

S&G Air Conditioning Contracts Limited
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Health & Safety Manual

Prepared by MBO Safety Services Limited



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Section 1 – HEALTH AND SAFETY POLICY

As the Directors of S&G Air Conditioning Contracts Limited (hereafter referred to as the Company), I accept responsibility for Health and Safety as stated in this policy.

The Company is committed to protecting and promoting the health, safety, and welfare of all its employees, visitors and any others who may be affected by our activities.

The Company recognises the importance of the management of health, safety and welfare at work and this policy ensures we comply with its statutory obligations as stated within section 2(2) of the Health & Safety at Work etc. Act 1974 to:

- Provide and maintain all our premises in a condition that is safe, including the provision and maintenance of safe entry and exit from them.
- Provide and maintain safe plant, safe equipment and safe systems of work for our employees.
- Ensure all our employees are provided with suitable training, supervision, information and instruction to enable them to work safely.
- Ensure that all substances and articles are used, handled, stored, transported and disposed of safely.
- Provide and maintain suitable working environments, facilities and welfare arrangements for employees.
- Make sure that sufficient human and financial resources are available within the Company to enable the proper management of health and safety issues.

All levels of management are responsible for maintaining safety standards. This will be achieved by assessing risks, removing hazards wherever possible and implementing safe systems of work.

Improvements in health and safety performance can only be achieved if there is full commitment not only from management, but from all employees to implement and monitor this policy.

Given this, **every employee** is required to cooperate with the Company in the spirit and operation of this Policy to:

- Work safely, following the training and instructions given.
- Comply with the safe systems of work and procedures that implement them.
- Report all accidents immediately, and assist with accident investigations.
- Use any personal protective equipment and clothing where it is identified and required.
- Take care of themselves and any others that they come into contact with and who may be affected by their activities.

This policy will be reviewed annually.

Name: Paul Copner
Position: Managing Director
Date: 01/05/2024

Section 2 – ORGANISATION AND RESPONSIBILITIES

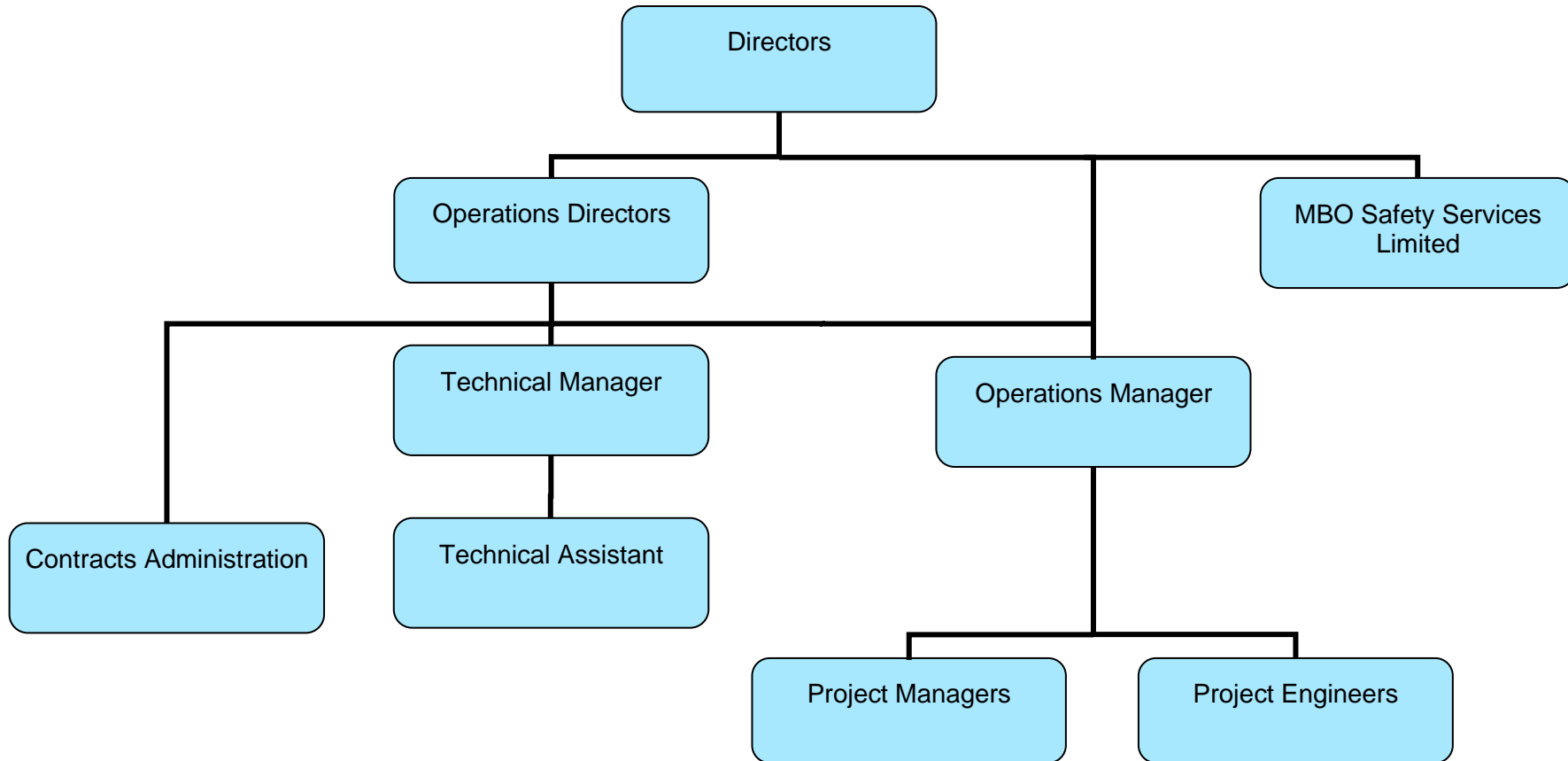
S&G Air Conditioning Contracts Limited (hereafter referred to as the Company) recognises and accepts responsibility as an employer for the provision and maintenance of safe and healthy working places for all employees and visitors and regards the subject of adequate health and safety measures as a mutual objective for management and employees.

Constant effort will be made to ensure that the need for promoting health and safety throughout S&G Air Conditioning Contracts Limited is fully appreciated by and implemented, so far as is reasonably practicable, by all members of the organisation in order to minimise the risks to all.

Management Structure

The management structure diagram overleaf outlines the chain of command in respect of health and safety management. It also shows who has responsibility for the implementation of the Health and Safety General Policy.

S&G Air Conditioning Contracts Limited - Organisation Chart



Management Responsibilities

Health and Safety law lays down specific duties on employers to make arrangements to protect the health, safety, and welfare of their employees whilst at work and others (visitors etc) that might be affected by their undertakings.

To help the organisation comply with these duties specific responsibilities have been delegated and are described below.

Directors

The Directors have overall executive responsibility for the maintenance and development of safe working practices and conditions for all employees and visitors working for, or affected by, the Company's activities.

In particular, the Directors will identify the hazards associated with the Company's activities, in consultation with the members of staff concerned, and will endeavour, so far as is reasonably practicable, to reduce the risks associated with such hazards to the safest possible level.

The Directors will endeavour to ensure that all hazards are controlled by utilising the various services and control measures available.

The main responsibilities of the Directors are:

- Actively promote the Company's Health & Safety Policy for the prevention of injury, ill-health, damage and wastage.
- Be advised of the requirements of appropriate legislation using external sources where relevant, and ensure the requirements are implemented across the business.
- Monitor the effectiveness of the Company's Health & Safety Policy and ensure that any necessary changes are made and maintained in line with development and legislation.
- Ensure that delegated duties for implementing health and safety requirements are carried out.
- Instigate and maintain liaison with other management and external advisers and encourage the distribution of relevant information throughout the Company.
- Ensure all requirements defined in the Company's Health & Safety Policy are suitably funded and that those responsible for the implementation are suitably trained.
- Ensure that safety is integral to the business planning process and that sufficient human and financial resources are available within the Company to enable the proper management of health and safety issues.
- Provide adequate public and employer's liability insurance cover and any other insurance necessary to meet statutory requirements.
- Ensure that any employee failing to satisfactorily discharge their health and safety responsibilities could face disciplinary action.
- Ensure that only competent persons undertake risk assessments for tasks and activities so ensuring that written assessments are done for significant risk areas.
- Set a personal example as regards commitment to health and safety.
- Ensure that the Company has one or more competent persons internally and an external body who provides assistance in health and safety in order to comply with the law.
- Ensure that employees are provided with relevant information on risks together with

preventive and protective measures and that they are consulted on health and safety issues.

- Ensure that the Company premises, operations, equipment and systems of work all contribute to a safe and healthy working environment.
- Ensure safe arrangements for the handling, storage and transport of items/substances.
- Ensure all health and safety policies are provided in the form of information, instruction, training and supervision as are necessary to all employees.
- Provide adequate welfare facilities.
- Commit to improving safety performance and reducing accidents.

In the absence of the Directors, the Operations Manager and/or Project Managers will assume the above responsibilities for Health and Safety.

Operations Manager / Project Managers

The Operations Manager and Project Managers have overall responsibility for the co-ordination of health and safety matters within the Company.

