any receipt of such must be referred to the head office. No person must give, promise or offer a payment, gift or hospitality unless there is believed that a business advantage will be received.

If any person is threatened or coerced into engaging in conduct, which might amount to a possible breach of this policy, then they may act in a way which will safeguard their health and safety and when safe to do so, report to the office.

All reports of fraud or bribery will be fully investigated and reported to me as the Managing Director, and I will ensure that the required accounts and records are submitted to the relevant persons as required.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

Health, Safety, Welfare, Quality & Environmental Policy – REV 17.0 – July 2023

12.0 Worksafe Policy Statement

As a leading company in our field, we welcome the Worksafe policy (or refusal to work policy) into our company structure. We acknowledge our responsibility under the Health & Safety at Work Act and recognise our duty of care to maintain safe systems of work and operate a Worksafe Policy for all our staff and sub-contractors working on all sites.

Risk Assessments are carried out in line with the Management of Health & Safety at Work Regulations and our Health & Safety Policy. Control measures are put in place including Method Statements, Plan of works, company work procedures, COSHH information and Toolbox Talks to reduce risks as far as reasonably practical.

Sufficient training and mentoring is provided in accordance with our Training Policy, to ensure the competence of all staff and we do not expect any employee or sub-contractor to undertake any duties unless they are competent, have been briefed on any relevant information specific to the task and have suitable personal and respiratory protective equipment (RPE & PPE) to undertake the task in a safe and compliant manner.

We require all employees and sub-contractors to work safely and to ensure that others around them worksafely. This includes complying with site rules, all site-specific procedures, and instructions, wearing the correct and appropriate PPE/RPE and the use of the correct tools and equipment.

Where the use or operation of a machine, method of working or other influencing factor(s) that constitute a danger to staff or another person exists, the employee or sub-contractor may refuse to operate the plant or machine. The employee or sub-contractor may also refuse to carry out a method of working when it puts the life, health or safety of himself/herself or another person in danger.

Employees and sub-contractors refusing to work on Health & Safety grounds will be supported and no disciplinary action, financial or other penalty will be taken against them. Escalation for resolving a refusal to work is through the senior person on site in the first instance such as your site supervisor who will report the identified unsafe working to the head office, where it will be investigated, and appropriate remedial action taken. No work must recommence until the issue/s causing concern have been dealt with sufficiently and they are happy to return to work.

If any such reporting to the site supervisor is not dealt with sufficiently, then operatives may report directly to their senior manager, if they are still dissatisfied with the outcome of reporting a worksafe issue, then they may approach me directly, only when all other avenues have been used. Such direct reports to myself as the Managing Director will be dealt with confidentially and the person will be kept informed of the outcome.

As part of our induction process employees and sub-contractors will be made aware of their absolute right to decline to carry out work if they feel it is not safe to do so. A copy will be made available on site for further reference.

Any employee raising the Worksafe Procedure will be informed of decisions throughout the process.

All managers and staff are actively encouraged to report any unsafe acts or conditions.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

12.1 Business Continuity Policy Statement & Plan

We are committed to providing the best possible services to our customers and the best possible relationships with our employees and suppliers to ensure that all company business activities can be kept at normal or near-normal performance following an incident that has the potential to disrupt or destroy the company.

We recognise the importance of an active and fully supported policy and plan to ensure the safety, health, and continued availability of employment of our employees and the production and delivery of a quality service for clients and other stakeholders. We require the commitment and support of every employee in support of the activities required to protect the company assets and survivability.

To ensure the consistent availability and delivery of our services, we have developed the following business continuity policy and plan to ensure our overall business survivability. The scope of this policy applies to the company as whole and all employees are required to ensure that document back up and system controls are maintained at all times, if any concerns, report must be made to the IT management immediately.

We like any other company, are exposed to potential risks that could disrupt or destroy critical business functions and/or the delivery of our goods and services. Our strategy for continuing business in the event of an incident is to ensure the safety and security of all employees; and to continue critical business functions and delivery of services from predefined alternative sites. If any incident occurs, that restricts access to the main head office, alternative locations have been identified as working from home office locations, with access to the company remote server to ensure existing records and documentation can continue to be accessed and daily works can proceed. All management are equipped with laptop and tablet facilities to enable remote location working to maintain receipt of email and electronic database requirements. All management are equipped with mobile phone handsets, which would ensure receipt of phone calls would continue to be maintained and any disruption to office phone will be diverted to the Office Administrator.

All IT undertakings are backed up continuously to our remote server, managed by our external IT consultant, where it can be accessed from a remote location, if required, to maintain access to company records, documents, training certificates, plant certificates, job files, as all documents are scanned in for electronic as well as paper storage.

The Information Technology (IT) management are responsible for the recovery plans to ensure that any damage or disruptions to critical assets can be quickly minimised and that these assets can be restored to normal or near-normal operation as quickly as possible.

To ensure business functions are maintained any requirements for holiday must be requested via the Office Administrator to ensure that cover can be arranged. The company directors ensure that only one of them is away from the company undertakings at any one time to ensure that senior decision makings can always be maintained.

If any employee is sick, they are required to report into the office as soon as possible so that cover can be arranged. If management are disposed from their office duties due to illness, then the Office Administrator will check the main email inbox for that manager, to monitor any urgent emails that may need immediate attention.

The person with the overall responsibility for the implementation of this policy rests with the Managing Director, who in turn expects all levels of management to apply to this policy and plan. Failure to comply with this policy within the allotted time for resolution may result in verbal reprimands, notes in personnel files, termination and other remedies as deemed appropriate.

Any deviations from this policy must be approved by the Managing Director after consultation with all levels of management. This policy and plan will be reviewed at least annually to ensure that it remains up to date and relevant to the company undertakings.

Signed:



Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.2 Corporate Social Responsibility Policy Statement

We are committed to meeting the highest standards of corporate citizenship by protecting the health, safety, and welfare of our employees, by safeguarding the environment and by creating a long-lasting positive impact on the communities where we do business.

We believe that our strong commitment to the highest standards of corporate citizenship and sustainability strengthens our business, our workforce and the communities where we operate. Social Responsibility is integral to the way we conduct business, particularly with regards to the nature of our works.

This policy referred to as our CSR, has been put together for all levels of employees within our company structure to further strengthen our existing health and safety policy statement, environmental policy statement, equal opportunities policy statement, sustainability policy statement and our anti-fraud and bribery policy statement. With the combination of these policies merged with this policy statement ensure that we identify all areas that may influence the business undertakings.

We undertake asbestos removal works for several clients, which we undertake nationwide with our main concentration from the midlands down to south coast of England. Due to the nationwide cover of some of our client base, we follow the works as required to ensure that the high standards our clients have come to know and expect from us are delivered.

This policy will be implemented throughout the company structure, whatever job they undertake from our onsite workforce, to our office admin, right the way up to our company directors. All are required to comply and raise any concerns or additions that they feel could assist in developing this policy to a higher standard.

The company directors strongly believe in delivering a high standard of company undertakings over and above legislation and industry best practice, which is often reflected in the company investment in training and equipment required.

With our ISO 9001 and 14001 systems manual, working alongside our company policies and procedures, ensures we have a strong documented work ethics which is externally audited to ensure our company continues to develop and standardize appropriate working practices.

With the introduction of this policy the company directors have committed to the following:

- To conduct our business to the highest standards and personal integrity;
- To respect the laws and regulations defined within the country of working;
- To be committed to transparency and good governance;
- To implement fair and honest competition, and endorse our Anti-Fraud and Bribery Policy, to assist in combating corruption and promote the rule of law;
- To endorse and respect the Human Rights Act;
- To endorse and implement the international voluntary initiatives designed to protect the environment and human rights;
- To provide training for our employees to comply with our statutory duties and to deliver over and above the standards required;
- To ensure our contractors and suppliers apply their own Code of Business Conduct and Ethics and their related policies, or to adopt equivalent standards to our own expectations, and to train their employees accordingly.

With regards to the effects on our communities the company directors have committed to:

- Conducting Environmental and Social Impact Assessments to identify and understand the potential social, cultural and environmental impact of operations prior to making major investments, as referred in our ISO 14001 standards;
- To identify and assess our contributions to social and cultural changes in the areas where we operate and develop appropriate strategies to respect the rights and cultures of local communities;
- To collaborate with host governments, civil society, businesses and other stakeholders to make lasting contributions to social development, especially in the areas of education and health;
- To be fully committed to respecting all human rights where we operate;
- To seek to minimise any negative environmental, welfare, quality, and health and safety impact on our host communities as a result of our operations.

Our company directors respect the rights of all persons and will implement the following by:

- Supporting the fundamental principles of the rights to work;

- Not permitting the employment of under-age children in our workforce or the use of forced or compulsory labour in any of our operations;
- Being committed to diversity and providing equal employment opportunities to all employees and job applicants regardless of race, colour, sex, age, sexual orientation, creed, national origin or disability as defined within our Equal Opportunities Policy;
- Not tolerating any form of workplace harassment including sexual harassment of an employee or employment candidate;
- Recognising and respecting our employees' right to join associations and choose representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules, regulations and local customs;
- Being committed to providing challenging and rewarding career opportunities to ensure that we have a skilled, capable and energised workforce;
- Providing learning opportunities for employees to maximise their potential and ensure that our company achieves its business objectives.

The health, welfare and safety of our employees and our neighbours are of paramount concern to us. Our Environmental including Sustainability Policy, our Health and Safety Policy addresses all these areas in greater detail.

We will routinely monitor, assess, and report on our conformity with this policy statement.

We require all employees to comply with this policy and related directives and additional policies. We are working towards ensuring that our contractors and suppliers respect this policy to its maximum.

Signed: 

Date: 1st July 2023

Mr. Bradley Rees, Managing Director

12.3 Whistleblowing Policy Statement

We are committed to providing the best human resources support to our company employees and ensure the best possible working relationship with each and every employee. This policy defines our commitment to the protection of employee rights if they ever raise a concern with regards to bad practices, unethical or immoral behaviour being undertaken by any of our company employees that may affect others.

Such organisational processes that may be reported under the protection of this policy, some of which have been already defined within our additional policy statements, could include:

- wasteful use of company plant, equipment and provisions;
- fraudulent activities as defined within our anti-fraud and bribery policy;
- unsafe working practices as defined within our work at height, training and worksafe policy;
- environmental impacts as defined within our environmental policy;
- impact on our corporate and social responsibility to the community and neighbourhoods that we live and work in as defined within our corporate social responsibility policy;
- mistreatment and/or discrimination of an employee as defined within our equality policy;
- undertaking works to a poor standard that reflects on our quality assurance policy statement that we commit to our customers and others who may be affected by our works;
- employees refusing to apply our smoke free policy and exposing others breaching the health act 2006.

We recognise the importance of actively and fully supporting this policy to ensure that employees do not feel intimidated to report any such incidents that they feel need to be made aware to the company directors. This requires the commitment and support of the managing director, who would like to remind all employees that he runs an open-door policy and can always be approached.

The scope of this policy applies to all employees, whatever position they hold. If concerns are to be raised about supervision or management, it can be raised directly to the managing director at a convenient time and all whistleblowing will be treated with the strictest of confidence.

When reported the relevant person will be assured by the managing director that personal reprisals will be protected against and that they will be suitably informed on any movement in the particular investigation and follow up the concern raised. The relevant person must ensure that they do not discuss the concern with any other employee that may further escalate the situation.


If the whistleblowing raised potentially breaks any laws, then further advice may be sought from our appointed solicitor as required to further investigate any legal action that may need to be undertaken.

Employees are informed that any accusations made must be taken responsibility for and malicious or reckless charges will not be sanctioned. Disgruntled employees must not take this route if it is not relevant and are informed that if a legal route is taken, then they will be required to attend any court, tribunal, or other such meeting to further progress such action.

If an employee feels that they are not receiving an adequate response to their concern/s then they may contact the Citizens Advice on the link below for further information.

[Citizens Advice www.citizensadvice.org.uk/](http://www.citizensadvice.org.uk/) 03454 04 05 06

Any deviations from this policy must be approved by myself as the Managing Director after I have consulted with all levels of management. This policy will be reviewed at least annually to ensure that it remains up to date and relevant to the company undertakings.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.4 General Data Protection Policy Statement

To ensure compliance with the General Data Protection Regulations (GDPR) the following policy has been written to assist with the required arrangements to be put in place. We must ensure all employees and key personnel are aware of their legal duties and that documents we hold with personnel data is protected in accordance with GDPR. We also need to verify how employee's individual rights including, how information would be deleted.

Under the GDPR we have defined our company as the processor of personal data and understand that we will be in breach if we do not apply our legal duties. We are required to record an array of employee records with regards to health records, to comply with CAR 2012 for the specific purpose of collecting data for personal monitoring and exposure record requirements, which will need to be maintained. This data is collected only for our company use and records and is not shared with any other third party, other than if requested by the HSE for compliance.

This data is already well protected with regards to key paperwork files stored in locked filing cabinet with only designated admin staff requiring access for maintaining records as works progress and documents are updated. The recording of data includes both paperwork based, scanned documents, computer stored documents and data uploaded to our database, all of which is covered by GDPR, and must be protected. Therefore, all employees will be required to assist in our compliance and not share sensitive personal data with others without the permission of the company Data Protection Officer (DPO).

We have appointed a DPO to apply the principles of the roles and responsibilities that this position would require, therefore safeguarding our data records. We are also required to hold Disclosure Barring Service (DBS) records for some of our clients, therefore potentially holding more sensitive data on previous criminal convictions and offences.


All employee's will be required to complete our right to consent for the maintaining of their personnel records to enable us to comply with CAR 2012 requirements initially and at the same time comply with the GDPR. This form will be handled by the DPO to ensure all employees are signed up to this requirement. If employees feel they are not able to give such consent, then they must be referred to the section of the CAR 2012 which requires an employer to record such data and maintain for 40 years and other such personnel data required for HMRC and rights to work requirements.

Our computer-based system is password protected for each individual user, with the DPO having password access override if employee leaves company and passwords requiring changing to prevent access thereafter for that employee. All computer-based documentation is backed up by secure remote location server which the DPO has main access control only. All computer users must set up a screen saver mode to ensure when leaving their desk sensitive personnel information cannot be accessed by others.

All employees that have access to sensitive information will receive internal training on how to assist us with compliance by operating a clear desk policy at the end of each working day and when they will be away from their desk for a long period time, such as a lunch break or visiting site. Those responsible for maintaining lockable cabinets will also be instructed on keeping lock on the cabinets when not in use.

We have conducted an internal information audit map to identify areas of data flow in and out of the company and assessed the possible risks that may breach an individual's rights and the freedom of individuals. This will be reviewed at least 6 monthly, to ensure compliance remains in place and identify any new additional information flows, that may present a risk.

Full details of our compliance will be detailed within our GDPR privacy policy.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.5 Modern Slavery & Human Trafficking Policy Statement

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out that T & S Environmental Ltd have taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

Modern slavery and human trafficking remain a hidden blight on our global society. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages, and we as a company prohibit any form of modern slavery.

All our employees' and subcontractors have a responsibility to comply with this policy and be alert to the risks brought about by modern slavery in our business and the wider supply chain. Employees are expected to report any concerns and management are expected to act upon them.

We shall put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment, and modern slavery in accordance with relevant legislation and standards.

The requirements made of our supply chain regarding modern slavery will be communicated and contracted through a copy of this policy being forwarded to all approved key suppliers. We therefore expect all suppliers to conduct right-to-work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006.


We will seek to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern-day slavery across our industry and throughout our supply chain, in accordance with the international environmental, social, and ethical standards.

We will provide an option for anonymity, and encourage our employees', subcontractors, and suppliers to report any suspected legal or ethical breaches to the relevant government body.

We want to ensure that ethical business values are applied throughout the company, and we believe our ethical values are the basis on which we can develop better solutions, projects, and customer outcomes, and therefore a competitive edge.

Ethical values are evident in every interaction we have with our employees', contractors, suppliers, customers, and members of the public. We expect our employees' and subcontractors to always consider whether their actions are fair and ethical. Doing the right thing is embedded in our vision and values, processes and procedures and working environment. It translates into partner relationships, the way employees' and subcontractors are treated and the process used for procuring goods and services.

We will continue to review this policy on an annual basis.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.6 Social Media Policy Statement

The scope of this policy applies to all employees, whatever position they hold. If concerns are to be raised about supervision or management, it can be raised directly to the managing director at a convenient time and all whistleblowing will be treated with the strictest of confidence in accordance with our whistleblowing policy.

We actively believe in open communication and encourage our employees to tell the world about the important work they undertake but remind them of the sensitive nature of information that may be involved.

The use of any online social network or any other form of online publishing or discussion forum is completely up to the individual employee, but must remind them, that discussion of works being undertaken or works that have been undertaken in the past must not be posted.

The use of social media must be restricted to the employee's own time, accept when requested to use such media for the benefit of the company by the company directors. If employees proceed to use company devices during breaks or outside of working hours, then they must ensure they understand this policy.

When employees discuss any company related matters on the internet, they must identify themselves with their name and, when relevant, role at the company and always include their company contact details.

Only the company directors are official spokespersons for the company, so employees must make clear that they are speaking for themselves and not for the company. Such postings must include the following, "this posting is my own words and do not represent the position, strategy or opinions of the company".

Employees must ensure that they use their own personnel email address and not the company email address for any private communications. If posting anonymous postings on Wikipedia, this can also be traced back to the company. Any persons posting content they publish on blogs, wikis or any other form of user generated media can also be traced.

All employees must remember that the internet never forgets. This means everything published will be visible to the world for a very long time. All employees should apply a common-sense approach and check anything they are about to publish to ensure that, if they read it back and it makes them feel the slightest bit uncomfortable, do not post it. All employees are required to act responsibly with the information that they are entrusted with.

They must never comment on work-related matters, particularly any legal matters unless you are an official spoke person and have the legal approval from the company directors to do so. Also talking about revenues, future products, pricing decisions, unannounced financial results or similar matters must not be discussed.


All employees must also show consideration for others privacy and for topics that may be considered objectionable or inflammatory (like religion, sexuality, member of a group or politics).

Using your public voice to trash or embarrass your employer, your customers, your co-workers or even you is not okay - and not very smart. You must not cite or reference clients, partners, or suppliers without their approval. You must be aware that others will associate you with your employer when you identify yourself as such.

Copyright must always be respected, if it is not yours, don't use it. It is that person's choice to share his or her material with the world, not yours. Before posting someone else's work, you must check with the owner first.

Even if you act with the best intentions, you must remember that anything you put out there about our company and its employees can potentially harm the company. As soon as you act on the company's behalf by distributing information, you are upholding the company's image, so you must act responsibly. If in doubt, do not do it.

Any deviations from this policy must be approved by the Managing Director after consultation with all levels of management. This policy will be reviewed at least annually to ensure that it remains up to date and relevant to the company undertakings.

Signed:  Date: 1st July 2023
Mr. Bradley Rees, Managing Director

12.7 Health and Wellbeing Policy Statement

This policy sets out our company approach to securing the health and wellbeing of our employees, defining our commitment and arrangements for securing the health and wellbeing of our employees and others that may be impacted by works.

This policy complements and supports the implementation of our other company policies and procedures.

'Health' is defined by the World Health Organisation (WHO) as '...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity'. 'Wellbeing' defined as "...a state of being with others, where human needs are met, where one can act meaningfully to pursue one's goals, and where one enjoys a satisfactory quality of life" (Economic and Social Research Council).

'Occupational Health' defined as being "the promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations by preventing departures from health, controlling risks and the adaptation of work to people, and people to their jobs".

As the Managing Director I recognise the protection of health and the promotion of wellbeing as important factors in sustaining attendance at work and supporting job satisfaction and success. I am committed to providing a working and living environment for our employees which minimises risk to health and promotes positive wellbeing.

I aim to deliver this commitment by:

- Providing an environment in which employees who have health problems, that may affect their work receive suitable support, and that reasonable steps are taken to make adjustments to their work circumstances to enable them to achieve their full potential;
- Promoting the health and wellbeing of our employees through our management policies, support services, information networks, and by means of health promotion campaigns;
- Providing access to specialist health and mental health support for employees;
- Encouraging employees to declare any relevant health or wellbeing matters to enable us to identify and implement appropriate measures to actively support them.

We will respect the confidentiality of all employees making such declarations and will ensure that information is only shared where it is appropriate to do so, such as giving support to the individual or to prevent harm to the individual or to others.

As the Managing Director, I will ensure sufficient allocation of resources to enable the company to fulfil their responsibilities under this policy statement. Ensuring that any confidential health information disclosed by employees is maintained as confidential and is only shared where there is a need to do so in order to support the individual or to protect their health, safety and wellbeing or that of anyone else who might be affected.

As Managing Director, I have overall day to day responsibility for health and safety matters at the company but delegate these responsibilities for undertaking aspects of these duties through to our management and identified roles.

As the Managing Director, I will:


- Implement and promote the principles and behaviours embedded in the company policies and procedures that contribute to positive employee wellbeing;
- Ensure that significant risks to health and wellbeing are assessed and that identified control measures, including control measures relating to emergency situations, are implemented so that risks are reduced to a tolerable level;
- Develop and implement action plans where existing control measures do not adequately address significant risks to health and / or wellbeing;
- Ensure these action plans are brought to the attention of anyone who needs to see them, including employees and those expected to implement changes or undertake action;
- Ensure that risk assessments include appropriate consideration of potential significant risks to health and wellbeing. Risk assessments will include consideration of any support that employees might require in emergency situations (for example, a Personal Emergency Evacuation Plan);
- Ensure that risk assessments identify appropriate control measures to reduce risks to health and wellbeing as far as reasonably practicable;
- Monitor working times and encourage them to take the rest breaks and leave that they are entitled to in the course of their employment;
- Monitor workload to ensure allocated tasks are capable of being completed within the time and resources allocated and are within the competency of the relevant employee;
- Consult appropriately with employees over aspects of their employment, role and anything else which may significantly impact upon their health, especially any planned changes;

- Consult with management in respect of any employee that they may believe would benefit from support from Occupational Health and/or employee counselling scheme;
- Ensure that those employees subject to health surveillance or further occupational health investigation are provided with sufficient time to attend appointments;
- Promote employee health and wellbeing;
- Ensure competent advice is available for health and wellbeing matters;
- Consult with relevant trade union safety representatives and other stakeholders, where appropriate, on proposed action relating to staff wellbeing and the prevention of workplace ill-health.

Our employees will be made aware of their general duties as below:

- To cooperate on matters of health and safety, such as attending the statutory health surveillance programmes;
- To protect their own health and safety and that of any other person who may be affected by their acts or omissions;
- Disclose any relevant health and wellbeing information to management to enable us to identify and implement any support measures to sustain attendance and support health and wellbeing;
- Attend Occupational Health where this is recommended and consent to relevant information being disclosed to management;
- To inform as soon as is practicable if they have a health or wellbeing concern that affects, or is likely to affect their ability to carry out their works, so that reasonable steps can be taken to identify and implement suitable support;
- To report any person about whom they have concerns with respect to their health or wellbeing.

This policy will be reviewed accordingly as new schemes for supporting health and wellbeing are applied.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.8 Industrial Relations Policy Statement

We are a leading provider of asbestos removal and support services to the UK and we recognise the importance of Industrial Relations.

We are committed to upholding our duties as a responsible company for the greater benefit of the communities in which we operate, and we will take a pro-active and balanced approach to managing our business activities in a responsible manner.

The objectives of this policy are to ensure that activities associated with all our contracts:

- Provide a framework that promotes and meets all legal requirements in relation to employment;
- Create a healthy, productive and stable operational environment for everyone;
- Establish requirements that will minimise and mitigate risks which may impact on any of our contracts;
- Mitigate any risk that may lead to disruption on any of our contracts;
- Facilitate processes that will ease potential constraint to any of our contracts;
- Engage with clients frameworks to provide for a joint, strategic approach to industrial relations risk management;
- Promote joint working between our company, our clients, suppliers and trade unions.

To undertake the management of industrial relations we will comply with the law and our client's industrial relations policies, which will include the respect of the right of all employees to join a recognised trade union. For our site-based staff, the client or the Principal Contractor will take the lead with communicating with interested parties on industrial relations matters.

We will monitor industrial relations of our suppliers and ensure compliance with this policy and compliance with the Information and Consultation of Employees Regulations 2004 which require employers to establish arrangements for informing and consulting their employees by way of either a negotiated agreement or the standard provisions laid down in the regulations if requested by 10% of the workforce. The Central Arbitration Committee's has the responsibility to resolve disputes about the establishment and operation of these arrangements and can be contacted either of these, www.cac.gov.uk or email, enquiries@cac.gov.uk.

Day to day coordination of industrial relations will be in accordance with any reasonable requirement imposed by way of contract upon our company and our supply chain. For this purpose, the Company Directors will attend any coordination meetings required.

Employment will be in accordance with an appropriate employee contract and shall be executed in accordance with our company safe working procedures and policy.

Dispute Claims, Disciplinary and Grievances must be notified at the earliest opportunity to the Company Directors who will keep those involved, informed, and updated through the process until resolved. This may require review meeting of the individuals concerned and liaising with any representatives with area responsibility for site arrangements for industrial relations for early mediation to be established.

The following process must be applied for an Employment Relations Recognition of Trade Union:


1. The Union must apply for recognition.
2. As the Employer we must confirm recognition of the Trade Union within 10 days. If the answer is yes then we proceed to stage 3, if not we must proceed in accordance with Employment Relations Act- Part I - Union Recognition, referring to the Central Arbitration Committee (CAC).
3. Trade Union must submit to us as the Employer a collective bargaining procedure.
4. As the Employer we must agree within 30 days with the proposed bargaining procedure, if not then we must proceed in accordance with Employment Relations Act- Part I, referring to the Central Arbitration Committee (CAC).

Below is the applicable key legislation to be applied alongside this policy;

- The Employment Act 2008;
- The Employment Tribunals (Constitution and Rules of Procedure) (AMENDMENT) Regulations 2008;
- Tribunals, Courts and Enforcement Act 2007 The Information and Consultation of Employees Regulations 2004 The Employment Relations Act 2004;
- The Employment Act 2002;
- Employment Relations Act 1999 sets out procedures for the recognition of an independent trade union to conduct collective bargaining on behalf of a group of workers, referred to as the bargaining unit. It provides a method for agreeing the appropriate bargaining unit, whether the union should be recognised, and how collective bargaining should be conducted. The key steps in the recognition procedure are illustrated in Figure 1 within this Act;

- The Trade Union and Labour Relations (Consolidation) Act 1992;
- The Employment Act 1990;
- The Employment Act 1989;
- National Minimum Wage Act 1998;
- Employment Rights (Dispute Resolution) Act 1998;
- The Employment Tribunals Act 1996;
- The Trade Union Reform and Employment Rights Act 1993;
- The Transfer of Undertakings (Protection of Employment) Regulations 1981;
- The Employment Protection Act 1975;
- The Employment Agencies Act 1973.

This policy will be reviewed accordingly as any changes to legislation are required or changes in our company policy are required to be applied.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

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12.9 Hygiene Standards Policy Statement


Following the years of COVID restrictions and the knowledge gained from maintaining high standards of hygiene standards, despite the revocation of the COVID regulations we have continued to adopt the maintenance of a good standard of hygiene to reduce the risk from flu and other transmittable bugs and sickness. This will help to assist with keeping our employees healthy and ensure that employees keep themselves safe.

The previous requirement for looking at ways to enable employees to work from home was not something we could install during the pandemic as we needed our office staffed to ensure our works could in a safe and compliant manner. If employees to feel unwell they are required to report into the office as soon as possible either to their direct manager, or if not available to either of the Directors, so that they are able to arrange cover for works or office staff may need to take care of their tasks for the time they are absent from work.

Although social distancing is no longer enforced, we have continued to maintain the distances between workstations in the office and advise users to clean their areas down often to maintain cleanliness and hygiene. Persons travelling in our vans are no longer required to maintain a controlled procedure, but we still encourage regular hygiene wipe down of common touched areas in the vans, maintain good airflow and we continue to keep the same teams working together where possible.

We will continue to encourage good hand washing techniques and continue to provide hand sanitiser dispensers in the vans as a good practice as in certain situations they may not be able to access suitable hand washing facilities immediately and the sanitiser can act as a barrier to germs until they can. We continue to remind employees that sanitiser is not a replacement for good hand washing, more of an aid until suitable hand washing can be complete. Usual welfare standards of warm running water, hand wash and drying facilities must be provided at all times and the Supervisors are responsible for reporting any concerns on site.

The above has the full commitment of myself as the Managing Director and we will continue to review and amend as further information or changes apply and monitor sickness absence at certain times of the year when flu and bugs are more prevalent.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.10 Fatigue Management Policy Statement

The purpose of this procedure is to define the requirements for how we will undertake the management of fatigue, with reference to driving and our working hours.

Fatigue has the potential to be an issue within our company undertakings, therefore if we manage the factors that lead to fatigue, we can try to reduce potential affect it may have on our workforce and assist in the reduction of incidents and accidents. A state of perceived weariness from physical and/or mental exhaustion, can result from prolonged working, heavy workload, insufficient rest, and inadequate sleep.

Below are a list of the working time limits that will be applied as our standard arrangements:

- No more than 12 hours continuous duty;
- No more than 16 hours door to door (above work maximum applies);
- An ideal minimum of 11 hours rest between period of duty with an absolute minimum of 8 hours (subject to risk assessment and compensatory rest);
- No more than 78 hours in a 7-day period;
- No more than 12 periods of duty in any 14-day period;
- A minimum break of 20 minutes for every 6 hours worked;
- Maximum of 400 miles driven in a single period of duty including to and from the place of work;
- Maximum of 6 hours driving in a single period of duty including to and from the place of work (above work maximum applies).

The definition of the actual hours of work includes any overtime, rest days worked, door to door travel time and paid meal rest breaks. A period of being on duty includes all shift or work activities including travel time to and from the place of work, including on-call duties, overtime and meal and rest breaks.

Persons under the age of 18 must not work for more than 8 hours per day and 40 hours per week, this should not have a major effect on monitoring our works as we are unable to use under 18's for undertaking asbestos works.

Contrary to the above there may be exceptional circumstances which either cannot be anticipated, or which threaten serious disruption to the areas of works that we may be assisting, that may exceed the policy, such as:

- severe weather conditions;
- faults on site that may threaten disruption to the area of works that we are assisting;
- incidences which may or will result in risk to employees and/or the general public;
- vandalism;
- restricted access to the area.

Any time spent travelling from home to a work location and back again plus any travel time between locations is to be counted.

Emergency works, where employees have been called out for emergency maintenance and repairs or those involving activities where, because of risks to the individuals concerned or to others, the employees need to have full, unimpaired control of their physical and/or mental capabilities, this will be monitored by the supervisor of the particular project and if they feel the employee is of concern, they have the backing of myself as Managing Director to stop the employee from undertaking further works.

Working patterns or shifts will be periodically reviewed and re-assessed to ensure they remain appropriate for the works being undertaken and continue to reduce the risk of fatigue.

When assessing working patterns, the following will be reviewed:

- Any safety critical works that have been undertaken;
- Providing adequate rest between periods of duty;
- Providing adequate rest within periods of duty;
- The amount of travelling time from home to work and back again;
- The amount of travelling time within work;
- The hours required to undertake the work and whether long duration tasks can be shared / split with others;
- Where particular skills are required, that there are sufficient resources available to meet operational requirements.

When we are planning future works, we will take account of working and travelling time for each individual. Where staff are required to travel long distances, we will ensure that accommodation arrangements are made close to the place of work, in order that work and travelling time is kept to a minimum.

Time limits of standard operations can only be exceeded in exceptional situations and subject to completion of a satisfactory risk assessment and approval by either myself as Managing Director or Special Projects Director, if not available. This may require a dynamic risk assessment on site to be undertaken by the supervisor, liaising with the Directors to determine the anticipated time to complete the task safely and the individuals on site are suitable to proceed, if they are not, they must be replaced.

Following the cessation of the extended period of work, the individual must take a minimum of 11 hours compensatory rest before returning to work. The applicable Director is responsible for determining whether the individual is fit to proceed and any measures that must be taken to limit fatigue.

All personnel site working hours are monitored on our supervisor control sheet, this is calculated against travel time to and from site and other subsequent journeys that may be required and maintained at the office by the Operations Manager, to enable the hours to be monitored.

Any instance identified by Operations Manager where the hours have been exceeded without being subject to a risk assessment are reported to the Directors to be investigated and any further remedial actions implemented.

As the Managing Director I ensure that appropriate arrangements are in place to prevent employees from being put to work when they are suffering from fatigue and identify when fatigue could become an issue.

Our supervisors are instructed to remain mindful that fatigue can still occur when complying with authorised working patterns, as a result of other external or personal factors which may include:

- Short / long-term health condition;
- Prescribed / non-prescribed medication;
- Poor lifestyle / fitness;
- Age;
- Personnel issues;
- Disturbed sleep;
- Stress / exertion.

If any of the above are identified, then they must report back to the Directors regarding the course of action to take, which may include referring to external occupational health advice.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023

12.11 Anti-Facilitation of Tax Evasion Policy Statement

This policy has been produced to ensure that any associated persons with our company do not participate in the facilitation of tax evasion at any time, in any jurisdiction and in any capacity.

Tax evasion is any fraudulent activity that intends to divert funds from the public revenue. A facilitation offence will be committed where an individual or entity deliberately and dishonestly facilitates tax evasion. An example of this would be if a member of staff knowingly facilitated or turned a blind eye to a contractor or supplier's tax evasion. This may be achieved for example through false invoicing or making payments in cash.

We hold all our employees to the highest standards and have a zero-tolerance stance on anyone engaging in any form of tax evasion, whether directly or as a facilitator of the evasion. We constantly strive to ensure that any party who acts either for or with us (e.g. employees, agency staff, suppliers, sub-contractors, etc.) do not facilitate tax evasion in doing so.

The facilitation of tax evasion is a criminal offence with serious consequences for individuals found guilty, from financial penalties to jail. Breaches of this policy by employees will result in disciplinary action and may result in dismissal/termination of contract.

As a company we can also be held liable and face prosecution, which could influence obtaining high status contracts and incur significant financial penalties, so therefore we need safeguards to protect against any unlawful activity and that we have robust procedures in place, and we are fully committed to acting diligently and lawfully. We could be criminally liable if we fail to prevent the individual or entity, who was acting for or on behalf of the company at the time, from facilitating the tax evasion. Our defence is that we have reasonable prevention procedures in place to prevent the facilitation from taking place.

All employees must ensure that they read, understand, and comply with this policy. The prevention, detection and reporting of instances of facilitation of tax evasion are the responsibility of all those working for or providing services on behalf of our company.

It is not our duty to prevent a third party (e.g. customer, supplier, contractor) from committing tax evasion, however, if we continue to work with or for them in the knowledge that they are intending on committing tax evasion, we could be found to have committed the civil offence of the facilitation of tax evasion, which could lead to us committing a criminal offence.

Training for key employees such as office staff will be provided, and attendance is mandatory.

Employees must remain vigilant in spotting 'red flags'. If a red flag is identified, it must be reported immediately to the myself as the Managing Director.

Such red flags could include but are not limited to:

- The customer, supplier, subcontractor or agency staff member refuses or fails to confirm that they will comply with any due diligence we deem necessary;
- Where the supplier or subcontractor operates in a country where tax evasion is more prevalent;
- The supplier, subcontractor or agency staff member has unusual invoicing or documentation practices (for example, invoicing a different company to the one receiving the service);
- The supplier, subcontractor or agency staff member requests payments to be made in cash, to another entity, or to bank accounts in a different country.

No payments should be made, approved, or processed where there is any suspicion that any part of the payment is to be used for any purpose other than that detailed by the documents which evidence the payment. No payments can be left unrecorded.

All information we receive relating to breaches of the policy will be treated seriously and investigated thoroughly. Even where employees are mistaken, if they have acted in good faith, we as the company will protect you. If a member of staff has a concern about tax evasion or the facilitation of tax evasion, they should normally first raise the issue with their immediate manager. This may be done orally or in writing.

If they feel that they are not getting the response they expected to the matter raised, then it must be raised directly to myself as the Managing Director. Or if the member of staff feels unable to raise the matter with their immediate manager, for whatever reason, they should raise the matter directly to myself as the Managing Director

We will review and update this policy at least annually.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023
Date: 1st July 2023

12.12 Prevention of Bullying, Harassment & Sexual Misconduct Policy Statement

This policy statement is installed to ensure a safe, welcoming, and inclusive working environment for all at our company, which includes those who come in contact with our employees and others facilitated for assistance with our works. Bullying, harassment and sexual misconduct are unacceptable behaviours and contrary to the Equality Act 2010 and/or the Protection from Harassment Act 1997, and to our company ethos and mission as detailed in our Equal Opportunities Policy Statement, for which this policy further strengthens.

No member of our working environment is expected to tolerate such unacceptable behaviour, whether by a member of staff, or by a third party such as a supplier or visitor to our site or office; or a member of the public. This policy seeks to ensure that all persons are protected from bullying, harassment, and sexual misconduct. Staff, members of the public and others who may be involved with our works have the right to disclose experiences of unacceptable behaviour experienced while working or participating in our company activities; to be listened to, and to seek support.

Breaches of this policy will be investigated under the relevant disciplinary procedure which may result in dismissal or expulsion and referral to the police. Breaches by members of the public will be referred to the police.

12.12.1. Scope

This policy applies to bullying, harassment and sexual misconduct that is committed or is alleged to have been committed by our employees, whether temporary or direct and others who may be involved with our works including third parties.

The alleged misconduct may have occurred:

- At our premises;
- Via our IT systems;
- On site;
- Online whether via email, the internet or social media;
- In the UK or abroad.

12.12.2 Definitions

For the benefit of understanding the context of this policy the following defines the key words and their definitions.

An **abuse of power** is where someone uses their position of power or authority in an abusive and unacceptable manner. Abuse of power can take various forms and may include, but is not limited to manipulation, coercion, or pressuring someone to do something which may be illegal or against the rules, or something which they are not comfortable with. Abuse of power may also occur in the context of a close personal or intimate relationship. The above behaviours may be expressed in person, in writing and/or by electronic means.

According to ACAS guidance, **bullying** is intimidating, hostile, degrading, humiliating or offensive behaviour, through means which have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, or humiliating environment. Bullying usually involves a repeated course of conduct.

Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given, that it is informed and recognises that it can be withdrawn at any time.

Freedom to consent is when a person is free to make a choice if nothing negative would happen to them if they said no. For example, a person may not feel free to make a choice if:

- they are being threatened with violence (by the perpetrator and/or by someone else);
- they are being threatened with humiliation;
- they believe that the continuation or assessment of their studies, or progression or advancement of their career, will be at risk if they refused;
- they are being blackmailed;
- there is a significant power imbalance and the party without power feels pressured to continue in the relationship against their will.

Capacity to consent is about whether someone is physically and/or mentally able to make a choice and to understand the consequences of that choice. For example, a person does not have the capacity to give consent if:

- they are drunk or under the influence of drugs - this means someone may still be physically able to have sex but they may not be able to consent;
- they are asleep or unconscious;
- a person may also not have capacity to give consent if they have, for example, a cognitive or learning difficulty, a disability which impairs their speech, or are experiencing a mental health crisis.

Disclosure, for the purposes of this policy, involves an individual choosing to tell anyone who is part of the company, about their experience of bullying, harassment or sexual misconduct. Unlike Reporting, Disclosure does not trigger an investigation or action, but it would lead to support being offered.

With regards to **Discrimination** the Equality Act 2010 states that it is against the law to treat any person unfairly or less favourably on the basis of a protected characteristic. The 9 protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including ethnic origin, nationality and colour), religion or belief, sex and sexual orientation.

Grooming can be defined as a gradual process that someone in a position of power uses to manipulate someone to do things they may not be comfortable with and to make them less likely to reject or report abusive behaviour. Grooming will initially start as befriending someone and making them feel special and may result in sexual abuse and/or exploitation.

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. The unwanted conduct can be physical, verbal or non-verbal.

Reporting is the sharing of information with a staff member regarding an incident of bullying, harassment or sexual misconduct experienced by that individual for the purposes of initiating the investigation process set out in this policy and is different from Disclosure. The Reported Party is the person(s) whose behaviour it is alleged amounted to an incident of bullying, harassment, or sexual misconduct. The Reporting Party is the person(s) who witnessed or was subject to the alleged incident of bullying, harassment, or sexual misconduct.

Sexual misconduct is a form of harassment and is unacceptable behaviour of a sexual nature. It can include: sexual harassment; sexual violence; intimate partner violence; sexual assault; grooming; coercion or bullying with sexual elements; sexual invitations and demands; sexual comments; sexual non-verbal communication; creation of atmospheres of discomfort; and promised resources or advancement in exchange for sexual access.

Stalking is regarded as following a person, watching or spying on them or forcing unwanted contact with the victim through any means, including social media. The effect of such behaviour is to curtail a victim's freedom, leaving them feeling that they constantly have to be careful. In many cases, the conduct might appear innocent (if it were to be taken in isolation), but when carried out repeatedly so as to amount to a course of conduct, it may then cause significant alarm, harassment or distress to the victim.

Victimisation is treating someone less favourably because they have made a claim or complaint of discrimination or helped someone else to make a complaint (under the Equality Act), or made a disclosure (whistleblowing policy statement) under the Public Interest Disclosure Act 1998, or in either case the affected person is believed to have made or helped make, or is believed that they may make or help make, a complaint or disclosure.

12.12.3 Roles and responsibilities

We are committed to preventing incidents of bullying, harassment, or sexual misconduct where reasonably possible; and to provide educational and preventative training programs regarding such behaviours. We also commit to make available timely support for those who have been affected by such behaviours; and to provide prompt and equitable methods of investigation and resolution to stop bullying, harassment and sexual misconduct, to remedy any harm, and to prevent its recurrence.

All staff, employees and others connected with our company activities have a responsibility to ensure we have a working environment where everyone is treated with equal respect and dignity. Each member of staff is expected to contribute to preventing unacceptable behaviours, including harassment, bullying or sexual misconduct through self-awareness; and by modelling positive behaviour for others, and raising any concerns. It is important that exemplary behaviour is demonstrated. It must be remembered that actions can be misinterpreted by others, no matter how well intentioned. Due consideration should always be given as to what is an appropriate environment and what is appropriate conduct in relation to the activities which are being undertaken.

All staff, employees and others connected with our company activities are required to disclose criminal convictions acquired during employment.

12.12.4 Informal resolution

A person affected by bullying, harassment or sexual misconduct under this policy may wish to resolve the behaviour informally if it is a one-off occurrence or is not considered serious. Site based personnel are encouraged to speak to their supervisor first in this occasion, if they feel that they are not getting the response they expected from the supervisor then they may contact the Directors. If they are approached and told that their behaviour could be construed as bullying,

harassment, or sexual misconduct, they should be prepared to listen patiently and calmly. Whilst it may be upsetting, they should allow the person to express their concerns, and if appropriate, try to reach common ground to remedy the situation and allow a positive working relationship to be resumed. If the nature of the complaint is serious or inappropriate, they must refer this to the Directors to agree the next steps.

12.12.5 Procedure for making a formal complaint

Those who feel they have experienced or witnessed bullying, harassment or sexual misconduct by another may make a formal report to the Directors, and they are to be informed that they will be supported through the formal reporting process.

Those who feel they have experienced or witnessed bullying, harassment, or sexual misconduct by a third party, or a member of the public should discuss this with the Directors, as this may involve notifying third parties on site and using their complaints procedure; or notifying site Security and/or the police when involving members of the public.

Those who feel they have experienced or witnessed bullying, harassment, or sexual misconduct to someone under the age of 18 or is deemed to be an "adult at risk", there may be a safeguarding element involved, and this must be referred as a safeguarding concern and reported to the relevant persons.

12.12.6 Outcome of a formal complaint/disciplinary case

The Reporting Party will be told whether their complaint has been upheld or not; and whether the Reported Party has been dismissed or expelled.

If the complaint is not upheld or the Reported Party is not dismissed or expelled, information will be shared with the Reporting Party to minimise any adverse effects in accessing their work environment where possible, but there may be limits to the information about the consequences to the Reported Party that can be shared with the Reporting Party.

Where the Reporting Party is told the outcome they will be asked to respect confidentiality with regards to the outcome.

12.12.7 Support available

We are committed to providing support for all those affected by these issues. Support information may require direction to internal and external support providers. Support resources are available to any person who discloses an incident regardless of whether they choose to make a report to us or direct to the Police. We will also offer interim measures as appropriate to the reporting and reported parties, and witnesses involved in formal complaints.

Interim measures following a report, or a disclosure that requires an investigation may determine the interim measures required, this should include assessing support needed, consider how to protect the interests of all parties and others who may be impacted by the case, and agree to next steps. This will be achieved through a robust risk assessment to consider the welfare and support needs of the parties, and any interim measures necessary to ensure a fair and transparent investigation, where appropriate.

Any interim measures will be proportionate to the nature of the risk(s) being managed. Interim measures may include alternative working arrangements, provision of support, or a recommendation to partially or fully suspend an employee during this time and will be reviewed by the Directors accordingly.

12.12.8 Police investigations and judicial proceedings

Where criminal investigations and/or judicial proceedings are ongoing or are likely to commence in respect of a disclosure or report, we will continue our own investigation and any disciplinary action, subject to the circumstances of the case and police advice. Where, following police advice or otherwise, we may decide not to undertake our own investigation until the case has concluded, we reserve the right to review this decision and to initiate our own investigation and/or disciplinary action at a later stage in or on completion of the criminal investigation and/or judicial proceedings.

A decision by the Police or Crown Prosecution Service (or other law enforcement agency) to take no further action in relation to a criminal matter, or an acquittal at a trial, does not preclude or negate the outcome of our own investigation and/or disciplinary action. Where the trial has completely exonerated the subject of the complaint and it has been found that the Reporting Party has made a false, bad faith or misleading complaint, we may revisit any disciplinary sanction issued to the Reported Party and may consider disciplinary action against the Reporting Party.

Our internal investigation will be focused exclusively on whether a breach of the Prevention of bullying, harassment, and sexual misconduct policy and/or other applicable obligations or policies has occurred. The internal process may therefore be considering different issues from a Police investigation or criminal prosecution. This is why it may,

depending on the circumstances, be possible to proceed with an internal investigation at the same time as a criminal process.

Where the relevant party is convicted of a criminal offence or accepts a Police caution in relation to behaviour that falls within the scope of our Prevention of bullying, harassment and sexual misconduct policy, they must declare this to the Directors without undue delay. The conviction/caution will be taken as conclusive evidence that the behaviour took place, and no further investigation shall be required. Appropriate measures may be taken (if they have not already) under our Disciplinary Procedure.

12.12.9 Victimisation, false, bad faith, or misleading complaints

We will not tolerate any form of victimisation against someone who has raised a complaint, or supported a complaint, or for cooperating in an investigation, or challenging unacceptable behaviour, or in each case is believed to have or is believed to be likely to take such steps. If a formal complaint of victimisation is made it will be fully investigated and dealt with in accordance with our Disciplinary Procedure.

Submitting a complaint that is not in good faith or providing false or misleading information in any investigation of complaints is also prohibited. If a complaint is found to be false, misleading or in bad faith, it will be dealt with in accordance with our Disciplinary Procedure.

12.12.10 Confidentiality

Confidentiality is very important in dealing with cases of alleged unacceptable behaviour. The Reporting Party, the Reported Party and senior staff handling the report should only divulge information to relevant people on a 'need-to-know' basis.

12.12.11 Examples of unacceptable behaviour

For clarification, examples of unacceptable behaviour that are covered by this statement include (but are not limited to) the following:

Shouting at, being sarcastic towards, ridiculing or demeaning others

- Repeatedly or deliberately ignoring people who are waiting to make a contribution to a meeting; continuously cutting people off whilst they are speaking; persistent aggressive questioning; wilfully being dismissive of someone and their suggestions;
- Deliberately excluding someone from meetings, communications or a social activity without a good reason;
- Abuse of power by blaming someone else if something has gone wrong, rather than taking personal responsibility;
- Deliberately creating an environment where an individual is side-lined or has their responsibilities limited or narrowed;

Physical or psychological threats

- Overbearing and intimidating levels of supervision;
- "Grooming" behaviour, for example making someone feel special by befriending them, for example, then gradually manipulating them to carry out duties outside of their normal remit, or to do things which are in breach of our policy or with which they are not comfortable;
- Allocating staff unreasonable workloads with unreasonable deadlines that require an individual to work excessive hours for sustained periods.

Inappropriate and/or derogatory remarks about someone's performance


- Unwanted physical contact, including touching, pinching, pushing, grabbing, invading their personal space and more serious forms of physical or sexual assault;
- Making offensive jokes or derogatory or stereotypical remarks, or mocking, mimicking or belittling a person's protected characteristic.

Outing or threatening to out someone as gay, lesbian, bisexual or trans

- Speculating or gossiping about someone's perceived sexuality or gender identity, refusing to use someone's preferred gendered pronoun (e.g. using 'he' to refer to a trans woman) or continuing to use their former name ('dead naming');
- Practices which are potentially discriminatory and have the effect of excluding certain people. Examples may include regularly holding a meeting at a time or on a day that a part-time worker cannot make or arranging an away day with a physical activity which a wheelchair-user cannot access;
- Not providing equal development opportunities or promotional prospects to those in a team;
- Being discriminatory in recruitment practices or appointing staff in a non-transparent way;

- Sexual harassment, which can include (but is not limited to) unwanted sexual advances, sexual comments or comments about someone's body or appearance; innuendos; wolf whistling; groping; tugging or lifting someone's clothing or stalking;
- Racist behaviour, which can include (but is not limited to) making racist jokes, name calling, making assumptions about someone based on their race or religion, racial harassment (for example, anti-Semitism or islamophobia) or racialised micro-aggressions;
- Not giving due consideration and/or an explanation of a refusal to a reasonable request covered by our policy, such as flexible working, or requests for annual leave;
- Overtly or covertly recording colleagues in order to gather evidence that may be used against them.

We will review and update this policy at least annually.

Signed: 
Mr. Bradley Rees, Managing Director

Date: 1st July 2023
Date: 1st July 2023

13.0 Organisation & Management

This policy and all its statements must be read in conjunction with the responsibilities, arrangements, procedures and guidance that together form our health and safety management system. This is further backed up in our Asbestos Work Procedures and must be read in conjunction with this policy.

The ultimate responsibility rests with the Managing Director but in practice these duties may be delegated in authority only.

Duties arising from that responsibility have been delegated to the Special Projects Director, Office Manager, Operations Manager, Stores Manager, Site Audit Manager and Supervisory Staff who monitor compliance with the Health and Safety Policy. These duties have been allocated under their own individual responsibilities so that everyone knows who and what they are responsible for and to whom they are responsible. They are as accountable for the management of health and safety as they would be for any other function of management.

Employee's initiatives are dealt with by their immediate supervisors before being forwarded to the Managing Director for further discussion.

After consultation with the Managing Director training courses are arranged either 'in house' or at authorised establishments.

The Managing Director will ensure that sufficient time is made available for employees to receive training and that adequate finances are provided to cover such resources as are necessary for the health and safety of employees.

Provisions for Risk Management have been incorporated in accordance with The Management of Health and Safety at Work Regulations 1999 (as amended).

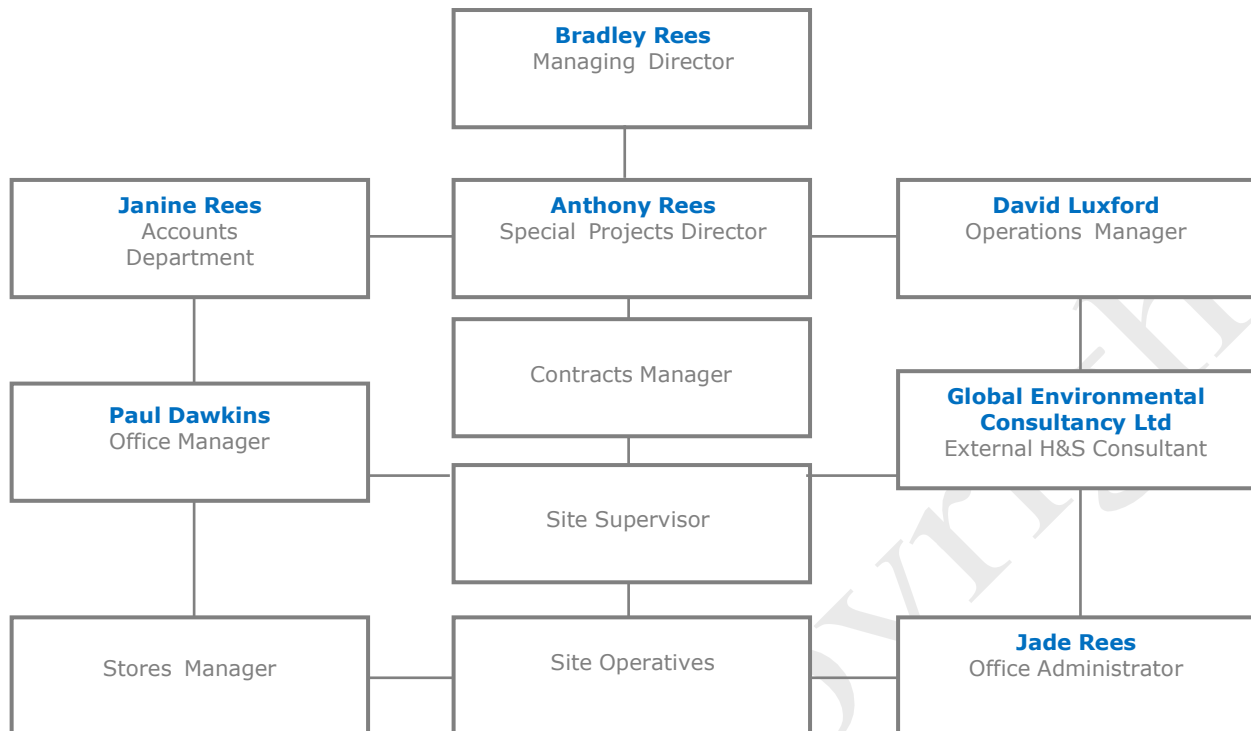
We will specify how checks are to be made on our security. This will include: the role / person responsible for the checking, the frequency of checks, the records of the checks and the records of actions taken.

Our management system will include our detailed systems with regards to the maintenance and inspection for our plant in use. This will include the role / person responsible for inspection and maintenance, the frequency of inspections and maintenance, associated records and the records of actions taken. Inspection and maintenance will normally be in accordance with the manufacturer's schedules.

- Our management system will consider:
- What is likely to go wrong;
- How it will be detected when it happens;
- What actions will be taken and;
- The role/person responsible for taking those actions, and;
- What will be done to investigate the cause to prevent it from happening again;
- The role/person responsible for investigating accidents, incidents and non-conformances.

All our employees will need to demonstrate technical competence by undertaking, external training qualifications and vocational qualifications. We will document all roles and specify their individual responsibilities. Procedures will be put in place to identify training needs (including refresher training) and ensure that records are held of the training that has been carried out.

13.1 Management Structure



14.0 Roles & responsibilities

General duties of employees

The Health and Safety at Work Act 1974 places the following responsibilities on all our employees whilst at work:

- To take reasonable care of their own health and safety and that of other people;
- To co-operate with their employer in the observance of laws and codes of practice relating to health and safety;
- Not to tamper or meddle with safety equipment or signs which may endanger life and it is strictly forbidden to do so.

Observation of the safety rules contained in this safety policy and within our Company Procedures will help prevent accidents or hazardous occurrences.

All employees are instructed to never take risks or short cuts with work - the result may be an accident to yourself or others. If in doubt of any safety concern, then all points must be first relayed to your Supervisor.

Each responsible person will be kept up to date with the necessary requirements to keep them competent in their role by using the following:

- Undertaking academic qualifications;
- Professional qualifications;
- Vocational qualifications such as NVQs;
- External training qualification/certification from a competent training provider;
- Attendance of external or in-house training courses;
- Using approved training providers;
- Mentoring of inexperienced staff with competency assessment, as part of 'on the job' training;
- Employing new staff who have relevant experience in our field.

Managing Director

1. Be fully aware of your roles and responsibilities as defined below.
2. Be fully aware of the Company Health and Safety policy and Asbestos and Special Works Procedures and ensure that they are observed as far as is reasonably practicable.
3. Be aware of the requirements of the Health and Safety at Work Act 1974 and other current/relevant legislation, particularly Control of Asbestos Regulations 2012 and ensure that they are observed as far as is reasonably practicable.
4. Insist that sound working practice is always regularly observed and that the Asbestos Work Procedures are adopted into use.
5. To prepare the site-specific plan of works and risk assessments and ASB5/ASBNLW1 notification/s to the relevant authority for all contracts under your control and ensure the paperwork is brought to the attention of the relevant persons.
6. Ensure that investigations of all accidents and dangerous occurrences are undertaken by delegating this role to the Operations Manager. Ensure the requirements of RIDDOR are complied with where applicable. Ensure that the external Safety Advisor is notified of any accidents or incidents.
7. Reprimand any member of staff for failing to discharge satisfactorily the responsibilities allocated to them.
8. Make provision for the appointment of First Aiders or appointed persons as per The First Aid Regulations 1981. Ensure that the necessary funding is made available to enable enough first aid facilities and training to be made available.
9. Set a personal example by wearing the correct and appropriate protective clothing (P.P.E.) and R.P.E. and ensure that a regular stock of the required PPE/RPE is maintained for use at the company stores.
10. Make provision to take out and maintain the required company insurance.
11. Ensure that a current and accurate fire risk assessment is in place for all areas where employees/persons are employed, meet, or gather, and for all work areas and places of employment or social gathering.
12. Ensure that any electricity supply is installed and maintained in a safe and proper manner to the company offices.
13. Ensure that the necessary finances and time are allotted to allow 10% of our works to be audited internally.
14. Liaise with the Safety Advisor on a regular basis to discuss and act on his recommendations.
15. To carry out an investigation of any worksafe issues that may be raised directly to you from employees or sub-contractors and report to the relevant persons when investigation has been completed.
16. Ensure that all levels of staff are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if such an act is undertaken.
17. Monitor the Business Continuity Policy and Plan and take the necessary action if required to implement its requirements.

18. To ensure the required financial resources, allotted time and training is given to allow the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
19. Arrange for monthly meetings to discuss company safety and other relevant matters and ensure the minutes of meeting are recorded and distributed to all relevant parties.
20. To carry out checks on all employees for their legal status to work in the UK and to keep a record of such checks following the home office guidance Comprehensive Guidance for Employers on Preventing Illegal Working.
21. Apply the requirements of the Hygiene Standards policy statement and encourage a good standard of cleanliness and hygiene throughout the company.

Special Projects Director

1. Be fully aware of your roles and responsibilities as defined below.
2. Be fully aware of the Company Health and Safety policy and Asbestos and Special Works Procedures and ensure that they are observed as far as is reasonably practicable.
3. Be aware of the requirements of the Health and Safety at Work Act 1974 and other current/relevant legislation, particularly Control of Asbestos Regulations 2012 and ensure that they are observed as far as is reasonably practicable.
4. To prepare the site-specific plan of works and risk assessments and ASB5/ASBNNLW1 notification/s to the relevant authority for all contracts under your control and ensure the paperwork is brought to the attention of the relevant persons.
5. Be aware of the responsibilities of personnel under your immediate supervision and to ensure that they have the relevant training, medicals, and face fits to undertake the works that are required of them.
6. Ensure that all equipment is safe, fitted with necessary guards or safety devices, serviced regularly, and maintained as recommended by the manufacturer and that all certification is suitably stored.
7. Provide accident investigation reports to insurers when necessary and assist as far as possible.
8. Set a personal example when visiting sites by wearing appropriate protective clothing (P.P.E.) and R.P.E. as required.
9. Co-operate with the Safety Advisor and act on his recommendations.
10. To carry out an investigation of any worksafe issues that may be raised directly to you from employees or sub-contractors and report to the Managing Director when investigation has been completed.
11. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and that action will be taken if you breach this policy. If you are given any information on breaches of this policy, you must forward to the Managing Director.
12. Notify the Managing Director as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the strictest confidence.
13. Apply the requirements of the Hygiene Standards policy statement and encourage a good standard of cleanliness and hygiene throughout the company.
14. To assist the Managing Director in monitoring the Business Continuity Policy and Plan and take the necessary action if required to implement its requirements.
15. To assist the Managing Director in monitoring that the required financial resources, allotted time and training is given to allow the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
16. Assist the Managing Director to implement the requirements of a good standard of health and hygiene.

Operations Manager

1. Be fully aware of your roles and responsibilities as defined below.
2. Be aware of the Company Health and Safety policy and Asbestos and Special Works Procedures and ensure that they are observed as far as is reasonably practicable.
3. Be aware of the requirements of the Health and Safety at Work Act 1974 and other current/relevant legislation, particularly Control of Asbestos Regulations 2012, and ensure that they are observed as far as is reasonably practicable.
4. To quality check site personal monitoring records as they return from site for completion before passing to Admin for uploading to the company database system.
5. Report all safety matters immediately to the Company Directors so that the appropriate action can be undertaken.
6. Ensure that the new recruits form is completed as and when required, ensuring that all new recruits receive the company induction and sign the declaration accordingly.
7. Ensure that you are aware of our company Worksafe and Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy. If given any information on breaches of the policies you must forward to the Company Directors.
8. Notify the Company Directors as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the

strictest confidence. If you feel that you would like to discuss the matter with a senior member of staff the notification may be made directly to the Managing Director.

9. To undertake the role of Systems Manager to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
10. Ensure that all records relating to exposure to asbestos fibres and corresponding site information which are returned from site/s are entered onto the company's computer system to maintain records of hours exposed to asbestos and relevant maintenance of site-based records.
11. Comply the requirements of the Hygiene Standards policy statement and encourage a good standard of cleanliness and hygiene throughout the company.
12. Undertake the responsibilities of the appointed Fire Marshal for the office and stores and complete the fire logbook requirements.
13. To ensure that the server system is backed up by removing the external hard drive from the server at the end of each weeks, work on Friday at the office to back up the 40-year storage of all our documentation.
14. Undertake the vehicle audit requirements, complete audit reports, and communicate the findings to the Company Directors.
15. To prepare the site-specific plan of works and risk assessments, including identifying non asbestos risks, and the required ASB5/ASBNNLW1 notification/s to the relevant authority for all contracts under your control and ensure the paperwork is brought to the attention of the relevant persons.
16. Supply the appointed UKAS analyst with the required information prior to attending site as required.
17. Ensure that the DCUs supplied to site are maintained to the high standard required for gas, electric, water, roadworthiness and general hygiene and cleanliness and remain sufficient and safe to use.
18. Confirm and coordinate that suitable welfare facilities are set up and made available for all sites, or arrange sufficient facilities as required to maintain compliance.

Contracts Manager

1. Be fully aware of your roles and responsibilities as defined below.
2. Be aware of the Company Health and Safety policy and Asbestos and Special Works Procedures and ensure that they are observed as far as is reasonably practicable relevant to your tasks.
3. Be aware of the requirements of the Health and Safety at Work Act 1974 and other current/relevant legislation, particularly Control of Asbestos Regulations 2012, and ensure that they are observed as far as is reasonably practicable.
4. To monitor records of site activities by undertaking the relevant checks on the site works and ensure they are maintained in the audit files.
5. Report any accident which results in damage or injury in accordance with Company Policy.
6. Report to the Special Projects Director any additional improvements or additions which you feel are required to be amended into the policy or procedures.
7. To report any issues (refer to Worksafe Policy), where you believe it is unsafe for you to continue with your works to the Special Projects Director.
8. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
9. Ensure that you are wearing appropriate protective clothing and respiratory equipment when undertaking your tasks.
10. Notify the Special Projects Director as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the strictest confidence.
11. To maintain the areas of work under your control.
12. To assist the Managing Director and Special Projects Director in any reasonable request to undertake tasks and general operations in the day-to-day company undertakings.
13. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

Stores Manager

1. Be fully aware of your roles and responsibilities as defined below.
2. Be aware of the Company Health and Safety policy and Asbestos and Special Works Procedures and ensure that they are observed as far as is reasonably practicable relevant to your tasks as storeman.
3. Be aware of the requirements of the Health and Safety at Work Act 1974 and other current/relevant legislation, particularly Control of Asbestos Regulations 2012, and ensure that they are observed as far as is reasonably practicable.
4. To monitor records of company equipment and ensure they are maintained in the relevant site files.
5. To carry out monthly competent person RPE checks on all masks worn and maintain records.
6. To carry out the vehicle checks on all company owned vehicles to ensure road worthiness and ensure that records are maintained.

7. To monitor plant and equipment leaving and returning to stores for damage and repairs and ensure disregard for company property is reported to the company directors.
8. Ensure that all electrical equipment and power tools sent to site from stores have been checked and are safe and in good condition and that the relevant PATesting has been carried out.
9. Ensure that any other equipment, tools, or materials sent to site from stores are suitable and safe when used for the purposes for which they are intended. If in doubt, ask for confirmation from technical staff or other competent persons.
10. Ensure that full instructions for the safe use of any article or substance are sent with the article or substance and to check that full instructions are available on site.
11. Maintain a stock of protective clothing and safety equipment for issue to sites as and when required.
12. Ensure that material or equipment delivered to the stores is stacked or stored in a position and manner which does not create a hazard.
13. Report any accident which results in damage or injury in accordance with company policy.
14. Report to the Company Directors any additional improvements or additions which you feel are required to be amended into the policy or procedures.
15. Ensure that all required certification is handed to the relevant person for inclusion in the office files.
16. To report any issues (refer to Worksafe Policy), where you believe it is unsafe for you to continue with your works to the Operations Manager.
17. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
18. Ensure the maintenance of firefighting equipment, escape routes, emergency lighting, means of raising the alarm in the event of fire and maintenance of provided fire detection systems exits are maintained within the yard and office and that the same are made available for provision on sites.
19. Ensure that you are wearing appropriate protective clothing and respiratory equipment when undertaking your tasks and ensure all persons entering the stores and yard are wearing their appropriate safety wear.
20. Notify the Operations Manager as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the strictest confidence. If you feel that you would like to discuss the matter with a senior member the notification may be made directly to the Managing Director.
21. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
22. To assist in setting up supplier accounts and monitoring company expenditure for plant, fuel, and equipment, including the use of hired equipment and ensuring hired equipment is returned in good time.
23. Assist in the maintaining of stores and office safety and security.
24. Assist in any reasonable request to undertake office tasks and general operations in the day to day company undertakings, including but not limited to, the download of photographic files, assisting with fines and parking tickets.
25. To assist the Managing Director in maintaining insurance cover for all company requirements.
26. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.
27. Ensure DCUs are maintained correctly in accordance with HSG 247 chapter 8 and our asbestos works procedures, and the gas, electric, water, roadworthiness and general hygiene and cleanliness remain sufficient and safe to use.

Site Supervisor

1. Be fully aware of your roles and responsibilities as defined below.
2. Be fully aware of the Company Health and Safety Policy and Asbestos and Special Works Procedures and all relevant legislation, particularly Control of Asbestos Regulations 2012.
3. Be aware of the responsibilities of personnel under your immediate supervision and ensure that they avoid unsafe working conditions.
4. Attend regular meetings to discuss concerns with health and safety matters and raise any issues with the relevant Manager.
5. Ensure that there is always adequate and safe access and egress from the place of work and that there is provision for adequate lighting and safe method of electrical distribution.
6. Ensure that all accidents and incidents are reported to the relevant Manager as soon as it is safe to do so.
7. Ensure that personal protective equipment is worn, and the correct tools, equipment and materials are used correctly, by all persons under your control.
8. Report defects in plant, transport and portable equipment to the relevant Manager and remove from service those items or equipment considered to be imminently dangerous.
9. Report to the relevant Manager any additional improvements or additions which you feel are required to be amended into the policy or procedures.
10. Take appropriate action when notified of disregard of Safety advice.
11. Keep all registers, records, and reports up to date and properly filled in and ensure that they are kept in a safe place and pass them to the relevant Manager to pass to the head office for inclusion in the relevant files.

12. Arrange delivery and stacking to avoid double handling and ensure that off-loading and stacking is carried out in a safe manner as per the Manual Handling Operation Regulations 1992. (As amended).
13. Organise sites so that work is carried out to the required standard with minimum risk to employees, other contractors, the public, equipment or materials.
14. To ensure all operatives carry out daily checks of their RPE that is used on site and to maintain written records of such checks which must be returned for safe keeping to the main office at the end of each job.
15. If works require opening of underground ducting, ensure that all information is made available relating to underground services on the site and that services are located marked and plotted accurately before work starts.
16. Plan and maintain a tidy site.
17. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.
18. Work with the appointed UKAS analyst and ensure the required information is provided to enable their works to be completed to the standard required.
19. Ensure that you have understood all non-asbestos risks as defined in the plan of works and the required safe systems of work and control measures are suitably and sufficiently applied.
20. Ensure that suitable and sufficient welfare facilities have been made available for all sites, if not suitably provided report to Operations Manager for further confirmation.
21. Ensure the DCU has been set correctly in accordance with HSG 247 chapter 8 and our asbestos works procedures, the correct ratio to shower head is maintained, it has been suitably earthed and external RCD connected to external 240-volt supply, and the gas, electric, water, roadworthiness and general hygiene and cleanliness remain sufficient and safe to use.
22. Check that all machinery and plant on site, including power and hand tools, are maintained in good condition and all temporary electrical equipment is not more than 110 volts.
23. Ensure that adequate first aid facilities are on site and all persons are aware of the identified First Aiders by name and their location on site and the procedure for receiving treatment of injuries.
24. Accompany HSE Inspectors or Environmental Health Officers on site visits and act on their recommendations. In the case of the Inspector issuing a Notice (Prohibition or Improvement) contact the relevant Manager immediately after complying with any requirement to stop work.
25. Ensure that adequate fire precautions are provided on site where any flammable liquids or liquefied petroleum gases are used, that they are safely and stored in separate 'full' and 'empty' gas bottle storage compounds.
26. Examine drawings to determine requirements in advance and provide the required equipment in accordance with Company working Policy and Plan of works and Risk Assessment.
27. Set a personal example by wearing appropriate protective clothing and respiratory equipment on site.
28. To carry out weekly checks of all RPE that is used on site and to maintain written records of such checks which are returned to the relevant Manager.
29. To assist and co-operate with the appointed analysis in the undertaking of their duties on site.
30. To report any worksafe issues that may be raised directly to you and report to the relevant Manager for further instruction if the matter cannot be resolved on site.
31. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
32. Notify the relevant Manager as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the strictest confidence. If you feel that you would like to discuss the matter with a senior member of staff the notification may be made directly to the Managing Director.
33. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
34. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

Operatives

1. Be fully aware of your roles and responsibilities as defined below.
2. Keep the workplace tidy, refrain from horseplay and work safely. This includes using the correct tools and equipment for the job, wearing the correct PPE and RPE for the task.
3. Ensure all machinery and plant has protective safety guard's position, before starting machinery and report if unsafe to use.
4. Keep hand tools in a good condition and report any defects. Do not continue to operate any plant or machinery if it is found to be defective.
5. Read and understand the risk assessments and safe systems of work and carry out your work in accordance with its requirements. Sign that you have read and understood it.
6. Know the basic requirements affecting the use of the plant and equipment that you are trained and competent to use and make regular inspections for defects every day before use.
7. Never use any plant for work for which it is not designed. If in doubt, ask the Site Supervisor for advice.
8. Suggest ways to eliminate hazards or improve working methods with the Site Supervisor.
9. Ensure, if necessary, that you work with a Traffic Marshal and, if so, you are both sure before starting work of the

meaning of signals which may be used. i.e. the reversing of DCU's on site.