These duties include:

- To organise the work area so that operations are carried out to a safe system of work, resulting in there being a minimal risk to persons, equipment and materials.
- To understand the application of the Health and Safety at Work etc Act 1974 and other legislation relevant to the Company's operations.
- To plan and maintain a tidy working area, including safe access and egress.
- To ensure that all persons under their control are trained and competent to carry out their jobs in a safe manner.
- To ensure that safe working practices are followed.
- To ensure that arrangements are made to protect employees from risks associated with lone working.
- To ensure that the location of fire extinguishers is known to employees and that they understand the procedure to be followed in the event of a fire.
- To ensure that the location of first aid equipment and personnel are known to employees.
- To assist the Directors in carrying out risk assessments or to complete risk assessments where necessary.
- To report and investigate all accidents and occurrences.
- To cooperate with health and safety advisers and to act on their advice and recommendations.
- To ensure that arrangements are made to protect members of the public or anyone else that may be affected by the Company's activities.

MBO Safety Services Limited

MBO Safety Services Limited has been appointed to offer guidance and advice on all aspects of health and safety. The Company's main duties are to assist the Directors in meeting their responsibilities for health and safety as listed above. This guidance and advice may include but is not limited to assistance with:

- Investigation and reporting of potential hazards and dangerous occurrences within the

Company (whether or not they are drawn to their attention by Company employees) and to examine the causes of accidents.

- Maintenance of the Health and Safety Management System, to include advice on legal requirements.
- Attend health and safety meetings as required by the Directors.
- Communication on health and safety matters with the Directors, Operations Manager, Project Managers and employees.
- Develop and deliver health and safety courses as required.

Employees

The Company relies on sub-contractors to carry out work at customer's sites. Many of these sub-contractors work for the Company for the majority of their time. While these sub-contractors are working on behalf of the Company, they are subject to the same responsibilities and duties of direct employees and for the purposes of this manual are included in the term 'employee'.

Employees have specific duties and responsibilities. These are:

- To make themselves familiar with and understand the Company's Health and Safety Policy, procedures and safety rules.
- To take all reasonable care for their own health and safety and for that of others who may be affected by their acts.
- To follow safe working practices and obey safety rules at all times.
- Not to intentionally or recklessly interfere with, or misuse any equipment, materials or facilities provided in the interest of health, safety and welfare, or in fulfilment of any legal obligation by the Company.
- To maintain a tidy working area, thereby not creating hazards to self and others.
- To cooperate with the Directors, Operations Manager and Project Managers on all aspects necessary to provide a healthy and safe working environment, including the participation in any training.
- To keep Company vehicles and equipment in their use in good order at all times and to report any faults.
- To know the location of fire extinguishers within the areas in which they are working and the action to be taken in the event of a fire.
- To know the location of first aid boxes within the areas in which they are working and the action to be taken in the event of an accident.
- To report any accident, dangerous occurrence or hazardous condition.
- To not undertake any tasks or use any equipment for which they have not had the correct training or supervision.

Employees could face disciplinary action if they do not adhere to Health and Safety policies/legislation.

Section 3 – PROCEDURES

Accident Recording, Reporting and Investigation

Introduction

The Company will ensure that any accident, industrial disease, or dangerous occurrence, occurring as a result of operational activities, is investigated in order to identify the immediate and root causes. Failures, identified as a result of these investigations, will be recorded, reported, documented and, in addition, actions will be taken to eliminate or reduce the possibility of future occurrences.

This procedure covers the reporting and recording procedures for Managers, employees, and non-employees. Suitable information and training will be given to all personnel regarding accident reporting and the location and completion of the Accident Book. (B1510).

All personnel on our premises, or customer premises, are required to report accidents and near-miss incidents whilst carrying out work activities on behalf of the Company.

The 4 most important steps are to:

- Make sure that all the relevant details are reported as soon as possible, in accordance with established procedures.
- Remove residual hazards that may pose a risk for other people in the area.
- Notify management of incapacity for work that results from an injury sustained during a work activity.
- Review existing systems of work to prevent a reoccurrence.

Procedure

This procedure outlines the requirements for the investigation and reporting of incidents that occur during Company activities. It also outlines the requirements for statutory reporting of notifiable work-related injuries and dangerous occurrences to health and safety enforcing authorities (HSE or Local Authority); a mandatory requirement under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR).

This procedure is to be adopted when any employee, visitor or contractor experiences an accident, near miss or dangerous occurrence on our premises and sites, or for employees when at a customer's site. This will also apply to visitors who are members of the public and therefore not at work.

All incidents should be reported on the Incident Record Form.

Significant incidents, including those resulting in lost time injury, will be investigated as soon as possible after the occurrence.

Within 24 hours, the completed Incident Report will be forwarded to the Directors.

All incidents will be recorded on the accident/incident report form, Form 22: Incident Record Form.

All accidents and incidents will be investigated within 8 hours of the event occurring. The extent of an investigation will depend upon the severity or potential serious outcome. Form 23: Investigation Form will be used to record all findings and actions to eliminate future occurrences.

Within 24 hours, the completed Incident Report will be forwarded to the Directors or their nominated responsible person.

Notifiable Events

Notifiable events are work-related accidents, diseases and dangerous occurrences as detailed below:

1. Deaths

All deaths to workers and non-workers must be reported if they arise from a work-related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident.

2. Specified injuries

- A fracture, other than a finger, thumbs, or toes.
- Amputation of an arm, hand, finger, thumb, leg, foot, or toe.
- Permanent loss of sight or reduction of sight.
- Crush injury leading to internal organ damage.
- Serious burns (covering > 10% of the body, or damaging the eyes, respiratory system or other vital organs).
- Scalpings (separation of skin from head) which requires hospital treatment.
- Unconsciousness caused by head injury or asphyxia.
- Any other injury from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

3. Over 7-day injury

When an employee is away from work or unable to perform their normal duties for more than 7 consecutive days. (Not including the day of the event).

Note: Examples of incidents that do and do not have to be reported are available at www.hse.gov.uk/riddor/do-i-need-to-report.htm.

4. Injuries to non-workers

Work-related accidents involving members of the public or people who are not at work must be reported if a person is injured and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.

Reporting Timeframes

Deaths, notifiable work-related injuries, or dangerous occurrences must be reported forthwith using the quickest practicable means and, within 10 days, send a report to the HSE.

Over 7-day injuries are to be reported within 15 days of the event.

*All major and over 7-day injuries, incidents are to be reported on-line, however a telephone service is provided for reporting fatal and major injury **ONLY**.*

Call the Incident Contact Centre (ICC) on 0845 300 9923 (opening hours Monday to Friday 8:30 am to 5:30 pm).

E-mail: riddor@natbrit.com (24 hours)

Website: <http://www.riddor.gov.uk> (24 hours)

Once contacted, the ICC will pass the details that you have given regarding the incident to the relevant enforcing authority (HSE or Local Authority Environmental Health Department).

Reportable Occupational Diseases

The Company will report occupational diseases only if it is diagnosed by a medical professional, where these are likely to have been caused or made worse by their work.

These diseases include:

- Carpel Tunnel Syndrome.
- Severe cramp of the hand or forearm.
- Occupational dermatitis.
- Hand arm vibration syndrome.
- Occupational asthma.
- Tendonitis or tenosynovitis of the hand or forearm.
- Any occupational cancer.
- Any disease attributed to an occupational exposure to a biological agent.

In the event of a reported case of an occupational disease the Company may contact MBO Safety Services Limited for advice and guidance as appropriate.

Dangerous Occurrences

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most work activities and workplaces, for example:

- the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment.
- plant or equipment coming into contact with overhead power lines.
- the accidental release of any substance which could cause injury to any person.

In the event of a perceived dangerous occurrence the Company may contact MBO Safety Services Limited for a full list and advice and guidance as appropriate.

In-House Reporting

Following any accident of any severity that requires treatment, the employee's Line Manager will notify the responsible person, who will:

- Complete an accident investigation report on Form 22: Incident Record Form.
- Notify the enforcing authority, if the accident is reportable.

Following any accident of any severity that requires treatment, the employee's Line Manager will take statements and retain any other documents related to the accident.

If the injury is of a serious nature, or if there is any doubt, the injured person will be referred to the nearest hospital or other health professional for treatment.

Accidents and injuries that are reportable to the enforcing authority will also be reported to our employer's liability insurer by the responsible person.

Near-Miss Reporting (Internal)

In the event of a near miss, the observer will verbally report to the responsible person details of the hazard and near-miss incident including date, time, place and details of any third-party involvement.

The responsible person will record the incident on Form 22 Incident Report Form, adding appropriate action taken either in correcting the situation himself or by informing his superiors or management.

All Near-Miss Investigation Forms will be available for review at health and safety meetings at which particular reference will be made to hazards outstanding and what action has already been or is being taken to remove them.

Accident Investigation

The prime purpose of an incident investigation is to establish the immediate and root causes of the event so as to identify corrective actions necessary to prevent a reoccurrence.

If practicable, the management representative should consult with the health and safety representative of the area concerned during investigations.

General Guidelines

An investigation will begin as soon as possible after the hazard or incident is reported and the medical needs of any injured people have been met. For this to happen, incidents must be reported as soon as possible after they occur, ideally within 8 hours of the event.