10. Ensure that all plant and machinery is only used in accordance with the manufacturer's recommendations and only used by trained and competent individuals. Develop a personal concern for safety - for yourself and others, particularly new employees.
11. Understand our emergency procedures, the location of firefighting equipment, keep fire exits clear; know the named First Aider and the location of first aid equipment.
12. Report any accidents or incidents or unsafe working practices, immediately to your supervisor.
13. Attend all toolbox talks, medicals, face fits and training courses as required for assistance in compliance with health and safety law.
14. To report any worksafe issues (refer to Worksafe (Refusal to work) Policy), where you believe it is unsafe for you to continue with your works to your site supervisor.
15. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
16. Notify the Company Directors as soon as possible of any change to your medical condition, particularly if the condition may affect your ability to undertake your job in a safe manner, all notifications will be treated in the strictest confidence. If you feel that you would like to discuss that matter with a senior member of staff the notification may be made directly to the Managing Director.
17. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
18. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

Drivers & users of company vehicles

1. Be fully aware of your roles and responsibilities as defined below including your additional roles and responsibilities as per your position in the company.
2. Ensure that all transport is safe and fully efficient and has been tested and thoroughly examined in accordance with the VOSA requirements.
3. Ensure that all drivers are qualified for the vehicles they will operate.
4. Arrange for regular servicing and maintenance of all plant/vehicles and ensure all defects are dealt with promptly.
5. Ensure that a risk assessment has been carried out of any substances, process, or work activity hazardous to health and safety, and all appropriate control measures, training, instruction, protective clothing etc. have been provided.
6. Ensure that all fitters carrying out any maintenance activities have been provided with any necessary protective equipment (ear defenders, goggles, gloves etc.).
7. Ensure that any vehicles hired or purchased is suitable from a safety viewpoint and complies with all statutory requirements and current recommendations. Ensure that noise levels are not above recommended limits.
8. Set a good example by using and wearing suitable safety footwear and personal protective equipment (PPE) when leaving your vehicle, as you will be exposed to the same hazards as others when not in your vehicle.
9. Make regular inspections of your vehicle and items towed for obvious defects and ensure any defects noticed are reported to the Stores Manager and rectified without delay. Check lights, tyres, oil, water, windscreen wipers and washer reservoir etc. at least every week.
10. Always report to the gatehouse/site security before travelling/unloading on sites.
11. Get out of the cab of your vehicle when it is being loaded with loose materials (unless suitable means are provided to protect the cab).
12. Drive in a safe manner always and be particularly careful when driving on sites, to consider the conditions of temporary access roads or roads that are under construction and being used for access purposes.
13. Ensure before reversing that there are no obstructions or people behind the vehicle use a trained and competent Traffic Marshal when reversing.
14. Ensure that any load on your vehicle is well secured; also ensure your vehicle is not overloaded or loaded in such a way as to affect the handling of the vehicle.
15. Do not use a mobile telephone whilst driving. Driving whilst using a mobile phone is dangerous. It affects the ability to concentrate and anticipate the road ahead, putting the driver and other road users at risk.
16. Drive in accordance with road traffic legislation and the Highway Code at all times and be particularly careful when driving on sites, to consider the conditions of temporary access roads or roads which are under construction and being used for access purposes.
17. Ensure any traffic violations you are involved in, which result in you being prosecuted, are reported to the Stores Manager.
18. Do not drink alcohol or take medication, which could affect your driving ability, before driving a vehicle.
19. When long distance driving, ensure frequent stops and rest breaks, at least every 2 hours and leave the vehicle for approximately 15 minutes. If in any doubt about your driving safety - take longer breaks.
20. Notify the Company Directors immediately of any change to your medical condition, particularly if the condition may affect your ability to drive in a safe manner, all notifications will be treated in the strictest confidence.
21. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of

cleanliness and hygiene with regards to your vehicle.

Office Manager

1. Be fully aware of your roles and responsibilities as defined below.
2. Read and understand the company health and safety policy and ensure that it is brought to the attention of all personnel under your control.
3. Ensure that a safe means of access/egress is always maintained to the office area creating a safe place of work and use correctly designed equipment to reach high levels.
4. Ensure that you do not undertake a task which you have not been trained for and use the correct equipment, materials and work methods at all times.
5. That adequate first aid equipment is available, and employees know where it is located and know the appointed named First Aider.
6. Ensure that Employees know the location of firefighting equipment and how to use it and in the event of an emergency, take appropriate action to ensure the safety of employees and visitors.
7. Do not try to use, repair or maintain any office equipment or machinery for which you have not received full instructions or training.
8. Do not attempt to lift or move articles or materials so heavy as to be likely to cause injury.
9. Keep your office building clean and tidy. Ensure that gangways are kept clear.
10. Report any accident or damage to the Company Directors.
11. Be aware of VDU glare and correct posture position required when operating VDUs in the office i.e. lighting, sitting and height positions, as per the Display Screen Equipment Regulations 1992. (As amended).
12. To assist the Managing Director and Special Projects Director in any reasonable request to undertake tasks and general operations in the day to day company undertakings.
13. Have a basic understanding of the requirements as laid down in the Control of Asbestos Regulations 2012.
14. To report any worksafe issues (refer to Worksafe (Refusal to work) Policy), where you believe it is unsafe for you to continue with your works to your site supervisor.
15. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
16. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
17. To assist with the formulation of plan of works when requested by the Company Directors.
18. To monitor the purchase ordering system and report back to the Company Directors accordingly.
19. To assist with the framework contracts quotations, preparation and monitoring of the requirements.
20. Monitor the plant and equipment database records and ensure that the required certification and statutory checks remain in date.
21. To assist the Operations Manager in undertaking the fire logbook checks as required.
22. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

Office Administrator

1. Be fully aware of your roles and responsibilities as defined below.
2. Ensure that you do not undertake a task which you have not been trained for and use the correct equipment, materials, and work methods at all times.
3. Do not try to use, repair, or maintain any office equipment or machinery for which you have not received full instructions or training.
4. Do not attempt to lift or move articles or materials so heavy as to be likely to cause you an injury.
5. Report any accident or damage to the Company Directors.
6. To assist the Operations Manager and Office Manager in any reasonable request to undertake tasks and general operations in the day to day company undertakings.
7. Be aware of VDU glare and correct posture position required when operating VDUs in the office i.e. lighting, sitting and height positions, as per the Display Screen Equipment Regulations 1992. (As amended).
8. To report any worksafe issues (refer to Worksafe (Refusal to work) Policy), where you believe it is unsafe for you to continue with your works to your site supervisor.
9. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
10. Ensure all new operatives training, medical certificates and face fits are checked and verified and stamped accordingly.
11. Arrange for up to date copies of driver's licenses and operative's competency certificates to be taken and placed into the drivers or operators personnel file.
12. Arrange when requested 1 yearly quantitative face-fits checks and 2 yearly medicals for all employees and keep on file all relevant copies of certification.
13. Monitor the training matrix and ensure that employee's training remains up to date and is booked in before expiry.
14. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of

cleanliness and hygiene throughout the company.

Accounts Department

1. Be fully aware of your roles and responsibilities as defined below.
2. Ensure that you do not undertake a task which you have not been trained for and use the correct equipment, materials and work methods at all times.
3. Do not try to use, repair or maintain any office equipment or machinery for which you have not received full instructions or training.
4. Do not attempt to lift or move articles or materials so heavy as to be likely to cause injury.
5. Report any accident or damage to the Company Directors.
6. Be aware of VDU glare and correct posture position required when operating VDUs in the office i.e. lighting, sitting and height positions, as per the Display Screen Equipment Regulations 1992. (As amended).
7. To report any worksafe issues (refer to Worksafe (Refusal to work) Policy), where you believe it is unsafe for you to continue with your works to the Company Directors.
8. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
9. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
10. To undertake company accounting requirements as required by the Company Directors.
11. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

Health & Safety Advisor

1. Know and understand the company health and safety policy and relevant legislation regarding health, safety, and welfare and assist in its update as required.
2. Understand the requirements of the Health & Safety at Work Act 1974 and all relevant regulations.
3. Attend pre-contract site meetings, as requested, to discuss the proposed health and safety measures required to ensure the works are undertaken in a safe and compliant manner.
4. Advise the Company Directors to ensure that safe systems of work are being implemented throughout the company and that the procedures for developing safe systems are detailed within this policy.
5. Advise the Company Directors on training or instruction required for company employees to ensure compliance with statutory requirements, which are detailed within this policy.
6. Carry out site audits when requested to ensure that health and safety procedures required in relation to operations such as working at height, scaffolding, confined spaces, noise at work regulations, waste materials or other materials or other substances hazardous to health are established and being adhered to. Formulate a report of the findings and forward to the relevant persons.
7. Ensure that the Company Directors have in place procedures to report accidents/incidents and that the requirements of RIDDOR are complied with where applicable, the details of which are included within this policy.
8. Advise the Company Directors that personal protective equipment must be provided for all employees free of charge and worn correctly.
9. Advise the Company Directors of their responsibilities with regards to sub-contractors and that if they are required to work on their sites, their health & safety policy and documentation must be approved prior to carrying out works.
10. Ensure any changes in legislation are brought to the attention of all personnel within the company.
11. Carry out the reporting of accidents, incidents and diseases as laid down in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) if requested by the Company Directors to do so.
12. Set a personal example when visiting site by wearing appropriate protective clothing (PPE) and R.P.E as required.
13. Advise the Company Directors on the requirements to display/have available statutory notices prominently at all places of work.

Sub-contractors – licensed scaffolding, waste management & plant inspection companies

1. All sub-contractors must comply with their own company policy for health and safety and welfare for which a copy must be made available for approval to our Safety Advisor, prior to any subcontracting works commencing.
2. All work must be carried out in accordance with the relevant statutory provisions considering the safety of others on site and the general public.
3. Assessment of risk associated with any substance, process or work activity on site which will be hazardous to health and safety, must be provided to our Safety Advisor before work commences. Any material or substance brought on site which has health, fire or explosion risks must be used and stored in accordance with Regulations and current recommendations and that information must be provided to another person who may be affected on site.

4. Scaffolding must be inspected before first use by a competent person to ensure that it is erected and maintained in accordance with the regulations and codes of practice. All scaffolding operatives will be expected to comply with guidance document SG4:15 and the Working at Height Regulations 2005 when working on our sites and erect the scaffold in accordance with BS EN 12811-1/TG 20:13/21.
5. Sub-contractor's employees are not permitted to alter any scaffold provided for their use or to interfere with any plant or equipment on the site unless authorised to do so.
6. All plant or equipment brought onto site by sub-contractors must be in a safe and good working condition and fitted with any necessary guards and safety devices and with any necessary certificates available for checking. Information and assessment on noise levels of plant, equipment, or operations to be carried out by the sub-contractor must be provided to our Safety Advisor before work commences.
7. No power tools or electrical equipment of greater voltage than 110 volts may be brought onto site our sites, except for decontamination units to be used for asbestos removal projects, which require a supply of 240v. All transformers, generators, extension leads, plugs and sockets must be to latest British Standards for industrial use and in good condition.
8. Any injury sustained or damaged caused by sub-contractor's employees must be reported immediately to our Contracts Manager.
9. Sub-contractor's employees must comply with any safety instructions given by our Safety Advisor or management.
10. This company has appointed a Safety Advisor to advise and report on health and safety matters. Sub-contractors informed of any hazards or defects noted will be expected to take immediate action.
11. Suitable welfare facilities and first aid equipment in accordance with the Regulations must be provided by sub-contractors for their employees unless arrangements have been made for us to provide the above.
12. Sub-contractors will be instructed to ensure workplaces must be kept tidy and all debris waste materials etc. cleared and removed as work progresses.
13. All operatives, sub-contractors, visitors, etc. on our sites will wear the appropriate PPE as required, safety helmets, hi-vis and safety boots will be worn as a minimum standard. Other PPE requirements will be worn as per the risk assessments.
14. A detailed Plan of works, ASB5, copy of licence, insurance and employee certification will be required to be forwarded to our Contracts Manager for inclusion in the site file.
15. Sub-contractors will be made aware of relevant parts of Health and Safety Plans which apply to their work.
16. Sub-contractors will be subjected to a vetting procedure in respect of health and safety and competence. All required information will be requested in the form of a contractor questionnaire prior to commissioning works.
17. To comply with the relevant sections of our Health & Safety Policy that apply to the works being undertaken.
18. Failure to carry out the above will render the sub-contractor liable to suspension from site and no longer undertake works for our company.
19. To wear the required P.P.E. and R.P.E.
20. To set an example of safe behaviour.
21. To report any worksafe issues (refer to Worksafe (Refusal to work) Policy), where you believe it is unsafe for you to continue with your works to the relevant person who appointed you.
22. Ensure that you are aware of our company Anti-Fraud and Bribery Prevention Policy and the action that will be taken if you breach this policy.
23. To maintain the areas of work under your control to assist in the compliance with our ISO 9001 and 14001 standards and ensure the systems are maintained.
24. Apply the requirements of the Hygiene Standards policy statement and maintain a good standard of cleanliness and hygiene throughout the company.

15.0 Complaints procedure

1. If any employee feels that he or she has suffered discrimination in anyway, the company grievance procedure s must be utilised.
2. If the complaint is against the employee's own immediate or other superior, confidential appeals can be made to the Operations Manager or as a last resort and if not satisfactorily resolved by the Operations Manager you may request for the complaint to be brought before the Managing Director.
3. In instances of sexual harassment, as far as possible, the anonymity of the complainant shall be protected.
4. It must not be overlooked that an employee who discriminates or harasses may be liable for payment of damages to the person offended, in addition to any damages payable the company if we have failed to ensure the practice ceased forthwith.
5. To make a complaint of discrimination, harassment, victimisation, or unfair treatment it will be necessary to have available:
 - Details of what, when and where the occurrence took place.
 - Any witness statements or names.
 - Names of any others who have been treated in a similar way.
 - Details of any former complaint made about the incident, date, where and whom.
 - A preference for a solution to the incident.

Until a hearing is arranged, complainants must keep the matter confidential, other possibly than arranging for details of witnesses to be given to the Managing Director.

Refer to our Worksafe (Refusal to work) Policy for further information on failures on resolving issues with members of staff and reporting directly to the Managing Director any such issues.

16.0 Disciplinary procedure

1. This disciplinary procedure provides for disciplinary sanctions to be given for failure to meet the company standards of job performance, conduct (whether during working hours or not), and attendance, or for breach of any terms and conditions of employment. The procedure applies to all employees who must familiarize themselves with its provisions.
 - a) In the first instance the Manager will establish the facts surrounding the complaint and if necessary, will consider the statements of any available witnesses.
 - b) If the Manager considers that it is not necessary to resort to the formal warning procedure, he will discuss the matter with the employee suggesting areas for improvement. Discussion will, in as far as is possible be in private and the employee will be informed that no formal disciplinary action is being taken.
 - c) If the Manager considers it is necessary to invoke the formal warning procedure, he will inform the employee. The following procedure will then apply, but depending upon the seriousness of the offence, may be invoked at any level including summary dismissal.
2. In the case of general misconduct, the employee will be given a formal verbal warning. The Employee will be advised that the warning constitutes the first formal stage of disciplinary procedure and that a note will be placed on his personal file. The nature of the offence and likely consequences of further offences or a failure to improve will be examined.
 - a) In the case of more serious offences or repetition or earlier minor offences, the employee will be given a written warning, usually in the form of an appropriate letter, which will set out the precise nature of the offence, the likely consequences of further offences and specifying if appropriate the improvement required and over what period. A copy of this letter will be placed on the personal file and a copy will also be sent the employee.
 - b) In the case of further repetition of earlier offences, if the employee still fails to improve or if the offence, which falling short of gross misconduct, is serious enough to warrant only one written warning, the employee will be given a final written warning setting out the precise nature of the offence, containing a statement that any reoccurrence will lead to dismissal or whatever other penalty is considered appropriate specifying, if appropriate, the improvement required and over what period. A final warning will be issued by a senior member of staff personally in an interview attended by the employee and if requested by the employee and agreed by us, a representative of the employee's choice may attend as a witness. This must be formally requested in writing prior to the interview and submitted to the Managing Director for approval. An appropriate letter, a copy of which will be sent to the employee, will follow up the interview. It will be possible for the Employee to then make a formal written response.
 - c) Depending upon the seriousness of the matter and all circumstances, any of the above states may be omitted.
 - d) In the case of gross misconduct or if all the appropriate stages of the warning have been exhausted the employee will normally be dismissed, but only after consideration of other possible disciplinary action. If a verbal warning is given it will remain in force for 6 months. Any written warning shall remain in force for 12 months, unless stated otherwise in the warning itself.
3. In all cases before any disciplinary action including warnings is taken, the employee will be interviewed by their immediate supervisor or suitable member of the management staff and will be informed of the allegations made against him. The employee will be given the opportunity to state his case and at the interview may be accompanied by a work colleague as representative of his choice. If the complaint is upheld the employee will be informed of the disciplinary action to be taken.
4. The disciplinary procedure to be adopted depending upon the seriousness of the offence and the right to appeal. The employee may be suspended on pay pending investigation.
5. If the Employee is dissatisfied with the outcome of any stage of the above procedure, he may appeal either orally or in writing within 1 week to the Managing Director.
6. The following are non-exhaustive examples of the type of offences, which if committed will normally lead to formal disciplinary action being taken.

Examples of general misconduct are:

- a) Bad timekeeping;
- b) Low work output;
- c) Careless or inaccurate work;
- d) Breaches of safety rules;

- e) Rudeness to others;
- f) Being on parts of the premises without permission;
- g) Unauthorised use or neglect of company materials, time or equipment (including vehicles and telephones);
- h) Failure to follow established routines, methods, or procedures. However, it must be noted that this list is not exhaustive.

7 For gross misconduct, the management will reserve the right to dismiss instantly and normally dismissal will then be without notice. Examples of gross misconduct where the management has reasonable grounds for believing that the following matters have occurred are:

- a) Dishonesty, theft or fraud;
- b) Communicating confidential information to third parties;
- c) Working for a competitor without permission;
- d) Falsification of company records or unauthorised removal or sale of Company products or property;
- e) Wilful damage to Company property;
- f) Conviction of a serious criminal offence (taking into account the provisions of the Rehabilitation of Offenders Act 1974;
- g) Taking bribes in connection with employment;
- h) Actions which endanger an employee's safety;
- i) Knowingly breaking a legal requirement in connection with employment;
- j) Assault, threatening or inflammatory behaviours or rudeness to clients/customers;
- k) Wilful refusal to carry out a reasonable and proper request;
- l) False expense claims or fraudulent purchases;
- m) Loss of driving license where driving is an essential part of the employment;
- n) Repetition of previous offences for which warnings have already been given or the continuance of poor work within the time limit set at the first warning stage;
- o) Being under the influence of alcohol or illegal drugs during work hours or on company property;
- p) Persistent lateness or absenteeism.

This list is not exhaustive.

No disciplinary action will be undertaken against any employee or sub-contractor for following our Worksafe (Refusal to work) Policy, where you believe it is unsafe for you to continue with your works. Any such issues must follow our Worksafe Policy and be reported to the relevant person.

17.0 Arrangements

Requirements for training and refresher courses are monitored by the Managing Director and arrangements are made for in-house training or operatives will be sent to appropriate establishments capable of providing requisite training.

Employees are provided with protective clothing and equipment. Managing Director has the responsibility for ensuring that it is worn. Sub-contractors are responsible for supplying protective clothing and equipment to their own employees and ensuring that it is worn.

An accident book is retained in the Office and The Managing Director will ensure that all accidents are recorded in this book, this role has been defined to the Operations Manager and he is aware of the RIDDOR Regulations 2013 requirements and if required will consult for further clarification as to what is reportable.

General maintenance is carried out as required and when appropriate, additional maintenance is undertaken by specialist firms. Fire protection equipment is provided and maintained by our specialist suppliers and extinguishers serviced annually.

Tasks requiring safe systems of work are devised and monitored by the relevant Manager for the works. If sub-contractors need to carry out operations which require safe systems of work, details will be forwarded in writing, and subsequently agreed with the Managing Director before the sub-contractor is allowed to commence work. Adequate instructions, training and supervision will be provided to ensure that safe systems of work are adopted and adhered to.

In the head office, there is an adequate provision of first aid equipment. An 'Appointed Person' is always available to deal with an emergency and be responsible for the first aid equipment, which is a minimum requirement under the First Aid Regulations 1981 (as amended).

All maintenance will be carried out in full accordance with the manufacturers' recommended inspection and maintenance schedules.

Accidents are often a common cause of environmental incidents, so all potential incidents that could occur will be considered, assessed and the required pro-active action implemented.

17.1 Incidents and non-conformances

We will be held accountable for any incidents and non-conformances and will ensure a full investigation will be undertaken for any malfunction, breakdown or failure of plant, equipment or techniques and any near misses that occur and ensure that normal operation will be returned as soon as is reasonably practicable.

We will ensure that all our employees will be able to:

- detect abnormal operation and investigate the causes;
- assess the information and decide on the corrective action to be taken;
- implement the short-term corrective actions to enable a return to normal operation;
- implement the longer-term corrective action required to prevent a re-occurrence of any problems;
- notify the local residents of who to contact and how if there is a problem or concern;
- deal with complaints, take the appropriate measures, or minimise the causes.

A notice will be displayed at our site entrance as part of our system to deal with complaints; this will be made clearly visible and will include the following information:

- the name and address;
- our company name;
- an emergency contact name and telephone number.

All staff will be trained to manage and operate all our activities without a risk of causing pollution and ensure that they are made away of their roles and responsibilities. The requirements will be defined within the roles and responsibilities section of this policy and each defined role will be brought to the attention of everyone.

Our technically competent persons who will manage the day to day running of their relevant areas are named as the Operations Manager, Stores Manager, Office Manager, Site Audit Manager and Site Supervisor and they will ensure that their areas are suitably controlled. They will be responsible for keeping and maintaining all relevant records as required for adequate management of our works, vehicles, plant, security, and day to day running of the company.

Individual employee files will be kept for the recording of training records, disciplinary action, and personnel information and will assist in keeping training up to date and keeping the necessary competency levels required to undertake the relevant tasks of the individual to a high standard. These records will be held in a paper format within the office for reference and easy access.

17.2 Security

Site security is always of high regard and the following will be implemented:

- Security checks or supervision of people entering during normal working hours;
- Gates that are closed and locked outside normal operating hours to prevent people walking or driving on to sites;
- Security fences around the perimeter, regular checks, immediate repairs;
- Signs warning people not to enter, displayed at gate and at sufficient spacing around perimeter fencing.

Security measures shall prevent unauthorised access, as far as practicable.

18.0 Risk assessments

The management regulations require risks to be assessed; however, the risks do not have to be re-assessed under other legislation provided the initial risk assessment is adequate. The first operation is to assess whether any existing operations are in place. These could have been carried out under the following legislative requirements:

- Control Of Substances Hazardous to Health Regulations 2002 (as amended);
- Control of Noise At Work Regulations 2005;
- Health & Safety (Display Screen Equipment) Regulations 1992;
- Management of Health & Safety at Work Regulations 1999 (as amended);
- Manual Handling Operation Regulations 1992;
- Personal Protective Equipment at Work Regulations 1992 and 2002 (as amended);
- Fire Safety Regulatory Reform Order 2005;
- Control of Asbestos Regulations 2012;
- Control of Vibration at Work 2005.

Regulation 3 of the 1999 Management Regulations requires both employers and the self-employed to:

- Carry out a suitable and sufficient assessment of the risks to both employees and others who may be affected by their work activities;
- Record the significant findings of the assessment and identify any group of employees especially at risk.

There is a specific duty to assess risks to:

- Women of childbearing age (including their unborn, or newly born child), see 18.3;
- Young persons, see 18.4.

Particular attention must be paid to risk assessments made with regard to persons under the age of 18 years. No young person is to be employed where the work:

- Is beyond their physical and/or mental capacity;
- Involves exposure to certain hazardous substances or agents, including ionising radiation, carcinogens, temperature extremes, noise or vibration;
- Causes a risk of accidents, which are unlikely to be perceived by young persons.

Risk Assessments will be undertaken by the appointed named competent person and the conditions and dangers detailed.

Risk assessments completed by the competent person will:

- Identify any hazards;
- Identify anyone who may be harmed;
- Evaluate the risk and if existing precautions are adequate (or if more could be done to limit the risks);
- Record the findings;
- Review the assessment with regular revisions.

We will use a basic risk assessment document and hazard checklist, which will outline the safety hazards according to each specific task. As each job is different, each unique task will have a specific safe system of work and will incorporate a specific risk assessment relative to the activity.

The safe system of work and risk assessment will be communicated by the relevant Manager to the workforce. Risk assessments procedures and training, where appropriate, will be prepared and followed.

Risk assessments will be formulated from information which can be found in the following publications and manuals. They refer to the complete range of Health and Safety Executive and Environment Agency literature guidance notes:

- Technical Manuals;
- Generic Risk Assessment;
- Safety Procedures Manual.

18.1 Risk management

The workplace is forever changing and for this reason the original risk assessment may require reviewing. Checks must ensure no poor working practices have crept in, control measures are still in place and the circumstances within the workplace remain the same. The greater risk will require more frequent monitoring.

The following elements requiring implementation and control to maintain a high standard within the company are:

- Safe place and safe systems of work;
- Emergency procedure;
- Monitoring;
- Training;
- Records;
- Communication of information;
- Consultation with employees.

Review the assessment when:

- There is reason to suspect it is no longer valid;
- There has been a significant change in the matters to which it relates.

18.2 Safe places and safe systems of work

These will be controlled by management planning in accordance with risk assessment procedures which are:

- Identification of hazards;
- Risk assessment;
- Control of risk;
- Following information contained in a Safety Plan;
- Preparation of safe system of works;
- Monitoring;
- Permit to work system.

Following completion of the risk assessment procedure then the site-specific plan of works will be formulated in accordance with regulation 7 of the Control of Asbestos Regulations 2012 and memo 04/12 suitable plan of work.

For other works a site-specific method statement will be generated after completing the risk assessment visit for the contract. This may include demolition plans, lifting plans and other safe systems of work to ensure the works are undertaken in a safe and complaint manner.

18.3 New and expectant mothers

The Company will ensure that women of child bearing age are not put at any risk and that new or expectant mother needs are taken into consideration with respect to their working conditions, the type of work in which they are involved and their working environment conditions.

The Managing Director is responsible for ensuring that we;

- Determine whether females of child-bearing age are working in the Company;
- Ensure all women of child-bearing age are aware that there are special risks to pregnant and breastfeeding women, and they should notify the Managing Director as soon as they are aware that they are pregnant;
- Undertake an assessment to specifically cover risks to pregnant and breastfeeding workers and determine whether the existing control measures in place provide for adequate protection;
- Wherever possible if required modify the working conditions or hours of work to prevent or reduce the risks;
- Ensure that adequate rest facilities are provided for pregnant workers and new mothers;
- Review assessments as and when necessary.

Once a written notification has been made, that a woman is pregnant or has given birth in the last six months or is breast-feeding, an additional assessment of the risks to the health and safety of the woman will be undertaken.

Risks to be avoided by new and expectant mothers:

Physical agents:

- Shocks/vibrations/movements (including travel and other physical burdens);
- Lifting, moving and handling of loads entailing risks;
- Noise;
- Non-ionising radiation;
- Ionising radiation;
- Electric shock;
- Compressed air;
- Extremes of heat and cold;
- Fatigue and stress.

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Biological agents:

- Listeria;
- Rubella;
- Chickenpox;
- Toxoplasma;
- Cytomegalovirus;
- Hepatitis B and HIV;
- Herpes;
- Tuberculosis;
- Syphilis;
- Typhoid.

Chemical agents:

- Substances labelled R40, R45, R46, R47, R61, R63 and R64;
- Benzene;
- Anaesthetic gases;
- Mercury;
- Antimitotic drugs;
- Carbon monoxide;
- Lead;
- Percutaneous absorption;
- Anti-malarial chemoprophylaxis-mefloquine;
- Pesticides;
- CS gas.

Working conditions:

- Diving.
- Flying.
- Aircraft passengers.
- Display screen equipment.
- Ergonomics.

18.4 Young persons

We will provide employees with guidance and information on reducing and removing the health and safety risks associated with the employment of young persons.

We will carry out a suitable and sufficient risk assessment for all work involving young persons (16 to 18 years old) prior to their employment, and we will communicate the results of the risk assessment to the Young Person on their commencement of work.

Where risk assessments have already been undertaken, they will be reviewed when a young person is performing the work.

We will ensure that suitable safe working arrangements are implemented, and procedures are in place for monitoring and reviewing whenever necessary, the effectiveness of this procedure.

These arrangements will take into consideration the points listed below:

- Work which is beyond their physical or psychological capacity;
- Work in which there is a risk to their health from extreme cold or heat, or from noise or vibration;
- Work involving their harmful exposure to radiation;
- Work involving their exposure to agents which are toxic, carcinogenic, cause heritable damage, or harm to the unborn child or which in any other way chronically affect human health;
- Work involving the risk of accidents, which it may be assumed, cannot be avoided by young person's owing to their insufficient attention to safety or lack of experience or training;
- Working hours, rest from work and annual holidays;
- The location of work, task and processes to be applied;
- The type of equipment to be used and how it is handled;
- What health and safety training is required;
- What training is required in order to carry out the task.

Consideration will be given to the maintenance of closer supervision, ongoing training, and toolbox talks.

We will ensure we do not to employ young people on certain work which creates significant risks, to their health and safety.

Records of the risk assessment made in relation to Young Persons will be saved until no-longer required

If the young person is a child in addition to the child, the parents (or guardian) of the child will be informed of the findings of the risk assessment and any control measures that have been implemented or the child needs to take.

The following prohibitions do not apply where work is necessary for a young person's training, and they are adequately supervised by a competent person and any risk is reduced to the lowest level that is reasonably practicable.

Young persons – hazard and safe working method checklist carried out in relation to young persons are as follows:

- The fitting-out and layout of the workplace and workstation;
- The nature, degree and duration of exposure to physical, biological and chemical agents;
- The form, range and use of work equipment and the way in which it is handled;
- The Company of processes and activities;
- The extent of the H&S training to be provided.

Prohibited work for young persons must not be employed on work which:

- Is beyond their physical or psychological capacity;
- Involves harmful exposure to agents which are toxic, carcinogenic, cause heritable genetic damage to an unborn child or in any other way chronically affect human health, such as working with asbestos;
- Involves harmful exposure to radiation;
- Involves the risk of accidents which young people might reasonably not recognise because of inexperience;
- In which there is a risk to health from extreme cold or heat;
- In which there is a risk to health from noise;
- In which there is a risk to health from vibration.

Physical agents

- Ionising radiation; work in a high-pressure atmosphere, e.g. in pressurised containers, diving.

Biological agents

- Those which can or do cause severe human disease and present a serious hazard to workers, and may present a risk of spreading to the community.

Chemical agents

- Substances and preparations classified as toxic, very toxic, harmful, corrosive, explosive or irritant.

Processes and work

- Manufacture of auramine; work involving exposure to aromatic polycyclic hydrocarbons present in coal soots, tar, pitch, fumes or dust; work involving exposure to dusts, fumes and sprays produced during the roasting and electro-refining of cupro-nickel mattes; strong acid process in the manufacture of isopropyl alcohol;
- Manufacture and handling of objects containing explosives;
- Work with fierce or poisonous animals;
- Animal slaughtering on an industrial scale;
- Work involving the handling of equipment for the production, storage, or application of compressed, liquified or dissolved gases;
- Work with vats, tanks, and reservoirs containing chemical agents referred to above;
- Work involving a risk of structural collapse;
- Work involving high-voltage electrical hazards;
- Work the pace of which is determined by machinery and involving payment by results.

19.0 Records

Accident records will be kept. All accidents will be recorded, however minor, and will identify:

- Name address and occupation of injured person.
- Date time and place of accident
- An explanation of the circumstances
- Name of the injured person's employer

Accident to employees, sub-contractors or visitors will be recorded. If a reportable accident occurs Form F2508 will be forwarded to the Health and Safety Executive, as per RIDDOR 2013, see further section on RIDDOR.

If an employee ever carries out a task such that health surveillance becomes necessary, the correct procedures will be instigated.

Near miss report forms will be made freely available to all levels of Employees to record any near miss occurrences that may happen and used to detail as much information as possible. These will then be forwarded to the Head Office for immediate attention and action required to assist in reducing the risk of the near miss from happening again. Repetitions of near misses will be drawn to all Managers attention during our monthly safety meetings to agree on the way forward to stop reoccurrence.

Near miss examples may include:

- Minor injuries that could easily have been more serious;
- Falling materials that just missed persons and could have resulted in injury;
- Possible collisions with vehicles and persons that were narrowly avoided;
- Occurrences with members of the public;
- Risk of fire starting;
- Collapse of unstable loads or structures.

This list is non-exhaustive and any other issues that Employees fill needs reporting can be addressed. Near miss forms can also be undertaken on a confidential basis by taking a form and posting to the head office for the Managing Directors attention.

All records of asbestos medical and exposure records are covered in the asbestos section.

20.0 Emergency procedures

In all areas of operation, procedures will be instigated to deal with actions required in the case of fire, as per Regulatory Reform (Fire Safety) Order 2005 and The Workplace (Health, Safety & Welfare) Regulations 1992. It is also a further duty under regulation 15 of the Control of Asbestos Regulations 2012 to have prepared procedures which can be put into place in the event of an emergency on site.

A fire safety plan will be prepared and implemented. Each workplace will have identified the means of contacting the emergency services. If believed to be at risk from any other form of emergency (terrorist attack, bombing etc.) we will prepare and circulate procedures to deal with them.

The appointed named competent person will:

- establish procedures in the event of serious or imminent danger;
- nominate a competent person to implement the procedure;
- prevent access to any potentially dangerous area of work;
- inform any persons at work of potential danger to themselves;
- ensure there are adequate evacuation procedures;
- prevent resumption of work where serious and imminent danger exists;
- ensure suitable systems of warning are in place;
- provide adequate training;
- ensure suitable evacuation drills;
- undertake assessments of risk;
- provide adequate firefighting equipment;
- ensure maintenance of emergency routes and exits are clear of obstructions or restrictions;
- display a fire plan in a conspicuous location;
- provide and maintain fire alarms in good working order;
- provide and maintain fire detectors where applicable.

All employees will be suitably instructed on standard emergency procedures, which will include the following:

- We will determine severity of accident and if a major incident or accident occurs call the emergency services, as required on 999;
- Location of nearest hospital and casualty unit to send or take any person with minor injuries requiring hospital treatment;
- Name and location of appointed first Aider, identifiable by a green cross on their helmets
- Location of First Aid Kit (prominently displayed in suitable location)
- Location of the designated assembly point;
- The person discovering the accident to sound the alarm by operating nearest air horn;
- The site named competent person will carry out headcount and if necessary, organise rescue team to look for unaccounted persons, if safe to do so;
- Site Supervisor will advise access etc to fire/ambulance/police;
- Small fires to be tackled with fire extinguishers provided there is no risk to personal safety in all cases the fire brigade will be called to ensure that fire is properly extinguished;
- have an appointed fire warden, and given specific instructions;
- when alarm sounds all buildings must be evacuated;
- Bomb threats etc will be dealt with as above with all personnel being assembled, in readiness for total evacuation and the person who received the call / threat will telephone 999 immediately.

Further reference to asbestos site-specific emergencies are detailed within our Asbestos Work Procedures.

20.1 Accident & near miss reporting & investigation

We recognise our duty to report all accidents and near misses, however trivial, connected with our work where an employee, trainee, self-employed person or a person not in our employment suffers an accident and will obtain first aid immediately and report the injury and its cause to the immediate supervisor at the first opportunity. This role has defined in the roles and responsibilities.

An accident Book has been provided and will be prominently displayed within the office. The accident book will be completed with the full details of all accidents, however trivial.

Where the accident results in the fracture of any bone, amputation of any body part, injury to the eyes, loss of consciousness or injuries requiring immediate medical treatment, we will call an ambulance immediately.

A telephone call under the designated HSE Call Line system is available for when anyone who is:

- killed or suffers a specified injury (including acts of physical violence);
- or suffers a major incident.

Workplace injuries and reportable incidents can only be reported via the HSE website.

We will investigate the circumstances of the accident or near miss and ensure that there is a clear understanding of the cause and to make and discuss recommendations to ensure there is not a re-occurrence.

We will always be alert to the risk of accidents and carry out the allotted daily tasks safely and in accordance with the approved design and safe system of work and the risk assessment. It will also be considered how the work in hand can be carried safely not only to our employees but also to other people who may be affected.

Over seven days' incapacitation (not counting the day on which the accident happened) require reporting under RIDDOR. Incapacitation means that the worker is absent or is unable to do work that they would reasonably be expected to do as part of their normal work. The deadline by which the over-seven-day injury must be reported using the form F2508 is 15 days from the day of the accident, this will be undertaken as defined in the individual roles and responsibilities.

As an Employer we must keep a record of all over-three day-injuries, which will be recorded in our accident book to further identify any trends.

We will also report any dangerous occurrences which might have caused injury and occupational diseases as soon as they advised by a doctor as per RIDDOR Schedule 2 and Schedule 3.

21.0 Electrical equipment & power tools

Personnel responsible for ensuring that equipment has been checked and certificated will be designated as the office manager for all office equipment and the site supervisor for all portable equipment that will be used at our sites.

Any hired equipment will be checked for the correct certification prior to use, if the correct paperwork has not been made available then the equipment must not be used. The hire company will be contacted for the equipment to be replaced or the correct paperwork to be forwarded.

Pat testing or portable appliance testing is an important part of any health & safety policy. Our procedure is intended as a guide to both the legal implications and to the technical requirements.

The Electricity at Work Regulations place a legal responsibility on employers, employees, and self-employed persons to comply with the provisions of the regulations and take reasonably practicable steps to ensure that no danger results from the use of such equipment. This in effect requires the implementation of a systematic and regular program of maintenance, inspection, and testing. The Health & Safety at Work Act (1974) places such an obligation on our company in the following circumstances:

1. Where appliances are used by our employees.
2. Where appliances are supplied or hired.
3. Where appliances are repaired or serviced.

The level of inspection and testing required is dependent upon the risk of the appliance becoming faulty, which is in turn dependent upon the type of appliance, the nature of its use and the environment in which it is used. The following table has been produced by the HSE to assist in identifying what frequency of testing must be undertaken.

Type of business	User checks	Formal visual inspection	Combined inspection and test
Equipment hire	N/A	Before issue/after return	Before issue
Construction (For indication only. See Electrical safety on construction sites for more detail)	110 V – Weekly 230 V mains – Daily/every shift	110 V – Monthly 230 V mains – Weekly	110 V – Before first use on site then 3-monthly 230 V mains – Before first use on site then monthly
Light industrial	Yes	Before initial use then 6-monthly	6 – 12 months
Heavy industrial/high risk of equipment damage	Daily	Weekly	6 – 12 months
Office information technology, e.g. desktop computers, photocopiers, fax machines	No	1-2 years	None if double-insulated, otherwise up to 5 years
Double-insulated equipment not hand-held, e.g. fans, table lamps	No	2-3 years	No
Hand-held, double-insulated (Class II) equipment, e.g. some floor cleaners, kitchen equipment and irons	Yes	6 months – 1 year	No
Earthed (Class I) equipment, e.g. electric kettles, some floor cleaners	Yes	6 months – 1 year	1 – 2 years
Equipment used by the public, e.g. in hotels	By member of staff	3 months	1 year
Cables and plugs, extension leads	Yes	1 year	2 years

22.0 Fire prevention

We will take all necessary measures to prevent fires, prevent them from spreading and minimise their effect on the local environment, the following will be implemented to assist in reducing the risk to a tolerable level:

- store incompatible materials apart;
- limit the size of stockpiles of combustible materials and surround them with firebreaks, which must be wide enough to allow access to emergency vehicles. And avoid storage of combustibles against our boundary;
- use wider firebreaks to protect sensitive areas such as occupied buildings, watercourses and public infrastructure such as power lines, transformers, roads and railways;
- have ways of storing emergency firewater or any other contaminated water before disposal, where practicable.

If an accident happens that may or does cause an adverse environmental impact, we will:

- immediately put into practice our accident management plan;
- do whatever else is necessary to minimise the environmental consequences;
- investigate why the accident happened and take action to stop it happening again;
- review the plan.

22.1 The regulatory reform order

This regulation incorporated several various fire regulations into one, which included the introduction of the Fire risk Assessment to be carried out within our company.

A responsible person must carry out or appoint a competent person to carry out a suitable and sufficient fire risk assessment of the risks of fire to their employees and others who may be affected by their work or business. Those who employ five or more employees must keep a formal record of any significant findings and remedial measures which have, or may need to be, taken, therefore we require this to be applied.

A competent person or fire risk assessor need not possess any specific academic qualifications but must:

- Understand the relevant fire safety legislation;
- Have appropriate education, training, knowledge and experience in the principles of fire safety;
- Have an understanding of fire development and the behaviour of people in fire;
- Understand the fire hazards, fire risks and relevant factors associated with occupants at special risk within the buildings of the type in question, and
- Have appropriate training and/or experience in carrying out fire risk assessments.

This role has been delegated in the roles and responsibilities section of this policy.

Whilst the legislation does not define suitable and sufficient it is generally considered that a risk assessment needs to do the following:

1. Identify the fire risks arising from or in connection with work:

Attention must be paid to sources of ignition, sources of fuel and work processes.

2. Identify the location of people at significant risk in case of fire:

It will be necessary to identify the areas that person will frequent, whether they be employees, customers, visiting contractors, etc.

Evaluate the risks:

- Are existing fire safety measures within the premises adequate?
- Are sources of fuel and ignition controlled?
- Is there adequate means for detecting fire and giving warning?
- Is there adequate means of escape in case of fire from all parts of the premises?
- Has adequate and appropriate firefighting equipment been provided, and is it suitably located?
- Is there an adequate testing and maintenance regime in place for fire precaution within the premises?
- Have employees been adequately trained in fire safety procedures within the premises and in the use of firefighting equipment?

1. Record findings and action taken:

Prepare an emergency plan, inform, instruct, and give training to employees in fire precautions.

2. Keep the assessment under review:

Generally, the review date should be one year from the date of completion of the risk assessment; however, it may be necessary to set an earlier date depending on the type of premises, processes carried out, etc.

Employers and the self-employed are expected to take reasonable steps to help themselves identify fire risks, e.g. by looking at appropriate sources of information such as legislation, and codes of practice or by reference to a competent individual:

- For small premises presenting few or simple hazards a suitable and sufficient fire risk assessment can be a very straightforward process;
- In many intermediate cases the fire risk assessments will need to be more sophisticated. Some areas of the assessment may require specialist advice such as in a particularly complicated building;
- Large and complex premises will require the most developed and sophisticated fire risk assessments particularly where fire engineering solutions have been developed to overcome difficult fire safety issues;
- Fire risk assessments must also consider all those might be affected by the undertaking whether they are employees or others such as contractors working on site or member of the public. Particular attentions must be given to those individuals who are especially vulnerable, such as young persons, the elderly or those with disabilities.

Significant findings need to include:

- The significant hazards identified in the assessment. That is, those hazards which might pose serious risk to workers or others who might be affected by the work activities if they were not properly controlled;
- The existing control measures in place and the extent to which they control the risk (this need not replicate details of measures more fully described in works manuals etc. but could refer to them);
- The population, which may be affected by these significant risks or hazards, including any groups of employees who are especially at risk;
- A fire logbook will need to be maintained to ensure that equipment and procedures are monitored.

23.0 First aid



As defined in the Health and Safety (First-Aid) Regulations 1981, first aid means “treatment for the purpose of preserving life and minimising the consequences of injury and illness” until more specialist help can be obtained, or the “treatment of minor injuries” where specialist help is not required.

It is a misconception that someone who has undertaken first-aid training should know what to do in any injury or illness situation that may arise: the role of first-aiders is simply to give short-term emergency aid or treatment where medical assistance is not required.

The legal responsibilities placed on us as employers in the Health and Safety (First-Aid) Regulations 1981 are to provide adequate and appropriate first-aid equipment, facilities and qualified persons to ensure employees can receive first-aid treatment if injured or taken ill at work. In addition, as an employer we have a duty to inform employees of the first-aid arrangements that have been made.

Regarding Health and Safety (First Aid) Regulations 1981 the Managing Director will provide or ensure the provision of equipment and facilities which are relevant for enabling first aid to be rendered to employees when they are injured or become ill at work. Provision will be made for suitable persons to administer first aid who are both trained and hold a current certificate. Refresher courses will be provided and attended at regular intervals. Guidance books INDG 214 and the ACoP L74 regarding first aid will be made available for further reference.

There are no legal requirements for what to stock in a first-aid kit. While many employers buy standard first-aid kits off the shelf and hope it will be enough, ideally, we must determine what is adequate and appropriate by means of a first-aid needs assessment exercise.

This has been undertaken assessing number of people the first-aid kit needs to cover as per the table below, the demands of our working environments, which activities might present most risk to our employees and how often, and what level of risk they may face.

Using this table shows the BS 8599 recommendation for the size of first-aid kit required, based on a combination of the level of risk and the number of employees in the workplace.

Risk/No. of Employees	Small kit	Medium kit	Large kit
Low risk — less than 25	X		
Low risk — 25–100		X	
Low risk — 100+			X
High risk — less than 5	X		
High risk — 5–100		X	
High risk — 25+			X

Note: this information is for guidance only and a risk assessment will be carried out for each workplace.

- Low-risk environments include such examples as offices, libraries, shops, etc.
- High-risk workplaces include those with engineering, processing, warehousing, construction and manufacturing work activities.

When conducting our first-aid needs assessment, the following will be considered:

- the type of the work we will be undertaking;
- specific hazards and risks in our workplace, including those that may need special arrangements (e.g. on construction sites where there is an increased presence of dust and other particles, an eye-wash station will be required and a burns station where there is hot work being undertaken);
- the nature and size of our workforce (e.g. different size sites or some employees for whom English is not their first language);
- different working patterns of staff, which will require greater communication and planning to ensure there is enough cover at all times;
- separate car emergency kits where employees drive for work;
- past accidents that have occurred within our organisation.

We must also consider:

- the needs of travelling, remote and lone workers;
- how long it would take emergency medical services to reach our site;
- whether our employees work on shared or multi-occupancy sites;
- first-aid provision for non-employees (e.g. members of the public.)]

First-aid kit contents, as recommended by BS 8599-1, are shown in the table below and we will use this as a good guide to maintain suitable equipment at our places of work after assessing as per the table above.

From papercuts or lacerations to falls or manual handling injuries, injuries can occur at any time whatever our work activities. As an employer, we must determine what needs to be included in our first-aid kits.

The size of our first-aid kits is something that only we can decide, and applying BS 8599-1:2019 First Aid Kits for the Workplace offers us a basic structure for a kit and we have assessed the level of risk and number of employees in our workplaces as per the table below.

First-aid kit contents, as recommended by BS 8599-1, are shown in the table below and we will apply accordingly to the vehicles and sites.

Contents	Small	Medium	Large
First-aid guidance leaflet	1	1	1
Medium sterile dressing	2	4	6
Large sterile dressing	2	3	4
Triangular dressing	2	3	4
Eye dressing	2	3	4
Adhesive dressings	40	60	100
Sterile wet wipes	20	30	40
Microporous tape	1	2	3
Nitrile gloves — pair	6	9	12
Face shield	1	2	3
Foil blanket	1	2	3
Burns dressing 10 × 10cm	1	2	2
Clothing shears	1	1	1
Conforming bandage	1	2	2
Finger dressing	2	3	4
Sterile eyewash — 250ml	0	0	0

Where there are special circumstances, such as remoteness from emergency medical services, shift working, or sites with several separate buildings, there may need to be more first aid personnel than set out below. Increased provision will be necessary to cover for absences.

Where we have agreed cover by other persons then the assessment must ensure that this cover is always available whilst our employees are on site.

Category of risk:	Numbers employed at any location:	Suggested number of first aid personnel:
Lower risk e.g. shops, offices, libraries	Less than 25	At least one appointed person
	25-50	At least one first aider trained in EFAW
	More than 50	At least one additional first aider trained in FAW for every 100 employed (or part thereof)
Higher risk e.g. light engineering and assembly work, food processing, warehousing, extensive work with dangerous machinery or sharp instruments, construction, chemical manufacture.	Less than 5	At least one appointed person
	5-50	At least one first aider trained in EFAW or FAW depending on the type of injuries that might occur
	More than 50	At least one first aider trained in FAW for every 50 employed (or part thereof)

When the assessment of first aid requirements has been completed, we will provide the materials, equipment and facilities needed to ensure that the level of cover identified as necessary will be available to our employees at all

relevant times. This will include ensuring that first aid equipment, suitably marked and easily accessible, is available in all places where working conditions require it.

The minimum level of first aid equipment is a suitably stocked and properly identified first aid container. There will be at least one first aid container supplied with enough first aid materials at each place of work, suitable for the circumstances. This will include company vehicles.

It will be ensured that first aid containers are kept easily accessible, and placed, if possible, near to hand washing facilities. First aid containers must protect first aid items from dust and damp and only be stocked with items useful for giving first aid.

Tablets and medication must not be kept in our first boxes and must never be administered by our employees.

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24.0 Communication & consultation

It is the goal of our company to establish and maintain effective communications with regards to health and safety issues to ensure the clear flow of information throughout the company to all levels of employees.

We will ensure that arrangements are in place to:

- document and respond to internal and external communications related to health and safety;
- ensure the internal communication of health and safety information between all levels of the company employees;
- ensure that the issues and ideas of employees and their representatives with regards to health and safety matters are considered;
- ensure that employees are consulted at all appropriate levels on all relevant aspects of health and safety associated with their work;
- encourage employees to participate actively in all aspects of the health and safety policy.

In order to be successful with the above and in communicating health and safety information, we will:

- send communications by an appropriate method;
- avoid conflicting or confusing messages;
- ensure that the people receiving messages understand them;
- communicate any further action required over both the long and short term.

We will establish meetings with our Employees to:

- resolve problems which have arisen;
- discuss health and safety issues e.g. performance standards, procedures, rules, training needs;
- preparation of information required by others;
- circulate information e.g. risk assessments, posters, relevant legislation;
- arrange induction/toolbox talks.

24.1 Consultation with employees

We acknowledge our responsibility to make available to all employees, either directly or via 'representatives of employee safety', information relating to their Health and Safety at Work. Consultation will be maintained with employees on all projects especially when toolbox talks are given. Employees will be actively encouraged to participate and raise any queries they may have relating to health and safety, or any suggestions they may have on improvements to health and Safety.

In particular, consultation will take place over matters relating to:

- The introduction of any measure at the workplace which may substantially affect the Health and Safety of those employees;
- The arrangements for appointing or nominating persons in accordance with The Workplace (Health Safety & Welfare) Regulations 1992 (as amended);
- Any Health and Safety information required to be provided under the relevant statutory provisions;
- The planning and organisation of any Health and Safety training that our Employees may of use to them in undertaking their tasks safely;
- The Health and Safety consequences of the introduction of new technology.

24.2 Communication methods

We will ensure that there is an adequate flow of information up, down and across the company.

Employees will be represented on health and safety matters and will be informed of who their employee representatives are.

Information relating to the health and safety policy's performance will be communicated throughout the company.

Information will be disseminated throughout the company by the following means:

- general promotion of health and safety;
- general meetings;
- health and safety meetings.

We will use different methods of communicating the health and safety message to employees.

Promotion on specific topics or issues will be developed by the Managing Director and promoted to the workforce via

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notice boards, email, safety briefings, etc.

We will display on notice boards information such as the:

- company health and safety policy;
- other materials relevant to health and safety;
- the health and safety law – what you need to know poster.

All employees are encouraged to participate in the promotion of health and safety.

Where required to discuss specific health and safety issues, meetings will be arranged. It will be ensured that meetings are attended by management and employees or their representatives. The details of meetings will be documented.

Where meetings cannot be set up specifically for health and safety, all management meetings will have health and safety as a topic on the agenda. Health and safety items discussed during meetings may include:

- a review of accidents and near misses since the last meeting;
- new hazards;
- progress on action items from previous meetings;
- results of assessments;
- current health and safety issues;
- new regulations, health and safety standards or operator requirements;
- refresher training for health and safety courses, regulations, health and safety standards, operator rules.

A health and safety committee will be established if at least two employees have requested so in writing.

To ensure our health and safety management policy is effective and we meet our legal responsibilities we undertake to communicate where appropriate with:

- enforcing authorities – health and safety executive/local authority;
- emergency services;
- suppliers;
- contractors;
- clients;
- trade associations

All communications written or verbal will be recorded and retained for future reference.

Legislation requires us to ensure that any external person or company appointed to assist in meeting our health and safety obligations is informed of any factors known or suspected to affect the health and safety of other people.

24.3 Communication with foreign nationals

Good communication is essential to ensure that we continue to operate a safe working environment when undertaking our works. With the continuing increase of foreign nationals into the construction industry and many of them only having a basic level of understanding English, as Employers we must be able to ensure that the health and safety message is communicated to everyone that may be at risk. With the difficulties of not being able to understand written and verbal instructions, especially with the use of plant and equipment, places workers in danger of accidents to themselves and others.

The following solutions will be employed with regards to our own workers:

- Firstly, employees will be selected with the understanding of the English language as far as possible;
- The use of buddy systems, with an English-speaking companion to act as an interpreter to relay the relevant instructions to the non-English speaking worker;
- Provision of information in various languages and formats, including the use of pictograms, diagrams, safety notes to ensure that the information can be passed on;
- Our main contractors must make allowances for the site inductions to ensure that the information is passed, if this is not available then the use of our buddy system must be allowed for;
- Supervision will be suitably trained to ensure safe working practices are communicated;
- Toolbox talks can ever be translated or the use of translator with enough time allowed to enable the message to be communicated correctly;
- It is essential that the operative concerned is competent to undertake the task that will be appointed to him;
- Training given must also be allowed for translation if required to ensure that they have adequate understanding of the instruction being given.

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Where possible we will provide non-English speakers with commonly used words in our industry assisted with pictograms to provide simple instructions. Where possible method statements will be translated in native language required ensuring that we check that information has been translated correctly as some words may not communicate correctly to the terms we use in our industry.

25.0 Personal Protective Equipment

Section 2 of the Health and Safety at Work Act 1974 requires us to provide a safe place of work. The provision of personal protective equipment (P.P.E.) helps to assist in compliance with this requirement. It is also a requirement of the Personal Protective Equipment at Work Regulations 1992 and 2002 (as amended) that P.P.E. is to be supplied and used at work, wherever there are risks to health and safety that cannot be controlled in other ways.

Under Section 7 of the Health and Safety at Work Act, Employees are required to co-operate with the Employer and to look after their own health and safety as well as others that may be affected by their acts or emissions. It is, therefore, a legal requirement that the Employee uses the protective equipment provided by us when instructed to do so and ensure it is maintained in a safe condition. They must also ensure that no modifications are carried out on such equipment and if there are any issues identified they are reported as soon as possible, where a replacement is required providing the equipment has been used correctly, it will be replaced free of charge.

The need to utilise P.P.E. will become apparent as part of the risk assessment process. Where a risk assessment defines the need for P.P.E. we will ensure that the P.P.E. is suitable for the task, suitable for the Employee to wear, is properly maintained and that the Employee is professionally trained to use it. The required PPE/RPE will be further defined in the site-specific safe system of work to be maintained on site.

P.P.E. is to be used as the last resort; all other practicable risk control measures are to be taken first and/or combined with the safe use of the defined PPE/RPE.

It must be noted that, although we are not obliged to provide them with the protective equipment, the self-employed and trade-contractors are also required to wear the equipment where and when designated.

All PPE selected will be CE marked type only to ensure that the minimum legal standard for design has been met.

25.1 Head protection

The PPE regulations require suitable head protection to be provided and worn where there is a risk of injury either from falling materials or from striking the head against projections.

As Employers it is important, we:

- Provide the correct head protection for all our workers (and any visitors to our site).

Head protection must:

- Be in a good condition. If it's damaged, report to your relevant responsible person for a replacement;
- Fits the person wearing it and is worn properly;
- Be compatible if wearing hearing protectors;
- Only be purchased from a reputable supplier – there are fake hard hats on the market.

We will make sure that head protection is worn and worn correctly:

- By making it a site rule on all of our sites;
- By all supervisory staff including the managing director wearing their head protection to set a good example;
- By checking others are wearing theirs.

Other options for use bump caps are only to be worn when a risk assessment can show there is no risk from overhead injury.

It is a company rule that all persons wear hard hats on all sites and that if there is the chance that the hat could fall or be blown off then a chin strap will be provided and be worn. If additional components such as ear defenders, protective visor or other such device is required to be fitted to the hard hat, it must be a recommended make as instructed by the manufacturer's instructions.



Hard hats to be worn always when there is an overhead risk of falling objects, which will include the majority of our sites. If being worn with RPE where head harness effects fit, then chin strap to be worn



Bump caps only to be worn on floor where no other risk of falling objects from height can occur, such areas include in enclosure on one floor, working in small tight areas where no risk of falling objects, but may result in bumping head on pipe work, ducting or other overhead structure in the tight area that may cause an injury.

25.2 Hearing protection

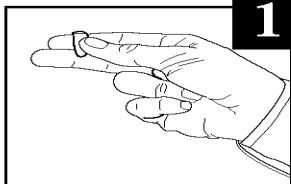
To be worn whilst carrying out all noisy operations or in noisy areas. Noisy, in this case, being defined as areas or operations where the noise exceeds 80 dB (a). Options available will include earmuffs suitable to be worn, via clips to hard hats or all in one earmuffs, where these may interfere with other PPE being worn then ear plugs will be provided and persons will be instructed in their correct fitting via the manufacturer's instructions given.

When fitting ear plugs employees must keep their hands clean to avoid infection from dirt and contaminants that may be on the fingers. Disposable ear plugs are for one use only, so a sufficient stock will be made available on all sites. See also the section on Noise.

25.2.1 Use of earplugs

The earplugs selected must have a single noise rating (SNR) of between 37 to 39 as a minimum to ensure exposures can be reduced as low as possible and at least below the upper level.

The fitting of earplugs is important to ensure the correct level of protection is given, therefore we conduct a training session including the description as below of the correct fitting procedure. This is also displayed on each individual pack of ear plugs and box.



1

Ensure fingers are clean, roll (do not squeeze) the ear plug between your thumb and first 2 fingers until the diameter is as small as possible.



2

Reach over your head with opposite hand and pull the top of your ear to open the ear canal.



3

Keep holding ear open and push in rolled end of plug into ear as far as possible and hold in place for about 10 seconds, allow to expand until sealed ear.



4

Plug should be properly in position as shown.

If it has not sealed properly, remove and try again, if not expanding properly discard plug/s and replace with fresh pair.



Checks on fitting correctly must be carried out before hood of overalls goes on.





Mandatory signage must be displayed at the point of where noise levels will be above the upper level, therefore work areas where noisy works are being undertaken and the surrounding area and/or floor level will be defined as mandatory zones.

25.3 Eye and Face Protection

To be used wherever there is a risk of contamination from chemicals either by vapour or splashing, or risk from dust or any danger from flying particles (e.g. using cutting equipment). All protection to be to BS EN 166. Safety glasses are not sufficient for cutting operations; they must wear safety goggles or full-face shield if working in confined spaces. UV protection safety glasses may be worn where there is a requirement to protect eyes from UV radiation exposure such as working with a requirement to look up on a sunny day.

Where full face respirator is to be worn the visor must be maintained at a medium or higher impact resistance specification as a minimum standard.

Items of equipment to be considered include safety glasses, safety goggles or full-face shield dependant on the hazards. Refer to the site-specific safe system of work for the what is required to be worn.



Safety glasses for general eye protection when walking around the site & any low level breaking out works. Not to be worn for any cutting.



Safety goggles for all cutting operations, but if in confined spaces then full face shield must be worn



Face shields for confined space environments when the face needs protection from possible splashes or flying particles, will also require further eye protection to be worn underneath if risk of particles getting behind the shield.



If falling object and head risk then hard hat attachment type will be required, ensuring it is the correct fittings, do not modify, if it is not correct do not use and request correct equipment.

If visibility of face shield is scratched and damaged and effecting works, then replace shield. Sweat bands can also be replaced.

25.4 Respiratory Protection

Details on R.P.E. use can be found in H.S.E. guidance note HSG 53 Respiratory protective equipment at Work for information on the correct selection of mask to the potential exposure. This guidance will be referred to for all assessments of the correct level of filters to be used to the type of exposure that is expected.

Operations giving rise to nuisance dusts, such drilling/cutting into concrete based products which may cause silica dust exposure, then suitable disposable dust masks shall be provided and used.

Requirements for wearing RPE will require a face fit for the employee to ensure the size and fit to the persons face shape, therefore offering the best level of protection. For disposal half mask and a fitted half mask the RPE requires a qualitative face fit to the type and brand to be worn to be undertaken by all employees.

RPE must be checked before use to ensure that it is in clean and usable condition especially if it has been stored for a period before use. Monthly/3 monthly (depending on frequency of use) competent person checks must be carried out and a record kept for all fitted RPE.

Use of disposals will require that they are checked to ensure they are suitable for the expected exposure and are disposed of correctly relevant to the type of exposure. All asbestos works requirements are covered within our asbestos company procedures, which includes the use of half masks for non-licensed works and full face for licensed works.

Exposures to other risks will include reference to HSG 53 in the correct selection according to the expected exposure.

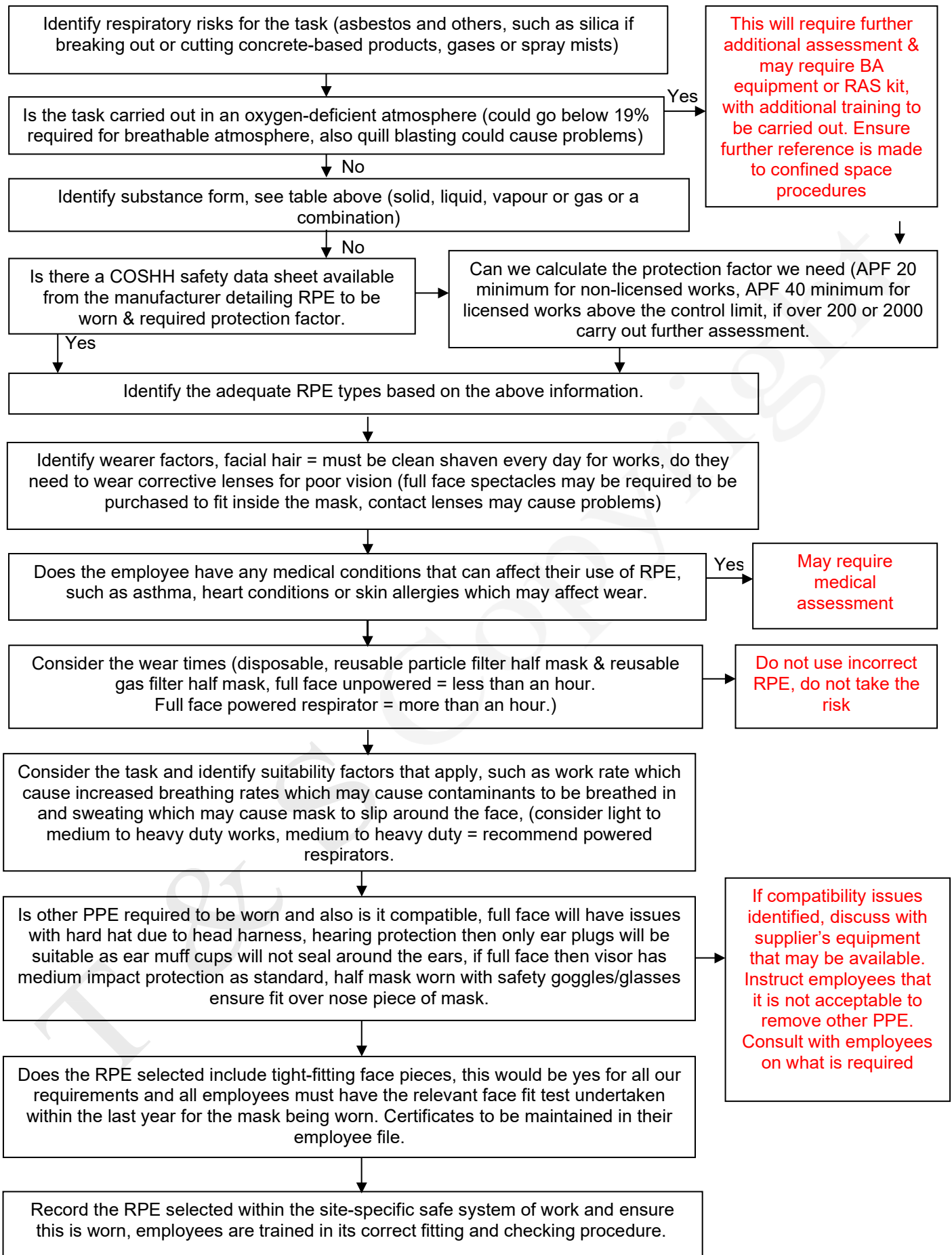
The different types of substances that we may encounter are defined in the following table:

Form	Properties	Examples
Solid particles	Particles of solid material, including aerosols, dusts, fibres, smokes, and fume	Asbestos dust Engine exhaust particles and fume Lead dust and fume Stone dust Welding fume Wood dust Smoke Fungal spores and parasites Bacteria and viruses Flour
Liquid particles	Fine sprays, mists and aerosols made up of small droplets of liquid	Sprayed liquids: <ul style="list-style-type: none"> ▪ Paints; ▪ Pesticides; ▪ powder coating mix; ▪ liquid jetting Mists: <ul style="list-style-type: none"> ▪ chrome acid; ▪ cutting fluids; ▪ oil mist
Vapour	Gaseous forms of a solid or liquid	Solvent vapour Mercury vapour
Gas		Carbon monoxide Engine exhaust gases Sewer gas Chlorine

The following table will be used to assist in the assessment process for the correct filters:

Filter types				
Colour code	Type	For use against	Class	Other information
White	P	Particles	1 2 3	European standard: EN 143
Brown	A	Organic gases & vapours, boiling point above 65°C	1 2 3	European standard: EN 1487
Grey	B	Inorganic gases & vapours	1 2 3	European standard: EN 14387 Do not use against carbon monoxide
Yellow	E	SO ₂ & other acid gases	1 2 3	European standard: EN 14387
Green	K	Ammonia & its organic derivatives	1 2 3	European standard: EN 14387
Red & White	Hg P3	Mercury		European standard: EN 14387 Includes P3 particle filter Maximum use time 50 hours No class number
Blue & White	NO P3	Oxides of nitrogen		European standard: EN 14387 Includes P3 particle filter Single use only No class number
Brown	AX	Organic gases & vapours, boiling point at or below 65°C		European standard: EN 14387 Single use only No class number
Violet	SX	Substance as specified by the manufacturer		European standard: EN 14387

The following flowchart will be used to assist in the assessment process for the correct respirator:



25.5 Hand protection

Gloves are provided for the handling of things which may be sharp, rough, hot, cold, contaminated with either chemical or biological agents or liable to cause a hazard by breaking in the hand, e.g. glass.

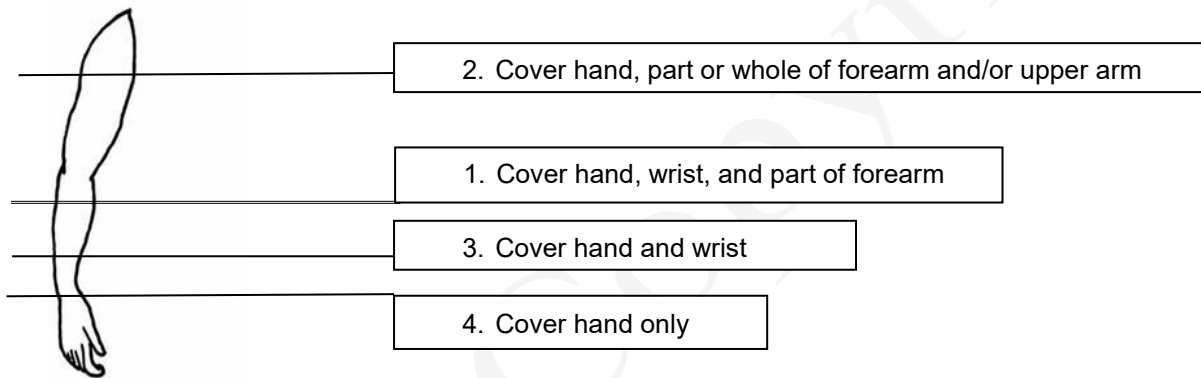
Suitable gloves sufficient for the handling of our materials will be selected and issued to all employees as required and must be defined with the site-specific method statement, which gloves must be worn for the relevant tasks that will be undertaken. It is not suitable to have one glove suits all tasks as there will be different levels of protection required.

We need to ensure whatever is selected the wearer is not allergic or have a sensitivity to the material that the glove is made of

Barrier creams are provided for use when dealing with mildly irritant substances and must be applied before the exposure.

The following questions will need to be answered before stipulating what type of gloves:

- 1. Do we need to cover just the hand?;
- 2. Do we need to cover the hand and wrist?;
- 3. Do we need to cover hand, wrist and part of forearm?;
- 4. Do we need to cover hand, part or whole of forearm and/or upper arm?



Gloves are to be removed as contaminated items and disposed of correctly, by pulling inside out and placing in correct waste bags relevant to the type of works being undertaken. If using any chemical products and they get inside the glove, remove immediately and clean hands thoroughly. Check every day if reusing for holes, debris and shape to ensure they can be worn again, if required replace with new pair.

25.6 Foot protection

Workers are required to wear protective footwear whilst on site and doing heavy work.

The bones in the foot are quite delicate and easily damaged and any muscle or tendon damage can prevent normal movement for several months.

Steel toecaps (or equivalent) protect against dropped objects.

Midsole protection (usually a steel plate) protects against puncture or penetration if a person should tread on a nail.

If our employees need to enter or work on a construction site as the employer, we will provide the standard of safety footwear required. They must look after it and make it last a reasonable time. If there are medical reasons why they cannot wear basic safety footwear as the employer, we will pay for a suitable kit.

When contacting suppliers, we will ensure any PPE is 'CE' marked and complies with the requirements of the Personal Protective Equipment Regulations 2002. The supplier/manufacturer must be able to provide us with the relevant information that the footwear is suitable for the type of task.

Some specific client site rules ban the use of rigger boots, where this is the case assessment of the work boots that have already been provided to the employees that may be working on the site needs to be looked at and may

require replacement.

General lace up safety boots may be worn for general non-asbestos works.

Lace-less safety boots must be worn for all asbestos tasks, including waste runs.

For potential risk of wet environment work then suitable wellington boots will be provided.

All asbestos works requirements are covered within our asbestos works procedures.

25.7 High-visibility clothing

This must be made from PVC impregnated with fluorescent pigments.

It MUST be worn by anyone working on or near the roadside or as defined by construction site rules. This must also be worn within any of our company premises where there is a risk of pedestrians coming into contact with moving plant or vehicles.

Also, anyone else working in areas where it is important to be seen, e.g. banks men, traffic marshal or where there is moving plant and poor visibility.

All general hi-visibility clothing must be to standard EN471.

If undertaking any hot works, then the flame retardant hi-visibility clothing to standard EN469 will be issued.

Where wet weather clothing is required to be worn then the combined hi-visibility type will be selected.

Different colour hi-visibility clothing may be selected to define certain individuals on site such as orange for traffic marshals, green for first aiders as required.

25.8 Safety harnesses

All those involved in working at height and where there is a risk of falling from height, even after implementing the hierarchy of control measures (safety harnesses must be worn as a last resort), must wear and use fall arrest equipment, and have received appropriate training in their use, inspection and maintenance of such equipment.

A competent person will be appointed to examine all harnesses at least every three months (minimum 6 monthly) and a record kept of the examination.

All users will be trained to give a visual and physical inspection before each use to ensure it is in a safe condition. Any items showing defect must be withdrawn from use immediately. Appropriate replacements must be provided before working at height works recommence.

Checks will be required to all components, including karabiners, lanyards, straps, connectors, and inertia blocks.

Defined anchorage points must be included in the site-specific method statement and ensure that the relevant pull tests have been completed where necessary.

The correct harness must be selected to the task to be undertaken such as confined space entry requires a rescue harness type to be worn and any element of suspension requires purpose designed harness and must not be undertaken wearing a general work at height harness.

Where any task identifies the need to wear a safety harness and there is a risk of being suspended in a harness when fallen then a detailed rescue plan must be set up, see section on work at height for further information and SWP 1.0 and 1.13 for detail on use of such equipment.

25.9 P.P.E. Register

When P.P.E. is issued to an individual, it is to be recorded on our PPE issue form to ensure that we have a record of when it was issued.

Any task specific PPE which is not identified above must be clearly define in the site-specific POWs or RAMS.

25.10 Wearing shorts

If the site has a policy on clothing that does not allow shorts, then you are expected to follow this rule and shorts must not be worn to undertake external work tasks.

Shorts may be worn under the disposable work overalls only to facilitate more comfortable working conditions, but this only applies to non-licensed works.

All licensed works for enclosure or contaminated ground licensed works must be disposable underwear only.

Clothing needs to protect against hazards to the task being undertaken, therefore when loading or unloading vans, full length trousers must be worn. The main reason for protecting the lower legs is to help guard against cuts, grazes, and splinters etc. in an environment where any skin damage can lead to infection.

During summer on very bright days, it is important to protect against over exposure to sunlight which can cause skincancer. Cases of malignant melanoma have increased dramatically in recent years.

During cold weather it is important to keep warm, especially when, for example, working at height where the cold can distract and lead to loss of concentration.

Therefore, the wearing of shorts must be applied to the site works or the risk of undertaking the task. The POWs / RAMS will define the risks and what protective clothing must be worn.

When undertaking any mixing of concrete or other products with a high alkaline mixture skin protection must be worn.