Nothing at the accident site will be disturbed until after the completion of the investigation, other than what is necessary to prevent further injury, loss, or contamination, until the investigating officer(s) or committee has authorised clearing away.

Where necessary, photographs or video footage will be taken, and equipment held for subsequent examination or test.

It is desirable to take statements from witnesses as soon as possible after the incident.

Witnesses will be interviewed separately, and questions will be carefully considered so that facts and opinions are not confused.

It will be emphasised that the purpose of investigation is not to assign blame for the incident but to establish the causes so as to identify actions necessary to prevent a recurrence.

It is essential that the investigation is sufficiently broad to assess the full range of technical, human, and administrative factors involved in the hazard or incident even if some factors are outside the chief responsibilities of the area.

Preventive Action

Following an incident, it is the responsibility of senior management to take steps to prevent a recurrence. This will generally be achieved by implementing the recommendations arising out of the investigation.

In considering these recommendations senior management must take into account employer duties within health and safety legislation to provide a healthy and safe work environment as far as reasonably practicable.

If the recommendations are deemed not to be practicable, then senior management must refer them back to the responsible person, supervisor and/or health and safety representative, providing an alternative solution.

Critical Incident Management

Procedures for the management of potentially critical incidents will be developed in consultation with employees from the outcomes of risk assessments. Training in the Critical Incident Procedure will be provided to ensure that employees are competent in the procedure.

Procedures in critical incident management will consider the management of an actual critical incident and procedures will include the following:

- Action at the time of occurrence of a critical incident.
- Action immediately after a critical incident.
- Action following a critical incident.
- Action post critical incident.

Action at the time of occurrence of a critical incident:

Contact emergency services as soon as it is safe to do so.

Ensure injured and/or traumatised persons are provided with appropriate emergency response(s).

Inform the relevant Line Manager.

Ensure support for injured persons, and their relatives if appropriate, is available in the event that an incident is still continuing.

Ensure reporting to the HSE is carried out as applicable to the incident type.

Action immediately after a critical incident:

Allow employees to contact their family/close friend to advise them of the situation.

Assist members of the public with contacting their family/close friend or assist them by arranging transport for them if needed.

Ensure the site, or anything associated with the incident, is not disturbed in relation to a Police matter or when an investigation is required by HSE Inspectors.

Provide people who have been exposed to the critical incident with emotional support and practical assistance.

Inform the relevant Senior Manager, and the workplace Health and Safety Representative of the situation.

Inform all workplace employees about what has occurred, as necessary.

Action following a critical incident:

Encourage employees to have individual counselling if required.

Provide an incident debriefing for employees involved in the critical incident.

Provide a professional post-trauma counselling service if necessary.

Return the workplace to normal operation as soon as reasonably practicable.

Action post critical incident:

An investigation of the incident will be conducted in line with the guidance above.

The investigation will be commenced within 24 hours of the incident to record factual data about the occurrence and develop a good understanding of what it was and how it happened, so that decisions regarding necessary preventative action can be made.

Alcohol and Substance Abuse

Introduction

We will ensure the health, safety, and welfare of employees by reducing the risk of accidents, incidents or near misses caused by employees suffering from the effects of alcohol or drug misuse.

This policy applies to all persons who may be present on the site including employees, contractors, visitors, work experience placements etc.

This policy applies at all times when employees are at work or on visits away from site. The policy applies to employees travelling to and from their place of work and during breaks and lunchtimes. It also affects the use of Company premises after normal working hours. Organisers of any after-work events should be made aware of the policy and their responsibility to implement it.

Procedure

Substance misuse can affect the performance of employees in several ways, and it may not be appropriate to deal with every situation in the same way. There may be an immediate situation requiring resolution or an ongoing performance issue to be managed. For example:

- An incident may occur as a result of an employee being under the influence of alcohol, drugs or other substances.
- A pattern of regular absences may emerge or a complaint may be received about an employee which indicates there may be a substance misuse problem.
- Performance may gradually deteriorate over a period of time.

As with any problem affecting ability to work, initial action must be taken by the Operations Manager or Project Managers. It is important to identify any ongoing problem at an early stage when help can be made available.

Assessing the risk – establishing the problem

There is no uniform method available to assess the risk of drug or alcohol consumption in the workplace. The severity of drug effects is different for each person and the potential risk caused by drug impairment varies according to the task being performed. The Operations Manager or Project Managers or employees will assess each case individually by taking into account the person involved, the type of work being performed, and the risk created by the individual being affected by drugs or alcohol.

- The Operations Manager or Project Managers, following discussion with the employee, should refer cases of suspected, or admitted substance misuse to the Directors.
- Employees can also make a confidential self-referral to management for help and support.
- Dealing in or possession of illegal substances will be reported immediately to the police and will be managed under the Company's disciplinary procedure.
- The Operations Manager or Project Managers are encouraged to recognise that employees may be adversely affected by the drinking, drug taking or substance misuse of others. Information about internal and external sources of advice and support is available from the Directors.
- If an alcohol or substance misuse problem is admitted, the Directors should advise the employee what support can be provided. Consideration may need to be given to re-allocation to other duties during and after rehabilitation, depending on the

circumstances. If after help and support, the situation does not improve, the employee should be advised of the implications of continuing problems with their performance or behaviour or absence and should be given an indication of how the situation will be monitored and over what time scale.

- Employees may deny having a drink or substance misuse problem. If this happens, the situation should be dealt with by making clear what improvement is required in their performance, behaviour or absence, within a stated timescale and how the situation will be monitored. The employee should also be advised who they can approach confidentially for help and advice.
- Following an investigation interview, if there is no improvement within the timescales given, the Operations Manager or Project Managers must inform the Directors, who will provide further advice and support on how to proceed in accordance with the Company's Disciplinary or Managing Sickness Absence policies.
- Should any individual refuse help or discontinue a programme of treatment, this should not in itself be grounds for disciplinary action. However, unacceptable behaviour and standards of work, or actions endangering other employees will be dealt with through normal disciplinary procedures.
- If, whilst under the influence of alcohol, drugs or other substances at work, an employee were to behave in a way which could be regarded as gross misconduct, for example carries out an assault, behaves indecently, causes malicious damage to property or threatens in any way the health or safety a member of the public, another employee or any other person then, irrespective of whether support may also be appropriate for an underlying problem, disciplinary action may be taken which could result in dismissal.

Persons affected by alcohol or another drug

If the Operations Manager, Project Managers, or employee observes a person behaving as if they are affected by drugs or alcohol while working, then action must be taken to preserve the safety of that person, others affected and Company property. Inappropriate behaviour of this type will be reported to the Directors as soon as possible.

Social functions

Alcohol may only be provided at a management-endorsed social function on Company premises when employees who consume alcohol will not be expected to return to work or drive a vehicle to get home.

Where alcohol is provided, "good service practice" will apply, i.e. food must be provided, low alcohol, and non-alcohol alternatives must be available. A nominee will be selected by local management to oversee the function.

Auditing and Review

Introduction

This procedure outlines the requirements for the internal auditing of the Company Health and Safety Management System and legislative compliance.

Arrangements to conduct periodic audits and site inspections will be established in order to determine whether the health and safety management system and its elements are in place, adequate and effective in protecting the safety and health of workers and preventing incidents.

- An audit and inspection programme will be developed, which includes a designation of auditor competency, the audit scope, the frequency of audits, audit methodology and reporting.
- The audit includes an evaluation of the Company health and safety management system elements or a subset of these, as appropriate. The audit will cover:
 - Health and Safety Policy.
 - Responsibility and accountability.
 - Communication and consultation.
 - Competence and training.
 - System planning, development, and implementation.
 - CDM compliance.
 - Risk management.
 - Management of change.
 - Emergency preparedness and response.
 - Contracting.
 - Performance monitoring and measurement.
 - Accident investigation.
 - Management review.
 - Preventive and corrective action.
 - Continual improvement.
 - Any other audit criteria or elements that may be appropriate.
- The audit conclusion will determine whether the implemented health and safety management system elements or a subset of these:
 - Are effective in meeting the Company health and safety policy and objectives.
 - Are effective in promoting employee's participation.
 - Respond to the results of health and safety performance evaluation and previous audits.
 - Enable the Company to achieve compliance with relevant national laws and regulations.
 - Fulfil the goals of continual improvement and best health and safety practice.

Site Inspection

A site inspection schedule will be drawn up for each project to include at least one documented fortnightly inspection by the Health and Safety Manager, Operations Manager or Project Manager.

Daily site inspections will also be carried out and any hazards / remedial actions rectified. These will be carried out by the Project Engineer and any hazards reported to the Operations Manager or Project Manager.

The Operations Manager or Project Manager will also undertake a site inspection during their routine visit.

Brazing

Introduction

Brazing is the main method of joining refrigeration pipework and is critical to the reliability of the system and containment of refrigerant. Consideration of Health and Safety is essential when using oxyacetylene and a Risk Assessment should be carried out in every instance before brazing commences and all safety precautions adhered to.

Identification of Cylinders and Brazing Equipment

Oxygen cylinders will be colour coded black with a solid white collar. Also, all components fitted to an oxygen cylinder will have right hand threads – this includes the regulator valves, flash back arrestors and the fitting to the torch.