26.0 Permit to work

The objective of a permit to work system is to maintain close monitoring when potentially hazardous work is being carried out and the following points relating to the permit to work procedure must be taken into account.

Specialised training may be required for the task being carried out.

Such tasks that would usually have been classified as high risk by a risk assessment and require a permit to work include:

- Electrical Works;
- Work in confined spaces;
- Excavation Works;
- Welding and/or Hot Works;
- Mechanical maintenance Works;
- Work at height.

Permits to work provide a safety control system against accidental injury to personnel, plant and products when a known hazardous work is undertaken. The permit to work must detail the precautions to be taken before commencement of work and must include:

- Identify the work to be undertaken;
- Identify who will undertake the work;
- State the time period for which it is valid;
- Supersede all other instructions until it is cancelled;
- Specify the control measures to be put into place before work commences;
- Identify known hazards that remain a risk to the permit holder;
- Identify any emergency precautions and procedures which need to be put into place;
- Identify any first aid facilities which may be necessary;
- Identify any special welfare facilities which may be necessary;
- Identify any necessary personal protective equipment;
- Ensure that no other work than that specified is undertaken;
- Define the limits of the work and the working area.

Our employees must ensure that the safe working procedures are implemented in accordance with the permit, but if at any time they feel it is unsafe to work they must report back to the office for further instruction.

The issue, co-ordination and authorisation of the permit to work systems are the responsibility of the nominated competent person for the individual project and whoever is defined as our competent person to take control of the permit must ensure they apply the safe systems identified.

The Permit to Work record must also show:

- Relevant information relating to the task;
- Authorisation of the task;
- Acknowledgement of receipt by competent person carrying out the work;
- Clearance that works have been/have not been completed;
- Cancellation, so that the permit can no longer be used.

For all confined space works refer to SWP 4.0 for confined space permit to work requirements.

For all asbestos works refer to the Document Procedures on completing asbestos permit to work.

27.0 Work Time Policy

In accordance with the Working Time Regulations employees are given the choice of whether they want to comply with the requirements of these regulations, and this will be discussed at the time of employment.

The Working Time Regulations entitle all unless defined under a certain exemption category to:

- A minimum daily rest period of 11 hours uninterrupted rest between finishing your job and starting the next day. (Workers aged between 15-18 are entitled to a minimum daily rest break of 12 hours);
- A weekly rest period of 24 hours uninterrupted rest within each seven-day period (Young Workers aged 15-18 are entitled to 48 hours); or, at the employer's choice, a fortnightly rest period of 48 consecutive hours within each 14 day period;
- The weekly rest period should not include any part of the daily rest period;
- A break of 20 minutes if your daily working day is more than 6 hours long (or 30 minutes if you are aged 15-18 years and you work more than 4.5 hours at a stretch);
- If an agency temporary worker, then the Employer they are working for (not the Agency who employs them) is responsible for them receiving these minimum rest breaks;
- The first 2 type of rest periods are generally unpaid. The 20-minute break may be paid or unpaid, depending on what it says in your contract of employment. For more information on rest breaks please see the Direct Gov website.

27.1 Opt out

In particular industry workers can be asked, by their Employers, to voluntarily sign an opt-out of this 48-hour limit (which is legally valid) – i.e. they agree that they can work for more than 48 hours per week. The opt-out is not a condition of their employment and it must remain optional and voluntary. Therefore, even if they have signed our contract with an opt out in place, they have the legal right to opt back in to the 48-hour limit at a later date, but they have to give us as the employer a minimum of 3 months written notice to do this.

Young workers defined as aged 15-18 cannot opt out.

Employees must not be subjected to any detriment by refusing or proposing to refuse to sign an opt-out agreement. If you are an employee and are dismissed because you refuse to sign an opt-out clause, then this could be seen as automatically unfair dismissal and you could potentially make a claim to an employment tribunal.

In the UK we continue to allow the opt out option and it remains legal and valid; therefore, this will be offered to all employees as per our opt-out procedure and the form signed by the applicable employees, which will be maintained in their employee file.

The number of hours they work per week can be averaged over the applicable 17/26 reference week period (or our contract length), rather than measured in one week, and the first 20 days holiday they are legally entitled to cannot be used to reduce your average number of hours worked. However, with the daily and weekly rest breaks and the opt out above included the maximum in any week they can work is 78 hours. See the information below about what a working week means.

Breaches of the 48-hour limit are dealt with by the Health and Safety Executive (i.e. a prosecution and/or a fine for the Employer, but not compensation for the worker).

Working week is calculated with our normal weekly working hours and any:

- Job-related training;
- Job-related travelling time (including where this is an integral part of your work);
- Business/working lunches;
- Time spent working abroad (for a UK company);
- Paid and some unpaid overtime (see below);
- Time spent on-call at the workplace (including time 'sleeping' when you are either working or asleep while on-call at the work-place – where 'sleeping' is allowed);
- Time spent on-call elsewhere while you are actually working.

The working week does not include:

- Breaks when no work is done (e.g. lunch breaks);
- Normal travel to and from work;

- Time spent travelling outside of normal working hours (for example an early meeting at a client's premises where this requires travel the night before, this time is not counted);
- Time on-call spent away from the workplace (unless you are actually working);
- Unpaid overtime where you have volunteered to, for example, stay late to finish something off;
- Paid or unpaid holiday.

27.3 Paid holidays

All workers and employees are entitled to a legal minimum of 28 days paid leave each year (5.6 weeks – pro rata'd if you are part-time).

Things they need to know as an employee:

- As the employer we have no legal obligation to ensure that employees have taken their statutory holiday entitlement, although we can serve them a notice to require that they take holiday on specified dates;
- Holiday entitlement builds up as soon as they start work;
- They must tell us when they want leave and that we may control when they take it (i.e. agree or disagree to the dates they want);
- As the employer we must specify the notice periods they are required to give, before they can take leave, in writing as defined in their contract. If this is not specified, then they must give at least twice the length of the intended leave period they wish to take – e.g. they must give 2 days' notice to take 1-day leave. As the Employer we must reply (agree or disagree) within the same length of time as their intended leave – e.g. if they want 1 day's leave, we give them 2 days' notice and they must reply within 1 day;
- As the Employer we may restrict them taking leave through the following – our employment contract, via custom or practice or by negotiations with a trade union or employee representative. We can restrict their leave because we shut down at certain times; we can specify when they may or may not take their leave; we may cap the amount of leave that they can take at any one time. If such arrangements don't already exist then we must give them notice to require them to take their leave of twice the length of the leave period we require them to take, e.g. we need to give them 2 weeks' notice to require them to take 1 weeks leave;
- As the Employer we may deny rights to statutory holiday entitlements and they can make a complaint to an employment tribunal. If the tribunal upholds the complaint, then they may order us to pay compensation;
- Holiday entitlement cannot be counted as weekly rest days, it is completely separate;
- If they are an agency temp, then the agency that employs them (not the Employer they are working for) is responsible for ensuring they receive their statutory minimum holiday entitlement. See further guidance brought in 1st October 2011 to give agency workers the right to equal treatment with permanent employees;
- They must get paid for untaken holiday if they leave the company (but they have no legal entitlement to be paid if they cannot or choose not to take them all – unless they have been off sick). For each week of holiday owed they are entitled to a week's pay;
- Bank and public holidays can be included in these 28 days; at the moment there is no statutory right to take bank holidays off. Therefore, if they take a day off as paid leave on a bank holiday it may count as one of their annual leave days under WTD legislation – depending on what our employment contract defines;
- As the employer we may give more leave than 28 days as defined as part of their contract;
- There is no legal obligation that the first 20 days holiday entitlement, if unused, must be carried forward into the next leave year, unless they have been off sick (see below). The additional 8 days holiday entitlement can be carried over into the next holiday leave year, if unused, with our agreement only;
- The Government increased the minimum statutory holiday entitlement to 24 days per year from 1st October 2007 and to 28 days per year from 1st April 2009 for those working 5 days per week.

28.0 Welfare

It is the policy of our company to comply with the relevant statutory provisions in order to promote an organisation wide culture of health, safety and welfare in the workplace. In this instance the definition of “workplace” excludes any site offices on construction sites. A place of work such as a permanent office is covered under the Workplace Health, Safety and Welfare Regulations 1992.

We will be responsible for the provision of suitable welfare facilities and our office facilities, these will include but not limited to:

- Mess Room - Heating/cooking/washing up facilities;
- Toilet facilities - both male and female or a shared toilet that is lockable from the inside;
- Fresh drinking water;
- Hot water for washing;
- Facilities for providing boiling water;
- Surface for preparing food;
- Adequate storage for equipment, tools etc.

We will provide all vehicles with:

- Hand washing facilities and bacterial agent;
- Eyewash and eye bath;
- App that they can locate local facilities;
- A location of Hospitals with A & E facilities within their plan of works.

When working on sites under the control of a Main/Principal Contractor then they will be responsible for providing the above and we must ensure this is provided and made available for use during our hours of work.

The following sections are further details on the requirements for compliance.

28.1 Maintenance of Workplace, Equipment, Devices and Systems

All equipment, devices and systems that fall under the scope of the Workplace Health, Safety Welfare regulations, including the workplace itself, will be maintained (including cleaned as appropriate) in an efficient condition and in a good state of working order and repair. Where appropriate this will include such items being subject to a suitable system of maintenance.

Where required we will also apply the following to all active sites and ensure it is maintained in a clean and usable condition for the duration of our contracts.

28.2 Ventilation

In order to comply with this provision effective and suitable provision will be made to ensure that every enclosed workplace is ventilated by a enough quantity of fresh or purified air. For health and safety purposes any plant used to achieve this purpose will include an effective device to give visible or audible warning of any failure of the plant. This only applies if such equipment is in place, if via the assessment suitable fresh air is maintained by opening a window then mechanical plant would not be required.

28.3 Temperature Indoor Places

Although no values are accorded to temperatures, we will ensure that, during working hours, the temperature inside the office building is reasonable, i.e. has achieved 16° within one hour of work commencing. To achieve a reasonable indoor temperature, we will not use a method of heating or cooling which results in the escape into the workplace of fumes, gas or vapour which could be injurious or offensive to any person.

All places of work will always be monitored and where required suitable warm clothing provided. If the person in control of the place of work deems the conditions to be unsafe then an assessment will be made to decide if works must stop.

28.4 Lighting

Every workplace inside the company’s premises will have suitable and sufficient lighting. Such lighting will, as far as is reasonably practicable, be natural and emergency lighting will be provided in any room in circumstances where employees would be exposed to dangers in the event of the failure of artificial lighting.

If a task with work equipment involves the perception of detail then additional lighting will be provided, as required.

The lighting provided will be such that it is adequate for the needs of the task. Where access is foreseeable on an intermittent basis then consideration will always be given to the provision of permanent lighting.

28.5 Cleanliness, Floors, Traffic Routes, Waste Materials

It will be a specified requirement that every workplace and the furniture, furnishings and fittings be kept sufficiently clean. Surfaces of walls, floors and ceilings of all workplaces inside buildings will be capable of being kept sufficiently clean. As far as is reasonably practicable, waste materials will not be allowed to accumulate in a workplace except in suitable receptacles.

The construction of all floors and traffic routes will be suitable for the purpose for which it is used, including the absence of unevenness, holes (unless suitably guarded to prevent falls), slopes (unless suitably handrailed) and slippery surfaces that constitute a risk to health and safety. All floors will have an adequate means of drainage where necessary.

So far as is reasonably practicable all floors and traffic routes will be free of obstructions, articles and substances that may cause a person to slip, trip or fall.

All traffic routes which are staircases will be fitted with suitable and sufficient handrails and where appropriate, guardrails, unless a handrail cannot be provided without obstructing the traffic route.

28.6 Workstations & Seating

Every workstation will be so arranged so that it is suitable both for the person doing the work and the work itself being performed.

Where a workstation is outdoors it will, as far as is reasonably practicable, be protected from adverse weather conditions, be such that it can be evacuated swiftly in the event of an emergency and be such that a person at the workstation is not liable to slip or fall.

A suitable seat will be provided for each person at work in the workplace whose work includes operations of a kind that the work (or a substantial part of it) can or must be done sitting. A suitable footrest will be provided where necessary.

28.7 Falls or Falling Objects

So far as is reasonably practicable, suitable and effective measures will be taken to prevent any of the following events:

- Any person falling a distance liable to cause personal injury;
- Any person being struck by a falling object liable to cause personal injury.

Any area where there is a risk to health and safety as a result of the above will be clearly indicated where appropriate.

So far as is practicable every tank, pit or structure where there is a risk of a person in the workplace falling into a dangerous substance in the tank, pit or structure will be securely covered or fenced. Any traffic route over, under or in an uncovered tank, pit or structure as mentioned above will be securely fenced.

A “dangerous substance” as mentioned above means:

- Any substance likely to scald or burn;
- Any poisonous substance;
- Any corrosive substance;
- Any fume, gas or vapour likely to overcome a person, or;
- Any granular or free flowing solid substance or any viscous substance which, in any case, is of a nature or quantity which is liable to cause danger to any person.

28.8 Organisation Etc. of Traffic Routes

Every workplace will be organised in such a manner so that pedestrians and vehicles can circulate in a safe manner. Traffic routes in a workplace will, as far as is reasonably practicable, be suitable for the persons or vehicles using them (including taking into account the separation of pedestrians and traffic using the same routes, and distance of doors, gates and pedestrian access points leading to vehicular traffic routes), sufficient in number, in suitable positions and of sufficient size. All traffic routes will be suitably indicated where necessary for reasons of health and

safety.

28.9 Doors & Gates

Doors and gates will be suitably constructed (including being fitted with safety devices where appropriate) and the following will be included in this section:

- Any sliding door or gate will be fitted with a device to prevent it coming off its track during use;
- Any upward opening door or gate will have a device to prevent it falling back;
- Any powered door or gate will have suitable and effective features to prevent it causing injury by trapping any person, and, where necessary for reasons of health and safety, can be operated manually unless it opens automatically in the event of a power failure and;
- Any door or gate that is capable of opening by being pushed from either side will, when closed, have a built in feature to enable a clear view of the space close to both sides.

28.10 Sanitary Conveniences

Suitable and sufficient sanitary conveniences will be provided at readily accessible places. The rooms containing the sanitary conveniences will be adequately ventilated and lit and be kept in a clean and orderly condition.

Separate rooms containing sanitary conveniences will be provided for men and women, where possible, as a minimum it will be lockable from the inside if a shared facility.

The following tables are a recommended guidance and will be applied where possible:

Number of toilets and wash basins for mixed use (or women only)		
Number of people at work	Number of toilets	Number of wash basins
1-5	1	1
6-25	2	2
26-50	3	3
51-75	4	4
76-100	5	5
Toilets used by men only		
Number of people at work	Number of toilets	Number of wash basins
1-15	1	1
16-30	2	1
31-45	2	2
46-60	3	2
61-75	3	3
76-90	4	3
91-100	4	4

Referenced from the HSE

28.11 Washing Facilities

Suitable and sufficient washing facilities, including showers if appropriate, will be provided at readily accessible places if required by the nature of the work or for health reasons.

Such washing facilities will be sited in the immediate vicinity of every sanitary convenience and changing room, and will include a supply of clean hot and cold running water, soap or other suitable means of cleaning as well as drying facilities (towels, paper dispenser or hot air dryer).

The rooms containing the washing facilities will be well lit and ventilated and will be kept in a clean and orderly state.

Separate shower facilities will be provided for men and women unless the room is capable of being secured from inside and the facilities inside the room are intended for the use of only one person at a time.

28.12 Drinking Water

It will be ensured that an adequate supply of wholesome drinking water will be provided for all persons at work in the workplace. Such drinking water will be readily accessible at suitable places and be conspicuously marked by an appropriate sign where necessary for reasons of health and safety. Additionally, suitable and sufficient cups or

other drinking vessels will be provided unless the supply of drinking water is in a jet from which persons can drink easily.

28.13 Accommodation for Clothing

Suitable and sufficient accommodation will be provided in a suitable location for the clothing of any person at work, which is not worn during working hours, and for special clothing which is worn at work, but which is not taken home. This will involve separate accommodation for clothing worn at work and for other clothing and such accommodation will be secure. So far as is reasonably practicable the accommodation will include facilities for the drying of clothing.

28.14 Facilities for Changing Clothing

Suitable and sufficient facilities will be provided for any person at work in the workplace to change clothing in all cases where the person has to wear special clothing for the purpose of work, and the person cannot, for reasons of health or propriety, be expected to change in another room. Separate changing facilities for males and females will be provided as required.

Changing facilities for asbestos removal works with regards to DCU set up are covered in our asbestos works procedures.

28.15 Facilities for Rest and to Eat Meals

Suitable and sufficient rest facilities, in the form of rest rooms or rest areas, will be provided at readily accessible places. These rest facilities will include suitable facilities to eat meals where food eaten in the workplace would otherwise be likely to become contaminated.

Rest rooms and/or areas will include arrangements to protect non-smokers from discomfort caused by tobacco smoke, as well as facilities for pregnant women or nursing mother to rest. Where meals are regularly eaten in the workplace then facilities will be provided for persons at work to eat meals.

28.16 Environmental

Offices shall be kept clean and tidy. Each person shall have a minimum of 3.7m² of floor space or, where the ceiling height is less than 3m, 11m³ of air space. The volume of any items of equipment is to be subtracted from the total room volume before obtaining this figure.

A minimum temperature of 16°C shall be attained within one hour of work commencing and maintained throughout the working day.

Lighting shall be either natural or artificial and steps shall be taken to eliminate glare and shadows. Adequate fresh air shall be provided either through open windows or by the means of air conditioning. In areas where fumes are likely to be present, local exhaust ventilation shall be provided.

28.17 Access

Stairs, steps and floors shall be maintained in good condition and shall, as far as is reasonably practicable, be kept free of materials likely to cause persons to slip or trip and shall not be obstructed. Non-slip floor polishes shall be used on linoleum or similar surfaces.

Trailing cables from V.D.U.s, telephones, etc. shall be kept to a minimum and are to be positioned so as not to cause a tripping hazard.

28.18 Filing and Storage

Incorrectly used filing cabinets can become unstable. If too many drawers are opened at one time they may topple over. All filing cabinets are to have the lowest drawer loaded first and only one drawer is to be opened at a time.

All racking shall be of adequate strength for the loads placed upon them and shall be rigidly secured to adjacent racks or the wall of the building. Steps or ladders are to be used to gain access to the higher levels of shelving. Heavy items shall not be placed on the higher shelves.

Prior to the installation of racking or filing cabinets, the floor strength is to be ascertained to ensure that the floor can withstand the load to be applied to it.

28.19 Office Safety

The main categories of serious injury to office workers are:

- Falls from a height e.g. down a staircase or from overreaching;
- Contact with electricity e.g. from damaged cables or badly wired repairs;
- Struck by falling objects e.g. goods from a shelf;
- Repetitive strain injuries;
- Contact with moving parts of office machinery e.g. shredders, guillotines.

There are two direct causes of accidents, i.e.: Unsafe Acts and Unsafe Conditions.

Unsafe acts may include:

- Using defective equipment;
- Using equipment incorrectly;
- Failing to use or incorrectly using PPE;
- Leaving equipment in a dangerous state;
- Using defective equipment.

Unsafe conditions include:

- Bad underfoot conditions;
- Defective equipment;
- Excessive noise;
- Exposure to radiation or other pollutants;
- Fire hazards;
- Inadequate fire warning systems;
- Lack of or inadequate guarding;
- Poor housekeeping;
- Poor lighting or ventilation

This list is not exhaustive, and employees must report any unsafe condition to your immediate superior for action as soon as possible.

29.0 Violence in the Workplace

We define harassment and violence as unacceptable behaviour by one or more individuals that can take many different forms, some of which may be more easily identifiable than others. Harassment occurs when someone is repeatedly and deliberately abused, threatened and/or humiliated in circumstances relating to work. Violence occurs when one or more worker or responsible person is assaulted in circumstances relating to work. Both may be carried out by one or more employees, worker, service user or member of the public with the purpose or effect of violating a worker's dignity, affecting his/her health and/or creating a hostile work environment.

As Employers we are responsible for identifying and managing the risk of harassment and violence at our workplaces. This policy aims to raise awareness of related issues among our workforce and set standards for workplace behaviour. Our employees will be made aware of the behaviour expected of them and the options available to them if they feel they have been a victim of violence and/or harassment and that if considered serious enough it may include recourse to the law.

Care will be exercised as hazardous situations may occur when dealing with an irate member of the public, and every effort must be made to handle the situation in a calm and courteous manner. If this is not possible then the police must be called to deal with the incident. Any employees involved in violent or aggressive behaviour will be subject to company disciplinary procedures.

The aim of our company is to prevent violence before it occurs.

30.0 Drugs & Alcohol

We are aware that we have a general duty under the Health & Safety at Work Act etc 1974 to ensure as far as reasonably practical, the health safety and welfare of their employees and the company will not knowingly allow an employee under the influence of excessive alcohol or drugs to continue working which places the employee or others at risk. Employees are required to take reasonable care of themselves and others who could be affected by what they do.

Alcohol and drugs (other than prescribed medication) are forbidden on all our places of Employment. Employees who have drunk alcohol or misused drugs are a hazard to themselves and others. The Company recognises the need to address the effects of drink and drug misuse in the workplace and is committed to develop good working practices throughout the work force. These practices will include the company ensuring only non- alcoholic drinks are consumed in the welfare facilities.

Prevention of alcohol and drug misuse is important, and the company will make general information about alcohol/drugs and health, available to all staff and encourage sensible drinking outside working hours, in the form of leaflets posters and tool box talks.

Alcohol/drugs screening is a very sensitive issue and is not the complete answer caused by drug/ alcohol misuse. Agreement to the principle of screening must be incorporated into each member of staff's contract of employment which is straightforward for new staff, but existing staff are under no obligation to agree to changes in their terms and conditions of service. The company is aware that if an employer tried to force a test on an unwilling employee, the employee could resign and claim 'constructive dismissal'. In addition to changes to the contract of employment written consent must be obtained for each test which is specifically relating to alcohol and /or drugs and to no other condition or disease. Medical confidentiality must be assured and only the relevant manager must be told if an employee is considered unfit for work.

Only laboratories accredited by the United Kingdom Accreditation Service (UKAS) who have satisfied assessors that it provides a service that meets all necessary criteria required in testing procedures, may be used.

30.1 Dealing with an Employee with a Possible Drug/Alcohol Problem

Employees with a drink/drug problem have the same rights to confidentiality and support as they would if they had any other medical or psychological condition.

Disciplinary action will be a last resort. A court may find dismissal unfair if an employer has made no attempt to help an employee whose work problems are related to drinking alcohol.

Many people with an alcohol/drug problem are able in time to regain full control over their drinking and return to their previous work performance. Employees need to know that their drinking/drug problem will be treated as a health problem rather than an immediate cause for dismissal or disciplinary action.

If an employees' drinking/drug taking is a matter of concern they will be encouraged to seek help from their GP or specialist alcohol agency.

A Health surveillance programme will be addressed and where required we may provide access to an occupational qualified Health Nurse to monitor any suspected drug abuse.

31.0 Safety Signs & Signals

The Health and Safety (Safety Signs and Signals) Regulations 1996 apply to all work premises and activities, but do not apply to signs relating to the supply of dangerous substances, the transport of dangerous goods by road or rail, or to signs regulating road or rail traffic.

Existing fire safety signs already in use in April 1996 can only continue to be displayed until 24 December 1998. Thereafter old signs must have been replaced.

The regulations cover the provision and use of safety signs and signals which are required to be displayed or used when a risk assessment shows that, in spite of protective measures, the risk cannot be eliminated or sufficiently reduced and a significant risk remains.

31.1 Safety Signs

Safety signs must conform to the requirements of the regulations. Signs must be illuminated where appropriate and must be kept clean and properly maintained. Make shift signs will not be acceptable and all signage must be both pictogram and words.

31.2 Signals

These include:

- Acoustic signals and/or verbal communication to signal danger, e.g. to call for emergency evacuation. Such signals must be tested at frequent intervals;
- Hand signals or verbal communication to guide persons carrying out hazardous or dangerous manoeuvres, e.g. crane signals. (Note: The signals detailed in the Regulations differ from those recommended in BS 7121 Code of Practice for the Safe Use of Cranes. However, the signals referred to in BS 7121 may continue to be used);
- Competent persons will be selected as traffic marshals and will be trained in the correct hand signals to be used in coordinating vehicle movements, particularly for reversing operations.

31.3 Training

Employees must be given sufficient information, instruction, and training about the meaning of safety signs and signals and on relevant action that must be taken. This will be covered in the company induction process and further backed up with regular toolbox talks.

The following defines the colours of signage and the meaning of definition of the signage message in accordance with the Safety Signs and Signals Regulations and other applicable regulations.

					
SAFETY MESSAGE & INFORMATION	FIRE SAFETY MESSAGE AND INFORMATION	MANDATORY – YOU MUST	WARNING - HAZARD	PROHIBITED – DO NOT	COSHH SYMBOLS

32.0 Compliance with COSHH



With reference to Control of Substances Hazardous to Health Regulations 2002 which applies to substances which are hazardous to health except for those prescribed under legislation, we will:

- Ensure that clear instructions are given to all staff, that dangerous substances must not be used without a prior written risk assessment;
- Obtain information/data from the supplier/manufacturer as to its toxicity or potential to cause harm;
- Ensure a written assessment of the relative risks is prepared by the competent person;
- Identify the control measures for its safe use;
- Where possible eliminate its use by substituting for a less harmful substance;
- Minimise exposure to the lowest practicable level;
- Ensure exposure is below any Workplace Exposure Level (WEL) for the substance;
- Provide where necessary personal protective equipment (PPE/RPE);
- Provide health surveillance where necessary;
- Provide any necessary information instructions and training in the safe use of the substance including the use of PPE;
- Monitor working practices in the use of a substance to ensure they remain adequate and record exposure in certain cases, as necessary, to make sure that control measures are effective;
- Ensure competent supervision is provided;
- Where necessary ban smoking, eating or drinking in some areas;
- Ensure workplace exposure limits (WELs) are not above the limit. For particularly hazardous substances, the exposure will be reduced as low as possible and ensure there is no danger to health;
- Limit the number of people who might be exposed.

As each COSHH item is identified, the relevant data sheet appertaining to the COSHH item will be maintained, so that in the event of a mishap the correct First Aid treatment can be carried out and Medical Services alerted and notified.

This will be further detailed in the company specific COSHH assessments which will be made available to all end users. We will continue to monitor new identified carcinogenic classifications as further research is carried out and update our assessments as required

The assessment demonstrates that we have considered all the factors relevant to the work and that informed judgements have been made with regard to the risk, the actions necessary to achieve and maintain adequate control of the risk, the requirements for monitoring exposure to the substances and health surveillance of employees who may be at risk.

In order for the assessment to be considered suitable and adequate, the detail and expertise with which it was carried out must reflect the nature and degree of risk arising out of the work being assessed, as well as the processes complexity and variability.

32.1 Survey & Data Sheets

The first process is to survey the site for substances. When substances have been identified we must obtain the data sheets for each substance, and formally assess the use of those substances that are hazardous in use.

The Data Sheet has the following purposes:

- It acts as a formal system of approval for substances being introduced into the workplace, in that only substances which have a Data Sheet should be purchased or used;
- It provides all the information on a hazardous substance that as an employer we required to provide to our employees in a standard and rational format;
- It provides all the essential information necessary to carry out the formal assessments.

The completed sheet must be filed and be updated if and when information or alterations to the information has been provided by the supplier.

32.2 Classification of substances

Once the data sheets on substances in the workplace have been gathered, we must classify each substance that has been identified as hazardous to health under the COSHH Regulations. This is done by scrutinising the information gained on the substance, using the criteria set out below.

For the purpose of the COSHH Regulations, a hazardous substance is defined as any substance, including any mixture, which is:

- A substance listed in Part 1 of the Approved List under the Classification, Packaging and Labelling of Dangerous Substances Regulations, and for which the general nature of the risk is given as Irritant, Corrosive, Harmful, Toxic or Very Toxic. In the case of substances introduced to the work area, this information must be displayed on the labelling on the container;
- A substance which has been assigned, by the Health and Safety Executive and published in the H.S.E. Guidance Note EH40 - Workplace Exposure Limit (WEL);
- A micro-organism which creates a hazard to the health of any person; dust of any kind, when present at a substantial concentration in the air;
- A substance, other than those already given, which creates a hazard to the health of any person that, is comparable with the hazards created by those substances already mentioned.

It may be possible to reach a decision as to the hazardous nature of the substance using our existing knowledge of exposure experience, process, etc. In other cases it may be necessary to draw upon the experience of others such as a competent occupational hygienist, health adviser or toxicologist.

Once the classification of substances has been carried out, the substances identified as hazardous must be formally assessed in accordance with COSHH Regulations.

32.3 Competency to assess

The assessment must be carried out by the person with the duty delegated to them in their responsibilities. Each assessment is required to be done competently, to comply with the Regulations. Therefore, the decision as to who should carry out that assessment will depend on the knowledge and experience required for the particular assessment and the complexity of the operation and/or process.

In order to carry out a correct assessment, the assessor must have a thorough practical understanding of what occurs, or what might occur, in the workplace. Should the decision be taken to seek assistance with the assessment, then that assessment must be carried out with a combination of in-house and outside expertise.

Personnel given the task of carrying out the assessment and any works arising from it will need to be provided with the necessary facilities and authority to do so competently. They will be given sufficient time and authority to gather the necessary information, talk to the appropriate persons and to examine any records and the workplace. The assessor must have an understanding of the COSHH Regulations and their aims and must have read and understood this section of our policy.

32.4 Procedure

In order to carry out a competent assessment, the following procedure is to be followed:

- Review the information
 - ❖ A review of the information available on the operation/process/substance must be carried out. This must comprise of the Supplier's Information Data Sheets, records of any tests and examinations carried out on control measures, and the results of any exposure monitoring and health surveillance previously carried out.
- Study the operation and/or process
 - ❖ Having reviewed the information above, a close study needs to be made of the operation and/or process itself. It is important to understand exactly what happens during the operation and/or process and to ask questions of those involved.
- Evaluation of risk
 - ❖ In order to evaluate the risks to health, the following have to be considered:
 - The hazard in relation to the substance;
 - The possibility of exposure occurring;
 - The quantity to which people are likely to be exposed;
 - The likely duration of the exposure;
 - Conclusions regarding the risk.
 - The Hazard.
- The possibility of exposure -This can be broken down into four areas below:
 1. Risk of exposure. - Whether it is reasonably foreseeable that an accidental leakage, spillage or discharge of the substance could occur;
 2. Frequency of exposure. - If it is reasonably foreseeable that exposure could occur, how often is that exposure like to be. This can normally be ascertained from past experience and general knowledge;

3. People at risk. - There is a need to identify the people at risk to exposure to the substance, whether they are exposed by working directly with it, are in the vicinity of the work or areas where the substance is handled, transported, processed, collected, packaged, stored, disposed of, or discharged and is to include members of the public and other non-employees.
 4. Routes of entry into the body: - Whether the hazard of exposure is due to inhalation, swallowing, absorption through or contamination of, the skin.
- The quantity to which people are likely to be exposed
 - ❖ It is necessary to evaluate and assess the quantities to which people are likely to be exposed. The concentration of the substance can, sometimes, be evaluated with the use of indicator tubes, dust lamps, etc. However, detailed measurements may need to be carried out to confidently establish these levels. Whenever levels are monitored or measured they must always take into account the circumstances, which could be expected to give, rise to the highest levels of exposure.
 - The likely duration and concentration of the exposure must always be known precisely in any of the following situations, where:
 - ❖ Exposure routinely and frequently occurs;
 - ❖ A high level of exposure can be foreseen;
 - ❖ The substance has been assigned a Workplace Exposure Limit (WEL);
 - ❖ The substance is listed in the Code of Practice for the Control of Carcinogenic Substances;
 - ❖ The substance is known to be particularly hazardous.

Where the magnitude or significance of the exposure is uncertain, detailed measurements will normally be required to enable the requirements for the prevention or adequate control of exposure to be assessed. The likely duration of exposure can normally be ascertained from past experience and general knowledge.

Once all the information has been gathered and collated, it should be possible to reach conclusions regarding the risks to health resulting in exposure to the hazardous substance.

If it is felt that there is still insufficient information to reach reasonable and valid conclusions, then further information and advice must be sought.

See our special works procedures for risk of exposure to lead, weils and avian flu.

32.5 Exposure to diesel engine exhaust emissions at work

32.5.1 Introduction

Exposure to diesel engine exhaust emissions (DEEEs) is an increasing workplace health and safety issue and with the known health effects of exposure to DEEEs, we as an employer will take the necessary steps to reduce the risks from exposure from our company vehicle use.

DEEEs are composed of a complex mixture of gases, vapours, liquid aerosols and particulate substances, which contain products of incomplete combustion and therefore include carbon monoxide, aldehydes, nitrogen oxides, sulphur oxides, polycyclic aromatic hydrocarbons (PAHs) as well as carbon particles, nitrogen and water.

It is the fine particulate matter (PM) in DEEEs that has the greatest effect on human health. PM consists of inhalable and respirable particles from a variety of components including sulphate, nitrates, ammonia, sodium chloride, carbon particles, mineral dust and water. PM with a diameter of less than 10 microns (PM10), is capable of penetrating peoples' lungs and entering the bloodstream, causing adverse health effects, with research pointing towards the smaller particles, in particular PM less than 2.5 microns (PM2.5), as being more closely associated with adverse health effects than PM10. PM2.5 is mainly particles of elemental carbon caused by incomplete combustion of fuel, with many hazardous substances, including aldehydes, nitrogen oxides, sulphur oxides and PAHs from the combustion process absorbed onto the particles.

The composition of the DEEE can vary with the fuel type or rate of consumption, speed of engine operation, the type of engine and what it is used for.

Exhaust emissions arising from the combustion of diesel fuel in compression ignition engines includes those from motor vehicles, trains and ships and generators. Anyone who works on or adjacent to these engines is exposed. In our trade some of the potentially highest work exposures will be to vehicle drivers, forklift drivers, other heavy machinery operators, garage workers and mechanics, anyone working long periods by main roads can also be affected.

32.5.2 Health effects of DEEEs

DEEEs can cause irritation to the eyes or respiratory tract even after the exposure has ceased. These effects are generally short term. However, prolonged exposure to DEEEs can lead to coughing, chestiness and breathlessness. There are also observations supporting the hypothesis that diesel exhaust can exacerbate allergic inflammation and induce the development of allergic immune responses.

It is not known which elements of the complex mixture of gases, vapours, liquid aerosols and particulate substances are responsible for the adverse ill health effects.

There is also evidence that repeated exposure to diesel fumes increases the risk of lung cancer, therefore exhaust emissions arising from the combustion of diesel fuel in compression ignition engines (DEEEs) have been classified as a Group 1 carcinogenic to humans.

32.5.3 Key legislation applying to DEEEs

As per this section of our policy a substance hazardous to health such as DEEEs are subject to the general provisions of the Control of Substances Hazardous to Health Regulations 2002 (COSHH). COSHH requires us as an employer to ensure that the exposure of our employees to substances hazardous to health is either prevented or, where this is not reasonably practicable, adequately controlled. This involves carrying out a suitable COSHH assessment of the risks of exposure and taking steps to prevent or limit those risks.

32.5.4 Controlling exposure: specific situations

The Health and Safety Executive (HSE) recommends in INDG286 *Diesel Engine Exhaust Emissions* that we as employers make a suitable and sufficient assessment of the risks to health where there is a risk of exposure to DEEEs. This will be used to identify the necessary steps to prevent or adequately control the exposure.

Where possible the emission of DEEEs must be prevented or reduced. Advances in diesel engine technology, including application of filters, will be used to reduce particulate matter emissions, and catalytic converters to reduce gaseous emissions where possible. These techniques will significantly reduce emissions from diesel engines we use.

Indoor workplaces where DEEEs are generated, such as garages, must be kept well ventilated, e.g. by air extraction fans or by installing air vents in the walls and ceiling. Exhaust gas scavenger systems can be connected to the vehicle tailpipe when static running, particularly when working in a vehicle inspection pit. Any such engineering controls used must be properly maintained and checked regularly.

More general control measures will also be considered, such as:

1. turning off engines when not required;
2. job rotation;
3. reducing exertion and the pace of work and avoiding long periods of strenuous work (the greater the exertion, the faster the breathing and the more DEEE is delivered to the lung);
4. providing suitable personal protective equipment (although respiratory protective equipment must only be provided as a last resort when other means of control are not suitable).