Acetylene cylinders are colour coded maroon. All the threads to the acetylene side of the brazing equipment have *left hand threads* so that it is impossible to incorrectly connect the equipment to the oxygen cylinder and components.

In addition to the above, it is normal to find that the components on the oxygen side of the equipment (valves, hoses flashback arrestors etc.) are blue while the similar components for acetylene are red.

Safety Knowledge of Acetylene

Acetylene is unstable in its free state when compressed to above 25psi, so it is supplied dissolved in a chemical called acetone. This is why it is called dissolved acetylene. The cylinder also contains a porous material such as charcoal, synthetic asbestos or kapok.

This has the effect of dividing up the space inside the cylinder into a large number of small cells; preventing the sudden decomposition of the whole of the acetylene charge should accidental local heating occur. A full cylinder of acetylene will be pressurised to about 225psig.

Acetylene is also liable to explode in the absence of air if the cylinder is given a sudden shock such as being hit with a heavy object or falling over onto a hard surface.

Never use any cylinder that shows signs of being damaged.

If a cylinder does become heated for any reason:

- Immediately take it outside if it is within a building.
- Immerse it in water or spray water over its outer surface.
- Open the valve and keep the cylinder as cool as possible until it is empty.
- Inform the cylinder supplier.

Acetylene will react with copper to form a dangerously explosive substance called copper acetylide so copper must not be used for fittings in an acetylene system. Copper alloys can be used as long as they do not contain more than 70% copper.

Safety Knowledge of Oxygen

Oxygen cylinders are pressurised to 2500psig.

On no account should oil or grease come into contact with the fittings on oxygen cylinders as they will oxidise readily in the presence of oxygen and may spontaneously ignite. *“The following sections are for guidance purposes only Engineers must use their own knowledge and training during any Brazing work”.*

Safe Handling of Transportable Gas Containers

Where cylinders are being moved within the workspace they should, wherever possible, be moved on trolleys.

In all cases, whether at the position where brazing is being carried out or while being transported on trolleys, cylinders must be secured and upright. This is especially important as regards cylinders of acetylene.

Before moving a cylinder, the valve must always be closed. Do not attempt to move a cylinder with the hose and regulator attached unless it is secured on a purpose-built trolley.

Protection against Burns from Flames and Sparks

- It is preferable that flame retardant overalls are worn to protect the body while brazing.
- Also, a similar type of glove should be used to protect the hands. These are only meant as a protection against heat and sparks NOT as a form of protection for picking up a hot piece of metal.
- Goggles manufactured to BS 679 should be worn as eye protection. These will need to be cleaned periodically to maintain good visibility and replaced when they become damaged or result in obscured vision.

Checks on the Workplace

- Harmful fumes can be given off from metals and fluxes during the brazing process which can be detrimental to the health of the operative(s) and anyone else in the vicinity.
- It is important to ensure that the workplace is well ventilated, or that an adequate extraction system is available in the area in which the brazing is taking place.
- Checks should be made to ensure that the extraction system does not result in unacceptable draughts or low temperatures occurring in the working area.
- In confined areas where adequate ventilation cannot be ensured then breathing apparatus must be used to prevent the inhalation of toxic fumes and gases.
- The location of suitable emergency exits, fire extinguishers, telephones and first-aid facilities should be ascertained before starting to work.
- All local safety requirements must be checked and met such as hot work permits.

Cylinder Storage

- Always store and use acetylene cylinders in an upright position.
- Store oxygen and acetylene cylinders apart and in a well-ventilated fireproof storeroom or under a shelter in a secure compound outside the building.
- Keep all cylinder connections free from dirt, oil, and grease.
- Prevent cylinders being subjected to any source of heat.
- Clearly mark cylinders that are empty and store them away from full cylinders.

Additional Safety Considerations

- Do not use excessive force when tightening gas seals but subsequently check to ensure that all connections are gas tight.

Assembling the Equipment

To prevent an accidental loss of gas and minimise the risk of an accident, the following instructions must be followed at all times:

- Stand both the cylinders vertically and attach to the trolley with the clamping bar.
- Position them so that the shut off valve is accessible from the front of the trolley.
- Check that the surfaces of the cylinders and the regulators are free from dirt, oil, grease or any lubricants and jointing compounds. This is extremely important as traces of these compounds could ignite and cause the cylinders to explode.
- Having first removed the protective cover fit the oxygen regulator to the oxygen cylinder. The regulator and the cylinder have a right-hand thread so the nut securing the regulator to the cylinder is tightened using the spanner provided by turning it in a clockwise direction, similar to a normal nut and bolt.
- Do not over tighten the nut, but just tighten sufficiently to ensure that the joint is gas tight.
- Fit the acetylene regulator to the cylinder of acetylene in the same way, but in this case, to avoid incorrect assembly between the two cylinders, the securing nut has a left-hand thread so it will have to be tightened by turning it in a counterclockwise direction.
- For identification, all left-hand threaded nuts have a groove cut around their outside edge.
- Screw the appropriate check valve and flashback arrestor to each of the regulators, the acetylene valve is coloured red and has a left-hand thread to prevent incorrect assembly.
- Tighten using the spanner provided.
- Fit the hose assembly to the check valve and flashback arrestors. If it is a combined hose, the two sections being attached to each other, it may be necessary to split them apart for a short length in order to be able to fit the two ends to the flame arrestors. Again, the acetylene hose is red and the oxygen one blue.
- Connect the torch body on the end of the hoses. The torch body has two valves to individually control the flow of both the oxygen and the acetylene, but here again it is not possible to fit the hoses to the wrong connections on the torch body because the two fittings have opposite hand threads.
- Fit a nozzle into the end of the torch body and tighten using the spanner provided. As the size of pipe being brazed increases so will the size of the nozzle required for this work.
- Experience will quickly enable a suitable sized nozzle to be selected for any particular job.
- It is always advisable to use a slightly larger nozzle than one which is too small.
- An undersized nozzle will restrict the amount of heat that can be applied, possibly preventing the brazing alloy from penetrating down the full depth of the joint.

Lighting and Adjusting the Flame

- Slowly open the valves on both the oxygen and acetylene cylinders - the valve may have a handle attached for this purpose. If it only has a square shaft use the key provided to open the valve.

- This key may be part of one of the spanners.
- Do not open the valve suddenly as this could damage the regulator and cause an accident.
- Only open the valve one full turn. Check that there is a supply of pressurised oxygen and acetylene in the cylinders.
- One of the gauges on each of the regulators will display the cylinder pressure.
- Slowly adjust the valve on the oxygen regulator to give a reading of about 0.5bar. Adjust the acetylene regulator to a similar pressure.
- Although the regulators can be opened to increase the operating pressures of both the oxygen and acetylene, no gas will flow until the valves on the body of the torch are opened.
- It will be necessary to open the valves on the body to relieve the pressure in the hoses if a lower pressure is to be set at the regulator. Also, it is sometimes easier to adjust the regulator with a small amount of gas purging through the torch.
- Care must be taken when setting the acetylene pressure in this way that there are no ignition sources close to the nozzle of the torch.
- The pressures given above will be satisfactory for most brazing operations.
- Once the required pressures have been set on the regulators open the acetylene valve on the torch and ignite the flame using the spark lighter provided holding it at right angles to the nozzle.

“Do not attempt to light the flame by using a match or cigarette lighter. Your hand will be too close to the flame when using either of these types of ignition”.

- Adjust the flow of acetylene by closing or opening the valve on the torch until the flame just ceases to smoke.
- Slowly open the oxygen valve on the torch. The flame will change as more oxygen is added.
- The ideal flame will have a white core as it leaves the nozzle with a narrow bright outer section.
- If there is not enough oxygen the flame will have a third cone of unburned acetylene at the end of the white inner core.
- If too much oxygen is present the outer edge of the flame will be ragged, the inner white cone will be barely visible and there will probably be an audible hissing sound.
- The size of the flame can be controlled by the amount of oxygen and acetylene being released.
- Adjustments can be made to either the regulator pressures or the valves on the torch.
- Experience will establish the best size of flame for most of the brazing procedures.

Lighting the Flame

- Always open cylinder valves slowly to avoid a sudden increase in gas pressure damaging the regulator.
- Only open cylinder valves about one turn, or just sufficient to ensure an adequate gas flow. This will enable them to be closed quickly in the event of an emergency.
- Slowly open valves on oxygen and acetylene cylinders (check pressures).

- Adjust oxygen regulator valve to 0.5bar – open mixer torch and check regulator setting.
- Adjust acetylene regulator valve to 0.5bar – open mixer torch and check regulator setting.
- Leak test equipment using approved fluid.
- Open acetylene valve on torch and ignite.
- Slowly open oxygen valve on torch.
- Adjust flame as required:
 - Neutral (Brazing).
 - Slightly Carburising (Silver Soldering).

Brazing Flame

Control flame size from torch valves, too much acetylene - unburned acetylene at end of white core.

Too much oxygen - ragged outer flame, small white core, hissing

Shutting Down the Flame

- To turn out the flame, first shut off the flow of acetylene by closing the valve on the torch.
- Once the flame has extinguished, close the oxygen valve.
- If no further brazing is to be done in the immediate future, close the valves on both the oxygen and acetylene cylinders.
- Slowly open both the valves on the torch to relieve the pressure in both hoses and then close them again.
- Open the gas regulators to relieve the spring pressure. It is not advisable to leave the regulator's spring under pressure for any period of time when not in use.

Maintenance

- Periodically, check all of the fittings to ensure that they are still gas tight and that the hoses are in good condition.
- If the flame is irregular and it cannot be corrected by adjusting the flow of oxygen or acetylene, it could be due to a partially blocked nozzle.
- Shut off the flame and close down all the valves.
- Clean the nozzle using the appropriate wire cleaner provided. Do not attempt to clean the nozzle with any other type of cleaner or it could permanently damage the nozzle.
- Be careful when cleaning a nozzle that has just been used, it will be very hot.

Construction (Design and Management) Regulations 2015

Introduction

The key aim of the Construction (Design and Management) Regulations (CDM), and this procedure, is to ensure health and safety is fully integrated into the design, management and end user use of our construction projects and that suitable resources are made available to ensure we fully comply with the requirements of the Regulations on health, safety, and welfare.

This procedure applies to all of our construction projects, both notifiable and non-notifiable.

A project will be notifiable to the Health and Safety Executive if the construction work is scheduled to last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project; or if it is likely to exceed 500 person days.

On all projects we will act as one or more of the following duty holders:

- Client.
- Domestic client.
- Designer.
- Principal Designers.
- Principal Contractor.
- Contractor (working on behalf of a Principal Contractor).

The Company will ensure that all projects where CDM applies are identified and that responsibilities are allocated at the earliest opportunity. In the event that we do not appoint a Designer, Principal Designer, or a Principal Contractor we will take on these responsibilities.

Key Elements

As a Company we will strive to implement a number of key elements towards securing construction health and safety. These include:

- managing the risks to health and safety by applying the **general principles of prevention**.
- **appointing** the right people and organisations at the right time;
- making sure everyone has the **information, instruction, training and supervision** they need to carry out their jobs in a way that secures health and safety;
- duty holders **co-operating and communicating** with each other and **co-ordinating** their work; and
- **consulting workers and engaging** with them to promote and develop effective measures to secure health, safety and welfare.

General

Procedure

The persons responsible for ensuring overall compliance with CDM are the Directors.

The Directors will ensure that the required appointments are made, and adequate resources are made available.

Where we act as a **Client** under the Regulations, the Operations Directors will ensure that:

- The competence and resources of all appointees are checked and that information, instruction, training and supervision is provided.
- Suitable management arrangements are in place for the project including welfare facilities.
- Adequate time and resources are made available for all stages.
- Pre-construction information is provided to designers and contractors.
- A Principal Designer is appointed in writing.
- A Competent Principal Contractor is appointed in writing.
- The construction phase does not start unless there are suitable welfare facilities and a suitable Construction Phase Plan is in place.
- A Health and Safety File is retained and made available to interested parties.

Where we act as the **Principal Designers** under the Regulations, the Operations Directors will ensure that:

- We advise and assist the client with their duties.
- The Health and Safety Executive are notified of the project (HSE Form F10), where required.
- All health and safety aspects of the design work are co-ordinated and that the Company cooperates with others involved in the project.
- Good lines of communication are facilitated between the client, designers and contractors.
- We liaise with the principal contractor regarding ongoing design issues.
- Pre-construction information is identified, collected and passed on.
- The Health and Safety File is prepared and updated as required.

Where we act as a **Designer** under the Regulations, the Operations Directors will ensure that:

- Hazards are eliminated where practical and risks reduced at the design stage.
- Information regarding remaining risks is publicised and made available to interested parties.
- The client has been made aware of their duties and a Principal Designers has been appointed.
- Any relevant information is provided for the Health and Safety File.

Where we act as a **Principal Contractor** under the Regulations, the Operations Directors will ensure that:

- The project is properly planned, managed and monitored.
- The competence of all our appointees is suitably verified and ensure that information, instruction, training and supervision is provided.
- Our own employees are trained and competent.
- There are adequate welfare facilities available for workers.
- A written plan is prepared, developed and implemented along with site rules, risk assessments and method statements.

- Relevant parts of the plan are given to contractors.
- We co-ordinate and communicate with all Contractors on our construction sites.
- ALL workers have a site induction and further information and training needed for the project.
- Workers are consulted.
- Emergency procedures are formulated, communicated and displayed.
- We liaise with the Principal Designers regarding on-going design issues.
- The site is secured and suitable signage displayed.
- Notification of Project (HSE Form F10) is displayed on site.

In addition to these responsibilities, as a minimum, in all cases, the Company will ensure that:

- Our own competence is constantly reviewed and verified.
- We co-operate with others and co-ordinate work to ensure the health and safety of construction workers and others who may be affected by the work.
- Obvious risks are reported.
- We take account of, and apply, the general principles of prevention when carrying out duties.

Where we act as a **Contractor** under the Regulations, the Operations Directors will ensure that:

- The project is planned, managed and monitored.
- The competence of all our appointees is verified and ensure that information, instruction, training and supervision is provided.
- Our own employees are provided with information, instruction, training and supervision.
- There are adequate welfare facilities available for workers.
- A written plan is prepared, developed and implemented along with site rules.
- Relevant parts of the plan are given to the Principal Contractor.
- ALL our workers have a site induction and further information and training needed for the work.
- Workers are consulted.
- We will liaise with the Principal Designers regarding on-going design issues.

In addition to these responsibilities, as a minimum, in all cases, the Company will ensure that:

- Our own competence is constantly reviewed and verified.
- We co-operate with others and co-ordinate work to ensure the health and safety of construction workers and others who may be affected by the work.
- Obvious risks are reported.
- We take account of, and apply, the general principles of prevention when carrying out duties.

Construction Phase Plan

Where we are required to put together a Construction Phase Plan, the Company has appointed the Principal Contractor to ensure the plan is prepared. As a minimum, where relevant, the plan will contain:

- Description of the project.
- Management arrangements for the work.
- Arrangements for controlling significant site risks.
- Details of the Health and Safety File layout, arrangements for gathering information and the storage of information.

Health and Safety File

Where we are required to put together a Health and Safety File, the Company has appointed the Principal Designer to ensure the file is prepared. As a minimum, where relevant, the file will contain:

- A brief description of the work carried out.
- Any residual hazards which remain and how they have been dealt with.
- Key structural principles.
- Details of any hazardous materials used.
- Information regarding the removal or dismantling of installed plant and equipment.
- Health and safety information about equipment provided for cleaning or maintaining the structure.
- The nature, location and markings of significant services, including underground cables, gas supply equipment, firefighting services.
- Information and as-built drawings of the structure, its plant and equipment.

Communication and Consultation

Introduction

The Company is committed to creating and maintaining effective systems of communication on health and safety matters and will actively encourage and support all employees in their effort to participate in ensuring that there is an adequate flow of information throughout the Company.

The Company will ensure that arrangements are in place, and procedures established and maintained to:

- Receive, document and respond to internal and external communications related to health and safety.
- Ensure the internal communication of health and safety information between relevant levels and functions of the Company.
- Ensure that the concerns, ideas and inputs of employees and contractors on health and safety matters are received and considered.
- Ensure that suitable procedures are developed to ensure meaningful communication between all parties on site, including the involvement of non-English speaking workers and contractors.

Internal Communication

The Company will regularly communicate with employees on health, safety and welfare issues and provide all the necessary information that they require for them to carry out their duties safely and efficiently.

The Company will actively encourage and support all employees and contractors in communicating on health and safety related matters.

The Company will consult employees on health, safety and welfare issues and will provide the information employees require in order to carry out their duties safely.

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

Details of the performance and effectiveness of the health and safety management system will be communicated to the Operations Manager and Project Managers.

The methods or systems to enable internal communications will be established and documented.

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

Periodic reviews will be undertaken of the established communication system and updated where necessary.

A system will be set up for each project to ensure at least weekly meetings are held and minutes recorded.

All parties on site (contractors, suppliers, clients etc.) will be requested to attend site meetings to ensure effective communication on site for the duration of the project.

The channels through which the Company proposes to communicate on health and safety, include:

- Health & Safety Meetings – both in the office and on site.
- Health and safety promotions and campaigns.

- Site Notice Board.
- Liaison with Consultants.
- Email and memo bulletins.
- Safety training.
- Tool-box talks.

Non-English speaking employees

At present, all of our employees are English speaking, although we would welcome applications from non-English speaking workers. Should we employ someone whose first language is not English we would adopt the following procedure:

- All critical health and safety documents will be professionally translated into the employees' first language.
- We would print and issue any relevant HSE publications that have been professionally translated.
- We will utilise the services of a competent interpreter where required for safety critical elements such as induction, general and specific health and safety training.
- We would ensure that the employee receives additional supervision (to be documented in our risk assessment) to ensure the employee understands the hazards of site work and control measures employed to ensure their safety.
- We will actively encourage the employee to learn English and allow for reasonable paid leave to study the English language.

External Communication

The aim of this procedure is to ensure our health and safety management system is effective and we meet our responsibilities for communicating any changes, improvements and alterations in health and safety that concern any third party. The responsibility for communicating on health and safety related matters with third parties lies with the Directors.