Employees likely to be exposed to DEEEs must have:

5. the necessary information on the risks of exposure to DEEEs;
6. instruction and training on the safe use of the control measures and any personal protective equipment that they are using;
7. the awareness to look out for:
 - a. blue smoke, which indicates a poorly serviced and/or tuned engine or black smoke, which indicates a mechanical fault with the engine and to inform us if workplace vehicles are producing either blue or black smoke so that prompt action can be taken to correct any problem;
 - b. the presence of soot on the walls or on other surfaces in the workplace, as this is a useful indicator that DEEEs are not being adequately controlled.

32.5.5 Monitoring DEEEs

To preventing harm to health, as an employer we must first determine if a worker is exposed to hazardous levels of DEEEs. This can only be done through personal exposure monitoring.

DEEEs are complex mixtures of variable composition. There are several components of DEEEs such as nitrogen dioxide and sulphur dioxide which have WELs and could be measured. However, determining the elemental carbon concentration is considered the most appropriate monitoring method, e.g. by using a cyclone sampler with quartz filter and subsequent analysis for respirable carbon.

Although EH40/2005 Workplace Exposure Limits does not contain a WEL for elemental carbon, SOCOTEC, the provider of testing, inspection, and compliance services, recommends an exposure limit of 0.1 mg/m³ for elemental carbon. This contrasts with the 0.05 mg/m³ required by the amendment to the Carcinogens Directive.

Where a significant risk has been identified we will arrange the required personal exposure monitoring to be undertaken and review data provided.

COSHH requires that if there is a reasonable likelihood that a disease or effect may occur under the particular conditions of the work and there are valid techniques for detecting indications of the disease or effect, as employers we must ensure that our employees are under suitable health surveillance.

32.6 Legionella

This section describes the methods to prevent, or where not possible minimise, the risks to health from the Legionella family of bacteria by having in place procedures and systems to prevent the spread of the bacteria.

32.6.1 Risk assessment

Hazard identification as part of the risk assessment process will identify the need for an assessment of risk from exposure to legionella from work activities and water systems on the premises and any necessary control measures. The assessment will include identification and evaluation of potential sources of risk and:

- The particular means by which exposure to legionella is to be prevented, or
- If prevention is not reasonably practicable, the particular means by which the risk to exposure from legionella is to be controlled.

Where the assessment demonstrates that there is no reasonably foreseeable risk or that the risks are insignificant and unlikely to increase, no further assessment or measures are necessary. However, if the situation changes the assessment will require review and any necessary control measures implemented.

The assessment needs to be reviewed at least every two years or if there is reason to believe that the original assessment is no longer valid.

32.6.2 Conducting a risk assessment

A number of factors are required to create a risk of exposure to legionellosis, these include:

- The presence of legionella bacteria,
- Conditions suitable for multiplication of the organisms to high numbers e.g., suitable temperature (20°C to 50°C) and a source of nutrients e.g. sludge, scale, rust, algae and other organic matter,
- A means of creating and disseminating breathable droplets e.g. the aerosol generated by a cooling tower or shower,
- The presence of susceptible individual's e.g. heavy smokers, people with chest disorders.

The individual nature of each site and systems needs to be considered when conducting a risk assessment.

32.6.3 Control measures

The risk from exposure to will normally be controlled by implementing measures to prevent the proliferation of legionella bacteria in the system and reduce exposure to water droplets and aerosol.

Precautions will, where appropriate, include the following:

- Control of the release of water spray,
- Avoidance of water temperatures between 20°C and 50°C,
- Avoidance of water stagnation,
- Maintaining the cleanliness of the system and the water in it,
- Only utilising approved materials in the construction and maintenance of the water system,
- Implementing a suitable water treatment regime where appropriate and it is safe to do so,
- Ensuring that the system is operated correctly, safely and is kept well maintained.

32.6.4 Record keeping

To ensure that the necessary control measures continue to be applied and that adequate information is available, a record of the assessments, precautionary measures and treatments will be kept.

32.7 Blood borne viruses

This section applies to all employees who may be exposed to potential risk from any blood borne viruses during work activities.

The procedure outlines the management of risks associated with work related communicable diseases through contact with human blood and body fluids including contact with discarded used drug injecting needles.

This procedure relates to the transmission of blood borne diseases and includes:

- ensuring that equipment, etc used in the workplace will not, so far as is reasonably practicable, present a risk of cutting, abrasions or puncture wounds;
- anyone who sustains an injury that may result in bleeding must cover the wound;
- spillages of blood or body fluids must be cleared up as soon as possible by someone using disposable protective gloves;
- contaminated needles or other sharps and any waste resulting from blood, etc spillages or cleaning wounds must be disposed of safely;
- first aiders must be trained in, and be provided with the necessary equipment for, preventing contact with body fluids and sharps.

32.7.1 Risks from human blood and other body fluids

The hazards associated with exposure to communicable disease through potential contact with human blood and other body fluids through needlestick injury and/or transmission of blood borne pathogens include Hepatitis B-C & HIV/AIDS.

Any employee finding needles or syringes must contact their manager immediately and advise the location. No member of staff is to touch sharps under any circumstances. The manager should inform the site contact who should arrange for disposal.

32.7.2 Needlestick Injury or exposure to blood / body fluids

In the case of a needlestick injury or exposure to blood / body fluids, seek urgent medical attention.

Follow company procedure for reporting incidents.

Immediate action:

- make the wound bleed for a few seconds, but do not suck the wound;
- wash wound with soap and warm running water, do not scrub;
- cover the wound;
- conjunctivae (eyes), mucous membrane (mouth) must be washed well under running water report the incident to the immediate manager and ask them to complete an accident/incident form as soon as possible. The accident/incident form must note whether the injury is deep, if there was visible blood on the device causing the injury, if the injury was caused by a needle which has been placed in our vein or artery, or if there was known HIV related illness in the source.

32.8 Controlling exposure to dust

COSHH imposes a general duty on employers to reduce the risk of harm to employees, arising from exposure to excessive levels of dust. The presence of airborne dust can arise in many construction operations and in particular in association with refurbishment work on existing structures or undertaking roof works. Silica is one of the most natural substances on earth and can be found in sandstone, concrete, tiles, granite, slate, bricks/blocks, limestone and marble, which are all products that we may come across in our works.

Such operations such as cutting, grinding breaking out may also require the need for health surveillance to be in place depending on the potential level of exposure to silica dust. This must include as a minimum looking for the early detection of breathing or lung problems or persistent cough in our employees. Any such identification of health concerns, then the employee should be referred to their GP initially or we may need to arrange appointment with a suitably qualified health professional, which may include the requirement to maintain health records for 40 years. If

such an incident of exposure is reported and the diagnosis is occupational related, then we must refer to RIDDOR section on the requirements of reporting an occupational disease.

All dust fumes, mists and vapours must be considered potentially harmful, as health effects depend upon toxicity, which cannot be known until a suitable assessment has been made. Dust can enter the body by way of inhalation and ingestion and affect sensory organs such as the eyes and nose.

Risks associated with dust at work will depend upon its nature and can include:

- Poisoning;
- Irritation of eyes, or sensory membranes giving rise to coughing and sneezing;
- Respiratory difficulties and shortness of breath;
- Contracting silicosis.

All work activities will be evaluated, risk assessments undertaken as appropriate and methods of working established in accordance with applicable standards. Any form of abrasive blasting must be considered as a last resort and will require further detailed risk assessment to be completed on the selection of silica free abrasive material and ensuring wet/saturation or vacuum blasting methods may be more suitable. Any form of shot blasting must be undertaken by competent persons and may require a higher level of RPE protection for the blaster, such as an air fed blasting helmet and suitable overall protection.

We shall:

- Ensure suitable training for employees on dangers and safe working practices relating to dust, that all information and competent supervision is provided, and appropriate control procedures established;
- Confirm that employees are competent and conversant with the appropriate procedures;
- Ensure that employees are issued with the appropriate personal protective equipment and that it is properly used and maintained;
- Monitor operations and take action to prohibit activity where risk assessment/ control procedures are considered inappropriate;
- Provide suitable extraction or suppression control measures applicable to the task;
- Continue to monitor work practices when cutting, drilling breaking, crushing, using substances that contain silica exposure risk.

32.8.1 Cutting concrete blocks, paving & kerbstones with a cut off saw

This type of work can create high levels of exposure to silica dust, which can cause serious lung diseases, therefore must put in place safe controls to help reduce the risk and reduce exposure to as low as is possible.

Where possible we assess whether material can be cut off site in controlled locations or delivered ready cut for use.

If cutting is required on site we will apply the following controls:

- Ensure all workers know the risks and that the controls must be applied;
- Set up sufficient extraction system where site conditions allow, if not possible water suppression must be applied;
- Check the cutting disc is right for the work. Use a diamond blade rather than an abrasive wheel, refer to section on abrasive wheels;
- Issue and wear minimum of FFP 3 or half mask with P3 filter, ensuring a qualitative face fit has verified tight fitting to the wearer, refer to section on RPE use;
- Issue and wear suitable and sufficient PPE with particular reference to section on eye protection and on hand protection;
- Use a cut-off saw with a water suppression attachment;
- Ensure that there is enough water for the amount of work and it flows at the rate needed;
- Use a water main connection where available on site to ensure continuous suppression;
- If mains not available use a pressurised water container such as a pump up spray bottle suitably filled and maintain pressure so spray applies evenly;
- Protect water against freezing in cold weather;
- Ensure you control the slurry created by the work and do not allow to run down surface drains;
- Set up one defined area away from drains or use a tray to catch the run-off;
- Clean up as we go to avoid excessive build-up of waste;
- Hose down and wet brush at least at the end of each day;
- Ensure all persons wash their hands before eating, drinking, smoking and going to the toilet, including after going to the toilet.

All operations that may give rise to silica dust will be risk assessed and incorporated into the site-specific safe systems of work and applied accordingly.

33.0 Health Surveillance

The Managing Director will ensure that all employees are provided with appropriate health & safety surveillance regarding health and safety risks, which are identified by assessments.

This will apply:

- Where there is an identifiable disease or adverse health condition;
- When valid techniques are available to detect disease or condition;
- Where there is reasonable likelihood that the disease or condition may occur due to work conditions;
- Where surveillance is likely to further the protection of the health of the employee.

Where relevant to the work activity and risk of exposure which may require health surveillance, the regulations listed below will be adhered to:

- Confined Spaces Regulations 1997;
- Construction (Design & Management) Regulations 2015;
- Control of Asbestos Regulations 2012;
- Control of Lead at Work Regulations 2002;
- Control of Noise at Work Regulations 2005;
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended);
- Control of Vibration at Work Regulations 2005;
- Ionising Radiation Regulations 1999;
- Health & Safety (First Aid) Regulations 1981(as amended);
- Work in Compressed Air Regulations 1996;
- Management of Health and Safety at Work Regulations 1999 (as amended);
- Manual Handling Regulations 1992(as amended);
- Reporting of Injuries Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR);
- Working at Height Regulations 2005 (as amended).

As an employer, we must and will:

- Assess the risk to the health of employees and plan for its control;
- Manage the risk;
- Provide suitable equipment for our employees use;
- Maintain equipment correctly;
- Ensure employees complete medical questionnaires before undertaking hazardous tasks;
- Give employees information and training on health risks and safe use of equipment;
- Provide health surveillance of employees where risks cannot be eliminated;
- Provide reports to the relevant enforcing authority on cases of occupational diseases to our workforce as per requirements of RIDDOR;
- Consult our safety or employee representative/s on our proposals to deal with hazards.

If the risk is identified, then we will set up a health surveillance and a management programme to reduce exposure and risk, will be set up and in place. This will include education/consultation/information, reporting system and health checks carried out by a medical practitioner.

If written confirmation is received from a doctor that an employee has been diagnosed with an occupational disease, the relevant enforcing authority will be notified on Form F2508 as required by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013.

34.0 Lone Workers

Lone workers are those who work by themselves without close or direct supervision.

Lone working represents a situation where a person has neither visual nor audible communication with someone else who can summon assistance in the event of an accident, illness, or another emergency. Lone working can, therefore, include those work activities undertaken both:

- during normal working hours;
- outside normal working hours.

We recognise the importance of ensuring that all lone working activities are managed appropriately to minimise risk. The safety of employees must always be carefully considered in these situations since other colleagues are unlikely to be present to assist in an emergency. Such emergencies may arise due to fire, accidents, and unauthorised intruders.

Lone working activities should be limited to activities presenting a low risk even if control measures fail. For example, staff working alone in offices outside normal working hours are unlikely to be at significant risk provided that appropriate fire and security precautions are in place. There is no evidence that this type of lone working activity presents an unacceptable risk requiring special monitoring arrangements, any more than many other activities that individuals undertake alone outside work.

When risk assessment shows that it is not possible for the work to be done safely by a loneworker, arrangements for providing help or back-up will be put in place.

Risk assessment will help decide the right level of supervision. There are some high-risk activities where at least one other person may need to be present e.g. high risk confined space working, working at height, where a supervisor may need to be present as well as someone dedicated to the rescue role or electrical works at or near exposed live conductors where at least two people are sometimes required.

When carrying out our assessment other potential hazards that need to be looked at can include:

- Location of premises, e.g. geographical, parking, passageways, walkways, high rise blocks;
- Unfamiliarity with premises and/or location, difficulty in withdrawing;
- Unhealthy or dangerous environment / premises;
- Other unknown, aggressive, volatile persons on the premises;
- Unfamiliarity with persons concerned – suspicious persons in the vicinity;
- Time of day (darkness or daylight hours);
- Perceived as carrying valuables, equipment etc.;
- Vehicle breakdown unable to summon assistance – accident/illness;
- Unpredictable animals, e.g. dogs.

Lone workers face problems. Some of the issues which will be given special attention when planning safe working arrangements are as follows:

- Will the workplace present a special risk to the lone worker?;
- Is there a safe way in and a safe way out for one person?;
- Can any temporary necessary access equipment, e.g. ladders or trestles be safely handled by one person?;
- Can all plant, substances and goods involved be safely handled by one person?;
- Consideration will be given to work which involves lifting objects too large for one person or whether more than one person is needed to operate essential controls for the safe running of equipment;
- Is there a risk of violence?;
- Are women especially at risk if they work alone?;
- Are young workers especially at risk if they work alone?;
- Does the lone workers have any medical condition which makes them unsuitable for working alone? If necessary seek medical advice;
- Consideration will be given to both routine work and foreseeable emergencies e.g. fire, equipment failure, illness and accidents, which may impose additional physical and mental burdens on the individual.

Training will be given where there is limited supervision to control, guide and help in situations of uncertainty:

- To avoid panic reactions in unusual situations;
- To ensure they have sufficient experience to fully understand the risks entailed and precautions needed;
- To be aware of the company's limits as to what can and cannot be done while working alone;
- To ensure that employees are competent to deal with circumstances which are new, unusual or beyond the scope of training e.g. when to stop work and seek advice from a supervisor;
- How to handle aggression.

Procedures will be put in place to control the risks of solitary work and to monitor lone workers to see they remain safe:

- Risk assessment will help identify foreseeable events;
- Supervisors will periodically visit and observe people working alone;
- There will be regular contact between the lone worker and supervision using either telephone or radio;
- The use of automatic warning devices which operate if specific signals are not received periodically from the lone worker e.g. systems for security staff;
- The use of other devices designed to raise the alarm in the event of an emergency, and which are operated manually or automatically by the absence of activity;
- Emergency procedures will be established, and lone workers trained in them;
- To ensure that lone workers will be capable of responding correctly to emergencies;
- Risk assessments to ascertain if lone workers need training in first aid;
- Lone workers will have access to adequate first aid facilities and mobile workers will carry a suitable first aid kit for treating minor injuries;
- Checks will be made to ensure that a lone worker has returned to their base or home on completion of a task;
- Information and training about emergency procedures and danger areas will be given to all lone workers.

35.0 Confined Space Working

A confined space is any workplace which is enclosed or when natural ventilation is restricted. The hazards associated with working in sewers, tunnels, manholes, shafts, headings etc will therefore be considered in a wide context.

We will ensure that:

- There is always adequate ventilation;
- Atmosphere monitoring will only be carried out by a trained person;
- All operatives are made aware and are alert to the dangers that fumes from some chemicals, solvents, adhesives etc can be fatal in confined spaces;
- Entry into confined spaces will always be supervised by a competent person

A risk assessment, in writing, will have been carried out by the competent person and due note to be taken before any confined space works are initiated. We must be advised prior to any works being carried out in confined spaces i.e. low oxygen content area, or where toxic substances have been stored. If in doubt, ask the retained external Safety Advisors for advice.

A safe system of work and a Permit to Work in confined spaces will be issued by the competent person, before any works commences and induction training will be given. The hazard and risk assessment will clearly define the safe working procedures to be adopted in the confined space working area.

This legal requirement will be initiated in writing, only by the Managing Director and further reference must be made to our Special Works Procedures SWP 4.0 for specific confined space working procedures to be applied.

36.0 Display Screen Equipment

Under the Health & Safety (Display Screen Equipment) Regulations 1992 (as amended) employers have a responsibility to assess the risks of health and safety and to provide a healthy working environment for Display Screen users. To assist in this duty the Health & Safety Executive have issued further guidance for working with VDUs.

VDU assessments must be undertaken of all workstations operated by the Company. The assessment will take the form of a questionnaire, to be completed by the operator, in conjunction with an inspection of the work area and tasks carried out.

The assessment will be reviewed annually, or more regularly if circumstances dictate. In assessing workstations three major areas will be taken into consideration:

1. Ensure the correct set-up of the workstation:
 - adjustment of the chair;
 - layout of the worktop and equipment;
 - use of wrist support, footrest or document holder;
 - prevention of glare, reflections or screen inadequacies such as brightness or flicker.
2. Using the workstation:
 - Sitting in the correct position;
 - Organising the work;
 - Taking regular short breaks from display screen work;
 - Regular screen cleaning.
3. Taking care of health:
 - Using spectacles where recommended;
 - Watching for signs of ill-health or stress;
 - Encouragement of users to follow the rules

If either the results of the assessment suggest it, or an employee requests it, a suitable eye and eye test will be paid for by the company. If the test confirms that a pair of fixed focal length spectacles are required then the company will pay for them.

37.0 Manual Handling & Lifting

When a general risk assessment carried out under Reg. 3 of the Management of Health & Safety at Work Regulations 1999 identifies a risk of injury from a manual handling task, and then it is a requirement under Reg. 4 of the Manual Handling Operations Regulations 1992 to carry out a suitable & sufficient manual handling assessment.

In determining suitable protective personal equipment, account will be taken of the risks to be controlled, the characteristics of the user, the correct fit and its effectiveness in protecting the user and with reference to Manual Handling Operations Regulations 1992 (as amended) and we will apply the following:

- avoid hazardous manual handling operations where possible;
- carry out risk assessments of manual handling activities which cannot be avoided;
- use mechanical assistance where possible;
- devise methods of manual handling to reduce risk of injury as far as practicable;
- ensure suitable and adequate training is provided;
- ensure appropriate information is provided relating to articles handled;
- suitable PPE is provided where necessary;
- competent supervision is provided.

In accordance with the manual handling regulations, where possible materials will be loaded/unloaded by mechanical means i.e. forklift, Hiab, cranes. Only trained and competent operatives must operate forklifts and Hiab. When using cranes only a trained slinger and signaller must be used to sling and coordinate lifting of loads.

When the risks have been identified the control measures can be put in place and the correct method statement followed accordingly, with further reference made to SWP 15 of our Special Works Procedures.

38.0 Control of Noise

We will take all reasonable steps necessary to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum.

We also recognise that noise levels below those which cause hearing damage, in offices, for example can still cause problems such as disturbance, interference with communication and stress will take all reasonable steps to reduce noise levels as far as possible.

Whenever an employee raises a matter related to noise in the workplace as a health and safety issue, we will:

- take all necessary steps to investigate the circumstances;
- Take corrective measures where appropriate;
- Advise the employee of the actions taken.

Workplace noise levels shall be minimised by design, engineering controls at the source, and/or by documented administrative controls.

The Managing Director will also:

- Ensure that assessments are carried by a competent person;
- Keep records of such assessments until they are reviewed;
- Reduce the risk of damage to hearing from exposure to noise to the lowest practicable level;
- Provide suitable and sufficient ear protectors where exposure is 80 dB(A) and above;
- Designate ear protection zones where appropriate;
- Enforce the wearing of ear protectors where exposure is 85dB(A) and above;
- Ensure ear protection equipment is maintained in an efficient state of use;
- Provide adequate information instruction and training where there is likely exposure to noise of 80dB(A) or above or peak sound pressure 135dB, on the risks of damage to hearing arising from exposure, together with control measures to minimise risk;
- Ensure levels do not exceed 87 dB(A) or peak sound pressure 140 dB.

38.1 Practice

As a broad guideline any circumstance the necessity to speak loudly to another person two meters away indicates a potential problem. Rudimentary techniques can be utilised to identify noise hazards, and appropriate noise reduction measures must be introduced wherever these indicate a problem area.

There are four main ways of limiting noise:

1. Reduction of noise at source;
 2. Isolation of the noise at source;
 3. Ear protection for workers at risk;
 4. Reduction of time to which personnel are exposed to noise.
- Taking these individually:
1. Good maintenance lubrication and on site practices (classically the compressor whose engine cover is left loose to rattle) can achieve plant noise reductions of up to 15 dB (A) and must be part of any noise reduction plan. Reduction of noise levels associated with the interaction of the tool bit and the material being worked are much more difficult and apart from mufflers to tools where no great precision is required (pneumatic concrete breaker) is best left to the manufacturer.
 2. Isolation of the noise at source can produce benefits. It may be possible to use one of the following techniques:
 - Enclosing the noise source;
 - Enclosing the noise source and the operator;
 - Screening bystanders from the source;
 - Reducing reverberation by introducing a noise absorbent material;
 - Removing the source to another non-reverberant location.
 3. It may be possible to plan for noise control. Organising work such that the number of operatives exposed to that noise is reduced, that the operatives rotate between more and less noisy functions or that other systems of work replace the noisy process completely.
 4. Personal Protective Equipment. This is almost certainly the quickest route to noise dose reduction. As a first resort however, it is frowned upon as it is seen as a way of avoiding reducing noise levels at source. Ear protection must, both legally and sensibly, be accompanied by an information campaign and training

program for both operatives at risk and supervisory staff.

Where subsequent changes in work practices make a survey no longer valid then the above will be repeated for the new conditions that prevail. Suppliers of new machines will be requested to supply details of the expected noise levels of any new machines purchased.

38.2 Noise assessments

We shall initially aim to prevent exposure to noise at work, where this is not possible the exposure will be reduced by implementing suitable control measures.

We shall, as far as reasonably practical, take all steps to reduce noise exposure levels of employees by means other than that of personal protective equipment. This will include reducing exposure times of noise to ensure that a daily or weekly dose rate of 80 dB (A) is not exceeded. We accept that the use of hearing protection is a last resort, and we are committed to continuing to seek and introduce alternative methods for reducing noise exposure levels wherever possible in the future.

Where a noise problem is known to exist, or is suspected, then a noise assessment must be carried out. A competent person who is familiar with the operation of and evaluation of results from a noise meter must only carry out such assessments. When completed, the noise assessment sheet must be filed either with the safe system of work for that task or with the risk assessment for that task and the information passed to those who need it.

These measurements will form the basis for remedial measures when necessary. Assessments and surveys will be recorded and updated regularly, particularly when changes in working practices cause changes in noise exposure levels for employees.

Formal assessments of noise will be made if it is likely that any employee will be exposed to:

- A noise level of 80dB(A) or above.

38.3 Provision of hearing protectors

We shall provide suitable and effective hearing protection to employees working in high noise levels, as indicated to be necessary by the results of noise exposure assessments. We will also provide for the maintenance and repair or renewal of the protective equipment and provide training in the selection and fitting of protectors and details of the circumstances in which these will be used.

38.4 Hearing protection zones

We shall, where deemed necessary, designate, and clearly mark hearing protection zones, which may include particular areas, operations or pieces of equipment. All personnel entering these zones will be required to wear hearing protectors inside these zones.

38.5 Use and maintenance of noise control equipment

We shall maintain all equipment and monitor all procedures introduced for the purpose of reducing noise exposure of employees, such as enclosures, silencers, machine covers etc. All personnel will be required to use these procedures and equipment correctly and promptly report any defects or deficiencies to a responsible person.

38.6 Training

Training will be provided for employees which will consist of the following:

- The effects of noise on hearing;
- The purpose of hearing protectors;
- The advantages, disadvantages, and attenuation of various types of hearing protectors;
- Instructions on selection, fitting, use, and care of hearing protectors.

We shall provide adequate noise at work information, instruction and training for employees who are subjected to high levels of noise at work. This shall contain information on the harmful effects of noise and the precautions they will take to protect themselves. Managers and supervisors will also be given appropriate training.

38.7 Monitoring

To monitor noisy work operations, we may employ the use of a sound meter to ensure levels are not exceeding the anticipated levels provided by the manufacturer and that other environmental factors are not adding higher

noise exposures.

The user will be given an internal briefing on the correct use and how to record the data generated by the meter.

We shall monitor noise exposure and provide protection against the effects of noise exposure when the sound levels exceed those shown in below, when measured on the A scale of a standard sound level meter at slow response.

Noise monitoring will be accomplished using one of the following methods:

- Area noise level measurements will be made using a sound level meter meeting the specifications for type 2 meters contained in the relevant standard;
- Where circumstances such as high worker mobility, significant variations in sound level, or a significant component of impulse noise make area monitoring generally inappropriate, representative personal sampling will be used;
- When noise levels are determined by octave band analysis, the equivalent A-weighted sound level will also be determined.

Monitoring will be repeated whenever a change in production, process, equipment, or controls increase noise exposures to the extent that additional employees may be exposed at or above the upper exposure action value described below; or the attenuation provided by hearing protectors being used by employees may be rendered inadequate.

Instruments used to measure employee noise exposure will have been calibrated to ensure measurement accuracy.

38.8 Health surveillance

We will provide suitable health surveillance where the risk assessment indicates a risk to workers' health, i.e. a risk from exposure to noise without taking account of the noise reduction provided by hearing protection. The results of our health surveillance will enable us to check, among other things, whether our hearing protection programme has prevented hearing damage.

There is strong evidence to show that regular exposure above the upper exposure action values can pose a risk to health. We will therefore provide health surveillance to workers regularly exposed above the upper exposure action values. Where exposure is between the lower and upper exposure action values, where employees are only occasionally exposed above the upper exposure action values, we will provide health surveillance if we find out that an individual may be particularly sensitive to noise. This may be from past medical history, audiometric test results from previous jobs, other independent assessments of a history of exposure to noise levels exceeding the upper exposure action values.

38.9 Exposure reduction

When employee's exposure exceeds that listed below, feasible administrative or engineering controls will be utilised.

If such controls fail to reduce exposure to within the levels below, personal protective equipment will be provided and used to reduce exposures to within the levels of the table.

For all employees exposed to noise at or above the lower exposure action value we shall:

- make hearing protectors available at no cost to the employee. hearing protectors will be replaced at no cost as necessary;
- ensure that hearing protectors are worn;
- provide a variety of suitable hearing protectors from which to select.

The Control of Noise at Work Regulations defines three noise action levels:

- the lower exposure action values, a daily or weekly personal noise exposure of 80 db(a) and a peak sound pressure of 135 db;
- the upper exposure action values, a daily or weekly personal noise exposure of 85 db(a) and a peak sound pressure of 137 db;
- the exposure limit values are, a daily or weekly personal noise exposure of 87 db(a) and a peak sound pressure of 140 db. overall level that may be determined using the 'c' weighting filter of a peak-detecting sound level meter

As the employer we are required to take action to protect the hearing of our employees who are subject to daily personal noise exposures at, or in excess of, the action levels. The action to be taken is specified in the Control of Noise at Work Regulations.

39.0 Control of Visitors

We will exercise a duty of care to those persons not in our employment, which may be affected by our activities and will ensure all visitors:

- Report to reception or office before accessing any site;
- Register their arrival and departure time;
- Are informed of any hazards or risks to which they may be exposed and of control measures in place to ensure their health and safety;
- Are advised of the emergency evacuation procedures and the exit and assembly points;
- Are escorted by a competent member of staff;
- Wearing personal protective equipment, where necessary

All measures will be taken, as far as reasonably practicable, to prevent children from accessing our sites and being exposed to hazardous situations and will include:

- Ensuring the provision of a secure perimeter fence 2 metres in height;
- Access and egress secure against unauthorised entry;
- Materials being stacked safely and securely;
- Suitable and easily understood notices being prominently displayed;
- Excavations/opening securely fenced off;
- Access to scaffolding etc being removed or made safely unusable while our sites are unoccupied;
- Power supplies being isolated or made dead during non-working hours;
- Machines will be left safe and inoperable during non-working hours;
- Harmful substances will be securely locked away.

40.0 Control of Vibration

As required by the Control of Vibration at Work Regulations 2005 we are required to assess all equipment provided to our employees and temporary workers, to ensure that they are not subjected to unacceptable levels of vibration.

Hand arm vibration syndrome (HAVS) is a range of disorders caused by being exposed to high levels of vibration. This can happen when using:

- Handheld power tools;
- Vibrating equipment that is guided by hand;
- Materials that vibrate as they are being processed.

HAVS can cause pain, tingling and numbness and loss of strength in the hands, wrists and arms. It can also reduce the ability to handle things and work with the hands. Hand transmitted vibration can damage blood vessels, nerves, muscles, and bones. Injuries caused by HAVs may never go away.

As we undertake some of our works using various handheld tools, we must request the vibration level of the tool and calculate the amount of time that can be spent using the tool or equipment, as this can have an effect on the risk of developing HAVS.

Further reference must be made to section SWP 2 of our Special Works Procedures on the safe use and calculating on site using the ready reckoner where required for hired in plant or using 2 different types of vibrating equipment on the same day.

To help prevent against HAVs the following points will be taken into consideration:

- Ascertain if the job can be done in a different way without using vibration tools;
- If vibration tool has to be used use a low vibration tool;
- Always use the right tool for the job;
- Check tools before using them to ensure they have been properly maintained and repaired to avoid vibration caused by faults and general wear;
- Ensure cutting tools are kept sharp;
- Reduce the amount of time of using the tool in one go, by doing alternative jobs in between;
- Avoid gripping or forcing tools more than necessary;
- Store tools correctly so that they do not have cold handles when next used

As an employer, we must:

- Assess the risk to the health of employees and plan for its control;
- Manage the risk and keep levels of exposure below 2.5 m/s^2 as far as is reasonably practicable;
- Provide suitable equipment for employees use;
- Maintain equipment correctly;
- Give employees information and training on health risks and safe use of equipment;
- Assess the need to provide health surveillance where employees are exposed to levels above the EAV;
- Provide reports to the relevant enforcing authority on cases of HAVs in your workforce;
- Consult their safety or employee representative on your proposals to deal with vibration hazards.

Our HAVS management programme is produced to reduce exposure level to our employees below the EAV by calculating the vibration magnitude and defining the times with the uncertainty K rating included and showing the times within the site-specific plan of works.

This will include education/consultation/information, reporting system and recording of exposure records on site to ensure levels are not being exceeded.

For whole body vibration, which is not seen as a risk for our works as we do not undertake work activities sitting on plant and equipment, will be reassessed if circumstances change in the future.

If written confirmation is received from a doctor that an employee has hand arm vibration syndrome, the relevant enforcing authority will be notified on Form F2508 as required by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013. We will then proceed to identify whether there have been factors caused during our employment and investigate and review our working procedures accordingly.

41.0 Provision & Use of Work Equipment

The Managing Director will work within the Provision and Use of Work Equipment Regulations 1998 (as amended) and will:

- Take account of work conditions and hazards when choosing equipment;
- Ensure that the equipment is suitable for its intended use;
- Make sure that it is maintained in good safe working order;
- Make regular inspections of equipment and complete a register;
- Provide adequate information instruction and training to the user of the equipment;
- Ensure that any supervisor receives appropriate information instruction and training in the correct use of the equipment;
- Provide personal protective equipment where necessary;
- Ensure that all hired in equipment has up to date inspection/maintenance records and all users have been adequately trained.

All plant and equipment will be maintained in accordance with our planned preventative maintenance programme. Inspections will be carried out by the operator prior to work each day and these inspections will be recorded.

There will be a system installed to ensure that no plant or machinery can be started up by unauthorised persons, as all keys will be issued to and signed for, by only the qualified plant operative to ensure lock out to an unauthorised person.

All relevant health and safety information and written instructions on the use of work equipment must be made available to the workforce at all levels. The information and written instructions must cover all the health and safety aspects of use that are likely to arise and any limitations on these uses, together with any foreseeable difficulties that could arise and the methods to deal with them.

Information can be verbal or in writing, but whichever method is chosen, the employer must ensure that it and the written instructions are easily understood by the workforce.

Adequate training in the use of work equipment must be given both to "users" and to their supervisors and managers. As Employers we must assess what training is adequate.

Further reference must be made to SWP 15.0 of our Special Work Procedures.

42.0 Lifting Operations

All lifting operations must be carried out in accordance with the Lifting Operations and Lifting Equipment Regulations 1998 with further reference made to section SWP 8 of our Special Works Procedures.

When requested to be involved in lifting operations we will ensure that competent contractors have been appointed, with the correct training and certification to undertake the works. We will request a copy of their lifting plan to ensure that the task has been properly assessed and that all lifting operations will be supervised by a competent and trained Lift Supervisor working to the instructions of the Lifting Plan. They will be required to undertake all required inspections of accessories and equipment and ensure the relevant paperwork is maintained. We may request copies of paperwork for inspection prior to undertaking the works, which they must make available.

If our site supervisor feels at any time that the appointed contractor may be working unsafely, as per our worksafe policy he may request the works to stop and report any concerns immediately to the relevant director for the project.

Our employees are not trained to undertake lifting operations and must not get involved in the works, this includes signalling and slinging of any form of loads. If works change on site, then report back to the office for further instruction. Do not attempt to undertake any task you are not trained to do.

43.0 Traffic Routes & Transport

43.1 Pedestrians



All traffic routes must ensure the separation, so far as is reasonably practicable of pedestrians from any work area, particularly where dangerous machinery is in use.

This may be achieved by the positioning of physical barriers or by the distinctive marking of safe routes using reflective tape or some similar means.

Arrangements for each site must be defined on the site-specific safe system of work and all persons made suitably aware of the requirements to be applied.

43.2 Vehicles

Vehicular traffic and pedestrians must be kept apart, as far as is reasonably practicable, and distinctive pedestrian routes must be marked. Traffic signs must be distinctive, legible and illuminated at night.

All plant to be operated and driven by qualified operatives only.

Pedestrians and vehicles must be segregated when operating plant and moving vehicles, particular site visitors must be segregated away from our working areas.

All vehicles, unless they are not required to travel on public roads, shall be taxed and registered in accordance with the Road Vehicles (Registration and Licensing) Regulations.

Where it is intended to use company vehicles on the public highway they shall be inspected and tested. All vehicles shall have a current MOT certificate.

The driver should satisfy him/herself that the vehicle is registered (has a number plate), tax disc, insurance, lights, horn and mirror. Site vehicles shall be fitted with lights, horns and mirrors.

All vehicles leaving our site must have clean wheels before proceeding onto the public highway.

All persons driving vehicles in the employment of this company must be:

- Over 21 years old, unless under training and direct supervision;
- In possession of a current driving license;
- And, where applicable, unless under training and direct supervision, hold a relevant Certificate of Training Achievement for that particular piece of equipment.

Only persons authorised to do so are to operate any form of transport.

Drivers and those who load the vehicles, must ensure that their vehicles are correctly loaded, do not exceed their capacity and that the loads are secure.

All drivers must be in possession of the correct personal protective equipment (e.g. hard hat), and these shall be worn at all times on site as required.

43.3 Tidiness

Roads, toilets, mess rooms, stores and all pathways will be kept clean and tidy. Tools and equipment must be replaced to the correct storage area when finished with.

Passageways and/or working platforms must not be obstructed to prevent safe access or present a trip hazard. Correct litter and rubbish skips will be used for different grades of waste materials and disposed of correctly.

All walkways will be kept clear at all times.

The work areas will be tidied and cleaned up at the end of each working day.

Equipment and supplies will be stored tidily and properly when not in use.

43.4 Workplace conditions

Where practicable, workplace roads shall be level, provide a good surface for traction and be planned to avoid overhead obstructions and underground services. Where possible a one-way system shall be instigated. If it is not possible to separate pedestrians and traffic then a system such as stop/go boards or traffic lights shall be used to ensure the safety of all. Pedestrians shall take precedence at all times.