External liaison could be conducted with interested third parties such as:

- Enforcing authorities – Health & Safety Executive/local authority
- Emergency services
- Local officials
- Community groups
- Neighbours
- Media
- Suppliers
- Contractors
- Service companies
- Clients
- Landlords and tenants

It is our aim to ensure the elements identified below will be implemented and monitored to meet the standards required.

- The method or process to request, receive, document and respond to communications from interested parties will be established and documented and distributed to the relevant people within the Company.
- Communication received from statutory authorities and external parties with respect to health and safety matters will be responded to promptly and within the timescales requested in any such correspondence.
- All communications on health and safety matters, whether written or verbal, will be recorded and those records retained for future reference.
- Positive steps will be taken to establish and maintain good relations with the local community whenever opportunities arise. Any community liaison meetings will be minuted and those minutes retained.
- An annual review of our clients' satisfaction with our health and safety arrangements will be undertaken, and the results reported in the management review meetings.

Periodic reviews will be undertaken of the established communication systems and elements updated where necessary.

Confined Spaces

Introduction

The Operations Manager and Project Managers are responsible for implementing this procedure and will ensure the effective operation of our safety arrangements in respect of the following:

- Avoid entry to confined spaces, e.g. by doing the work from outside.
- If entry to a confined space is unavoidable, follow a safe system of work.
- Put in place adequate emergency arrangements before the work starts.

Procedure

The Company has a duty to ensure compliance with the Confined Spaces Regulations regarding employees and others within their control.

The Company must assess the need for entry. No person should work within a confined space where it is reasonably practicable to undertake the work without entering the space.

A suitable and sufficient assessment of the risks must be undertaken for all work activities. For work in confined spaces this means identifying the hazards present, assessing the risks, and determining what precautions to take. In most cases the assessment will include consideration of:

- The task- the reason for entry.
- The working environment.
- Working materials and tools.
- The suitability of those carrying out the task.
- Arrangements for emergency rescue.
- Previous contents.
- Remaining residues.
- Contamination.
- Hypoxic environments.
- Levels of carbon dioxide and oxygen.
- Physical dimensions.
- Chemicals.
- Sources of ignition.
- Ingress of substances.
- Emergency rescue arrangements.

Where it is not reasonably practicable to avoid entering a confined space to undertake work, the employer or self-employed person is responsible for ensuring that a safe system of work is used. Priority should be given to eliminating the source of any danger before deciding what precautions are needed for entry.

The precautions required in a safe system of work will depend on the nature of the confined space and the risk assessment.

The main elements to consider when designing a safe system of work, and which may form the basis of a 'permit-to-work' are:

- Levels of supervision.
- Competence for confined spaces working.
- Communication methods and systems.
- Procedures and equipment for testing/monitoring the atmosphere.
- Gas purging.
- Ventilation.
- Removal of residues.
- Isolation from gases, liquids and other flowing materials.
- Isolation from mechanical and electrical equipment.
- Selection and use of suitable equipment.
- Personal protective equipment (PPE) and respiratory protective equipment (RPE).
- Fragile roof voids.
- Gas supplied by pipes and hoses.
- Access and egress.
- Fire prevention.
- Lighting.
- Static electricity.
- Smoking.
- Emergencies and rescue.
- Limited working time.

The Company will ensure that a permit-to-work system is implemented. A permit to work system is likely to be required where there is a reasonably foreseeable risk of serious injury in entering or working in the confined space because:

- The assessed risks are high and cannot be easily controlled.
- The system of work is complex.
- Other work activities being carried out can possibly affect safe working in the confined space.

Prior to the commencement of the work, the risk assessment and safe system of work must be reviewed and approved by a competent person.

All personnel involved with the confined space entry must be suitably fit, healthy, and trained to a competent standard.

All documentation and procedures must be reviewed if there are any significant changes, which may affect the safety of person(s) involved in the entry.

Control of Asbestos

Introduction

The Company will identify whether asbestos containing materials are likely to be present in any of its premises or on sites that it is refurbishing. We will, as far as is reasonably practical, ensure that asbestos is identified on site and managed appropriately by competent persons.

This procedure describes the requirement for effective management of asbestos remaining in situ, within the buildings and infrastructure and asbestos contained within the sites in which we work.

This procedure and associated documents apply to all persons associated with our work activities.

Procedure

Procedures relating to the management of asbestos throughout the organisation will be documented in our Asbestos Management Plan and will be accessed through the Operations Manager and Project Managers.

The Asbestos Management Plan will be kept up to date and shall provide a record of the location, condition, maintenance, and procedure for all asbestos containing materials.

The Asbestos Management Plan, as a minimum, will:

- Contain a suitable and sufficient assessment of the risks posed by all known or presumed asbestos containing materials.
- Identify control measures to ensure that known or presumed asbestos containing material is maintained or managed in such a way as to ensure that asbestos fibres are not released.
- Detail the arrangements and procedures to be followed to ensure that all work which could give rise to the release of asbestos fibres is assessed, planned, implemented, monitored and reviewed to eliminate the risk of asbestos fibre release.
- Identify how the plan will be communicated to any employees, visitors and contractors that could be exposed to asbestos fibres.
- Include procedures for ensuring that employees are advised of any risks associated with asbestos containing materials and are consulted in a timely manner on any planned works.
- Detail arrangements for ensuring that only competent, licensed persons undertake work on asbestos containing materials.
- Contain emergency procedures for dealing with unplanned releases of asbestos fibres including containment of those fibres and reduction of exposure to those fibres to the lowest possible level.
- Identify clearly how the plan is to be monitored to ensure that the plan is meeting its intended objectives.
- Identify the practical arrangements for ensuring that all information contained within the plan is kept up to date and demonstrates coherent control of the risks associated with asbestos containing material.

To comply with the aims of this procedure, regular consultation with employees will be required when:

- The risk assessment identifies significant risks of asbestos fibre release.

- An unplanned release of asbestos fibres occurs.

The plan will identify all persons at risk from exposure to asbestos fibres. The organisation will ensure that those persons identified are provided with suitable and sufficient information, instruction, training, and supervision to reduce those risks to a level consistent with the aims of this procedure.

Monitoring the condition of the asbestos containing material and updating risk assessments are an integral part of the plan. The responsibility for ensuring this monitoring is undertaken will fall on the nominated person responsible for this procedure.

The removal, transport and/or disposal of asbestos or asbestos containing materials or plant and equipment containing asbestos, will be carried out in accordance with legislative requirements.

Employees who work in areas which may be affected by the presence of asbestos will be made aware of and comply with the requirements of the Asbestos Management Plan and any procedures developed to ensure that we effectively manage asbestos and asbestos related issues.

Employees who employ or engage other personnel to undertake various works are responsible to ensure that those personnel are made aware of our Asbestos Management Plan. Such contractors or other external personnel shall receive appropriate training and instruction prior to the commencement of any work in areas or plant or equipment affected by or containing asbestos.

Those responsible for engaging such personnel shall monitor their activities to ensure that they do not breach asbestos-related legislation, policies or procedures whilst carrying out work in such areas.

We recognise our obligations in relation to persons working with or adjacent to asbestos in our buildings or on equipment containing asbestos.

Personnel from other organisations are responsible for ensuring that they are aware of and comply with the requirements of the Asbestos Management Plan and any procedures developed to ensure that we effectively manage asbestos and asbestos related issues.

Discovery and Management of Asbestos on Site

The risks associated with exposure to asbestos are well documented, especially in relation to the construction and refurbishment industries. In recognition of these risks and to fulfil its duties under the Health and Safety at Work Act and other relevant legislation the Company is committed to minimising any risk to the health of its employees, contractors, and the public from asbestos on construction sites.

The Company will manage asbestos 'in-situ' in a responsible manner, ensuring that it is 'safe'. Where this cannot be achieved with confidence, then a licensed contractor will remove the asbestos.

Prior to any intrusive works, and before any refurbishment or minor work necessary to the fabric of a building, the Company will undertake an asbestos survey (via a competent person) and make guidance available to employees, contractors, and others so that no person is knowingly exposed to the dangers of asbestos. This must be a type 3 or demolition/refurbishment survey.

Where materials suspected of containing asbestos are discovered during the course of work, work must cease immediately, the duty holder informed at the earliest opportunity and, in order that the material(s) can be assessed, a specialist UKAS accredited asbestos consultant or other competent person, as determined by the duty holder, will be instructed to assess the situation, and provide advice before continuation of the works.

The Company will expect any person who authorises work on property to:

- Fulfil the duty to provide site-specific advice to those undertaking work. This usually means providing information on known or suspected ACM (asbestos containing materials) where it has or is likely to be found. This will take the form of the Company's Asbestos Register and/or survey data.
- Raise awareness of this Asbestos Policy and Procedure.
- Ensure that all contractors undertaking asbestos works are HSE licensed and competent. This will take the form of an independent assessment plus membership of ARCA or other recognised industry body; or such other method that the duty holder shall determine, in addition to being registered by the HSE.
- Ensure that where suspected ACM are discovered, a relevant competent person undertakes an assessment of the risk to tenants, employees, contractors and the public.

The Company expects all employees and contractors working on its premises to:

- Read and understand asbestos information provided by the Company prior to commencing work and to plan the work accordingly.
- Ensure that all operatives carrying out work on site have been made aware of the Asbestos Register and any relevant additional survey information.
- Demonstrate that all operatives, including sub-contractors, have been given adequate asbestos awareness training and induction, and update training as required by the Regulations and associated Approved Codes of Practice (ACoP).
- Cease work upon discovery of suspected ACM (Asbestos Containing Materials), wherever possible leave the area in a safe condition, withdraw operatives from the affected area, secure the area to access and report immediately to the duty holder.
- Await the outcome of the results of any asbestos surveys undertaken to identify the materials and the instruction of the duty holder prior to re-entering the area.

Control of Hazardous Substances

Introduction

The Company will ensure that exposure to hazardous substances is either prevented or, where this is not reasonably practicable, adequately controlled. This duty is extended to any other person, at work or not, who may be affected by our activities.

This procedure outlines the requirements for the management of hazardous substances and dangerous goods in the workplace and on site, to minimise effects to health and safety from exposure and reduce the impact on the environment. The procedure summarises requirements for labelling, material safety data sheets (MSDSs), risk assessments, storage, and disposal. The procedure relates to all Company employees and contractors.

Procedure

Hazardous Substance Register

Hazardous substances used or produced in any process, including closed systems, at all workplaces and sites will be identified and a register maintained.

Non-hazardous chemicals will also be included.

A collection of MSDSs will be readily available to employees and constitutes part of the Register.

Preliminary Hazard Assessment

Prior to purchasing any hazardous substance, consideration will be given to the possibility of using a safer substance. This can be achieved by requesting an MSDS before using a new hazardous substance, so that the health hazard information can initially be reviewed.

Risk Assessment

For a substance to be used, the Risk Assessment Form must be completed in consultation with relevant employees. In addition, external experts may need to be utilised depending on the complexity of the material and process.

Note that if atmospheric monitoring is required, it needs to be carried out by an appropriately qualified person (or competent person depending on the complexity of the task) and the data must be recorded and retained (30 years).

Risk Control

Measures to eliminate or control risk will be developed in the following order of controls, known as the hierarchy of controls:

- **Elimination.**
- **Reduce.**
- **Isolate.**
- **Control.**
- **Personal Protective Equipment.**
- **Discipline.**

Training

Employees using hazardous substances or dangerous goods will as a minimum requirement

complete a training programme for the management of hazardous substances.

Risk assessments of dangerous goods and hazardous substances are to be carried out by employees trained in hazardous substance management principles.

Material Safety Data Sheets (MSDSs)

MSDSs are required for all chemicals that are deemed hazardous. MSDSs must be obtained for all chemicals in use or stored.

The MSDSs must:

- Be readily available to personnel using the substances with information on chemicals in a form that is easily understood by the user.
- Identify whether the substance is a designated hazardous substance.
- Meet the needs of those employees with language or literacy difficulties.

The manufacturer's MSDSs must be updated every five years and can be obtained from the supplier. The manufacturer's copy of the MSDS must be held on file.

Contracts for the supply of hazardous substances to the Company must include provision for the supplier to supply the appropriate MSDS and must notify any changes in formulation.

Action Summary:

Substance Inventory

A complete inventory covering the substances hazardous to health used and stored on the premises and used on site will be prepared and made available for inspection. The inventory listing is regularly reviewed and revised, as necessary.

Employees will be reminded that only substances hazardous to health listed on the substance inventory may be used. No substances hazardous to health may be introduced to the workplace without management authorisation in writing.

Risk assessments and data

Specific risk assessments as required by legislation will be carried out for all substances hazardous to health and processes in which they are used. Health and safety data will be obtained from the suppliers of all substances hazardous to health and will be kept readily available for inspection.

Information, instruction and training

Employees will be given information, instruction, and training in the activities they undertake involving substances hazardous to health. The information given to employees will include the results of the risk assessment, whether or not there are any significant risks. The information will not include the hazard data sheet, because this requires interpretation by a suitably competent person.

The use of substances hazardous to health will be restricted to trained/experienced authorised persons who are familiar with the safe use of the substances, hazards associated with processes and the safety precautions to be observed.

Personal protective equipment

- The condition and use of personal protective equipment (PPE) will be regularly monitored and equipment replaced as necessary.
- Employees will be instructed on the use and storage of PPE, its limitations, the results of failure to wear it and the maintenance required.

- Maintenance of PPE will be carried out by the supplier of the equipment, or the person authorised by the business to do so.

Control of Legionella

Introduction

Legionnaires' disease is a type of pneumonia. People catch Legionnaires' disease from inhaling small droplets of water suspended in the air which contain the legionella bacterium. This bacterium is widespread in nature and found in rivers and lakes etc. Outbreaks of the disease occur from purpose-built water systems where temperatures are warm enough to encourage the growth of bacteria (e.g. in cooling towers and evaporative condensers) and from water used in domestic and industrial buildings.

We will identify where Legionella creates a hazard to our employees through the risk assessment process and ensure full compliance with the Health & Safety Executive Approved Code of Practice – The Control of Legionella Bacteria in Water Systems (L8).

Procedure

As a Company we will:

- Identify and assess sources of risk of Legionella.
- Prepare a scheme (or course of action) for preventing or suitably controlling the risk.
- Implement and manage the scheme, appointing a competent, qualified organisation to work in conjunction with our Operations Manager and/or Project Managers to undertake any necessary assessments, testing, cleansing and remedial works.

We will create and maintain an up-to-date record of the potential risks inherent in the water systems in our building and equipment. This will be based on a risk assessment carried out by a 'Competent Person' as defined in Health & Safety Executive Approved Code of Practice – The Control of Legionella Bacteria in Water Systems (L8).

The risk assessment will identify whether conditions are present which will encourage bacteria to multiply, if there is a means of creating an aerosol of water droplets and if there are susceptible people present who present a greater than normal risk.

The risk assessment will include the measures to be implemented to reduce and minimise risks identified.

We will review the risk assessment every 12 months as a minimum or when systems are modified. The outcome of this review will be recorded.

We will implement the actions required to reduce and minimise legionella risk as set out in the risk assessment and maintain records of this action.

We will carry out regular and frequent inspection, monitoring and sampling using a competent person at those locations recommended for cyclical monitoring in the risk assessment.

The results of the monitoring will be recorded in a suitable logbook, kept at the premises.

We will ensure that all staff are aware of the dangers of Legionella and carry out their own duties in such a way that all risks are considered, and safeguards adopted to minimise or eliminate such risks.

We will fully co-operate in an investigation of any plant or equipment in our premises that may be suspected of being involved in the cause of an outbreak.

Control of Vibration

Introduction

The Company will take all reasonable steps to reduce exposure to vibration and to ensure that no person is knowingly exposed to vibration in excess of prescribed exposure levels.

This procedure aims to cover all work activities that have the potential to cause hand-arm vibration syndrome (HAVS), identifying the level of risk associated with such activities and to suggest ways of reducing any significant risks to an acceptable level.

Procedure

Employees will be made aware of the risks associated with regular exposure to vibration and actions that they can take to reduce the risks.

If health problems are reported, then medical advice is to be sought and the provision for health surveillance is to be instigated.

If there are any changes that are likely to affect the exposure of employees, then assessments shall be reviewed and revised, as necessary.

Employees shall report any problems with equipment including excessive noise and vibration to the Operations Manager or Project Manager.

Users of vibration equipment must report if they have any reason to believe that exposure to vibration is causing them any harm (such as regular spells of back ache, fingers go white when exposed to cold, tingling and numbness of fingers after using vibrating equipment). They must report any symptoms that may be related to vibration exposure.

Assessment of Exposure

An assessment shall be carried out in situations where individuals are exposed to vibration. This is to identify which tools, vehicles and machinery expose individuals to hazardous vibrations.

Measurement of vibration involves a complex procedure and requires the assistance of a competent person. Emphasis will be placed on management control procedures over vibration measurements.

The Company will identify activities where the hazard of vibration is a problem and include it in risk assessments, along with required control measures. The ways to establish whether there is a problem and how to reduce it are as follows:

To identify the extent of the problem:

- Identify the equipment that vibrates and find out about the levels of vibration – information will be obtained from manufacturers/suppliers, field data sources etc.
- Rank equipment in terms of hazard contribution, i.e. the level of vibration and how much they are used.
- Discuss with employees whether they have noticed any particular problems with certain types of equipment or individual machines.
- Check the workload of individuals who use vibration tools and at least estimate the exposure they may be receiving.

To reduce the risk:

There are two components to reducing the health risks from vibration: vibration magnitude and duration of exposure.

- Check whether it is necessary to use the current types of tools or whether a task may be achieved a different way.
- Minimise the need for operations and tools that expose employees to hazardous vibration.
- Minimise the forces needed to control tools.
- Consider the maintenance of the equipment and whether there is likely to be deterioration in anti-vibration mountings, etc. Ageing and/or poorly maintained equipment is likely to give worse levels of vibration.
- Reduce exposure times, e.g. by breaking up activities to minimise prolonged exposure.
- It is important that operators are able to maintain good blood circulation, gloves can be helpful although alone they are not the solution to a vibration problem.
- Heated handles, warm, weatherproof clothing and heating pads are amongst the other aids that can be considered.