A maximum speed limit will be established on site and shall not exceed 10 mph. Where there is a requirement to cross the public highway a traffic management system shall be used, such as traffic lights or a trained person directing traffic.

Where slopes are present on the site, the angle shall be established to ensure that vehicular access is safe. Where the slope is too great to be safe for vehicles, signs and, where practicable, barriers shall be erected.

43.5 Overhead lines

All overhead services shall be identified, marked, and protected and included in our safe system of work when operating on our site, any external contractors attending site will be made aware of locations.

When working at height overhead lines near our works must be identified and safe working distance requested from the local electricity board.

43.6 Repair and maintenance

All transport shall be maintained strictly in accordance with the manufacturer's instructions.

All vehicles shall be checked, whilst being serviced, to ensure that all components are sound in addition to the normal service checks.

43.7 Loading / unloading

Vehicles shall not be overloaded, and the loads are to be evenly distributed, secured and not project beyond the sides and rear of the vehicle. Where a long load has to project over the rear of a vehicle, that load shall be marked in a manner clearly identifiable to following vehicles and pedestrians.

Where the vehicle is being loaded by mechanical means the driver must leave the vehicle and take up a safe position unless he is in a protected cab.

During unloading, ropes and other load fixing devices must be removed with care to ensure that the load does not slip and cause injury to persons or damage to the load.

43.8 Towing

When required to tow, the driver must ensure that the vehicle is suitable to tow the trailer or plant and that the correct towing attachments are used.

The driver must have the correct category for towing on their licence, if they don't have it, they must not tow. A full car licence already lets you tow trailers weighing no more than 750 kg. You can also tow heavier trailers with a car as long as the total weight of vehicle and trailer isn't more than 3,500 kg.

If the driver passed their driving test before January 1997 then they may automatically be able to drive vehicles weighing up to 7.5 tonnes (the categories on the back of your driving licence will clarify this). If they passed their driving test after that date, they need to pass a further test to be able to drive vehicles over 3.5 tonnes.

If the driver is required to tow a trailer weighing more than 750 kilograms when the combined weight of the towing vehicle and trailer is more than 3,500 kilograms they will have to have passed a further test in category B+E, which would be shown on the back of the licence. They will then be able to tow trailers up to 3,500 kilograms. To pull a heavier trailer they must have passed a C1E test.

Conventional vans with a Gross Vehicle Weight of up to 3.5 tonnes are allowed to tow trailers up to seven metres long and 2.55 metres wide, so we will need a heavier vehicle and an appropriate licence if we need to tow anything larger than that.

Correct checks must be done on the item to be towed to ensure it is connected in accordance with instructions provided.

Lifting gear must not be used for towing. Only ropes and chains designated for towing must be used and the following precautions are to be followed:

- The safe working load of the rope or chain is not to be exceeded;
- Ropes attached to coupling points shall be provided with eyes fitted with thimbles;
- The rope or chain shall be securely attached to the coupling points and shall be as low as possible;
- The towing vehicle shall be provided with sufficient protection to ensure that the driver is not struck by the rope or chain should it break;
- All personnel shall keep clear of the rope or chain, and no one shall be permitted to stand in the path of a rope or chain under strain.

43.9 Drivers rules

As well as applying the defined roles and responsibilities for company drivers, the following also apply:

- Check the water, oil, fuel, lights, tyre pressure, brakes, steering and hydraulics daily;
- Ensure the vehicle is not overloaded;
- Ensure that starting handle shafts, drive shafts, belts, worm drives and flywheels are guarded;
- Report any defects immediately, do not use the vehicle if you consider it unsafe;
- Keep vehicle tidy, free from waste, tools, etc;
- Do not carry passengers, other than in the seats provided;
- Do not attempt to mount or leave a moving vehicle, or permit passengers to do so;
- Do not make adjustments with the engine running;
- Never leave the machine with the engine running;
- Never reverse without checking that it is safe to do so and with a traffic Marshal in attendance;
- Do not speed;
- Keep the machine in low gear when travelling downhill;
- Set the gear to neutral before starting the machine;
- Do not smoke during refuelling;
- Do not use petrol for cleaning purposes;
- Before tipping loads into excavations ensure that there is an adequate stop and that no one is working in the vicinity of the tip area.

43.10 Tiredness

Driving when tired can kill and many more are seriously injured where a driver has fallen asleep at the wheel. If you find yourself fighting to stay awake in a warm vehicle by having a window open and radio on, you may still nod off for a few seconds. If you were doing 70 mph on a motorway you would have travelled an eighth of a mile in a couple of seconds.

These arrangements have been put together to highlight to employees that driving when tired will risk killing themselves, their passengers, and other innocent victims.

The body clock winds down at certain times, driving between midnight and 6am, or 2pm to 4pm are particularly risky. Most men under 30 are most likely to fall asleep at the wheel in the early hours of the morning. Micro sleeps can be very fatal, a brief doze that can last between 2 and 30 seconds when you are tired but trying to stay awake. We will warn all our drivers about the risks of driving for too long or when they're tired, and to encourage them to plan their journey by following these tips:

- Never start a long trip if you're already tired;
- Avoid driving for long distances after a long day's work;
- Don't drive after you have been drinking;
- Don't drive if you are taking medicines that may cause drowsiness;
- Try to avoid making long trips between midnight and 6 am;
- Try to get a good night's sleep before starting a long journey.

Find a safe place to stop (not the hard shoulder) if you feel drowsy. On Britain's motorways you are never more than 5 miles from an exit or service station. Stop for a 15-minute break every 2 hours when on a long journey.

Drink 2 cups of coffee or a high caffeine drink and take a 15 minutes nap to allow caffeine to take effect. (If you have intolerance to caffeine a nap will be sufficient)

Opening a window or turning the radio up will do little to prevent you from falling asleep.

Shared driving must be adopted where possible.

Research has shown that drivers do not fall asleep without warning or prior sleepiness, if symptoms of tired begin to show, act before it is too late.

43.11 Drug driving

We realise the importance of having safe and competent drivers in control of their vehicles, therefore all company drivers must not drive any company vehicle under the influence of drugs whether illegal or prescribed medicines. It is just as dangerous as driving when drunk and is also against the law.

Drugs can affect your driving by causing:

- Slower reaction times;
- Poor concentration;
- Sleepiness/fatigue;
- Confused thinking;
- Over confidence;
- Impaired co-ordination;
- Nausea;
- Hallucinations;
- Dizziness;
- Cramps.

We operate a zero-tolerance policy on employees who use drugs whilst driving a company vehicle. Disciplinary procedures will be taken if employees are caught using drugs whilst driving a company vehicle or at any time when at work.

Drivers of company vehicles, who have been prescribed medicines that will affect their ability to drive, must notify the office so that additional arrangements can be made.

43.12 Mobile Phones

We realise the importance of obeying the Highway Code and the relevant legislation concerning the use of mobile phones whilst driving. These arrangements have been put together to notify our employees of the company procedures to be followed.

The use of hand-held phones and other similar devices when driving is illegal.

Drivers will still risk prosecution whilst using hand free devices for failure to have proper control of the vehicle.

The penalties are:

- Driving whilst using a hand-held mobile phone;
- Causing or permitting another person to drive while using a hand-held mobile phone;
- Driving a vehicle in a position, which does not give proper control or a full view of the road and traffic ahead. This offence can be used where a driver has been distracted by a hands-free phone, or has driven poorly by eating a sandwich;
- Causing or permitting another person to drive while in a position, which does not give proper control or a full view of the road and traffic ahead.

A hand-held phone is classed as a device that is or must be held at some point during the making or receiving of calls. The receiving and sending of text messages, still or moving images and the accessing of the internet are also a breach of the regulations.

The use of hands-free devices are not covered by this regulation however they are still classed as distracting and you can still be prosecuted for not having proper control of the vehicle under regulation 104 of the Road Vehicles (Control and Use) Regulations 1986.

If there has been any traffic incident whilst using a hand-held phone or similar device then a charge of careless driving may be used.

Under no circumstances must a phone be cradled between the ear and shoulder whilst making or receiving a call. Proper control of the vehicle must be exercised at all times.

Phones do not need to be turned off whilst driving; a passenger will be able to answer phone for the driver. If the driver is on his own, then let it ring off and return call when parked in safe manner or when on site. Voicemail can

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also be turned on prior to setting out on journey.

In the regulations driving also includes when stationary in traffic or hold ups, when the vehicle is expected to move off after a short while. If in a major traffic jam, when you are not expected to move for some time, then phones are considered safe to use if engine has been switched off.

The only exemptions to the rule are for calls to 999(112) in a genuine emergency when it is either unsafe or impractical to stop.

The regulations apply to anyone who causes or permits any other to use a hand-held mobile phone whilst driving. Employers would not be held liable for telephoning an employee whilst driving, although employers will be held liable if they require employees to use a hand-held phone.

Therefore, we do not require our drivers to answer a hand-held phone whilst they are in control of a company vehicle.

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44.0 Asbestos

We will provide a safe system of work to ensure that asbestos removal works are carried out in accordance with current legislation and guidance notes; and without endangering the health and safety of any persons directly or indirectly concerned with the work and any others who may be affected by the works being undertaken.

We are fully aware of the type of asbestos works to avoid, these being hot works, dry stripping, use of power tools, use of dry ice and if the works have not been notified correctly.

Our policy is designed to work alongside our Asbestos Work Procedures for all asbestos works, where further reference on removal techniques can be found in section 10 and sections 16-24. A full run down of our company check sheets and forms is available in our document file, with risk and COSHH assessments maintained in their own files for easy reference.

All persons working with asbestos materials will be supervised to ensure compliance with safety regulations and they will be made aware of known hazards, necessary measures to eliminate risks, relevant training and proficiency and safe use and maintenance of equipment.

44.1 Legislation

Compliance with the relevant statutory Regulations, Codes of Practice and Guidance will be adhered to at all times during our works. Information will be adhered to ensure compliance with the following:

- The CDM Regulations 2015;
- Control of Asbestos Regulations 2012;
- Control of Waste Regulations 1992 (as amended);
- Hazardous Waste Regulations 2005 (as amended);
- Health & Safety at Work Act 1974;
- Environmental Protection Act 1990;
- Control of Substances Hazardous to Health Amendment Regulations 2002 (COSHH);
- HSG 247 Asbestos: The Licensed Contractors' Guide;
- HSG 248 Asbestos: The Analyst Guide to Sampling Analysis and Clearance Procedures;
- HSG 53 Respiratory Protection at Work - Practical Guide Fourth Edition;
- L143 Second Edition Managing and Working with Materials that contain asbestos;
- HSG 264 Asbestos Surveyors Guide.

More detailed information on all relevant legislation can be found in appendix 8 of our Asbestos Work Procedures.

44.2 New Employees & Employee Involvement

All new employees will be required to complete the employee recruitment forms, which will include employee medical history, induction sheet and PPE issue. New employees will include returning employees who have been away from the company for any duration and will be included in the reassessment process.

All new employees will be assessed prior to working site by our training needs analysis questionnaire to measure their general understanding of asbestos and the works that they will be undertaking, the Operations Manager will mark the questions and score accordingly to identify any areas that may need further instruction before putting them to work. When signed off they will continue to be monitored by the site supervisor of the first site that they work on to obtain further feedback on their standard of works.

Due to the nature of our works, the hazardous materials that we deal with and the complexity of some of our contracts we will require some element of worker involvement. Based on the size of contracts we will request the site supervisor who will be running the contract to attend site to assist with assessment of the works. This will include discussing the proposed working methods that will be applied and actively encouraging them to raise any health and safety concerns that they may see with regards to the works.

Worker involvement will be encouraged on a continuous basis with our open-door policy to always be available to discuss any health and safety concerns that any employee may have. Regular toolbox talks will include requesting any feedback on the topic covered or any other concerns that they may have.

We do not have a formal safety committee or representative as we openly always consult with all employees .

To further involve our employees, we will undertake monthly supervisor meetings that must be attended as far as possible, but they must not miss more than 2 in a row. Therefore, dates will be coordinated at suitable intervals to

ensure the best attendance. These will be recorded meetings by way of minutes of points raised, topics discussed and areas that may require further discussion at the monthly main meetings to be held with the directors in attendance. We will also hold operative meetings at least twice yearly to ensure operatives are actively involved and able to raise any points that they feel is relevant to the day to day running of the company. To ensure the best meetings operatives must not attend the supervisors meeting and the supervisors must not attend the operatives meeting.

If there are any repeat non-attendances recorded, then action.

44.3 Control Limits

A single control limit of 0.1 fibres per centimetre cubed (f/cm^3) for work with all types of asbestos over a 4-hour period, with an implementation of exposure of Sporadic and of Low Intensity, which cannot be considered if the concentration of asbestos in the atmosphere is liable to exceed 0.6 f/cm^3 of air over 10 minutes in any working day. Further details are defined within our Asbestos Work Procedures.

44.4 Training/Medicals/TNAs

The information, instruction and training shall be given to all employees with a different level of training given to operatives, supervisors and managers depending on their responsibilities. Further information on training requirements can be found in section 2.0 of our Asbestos Work Procedures.

All persons must be in possession of a current HSE Medical and a suitable face fit for the type of respirator being used. The original or a certified copy of the face fit and HSE medical (green document) must be available for inspection before being allowed to work, if copies these must be checked and verified.

All personnel who are likely to encounter asbestos during their routine duties will be medically examined by an EMAS approved medical practitioner for all licensed works. These medicals will be carried out at least every two years and all details will be recorded and monitored.

All employees will require training needs analysis to be undertaken on a regular basis over and above their annual refresher training, this will include monitoring their works on site.

All new employees will complete our questionnaire forms relevant to their attended position in the company to assist in identifying any areas that we need to cover retraining or information on our company specific procedures. This will be included as part of their company induction process.

To assist in training needs analysis on site, we will use our TNA form to go out and assess individuals work to ensure that high standards are being maintained. The directors will be used to assess supervisors, and the supervisors to assess the operatives and temporary workers. They will need to assess for competency in undertaking their works to the standards defined within our asbestos work procedures and that the works are being carried out in accordance with the site-specific plan of works.

These will be carried out at least 4 monthly and records fed back to the next applicable monthly meeting to identify any issues or concerns raised. If gaps in training are identified they will be referred as required to ensure additional instruction is given either by internal toolbox talks or external training providers.

The training needs analysis questionnaire will be changed on an annual basis to rotate different questions and ensure that employees are assessed on a various array of different topics throughout employment.

44.5 Face Fits

HSG 247 Asbestos; The Licensed Contractors' Guide and HSG 53 Respiratory Protective Equipment at Work indicates that quantitative fit tests must be carried out to ensure that the face piece can provide adequate protection for the wearer. Face fit tests identify those wearers as being suitable for the type respirator that they are fitted for.

Those who cannot obtain an adequate fit i.e. those who have beards, are not clean shaven or have injuries to their face or other facial disfigurements must not be allowed to enter a work area that may have a level of asbestos fibres above the current control limit.

We are fully aware that just one minute particle entering the respiratory system may be sufficient to trigger any of the diseases associated with exposure to asbestos in those who are susceptible as such face fits will be carried out on a 1 yearly basis as per our asbestos work procedures by a qualified external specialist company.

A new face fit will be required if there are any major facial changes, this can include dental work, weight loss, weight gain or changes to the facial structure due to accident or injury.

Originals or certified copies of each operatives face fit tests will be kept in their training records and will be available for inspection on site. Any new starters will be verified by the Administration and checks on certification carried out by phoning companies who have provided certification for clarification of its authenticity. These will then be stamped with the date of check.

Photocopies of certification that are taken to site will be stamped by the office to verify that they are legitimate copies taken of the originals, originals will be held in the office files.

44.6 Notification

Notification of works will be undertaken by the Managing Director and Special Projects Director as defined in their roles and responsibilities. The online ASB 5 / ASBNNLW1 will be used to denote the required authority for the notification and the completed form submitted prior to commencing works.

44.7 PPE/RPE

It is our statutory duty to provide appropriate protective clothing and respiratory equipment as defined in the Control of Asbestos Regulations 2012.

Personal Protective clothing for Asbestos Removal operatives will consist of the following as a minimum:

- General Work coveralls type 5/6 category 3;
- Disposable Asbestos working coverall type 5/6 category 3;
- Disposable transit coverall type 5/6 category 3, Note: All overalls are complete with hood, elasticated cuffs and ankles, and are to have no pockets;
- Coveralls to be colour coded as detailed in our procedures;
- Underwear including socks. (Disposable only, when applicable);
- Industrial Safety Footwear (Rubber boots or overboots);
- RPE suitable for the task in hand.

Other PPE such as safety goggles/glasses, hearing protection, personal fall protective equipment, burning overalls/gauntlets/goggles, will be supplied as per the site-specific risk assessment, and supplied by us to all employees.

An audit checklist will be completed daily by the competent person to ensure that all respirators are in good condition and serviceable. Visual Inspections to check the condition of the components etc of the respirator will also be made monthly and recorded. All respirators will be serviced and checked, and machine tested every 6 months and the findings recorded. Further information on our company requirements with regards to RPE can be found in section 7 of our Asbestos Work Procedures.

Before carrying out any work which would release asbestos, the following procedures must be followed, in accordance with HSE HSG 247 Asbestos: Licensed Contractors Guide, which will ensure that, those carrying out the work:

- Do not contaminate their personal clothing – only special protective disposable clothing must be worn;
- Do not inhale any asbestos fibres – only their own approved respirators will be worn (for which they have had a face fit) Fully decontaminate at the end of each working session – so that there are no asbestos fibres present which could contaminate their personal clothes/belongings;
- All PPE will be provided in accordance with section 8 and RPE section 7 of our Asbestos Work Procedures.

All overalls, undergarments and towels will be disposable, and a suitable stock provided to carry out the works.

44.8 Risk assessment and Plan of Works

The Control of Asbestos Regulations 2012 regulation 6 and 7 requires that, prior to any work being commenced with asbestos, a written risk assessment and plan of works will be carried out and a copy kept on site. The site-specific plan of works must be read and understood by all persons involved in the works and sign accordingly.

The plan of works will be drawn up in accordance with HSE memo 04/12 will always be referred to, to ensure compliance. Specific site plans will be drawn up to detail the site set up, photos will be included where possible to aid in a better understanding of the works and site set up.

44.9 Air Monitoring Strategy

Personal air monitoring will be monitored by our Asbestos Site Management Database system to ensure that a representative sample of our works are undertaken. We will use the data base system to ensure that we get a representative spread of both employees and ACMs that we work on mainly focusing on AIB, asbestos insulation and sprayed coatings. The personal monitoring inside the removal area whilst will are stripping is to ascertain whether or not the respirators being used by our employees is giving the sufficient protection against the fibre concentrations being produced and that the work method is acceptable to continue

All corresponding data is to be uploaded on to the system and monitored by the Operations Manager to ensure that employee's exposures are not reaching elevated levels. Any elevated levels identified will be assessed to identify any issues that need to be discussed. The database system will include a red flag alert on any figures entered that are above 0.1 f/cm³. This is to highlight whether there has been a data input error or whether the recorded result is high and needs to be discussed at the next monthly meeting.

The general results of air monitoring will be discussed at our monthly safety meetings with all relevant persons in attendance to discuss any gaps in reaching our targets, looking at future contracts and what materials are being removed to ensure that arrangements can be made to book in further personal air monitoring as required. Our targets as set below are to be monitored closely and percentage readings are shown on the database system.

Material to be monitored	Target percentage	Comments
Asbestos insulating board	20% over the course of a licence year	<p>A representative selection of different uses of AIB to be selected from:</p> <ul style="list-style-type: none"> ▪ ceiling tile removal of different size; ▪ wall panel removal of different size works; ▪ fire break removal above ceiling voids; ▪ riser panel removal in tight working areas; ▪ lift plant room removal; ▪ boiler room removal taking account of different temperature working; ▪ debris removal damaged by others; ▪ underground duct removal; ▪ soil excavation works where AIB identified; ▪ Other form identified site specific use that is not listed. <p>A representative sample of different removal techniques from:</p> <ul style="list-style-type: none"> ▪ spray and remove; ▪ shadow vac on screw removal; ▪ nail fixing removal; ▪ soffit board removal where partial enclosure used; ▪ soffit board removal where full enclosure used; ▪ combination of different methods.
Asbestos insulation	20% over the course of a licence year	<p>A representative selection of different uses of insulation from:</p> <ul style="list-style-type: none"> ▪ hardset lagging of different thicknesses; ▪ bitumen and/or chicken wire wrapped lagging; ▪ bandage wrapping to pipework; ▪ rope wrapping to pipework; ▪ loose debris disturbed by others; ▪ boiler casing included card board insulation; ▪ underground ducts for pipework and/or debris; ▪ soil excavation works where insulation identified; ▪ Other form identified site specific use that is not listed. <p>A representative sample of different removal techniques from:</p> <ul style="list-style-type: none"> ▪ wrap and cut of obsolete pipework/equipment; ▪ wet strip injection using safestrip red box; ▪ wet strip injection using envirovac yellow box;

		<ul style="list-style-type: none"> ▪ spray and remove for thickness less than 1cm where injection is not suitable.
Sprayed coating	100% over the course of a licence year	All forms of identified spray coating work to receive personal monitoring at different stages of the main works. This includes residue scrapes using spray and remove and/or shadow vac, to full injection system use for wet strip to any form above 1cm in thickness.

All air monitoring must be carried out by an independent UKAS accredited analytical company. We will recommend that the client appoint their own analysis, or we will provide contact details for our pre-approved analytical companies and they can choose.

Other types of air monitoring that will be undertaken to monitor the works will include the following and will be indicated within the site-specific plan of works where applicable:

- Outside the removal area whilst stripping to check the integrity of the enclosure as required;
- During remedial repair works as required;
- Close to NPU exhaust vent if not possible to vent externally;
- Inside the removal area after stripping and decontamination has been completed for clearance purposes as per the 4-stage clearance requirements of CAR 2012;
- After the removal of the enclosure for reassurance purposes as requested site specific by the client and/or onsite representative;
- Background samples may also be taken before any work commences to establish the ambient fibre count in the vicinity of the proposed work area.

All records of personal monitoring and exposure records uploaded on to the database system will be maintained as part of our 40-year storage requirements using our external server to ensure all records are backed up in a secondary location. All other forms of air monitoring will be stored for 5 years.

44.10 Audit strategy

Audits will be monitored by our database system to ensure that a representative sample of audits are undertaken to ensure all site supervisors are covered at various intervals, ensuring that different types of materials are covered and that a record can be maintained for future reference. This will assist in monitoring that we reach the required targets as set out below for our licensed works.

Material to be removed	Internal audit frequency to be reached in annual licence period	External audit frequency to be reached in annual licence period	Comments
AIB	20%	1 in 15 jobs	A representative selection of different types of AIB jobs to be selected from: <ul style="list-style-type: none"> ▪ ceiling tile removal; ▪ wall panel removal; ▪ fire break removal; ▪ riser panel removal; ▪ lift plant room removal; ▪ boiler room removal taking account of different temperature working; ▪ debris removal damaged by others; ▪ underground duct removal; ▪ soil excavation works where AIB identified; ▪ works within school or hospital; ▪ Other sites due to unusual circumstances identified.
Asbestos insulation	20%	1 in 15 jobs	A representative selection of different types of insulation jobs to be selected from: <ul style="list-style-type: none"> ▪ hardset lagging of different thicknesses; ▪ bitumen and/or chicken wire wrapped lagging; ▪ bandage wrapping to pipework;

			<ul style="list-style-type: none"> ▪ rope wrapping to pipework; ▪ boiler room works; ▪ underground ducts requiring full confined space procedures; ▪ soil excavation works where insulation identified; ▪ works within school or hospital; ▪ Other sites due to unusual circumstances identified.
Sprayed coating	100%	All jobs	As defined all levels of sprayed coating works require both internal and external audits to be completed on all forms of removal from residue to full thickness injection removal.
Combination of AIB and insulation on the same job	25%	1 in 10	As per AIB and insulation removal combined.
Combination of AIB and sprayed coating on the same job	100%	All jobs	As per sprayed coating.
Combination of insulation and sprayed coating on the same job	100%	All jobs	As per sprayed coating.
Combination of all 3 types of material on the same job	100%	All jobs	As per sprayed coating.

As per above audit strategy we will also ensure frequency of supervisor auditing is maintained when selecting the different contracts to visit to ensure that the frequency is maintained as below, so that all supervisors are covered at suitable intervals:

Level of supervisor	Internal at least	External at least	Comments
More senior and been with company for over 10 years	1 in 20 jobs	1 in 25 jobs	More senior supervisor, reassess as per results of previous audits as required.
Supervisor been with company between 5 - 9 years	1 in 20 jobs	1 in 25 jobs	Reassess as per results of previous audits as required.
New supervisor	1 in 10 jobs	1 in 10 jobs	New supervisor requires further monitoring, reassess as per results of previous audits as required including TNAs completed.

Audits will be recorded on our asbestos site audit form and any issues highlighted that can be dealt with on site will be discussed with the site supervisor and action taken immediately. All information will still be recorded to help identify any common faults that may be occurring. Other faults identified that require further discussion will be referred to the relevant director for instruction as required.

The results of audits will be discussed at our monthly safety meetings with all relevant persons in attendance. Repeated failures will be discussed, and the necessary course of action implemented as soon as is practical to identify ways of preventing reoccurrence. This will include closing out action taken.

The audit result spread sheet will be used to identify any common issues that keep arising that require further discussion or implementing change in policy or procedures. The following scoring system will be utilised to assist in formulating a graph of information showing the common trends and target these key areas as required.

Score of 100% - no action required;

Score 99% - 87.5% medium action required; result shown on graph;

Score 87.4% - 75% high action required; result shown on graph;

Score below 75% very high-risk action required, immediately stop works, record details and report to director.

44.11 Working Procedures

Further details on our working procedures and practices to be undertaken on our contracts can be found within our Asbestos Work Procedures, which will be maintained on site for the duration of the contract. Site specific requirements will be further detailed within the plan of works.

Where working areas will require enclosing to prevent the transmission of air borne fibres to adjacent areas, we will implement asbestos works procedures and ensure that any requirements for pre- cleaning are completed before commencing works.

Prior to the removal of any asbestos contaminated materials all enclosures will be subjected to examination by a suitably competent person. If they are satisfied, then a smoke test will be carried out to ensure there is no leakage from the enclosure. No removal works will commence until all parties are satisfied that the integrity of the enclosure is complete. If available, then a client's representative will be asked to verify and sign that the smoke test was undertaken to a satisfactory conclusion. This is covered on part 4 of our permit to work sheet.

For schematic diagrams of recommended entry and exit procedures of working areas for asbestos enclosures to comply with our decontamination procedures refer to our Asbestos Work Procedures TSP 13.

44.12 Certification

A signed record of all smoke tests will be maintained and kept on site for the duration of the contract.

A job specific file will be kept for all relevant plant used on site; copies of plant test certificates will be kept within this file for inspection upon request.

Where background, personal or four stage clearance air tests are undertaken by an independent, UKAS accredited analytical company during removal works, copies of the test results will also be kept on site for the duration of the contract.

A fall site pack will be held on site for the duration of the works, including exposure records. The utmost protection will be bestowed on the exposure records and where possible they will be regularly taken to the office for copying and uploading to the Exposure Record Log.

44.13 Asbestos Waste

All records of waste will be monitored on our Consignment Note Monitoring database to ensure that all records are maintained and that we have full reference for where all waste has been produced, transported to and disposed off.

Waste shall be bagged or wrapped on a continual basis and not allowed to accumulate loose on floor areas. Waste shall be sealed into appropriate polythene bags or wrapped in equivalent polythene sheets marked "ASBESTOS WASTE" Care shall be exercised at all times where waste contains materials are liable to puncture polythene bags.

All waste will be stored and removed from the site in compliance with the Hazardous Waste Regulations 2005, the Classification, Packaging and Labelling Regulations and all relevant guidelines and transported to a licensed landfill site or licensed waste transfer facilities for correct disposal.

A suitable container/skip will be used to store or hold the waste, the site supervisor will ensure that it is inspected on delivery and secured at all times when it is unattended.

For smaller type works a designated van boarded out area and sealed from the cab area will be used. The waste carried within must comply with UN packaging and where practicable, must not weigh more than 10 kg per package. The full load of the vehicle shall not exceed 333 kg for fibrous amphiboles (blue or brown) or 1000 kg for bonded serpentine (white) and the vehicle must carry the relevant consignment notes, but does not need to display orange plates, but employees must have received the dangerous goods awareness course.

The site supervisor will ensure that the appropriate signs are displayed on any vehicle, information concerning the load is supplied, emergency equipment is available and appropriate sections of the consignment note will have been completed before leaving the site.

We hold a current Waste Carriers Licence which enables us to transport asbestos waste, a copy of which will be maintained in the vehicle and site file.

As we are often the carrier and we are always the producer of the waste, we will ensure that all relevant sections of the waste consignment notes are completed accordingly.

As producers and consignors, we will keep a register of consignment note copies and any schedule of carriers and returns from consignees for three years. As carriers we will keep copies of consignment notes and any schedules of carriers for twelve months. As consignees we will keep copies of consignment notes and schedule of carriers until we surrender the licence for the site managed and the registers will then be sent to the Environment Agency.

Further information on our company requirements for the correct packaging of waste as it is removed can be found in section 9 of our Asbestos Work Procedures. All waste notes will be completed in accordance with environmental agency guidance.

44.14 Non-licensed works

Where we requested to undertake non-licensed works, we will continue to ensure the appropriate controls are applied and follow the requirement for some non-licensed works to be notified, this additional appendix has been added to our procedures.

The term will be defined as notifiable non-licensed works (NNLW) and will require the following additional requirements:

- notify work with asbestos to the relevant enforcing authority;
- ensure medical examinations are carried out; and
- maintain registers of work (health records).

When requested to undertake non-licensed works we will continue to risk assess the particular materials to determine whether it falls into the NNLW category by considering the following:

- Friability of the material - the more friable a material is, the more likely it will release asbestos fibres when worked on and the greater the risk of exposure. Work which disturbs more friable materials e.g. asbestos insulation and AIB will tend to be NNLW (depending on condition), and work which disturbs the least friable materials e.g. asbestos cement can normally be treated as non-licensed work.
- Is the asbestos firmly bonded in a matrix – this includes ACMs where the asbestos is coated, covered, or contained within another material, such as cement, paint or plastic. ACMs of this type in good condition can usually be treated as non-licensed work but where they are significantly damaged, and so more likely to release fibres, they will need to be treated as NNLW.

This assessment will be carried out by the relevant manager for the works who will assess the general condition of the material and how it may be disturbed and the possibility of breakage during the works.

The following examples from the HSE website will be used as guidance to what may be NNLW, providing that the works will not exceed the control limit, where it would revert to a licensed works and be undertaken accordingly:

- minor, short duration, maintenance work involving asbestos insulation, e.g. repairing minor damage to a small section of pipe insulation where the exterior coating has been broken or damaged;
- minor removal work involving AIB, when short duration and as part of other maintenance work, e.g. removing AIB panels fixed with screws to access pipe work;
- entry into the roof space above an AIB tiled ceiling, when no decontamination or cleaning has taken place;
- removal work involving textured decorative coatings where the method of removal requires deterioration of the material, e.g. where the material is treated by steam, hydrating gel etc and scraped off the underlying surface, or where it is very badly flood-damaged;
- removal of asbestos paper and cardboard products if not firmly bonded in a matrix;
- removal of asbestos cement (AC) which is substantially degraded e.g. badly fire-damaged or de-laminated material, or where substantial breakage is unavoidable to achieve removal.

And the following examples will continue to be referred to as non-licensed works (NLW) and will be undertaken accordingly:

- short, non-continuous maintenance work involving AIB which is in good condition, e.g. drilling holes in AIB to attach a fitting or pass through a cable or pipe, cleaning light fittings attached to AIB, removing a door with AIB fire-proofing, or lifting ceiling tiles for inspection where there is no full-body entry into the roof space;
- short, non-continuous maintenance work on asbestos cement (AC), e.g. work on weathered AC roof tiles;
- removal of AC, which is kept virtually intact;

- short, non-continuous maintenance work on textured decorative coatings, e.g. drilling holes, inserting screws or painting;
- small-scale maintenance work with textured decorative coatings when this can be achieved without deterioration of the material, e.g. by careful cutting around backing sheets to achieve removal intact;
- removal, for example, of gaskets or asbestos rope cords from heating appliances, which can be left in situ for disposal or can be lifted out virtually intact, without substantial breakage;
- short, non-continuous maintenance work on clutch discs, brakes, friction products etc unless significant damage is required e.g. by power tools;
- removal of floor tiles or bitumen felt, when done with the appropriate controls, e.g. in line with Asbestos Essentials sheets A21 and A23;
- work to enclose or seal asbestos materials that are in good condition (and that do not require a licence);
- air monitoring and control, and the collection and analysis of samples.

When works fall into the NNLW category we will apply the following additional procedures.

We will notify the relevant authority (HSE, Local Authorities and the Office of Rail) using the online notifications form (via either a computer or Smartphone) prior to starting the work.

There is no minimum notice period, so the notification can be done on the same day of starting the works. No permission to commence is required, but we will maintain a copy of the pdf submission on the site for further reference.

When undertaking multiple contracts, which are the same works and located in the same location (i.e. same housing estate project) we can notify the whole project on one form.

The requirement for medical surveillance is already covered due to our employees attending the 2 yearly asbestos medical requirements, so there is no requirement for us to apply the 3 yearly medicals. We will continue to maintain the 2 yearly medical for all persons that may undertake NNLW to ensure compliance with our license requirements.

The need for record keeping for NNLW will continue to be included in our personal exposure files maintained for all our employees, which will include:

- the nature and duration of work with asbestos and estimated exposure for each individual worker; and
- dates of the worker's medical examinations;
- copy of the NNLW notification form.

We will continue to maintain all personal exposure records and health records in our 40-year storage requirements.

Actual and anticipated exposure levels will be taken from previous air monitoring records undertaken or from previous published exposure figures, if the task is assessed as unusual then we will undertake personal sampling and add to our database of figures.

A site-specific plan of works will be formulated for all NLW and NNLW and referenced to the relevant HSG 210 guidance sheets, which will be incorporated into the site pack for reference.

The category of illustrations table, formulated by the HSE will be used as our guidance for the categories to be applied, with further reference made to the flow chart provided in a0 of HSG 210.

44.15 Asbestos & Tenanted Properties

Where properties are leased to tenants for occupancy as a place to live, defined as a domestic premises, then regulation 4 of CAR 2012 will only apply to those areas deemed as common areas, for example stairways, lift shafts, foyers, corridors, plant rooms and other such areas which are defined clearly in the ACOP L143, must continue to be managed under the required management plan accordingly.

Where the areas within such properties are defined as the actual domestic element, such as the actual flat, a house of residence, the private rooms in sheltered accommodation, the private rooms in pubs, guest houses and other such similar places of occupancy that persons reside in, then these are deemed as domestic and are not specifically covered by regulation 4.

This is where the Homes (Fitness for Human Habitation) Act 2018 will be applicable with the main requirements focusing on the duty to manage asbestos and that failure to do so could cause a property to be unfit to some degree if materials are in a poor condition.

This Act is not creating any new obligations, it is to ensure the landlord is meeting their existing responsibilities and is designed to ensure that all rented accommodation are fit for human habitation and to strengthen tenants' means of redress against the minority of landlords who do not fulfil their legal obligations to keep their properties safe.

The prescribed condition that may be apparent to asbestos is the potential for a reasonably foreseeable risk of harm from a hazard such as an asbestos containing material in a poor state, that could cause a class 1 risk of lung cancer/mesothelioma as specified in schedule 2 of the Housing Health and Safety Rating System (England) Regulations 2005.

The Act applies to the following:

- tenancies shorter than 7 years that are granted on or after 20 March 2019 (tenancies longer than 7 years that can be terminated by the landlord before the expiry of 7 years shall be treated as if the tenancy was for less than 7 years);
- new secure, assured and introductory tenancies (on or after 20 March 2019) ;
- tenancies renewed for a fixed term (on or after 20 March 2019);
- from the 20 March 2020 the Act will apply to all periodic tenancies. This is all tenancies that started before 20 March 2019; in this instance landlords will have 12 months from the commencement date of the Act before the requirement comes into force.

Further reference will be made to <https://www.gov.uk/government/publications/homes-fitness-for-human-habitation-act-2018/guide-for-landlords-homes-fitness-for-human-habitation-act-2018> for further clarification as required.

45.0 Protection from the Sun

Due to the nature of some external works our employees may be exposed to the risk of sunburn. The following information will be handed to all employees advising them of the risk of sun exposure.

Due to the nature of our works our employees may often be exposed to the risk of sunburn. During the times of year when exposure will be greater, all employees will receive toolbox talk and leaflets advising them of the risk of sun exposure.

In the long-term exposure, the sun will speed up the ageing of the skin, making it leathery, mottled and wrinkled, but more serious effect is the risk of skin cancer.

All people are at risk of skin cancer but some more than others, particularly:

- Fair or freckled skin that doesn't tan, or goes red or burns before it tans;
- Red or fair hair and light-coloured eyes;
- Large number of moles, over 100 in young people or over 50 in older people.

Also workers of Asian or Afro-Caribbean origin are at the same risk as everyone else and must be informed that they must protect themselves as per this policy.

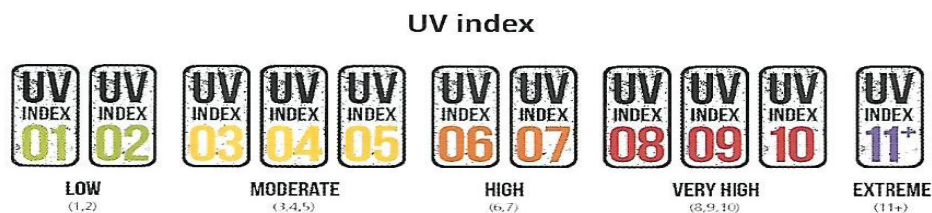
Despite the risk persons mentioned above, all persons must be particularly careful while working outside in the summer months in the 3 to 4-hour period around midday. This is when the sun is most intense, even on cloudy days, UV will filter through and cause damage.

The information given to our employees will include the following:

- Try to avoid the mild reddening, which is a sign of skin damage, as well as being an early sign of skin burning;
- Try to work and take your breaks in the shade if you can, this will reduce the risk of harming your skin and keep you cool;
- Take care when you on holiday as well as when you are at work;
- Get to know your skins vulnerable areas, like the back of neck, behind the ears and keep them covered;
- A tan is not a healthy sign, it may look good, but it is a sign of damage to your skin.

Clothing is the key to protecting your skin; cover up as much as possible with close woven fabric such as long-sleeved work shirt and jeans, which will protect against most UV exposure.

All employees will be expected to comply with the protection of exposure to the sun and keep covered up. Any employee showing symptoms of skin cancer must report to the Managing Director immediately.



The UV scale above can be used to assess the working conditions on a daily basis. Weather reports must be checked, and the relevant information communicated to our employees.

The following can be used to assess safe working practices to apply dependant on the levels defined.

A UV Index reading of 0 to 2 means low danger from the sun's UV rays for the average person:

- Wear sunglasses on bright days;
- If you burn easily, cover up and use broad spectrum SPF 30+ sunscreen.
- Watch out for bright surfaces, like sand, water, and windows, which reflect UV and increase exposure.

A UV Index reading of 3 to 5 means moderate risk of harm from unprotected sun exposure, so:

- Stay in shade near midday when the sun is strongest, coordinate work breaks to coincide with hottest part of day;

- If outdoors, wear protective clothing, wear hard hat with sun protection neck cover, and UV-blocking safety glasses;
- Generously apply broad spectrum SPF 30+ sunscreen every 2 hours, even on cloudy days, and particularly after sweating;
- Watch out for bright surfaces, like sand, water, and windows, which reflect UV and increase exposure.

A UV Index reading of 6 to 7 means high risk of harm from unprotected sun exposure. Protection against skin and eye damage is needed, so:

- Reduce time in the sun between 10 a.m. and 4 p.m.;
- If outdoors, seek shade and wear protective clothing, wear hard hat with sun protection neck cover, and UV-blocking safety glasses;
- Generously apply broad spectrum SPF 30+ sunscreen every 2 hours, even on cloudy days, and particularly after sweating;
- Watch out for bright surfaces, like sand, water, and windows, which reflect UV and increase exposure.

A UV Index reading of 8 to 10 means very high risk of harm from unprotected sun exposure. Take extra precautions because unprotected skin and eyes will be damaged and can burn quickly, so:

- Minimise sun exposure between 10 a.m. and 4 p.m.;
- If outdoors, seek shade and wear protective clothing, wear hard hat with sun protection neck cover, and UV-blocking safety glasses;
- Generously apply broad spectrum SPF 30+ sunscreen every 2 hours, even on cloudy days, and particularly after sweating;
- Watch out for bright surfaces, like sand, water, and windows, which reflect UV and increase exposure.

A UV Index reading of 11 or more means extreme risk of harm from unprotected sun exposure. Take all precautions because unprotected skin and eyes can burn in minutes:

- Try to avoid sun exposure between 10 a.m. and 4 p.m.
- If outdoors, seek shade and wear protective clothing, wear hard hat with sun protection neck cover, and UV-blocking safety glasses;
- Generously apply broad spectrum SPF 30+ sunscreen every 2 hours, even on cloudy days, and particularly after sweating;
- Watch out for bright surfaces, like sand, water, and windows, which reflect UV and increase exposure.

46.0 Monitoring of the Policy & Procedures

The Managing Director will implement initial monitoring of health and safety procedures to be carried out daily to ensure:

- The effectiveness of their Health and Safety Policy;
- Effective management organization;
- Improvement of performance standards;
- Prompt implementation of remedial measures.

The method of monitoring will consist of:

- Consultation with employees;
- Encouragement of suggestions observations & constructive criticisms of employees;
- Reporting hazards by employees;
- Reporting of all hazards, dangerous occurrences and incidents;
- Inspections by a competent person;
- The Health and Safety Advisor will make regular visits to carry out inspections to ensure any shortcomings are promptly rectified and noted by the Managing Director;
- Minutes of meetings with health and safety on the agenda;
- Health surveillance;
- An annual review will be held to audit the management of health and safety in accordance with laid down procedures which will aim to collect available information on performance to establish effectiveness of those procedures;
- The Health and Safety Policy will be reviewed regularly and revised annually and/or, as necessary.

The Managing Director, with regard to Environmental matters, will implement formal, informal and Tool Box talks to all company personnel and contractors at regular intervals and a monitoring review will take place on a quarterly basis, when a close examination of the collated information will be undertaken, which will detect any trends apparent. This examination must result in a reduction of waste and further improve our effectiveness.

By raising the awareness of employees and contractors through training and good example, we hope to promote a better understanding of environmental concerns and the impact on the protection of the environment for future generations.

All suggestions and improvements will be most welcome by the Managing Director, by telephone, by writing, or verbally, only as a team can we continue to maintain our current high standard of achievement, in the company's work activities.

New Legislation and Recommendations will be incorporated at the revision date but will be notified earlier than this date, depending on their Health & Safety importance to our working practices.

We will monitor The Health and Safety (Amendment) (EU Exit) Regulations 2018, which came into force on exit day. These regulations ensure that EU-derived health and safety protections will continue to be available in domestic law after the UK has left the EU.

47.0 Construction (Design & Management) Regulations 2015

The aim of the 2015 CDM regulations is to improve its usefulness by managing the health, safety and welfare of construction projects from beginning to end and ensure that all duty holders are aware of their requirements to ensure compliance.

Some of the main changes are the introduction of the Principal Designer and removing the role of CDMC, and the introduction of adding domestic clients. But the domestic client's duties will usually be transferred to the contractor or principal contractor.

A simple system has been implemented into the regulations so that duty holders will be able to ascertain their duties and CITB have produced several guidance's specific to the individual roles, these will be referred to relevant to the role being undertaken. There are six documents: one for each of the five duty holders under CDM 2015 and an additional one for the workers. Each one sets out in practical terms what actions are required to deliver the building and construction projects in a way that prevents injury and ill health.

The following guidance documents are available for downloading and are stored on our server for reference as listed below:

- Industry guidance for Clients;
- Industry guidance for Principal Designers;
- Industry guidance for Designers;
- Industry guidance for Principal Contractors;
- Industry guidance for Contractors;
- Industry guidance for Workers.

Organisation's or individuals can undertake more than one of the roles as above, provided they have the skills, knowledge and experience necessary to fulfil each role they take on in a way that secures the health and safety of the project.

To ensure the correct duty holder is defined the following gives a description of each role:

- The Client is an organisation or individual having a construction project carried out in connection with a business that we may be undertaking work for. If undertaking works for a domestic client this will also be included, if they are having building work carried out which is not connected to running a business, typically on the property where a family resides. The client must prepare a brief on the project setting out the key requirements, outlining their vision of the project and communicating their aims and aspirations. The client will continue to have the main responsibilities to make suitable arrangements for managing the project which includes making sure that:
 - ❖ All other duty holders are appointed;
 - ❖ That sufficient time and resources have been allocated;
 - ❖ That all relevant information is prepared and provided to all other duty holders;
 - ❖ Along with the Principal Designer ensure that the health and safety file is being prepared, maintained and passed to the end user;
 - ❖ The principal designer and principal contractor carry out their duties;
 - ❖ That all required welfare facilities are provided.
- The Designer is someone who as part of a business, prepares or modifies designs for a building, product or system relating to construction work. The designer's role when preparing or modifying designs is to eliminate, reduce or control foreseeable risks that may happen during construction or maintenance and use of a building after it's been built. The designer must also provide information to other members of the project team to help them fulfil their duties.
- The Principal Designer role added to CDM 2015 and is appointed by the client for all projects which will have more than one contractor. It can be an organisation or an individual with sufficient knowledge, experience and ability to carry out the role. The principal designer is responsible for planning, managing, monitoring and coordinating health and safety in the pre-construction phase of a project. This includes identifying, eliminating or controlling foreseeable risks, ensuring designers carry out their duties and preparing and providing relevant information to other duty holders. The principal designer will also be required to liaise with the principal contractor to help in the planning, management and monitoring of health and safety during the construction phase. When undertaking the role of Principal Contractor, we will ensure full cooperation with the Principal Designer and will provide all documentation accordingly.

- The Contractor is the individual or organisation who will be undertaking the actual construction work. This includes a sole trader, self-employed worker, individual or business carrying out, managing or controlling the work. Anyone who directly engages construction workers or manages construction work is a contractor. This includes companies that use their own workforce to do the work on their premises and the duties apply to all workers even if they are employees, self-employed or agency workers. The contractor's duty include:
 - ❖ To plan, manage and monitor construction work under their control so that it is carried out without risks to health and safety;
 - ❖ To ensure that projects involving more than one contractor, co-ordinate their activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor;
 - ❖ for single contractor projects, prepare a construction phase plan.

- The Principal Contractor must be appointed by the client to plan, manage, monitor and co-ordinate health and safety during the construction phase of a project when there is more than one contractor involved. Their duties will also include liaising with the client and principal designer to ensure that their duties are complied with. Further duties will be preparing the construction phase plan and organise good cooperation between all other contractors appointed to undertake works and coordinate their works throughout the project. If we are required to undertake this role, we will apply the above and will need to ensure that:
 - ❖ Suitable site inductions are provided;
 - ❖ Reasonable steps are taken to prevent unauthorised access to the site;
 - ❖ Workers are consulted and engaged in health and safety matters at all times;
 - ❖ That suitable and sufficient welfare facilities are provided and maintained throughout the duration of the project.

- And the final one is the worker, who is any individual working on or under the control of contractors on a construction site. As people working for or under the control of any contractors on a construction site the workers have duties as well as their employers and this will include all our workforce, whether subcontractors, direct employees, or agency workers. All workers must:
 - ❖ Be consulted about matters which affect their health, safety and welfare;
 - ❖ Take care of their own health and safety and others who may be affected by their actions;
 - ❖ Report anything, they see which is likely to endanger either their own or others' health and safety;
 - ❖ And cooperate with their employer, fellow workers, contractors, and other duty holders.

47.1 Notification

The notification requirements now include domestic clients, so the F10 must be submitted via the HSE online form where the construction work is expected to:

- Last more than 30 working days; or
- Have more than 20 workers working on the project at any one time; or
- Involve more than 500 person days, for example 50 people working for over 10 days.

All days on which construction work takes place count towards the period of construction work. Holidays and weekends do not count if no construction work takes place on these days.

47.2 General requirements for all construction / demolition sites

The relevant regulations that apply to all contractors undertaking construction works and all projects irrelevant of time scales commence from regulation 17 to 35 and relate to the following:

- Safe places of construction work;
- Good order and site security;
- Stability of structures;
- Demolition or dismantling;
- Use of explosives;
- Excavation works;
- Cofferdams and caissons;
- Reports of inspections;
- Energy distribution & installations;
- Prevention of drowning;
- Traffic routes;

- Vehicles;
- Prevent risk from fire, flooding or asphyxiation;
- Emergency procedures;
- Emergency routes and exits;
- Fire detection and firefighting;
- Fresh air;
- Temperature and weather protection;
- Lighting.

The above must be complied with for all our works, whether as Principal Contractor or as a Contractor. Further reference for the safe working procedures to facilitate the above regulations can be referred to the relevant sections within our company policy or procedures.

When working on projects involving more than one contractor, the Principal Contractor will be responsible for drawing up the construction phase plan, if we are appointed Principal Contractor, we will ensure this is undertaken before commencing works and ensure we plan, manage, monitor and coordinate the health and safety requirements accordingly. Where working as a contractor for the Principal Contractor, we will provide all necessary documentation and assistance available to us at the time, too enable them to fulfil their role. Further reference will be made to appendix 3 of CDM 2015 ACOP L153 for guidance on what is required to formulate a suitable construction phase plan, which must be proportionate to the scale and complexity of the project and may simple and easy to understand.

The health and safety file is only required for projects involving more than one contractor and must contain information about the project which must take into account future construction work, including cleaning, maintenance, alterations, refurbishment and demolition after the project has finished. The Principal Designer must prepare the file, review, update, and revise as required as the project progresses. If the Principal Designer will not continue through until the end of the project, then it must be handed over to the Principal Contractor to continue to maintain and then hand over to the end user. If we undertake the Principal Contractor role and continue the project after the Principal Designer has stopped, then we will take care of all necessary requirements to ensure the health and safety file is maintained and forwarded to the relevant persons accordingly.

47.3 Competence and training

When we are appointing contractors, designers or other such professionals to undertake works for us, we must assess the competency of the organisations and/or individuals by requesting that they demonstrate they have the relevant health and safety skills knowledge and experience to the undertake the works. Assessments will focus on the need of the particular project and be proportionate to the risks, size and complexity of the work. This mean making reasonable enquiries to check that the organisation or individual is competent to do the relevant work and can allocate adequate resources to it. Those taken on to do the work must also be sure that they are competent to carry out the required tasks before agreeing to take on the work.

We have our own Prequalification Questionnaire - Management of Health & Safety Information, which will be required to be completed by our sub-contractors to vet that they are sufficiently able to undertake the works in a safe and compliant manner.

We will expect all appointed contractors, designers, or other such professionals to cooperate fully with each other to ensure that good communication is maintained throughout the project and that due consideration for health and safety is always maintained.

47.4 Temporary Works

Temporary Works in the form of temporary supports or structures are often required to ensure the safety and stability of structures during excavation and demolition.

All temporary works must be carried out in accordance with BS 5975 2019 and a detailed procedure defined within our safe systems of work on how we intend to reduce the risk.

In accordance with the CDM Regulations 2015 temporary works must be designed and installed by competent persons in a safe and timely manner. The skills, knowledge and experience of the designer will depend upon the extent and complexity of the structure concerned. We will ensure that the relevant competent person is appointed to undertake the works accordingly.

Temporary supports or structures used to support permanent structures must only be erected or dismantled under the direct supervision of a competent person as required by the CDM Regulations 2015, copies of signing off certificates

T & S Environmental Ltd

for such temporary structures must be requested prior to entering any building.

A design brief will be prepared for each item of temporary works to assist the designer in understanding what is required.

There must be an appointed Temporary Works Coordinator to ensure that our procedures are followed and to coordinate information on large scale projects to an appointed Temporary Works Supervisor.

Full reference will be made to BS 5975 2019 for the defined categories of design checks and what is defined as a simple and/or potentially low risk of temporary works, more complex and/or potentially medium risk of temporary works and the more complex and/or potentially high risk temporary works, so that correct consideration can be given to the design, construction, commissioning, inspection and loading required.

Requirements for design checks must be carried out by an independent competent person, who must be assessed for their ability to undertake the checks relevant to its complexity and category as defined in BS 5975 2019.

Further reference will also be made to the 'Effective management of scaffolding to BS 5975: 2019' which helps to define the 2 different roles of TWC and TWS in relation to scaffolding works.

A person appointed as Temporary Works Coordinator's role must have undertaken the 2 day TWC course and have the competency relevant to the design of the temporary works that they are required to safely manage and given sufficient time to attend the relevant sites and ensure the works are undertaken sufficiently.

A Temporary Works Supervisor's role is to assist in the day to day running of a temporary works site, therefore supervisors would need to attend the one day TWS course to maintain competency on spotting possible risks and hazards on site with regards to the temporary works. Their role is to report back to the TWC for further guidance as required.

There is no legal requirement to have a Temporary Works Coordinator however the legal requirement is that the party in control of a project (regardless of size) must ensure that work is allocated and carried out in a manner that does not create unacceptable risk of harm to workers or members of the public, therefore the TWC role came along to answer this requirement.

The legal requirement is that the party in control must ensure that work is allocated and carried out in a manner that does not create unacceptable risk of harm to workers or members of the public. On projects with relatively simple TW needs, we may choose not to appoint a TWC.

However, we must still make sure that TW are properly managed to ensure safety, this could be covered by the designer, but they would need to attend site to ensure the works have been carried out in accordance with the design and know that they have been appointed to that role.

For scaffolding and TW, it often involves the ground loading before erecting scaffold, or if a scaffold is to be erected on floors what is the loading and if props required to support the floors, etc.

48.0 Premises Management

We will aim to ensure that every workplace under our control, and where any of our employee's work, complies with the relevant health and safety legislation.

We will ensure that all our buildings are maintained in a state of good repair.

All premises will have a planned preventative maintenance for all key building services such as air-conditioning, heating, hot and cold-water supplies, lighting, cleaning, fire equipment and alarm systems, security systems, sanitary facilities and general decoration.

All maintenance and repairs will only be undertaken by those designated to carry them out and will have the required level of knowledge, certification and training to undertake the work safely.

The Managing Director will undertake an assessment of the premises and in undertaking this assessment consideration will be given to the following points:

- all required signage, safety barriers, and route markings together with the condition of surfaces of traffic routes, vehicle parks and ramps internal to the premises;
- all existing electrical systems installed for adequacy of external lighting, sign lighting, traffic routes, and for external security for pedestrian or vehicle access to all parts of the premises;
- structurally including condition of finishes, roof, gutters, drains and the facility sewerage system;
- internal review of hazards and existing condition of finishes, fixtures and fittings, windows and blinds, doors, stairs and flooring material relative to or local any workplace;
- record any hazards found, damages and omissions and ensure corrections are carried out;
- all plant, equipment, workshops, workplaces and areas where the company will undertake work;
- all work activities to be undertaken, on the premises by the company.

Specific requirements for utilities include:

- **Electrical System** - Work on the electrical system and appliances will only be carried out by persons registered competent enough to do so and will be carried out in accordance with the relevant legislation. The electrical system will be tested annually by a competent person and an electrical test certificate will be obtained for record purposes.
- **Gas Safety** - Work on gas systems and appliances will only be carried out by persons registered with the Gas Safe Register and will be carried out in accordance with the relevant legislation. The gas system will be tested annually by a competent person and a test certificate will be obtained for record purposes.
- **Water** - The water supply within the premises will be subject to routine maintenance, chlorination, and disinfection by people competent to do so. This routine ongoing procedure will be designed to essentially take care of the problems before they arise. Modifications of water distribution systems shall not be carried out without the specific authority of the responsible person.
- **Sewage system** – The sewage connections will be subject to regular checks to ensure drainage remains clear and flow is maintained, ensuring only sewage water is dispersed to the drains.
- **IT connections** - The telephone and internet connection will be maintained and protected from damage and any faults reported to the applicable provider and no works are to be undertaken without the consent of the provider or their appointed engineer attending.

Asbestos management

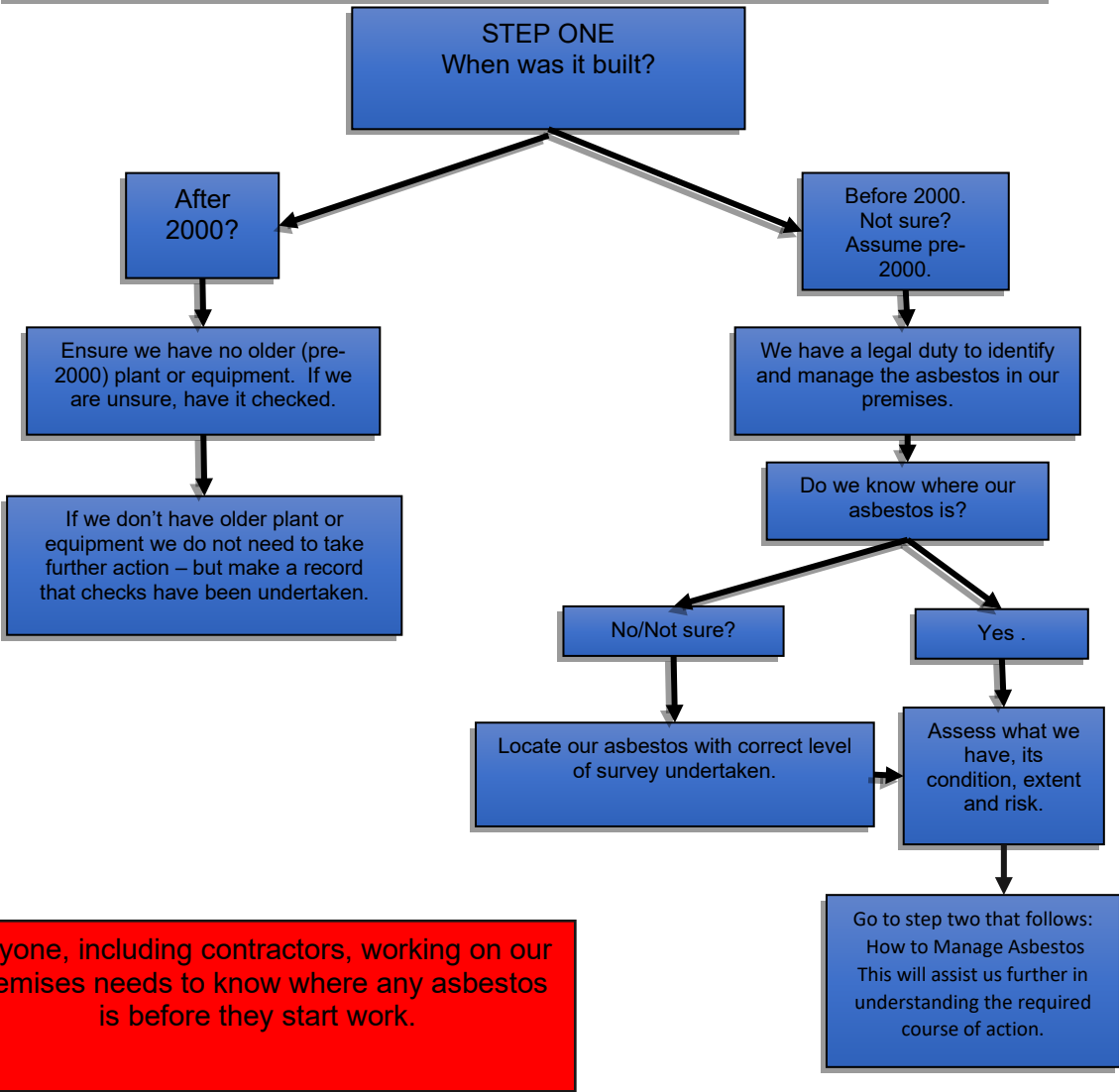
An Asbestos survey will be undertaken to determine the location of Asbestos containing materials within our premises depending on the age of construction of the property.

A written record of the locations of asbestos and presumed asbestos material will be collated.

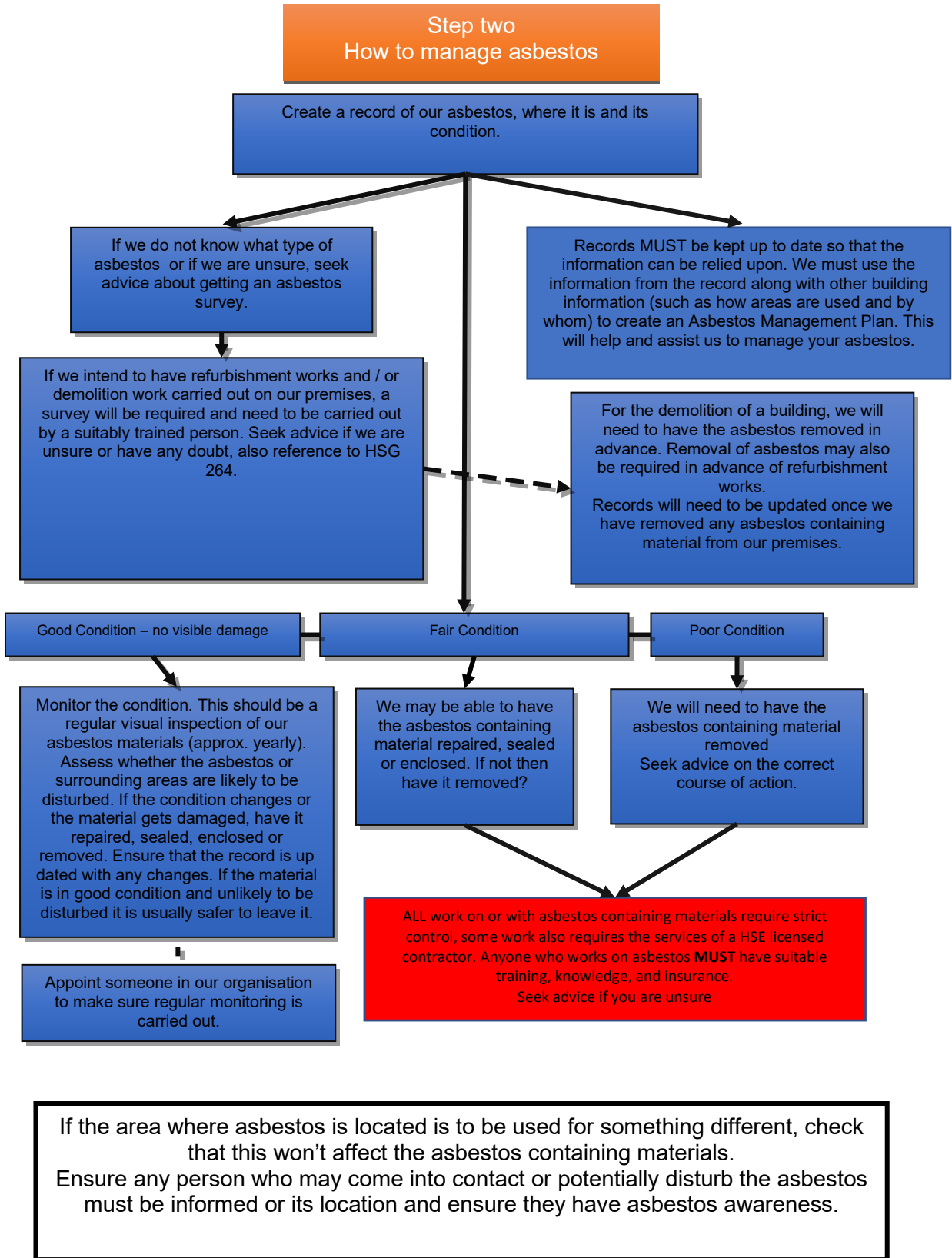
An assessment of the risks of exposure will be undertaken and document actions necessary to manage the Asbestos will be recorded.

The following flowcharts will be referred to for assistance with correct process to maintain compliance.

Do we own, manage, or have maintenance responsibility for a building (premise), part of a building or structure?
YES- then we have a legal duty to manage the asbestos in it
These two short step guides will help us understand what we need to do and how to apply our own asbestos management plan to maintain compliance with regulation 4 of the Control of Asbestos Regulations.



Anyone, including contractors, working on our premises needs to know where any asbestos is before they start work.



49.0 Stress

Excessive stress can manifest itself in physical, behavioural, mental, or emotional effects. These effects are normally short-lived and cause no lasting harm. When the pressures recede, there is a quick return to normal. Stress is not, therefore, the same as ill health. It is only when pressures are intense and prolonged that the effects of stress can become more sustained and damaging, leading to longer term psychological problems and physical ill health.

Long-term stress has been associated with high blood pressure, heart disease, anxiety and depression. These conditions may arise from other causes and, if a particular individual is suffering from one or more of these disorders, it will be for an occupational health practitioner to advise on the extent to which it is work related.

The Company accepts that, it has a duty to take reasonable care to ensure that employee's health is not placed at risk through excessive and sustained levels of stress arising from the way work is organised, the way people deal with others or from day-to-day demands placed on its employee.

Managers shall be trained in recognition of the early warning signs of psychological strain, stress management techniques and how to manage employee showing the signs of psychological strain.

Employees shall be trained in the recognition of psychological strain and stress management techniques.

Employees who may be suffering psychological strain will have access to confidential assistance through the Company.

Even though each of the signs and symptoms of stress may be due to other factors, the occurrence of several of the signs and symptoms together may require the need to take anti-stress action. At the individual level the following physical, behavioural and mental/emotional signs may be apparent:

- Dry throat, muscle tension, headaches, indigestion, insomnia, high blood pressure, heart disease;
- Irritability, impulsive behaviour, difficulty making decisions, sudden increase in smoking or alcohol use;
- Excessive worrying, feelings of worthlessness, brooding, forgetfulness, easily startled, daydreaming.

At the workplace level, high levels of absenteeism, employee turnover, work accidents (including minor ones) are often linked to stressful situations. Low productivity levels, poor quality production, frequent breakdown of equipment and difficult inter-personal relationships may also be associated with stress.

49.1 Stress assessment

An effective stress management programme requires proper identification of the stressors and assessment of the work performance and personal problems derived from stress.

All employee will be involved in identifying those factors which they feel cause unnecessary stress in their jobs and rating them to establish priorities for intervention. Assessment will be done in a systematic way, ideally using a stress audit, but useful information can also be obtained from employee surveys, stress diaries and focus groups, either small or large scale.

The ideal solution to tackle stress is to prevent its occurrence. It is generally agreed that improving the ability to cope with stress is a valuable strategy but will be secondary to combating the causes. Action will be aimed at eliminating as many causes as possible, so that stress is reduced, and further stress prevented.

It will be borne in mind that since stress is a multifaceted phenomenon, no simple solution is available. Furthermore, differences in the particular circumstances of each case make it impossible to provide off the shelf solutions for stress management. However, even simple solutions may help to relieve the overall stress package.

Various types of intervention will be considered, and the relevant manager will choose the most effective combination for the particular work situation. Further guidelines for managing traumatic incidents at work will be consulted should such an incident occur and have a detrimental effect on any employee.

50.0 Capability procedure

50.1 Introduction

As a company we place great importance on maintaining levels of performance at an acceptable standard and the capability procedure provides a fair and objective process to enable supervisors / managers to ensure that those standards are met in every aspect of the company's operations.

50.2 Definition

For the purpose of this Capability Procedure, capability is defined as: "Where a member of staff is failing in a significant or persistent way to carry out their responsibilities or duties in a satisfactory manner, either due to a lack of ability, inadequate training or lack of experience. Such failings will be identified using the following procedures and steps taken to improve performance. Where such steps prove unsuccessful the member of staff may have their employment terminated on the grounds of lack of capability to do their job".

The procedures set out in this document aim to ensure that there is:

- A means of monitoring performance and establishing performance criteria;
- A degree of consistency in how staff with widely differing responsibilities and duties are given opportunities to attain satisfactory levels of performance;
- Assistance in identifying the most appropriate form(s) of support and providing that support.

If a member of staff fails to overcome their difficulties, any consequent action will be based on:

- Adequate evidence that the member of staff is incapable of performing their duties satisfactorily;
- A fair procedure;
- The fact that the member of staff was given all reasonable assistance to overcome such failings.

50.3 Procedure

Stage 1 - Informal procedure:

Where an employee of our company exhibits an inability to perform their duties satisfactorily, we will attempt to resolve the matter informally via a meeting between the responsible management and the relevant member of staff. The nature and date of the meeting will be recorded, and a Performance Improvement Plan agreed with the member of staff indicating the nature of their unsatisfactory performance and how such performance can be improved to the required standard (see Performance Improvement Plan document).

At this meeting, the applicable manager will agree performance standards with the member of staff, and a time period (normally three months) over which improvement will be expected. They will also agree how the individual's performance will be monitored.

If the individual's performance improves adequately over the timescale, then the process will terminate at this stage. If performance remains unsatisfactory, then the formal procedure will be invoked by the applicable manager as set out in stage 2.

Stage 2 - Formal procedure - information collection:

Where possible the formal procedure will be implemented by the Director. They may commission the support of an external advisor or another member of the management team, to undertake collecting the necessary information. They would be expected to interview the member of staff concerned and the applicable manager, as well as any other appropriate individuals. The member of staff should be informed that they may be accompanied at any meetings by a trade union representative or work colleague if required.

A written report based on evidence gained e.g. by interviews and observation of performance will be prepared by the advisor / manager. The report must be precise and specific in the observations and comments it makes and shall contain clear information on:

- areas where the member of staff is failing to perform adequately;
- actions already taken by management to address these failings and whether these actions were adequate - i.e. were clear performance standards set and monitored;
- whether the member of staff acknowledges a problem and shows a willingness to improve;
- the impact of the individual's failings on colleagues and work output;
- any other mitigating factors.

The report must be given to the member of staff concerned and to the relevant manager. Both may record in writing any comments on the observations contained within the report.

The Director will consider the report, and may opt to take one of the following options:

- no further action;
- instruct the relevant manager to set reasonable performance standards for the individual and monitor these for a set period of time. (This option must be chosen if this has not previously been carried out adequately and at least three months given to improve);
- convene a formal capability hearing to consider the matter further.

Stage 3 - Capability hearing

The Director will write to the member of staff informing them of the date of the hearing, attaching any relevant documentation. The letter will contain:

- the performance deficits in sufficient detail to ensure that the member of staff fully comprehends their nature, extent, and seriousness;
- the time, date, and venue of the interview;
- the person who will conduct the interview, usually a manager or Director;
- a statement that all employees have the right to be accompanied by a trade union representative or work colleague at any interview or hearing held under the provision of these procedures;
- at least 10 days' notice of the hearing.

At the hearing, the member of staff will be given the opportunity to put forward a defence, to bring witnesses in support of their defence, to present mitigating circumstances and to make a full statement. A written copy of this procedure to be adhered to during the hearing must be made available to the member of staff before the hearing takes place.

If the allegation is found to be justified, then a decision on the action to be taken must be made. Depending on the nature, frequency and seriousness of the allegation(s) it is expected that at this stage a warning will be given and this will be confirmed in writing.

A letter must be sent to the member of staff confirming the decision and the reason(s) why it was made. The letter will also indicate that the member of staff's progress will continue to be monitored and how this will be carried out. A time scale for performance to improve and a review date(s) will be specified.

If the failings are found to be not sufficiently serious to warrant a formal warning or where there are mitigating circumstances, then monitoring should be discontinued subject to a clear indication to the member of staff that it may be reintroduced if the problem(s) reappear.

Stage 4 - Second capability hearing:

If poor performance continues, the process set out in stage 3 must be repeated. The time scale for improvement will depend on the nature of the duties and responsibilities of the employee concerned and the seriousness of the complaint(s).

If the conclusion of the second hearing is that performance has not sufficiently improved and that there is still evidence of incapability despite support and prior warnings, a final warning must be issued.

The letter confirming the decision as well as covering the points made at Stage 3, must clearly state that if an improvement is not forthcoming, we will convene a final meeting at which it will consider terminating the contract of the member of staff involved on the grounds of capability.

Stage 5 - Third capability hearing:

The appropriate manager will conduct the third hearing at which if previous advice, training and warnings have not had the desired effect, he/she will terminate the contract of the employee concerned. The procedures outlined in Stage 3 will be followed.

50.4 Appeals

An appeal against any decision to terminate the employee's contract of employment on the grounds of capability may be made in writing to the office within 14 days of the decision. The employee's appeal will be heard by the Director. Decisions made on appeal will be final.

50.5 Long-term/persistent illness

Where any shortfall in expected performance arises from long term or persistent illness we will refer to the management of absence policy.