For hand-transmitted vibration, the following list shows ways of reducing the risk:

- Choose low-vibration tools.
- Use correct tool for the job including attachments.
- Regular maintenance of tools and attachments.
- Do not use excessive grip and push forces.
- Wear suitable protective gloves to keep hands warm and dry.
- Gloves do not effectively reduce vibration transmitted to the hands.
- Avoid long work periods without rest breaks.
- Exercise fingers and hands to help blood flow.
- Consider job rotation.
- Stop or cut down smoking as it reduces blood circulation.

For whole-body vibration, the following list shows ways of reducing the risk:

- Adjust seat for good posture.
- Avoid poor working posture.
- Plan routes avoiding uneven surfaces.
- Avoid fast driving over off-road or rough surfaces.
- Regular maintenance of vehicle suspension and seat condition.
- Ensure the tyre pressures are correct.
- Consider job rotation.

The above lists are not exhaustive and do not include all environments that expose individuals to vibration.

Maintenance

All tools, machinery and vehicles will be maintained and serviced correctly; this will be carried out on regular basis. For hand-held and hand-operated tools, this could include making sure that the tools are kept sharp, vibration mounts replaced, and rotating parts

checked for out-of-balance forces.

For equipment involving exposure to whole-body vibration, this would include adequate maintenance of vehicle suspension components, seat adjustment and tyre pressures.

Provision of Information, Instruction and Training

The Operations Manager and Project Manager are to ensure that information and training is provided regarding the potential hazards from exposure to hand-arm and whole-body vibration. This shall include awareness of hand operated equipment and processes that may cause injuries to the hands of the operators, and the safe and efficient use of tools and machines so that unnecessarily high exposures to vibration do not occur. The Operations Manager and Project Manager are to ensure that employees are informed of the risks to health associated with exposure to vibration (hand-transmitted and whole-body vibration) and will inform operators of the need to report any relevant symptoms and to co-operate with any health surveillance programmes.

Record Keeping

The Company is to keep records of all vibration assessments and maintenance carried out on equipment within their area of responsibility. The records are to be kept for a period of 40 years.

Competence

Measurement of vibration, both whole-body and hand-arm, is a complex procedure. The vibration measurements require specialist equipment. The assessments require knowledge of the different guidelines and standards available concerned with human exposure to vibration.

Purchasing and Acquisition

We will introduce a positive purchasing and hire policy to purchase and hire equipment with the lowest levels of vibration output as is reasonably practical to undertake the work.

We will only purchase and hire equipment from reputable suppliers who can furnish us with relevant and extensive vibration exposure data for their equipment.

Controlling Contractors

Introduction

Where we do not have a particular specialism in-house, we may sub-contract this work to a competent contractor. It is vital that our contractors are suitably assessed for competence and that they adhere to the same high standards of our own workforce.

Procedure

This procedure outlines the requirements for the management of health and safety in relation to contractors working for the Company. The intention is to minimise risks to health and safety of contractors and Company employees from the work activities of contractors engaged to carry out work on behalf of the Company.

The Company will discuss with contractors the safety precautions necessary on the sites where contractors are to be used to ensure the safety of both contractor personnel and Company employees.

The areas where contractors operate and also any areas where contract personnel are not permitted access must be clearly defined.

An agreement must be reached as to whether amenities are to be made available to contractor employees e.g. catering, washing, sanitary facilities, first aid facilities and personal protective equipment storage etc.

The contractor must be provided with suitable and sufficient information on the activities which the Company undertake on the site which may affect or involve the contractor employees e.g. parking limitations, specific hazards, or use areas, hygiene requirements, adequate insurance cover etc.

The contractor must have or obtain adequate insurance cover to indemnify the Company in respect of any negligence resulting in personal accident or injury and/or death, damage to property or plant and equipment arising out of or in connection with contract work.

The Company will establish and document a system for the assessment and evaluation of contractors to ensure that only competent and qualified contractors are selected and permitted to carry out contracted works on Company premises.

The selection criteria will consist of safety performance indicators such as safety management system, safety track records, safety training records and competency in handling the job and safe working procedures.

The selection system will incorporate a pre-approval of contractors' procedures for major or specialised work for the Company. New contractors who are not on the pre-approved list will have to be subjected to an evaluation and selection process. Existing and new contractors who do not meet the selection criteria will not be offered any contracts.

All written contracts will clearly spell out the health and safety responsibilities and obligations that the contractor has to comply with.

Prior to commencement of work, a health and safety induction will be conducted for contractors who are entering the Company premises for the first time. The induction will cover basic health and safety requirements of the Company including emergency response, permit to work, and Code of Conduct.

Prior to commencement of any new area/item of work in the Company, the employees will be briefed on the safe working practices, the work's potential hazards and the safety control measures.

An effective communication chain will be established to update all contractors of any change

that has been made to the existing health and safety management system.

A system will be established to monitor and assess the contractor's safety performance throughout the progress of the work. The records will be used as criteria for future selection.

A system will be established to control and ensure that only equipment, tools, and machines that are certified to be of sound operating condition are allowed on Company premises.

A system will be established to inspect tools, equipment and machines that are brought onto Company premises. The inspections will be carried out periodically by a competent person.

The relevant Project Manager will ensure that all contractors who come on site establish systems at worksites for the implementation of this procedure.

This procedure will be included in all tender documents or with orders for work on site.

Contractors will be provided with this procedure and specific information relevant to worksite hazards prior to commencing work on site and will be required to acknowledge in writing that this procedure has been read, understood, and agreed to as a condition of contract.

The contractor will complete the Contractor's Permit to Work, if required and develop safe work methods for the work to be undertaken prior to the commencement of work.

The Contractor's Permit to Work will be authorised by the relevant Project Manager responsible for the work activities of the contractor.

The relevant Project Manager will ensure that the contractor or the contractor's nominated representative is inducted.

The relevant Project Manager will conduct regular site inspections of the work to ensure compliance with health and safety requirements and report any identified unsafe work methods to the contractor.

Any employee that identifies that a contractor or contractor's employees are operating in an unsafe manner, is responsible for reporting the unsafe practice to their immediate Project Manager, advising them of the unsafe practice being undertaken.

Sub-Contracting Work

We will keep an up-to-date list of 'Approved Contractors' who will have successfully completed our contractors' questionnaire and been assessed on site for safety and performance. This will form part of the contract and contractors will sign the assessment questionnaire to confirm this. We will regularly check these sub-contractors to ensure they are working to our requirements and standards.

Display Screen Equipment

Introduction

We will ensure that exposure to hazards in relation to Display Screen Equipment is either prevented, or, where this is not reasonably practicable, adequately controlled. This duty is extended to any other person, at work or not, who may be affected by our business.

This procedure outlines recommendations for the management of screen and keyboard-based equipment in keeping with ergonomic recommendations and standards.

This will cover everyone classed as a 'user' to assist in the prevention of musculo-skeletal injury.

We will apply the principles of reducing the risks to health and safety of the use of Display Screen Equipment to all users.

We will introduce arrangements and procedures for the assessment of risks from the use of Display Screen Equipment. The risk assessment will be followed by the provision, maintenance, and monitoring of appropriate control measures to minimise any risks identified.

Procedure

Workstation design within the Company will provide adequate flexibility in order to accommodate the needs of different individuals, particularly with multi-user workstations.

We will ensure the application of established ergonomic principles in relation to keyboard and screen-based equipment in accordance with the requirements of the regulations.

Workstations will be set up using appropriate ergonomic furniture and equipment that will enable employees working at a screen and keyboard equipment to adopt good practice in relation to work posture.

Laptop and notebook computers present additional hazards and further controls will be required to ensure the health and safety of users.

Where notebook computers are used for extended periods of time e.g. (greater than one hour at any one time) it is preferable that notebook computers are placed onto a stand of approximately 100mm high and that a standard sized keyboard and detached mouse is used.

Postural hazards result from poor ergonomics and working environment. The following may produce fatigue-related conditions:

- Sitting in an immobile position for long periods.
- High rates of repetitive finger movements, with the wrists bent.
- Poor circulation to the legs.
- Pressure from the seat/chair upon the thighs caused by incorrectly adjusted seat.

Visual fatigue may result from the following:

- Poor screen display, such as low contrast or flickering.
- High levels of ambient light compared to the screen display.
- Reflections or glare.
- The need for a document holder.

Employees will be considered to be users when:

- They use DSE regularly and continuously, typically for more than an hour at a time.
- They depend on display screen equipment to do the job, i.e. there is no alternative way of doing the job.
- They need additional training and/or particular skills in the use of display screen equipment to do the job.
- Fast transfer of information between operator and screen is important.
- The work being done requires a high level of attention and concentration and the consequences of error may be serious for the business.

We will undertake an assessment of all users, taking into consideration the elements listed below:

- Display Screen Equipment.
- Keyboard.
- Other desk equipment.
- Work surface/desk.
- Chair.
- Environment.
- Operator Interface.
- Management.

We will reimburse the DSE user for the eyesight test and for any corrective appliances where solely required for DSE use, as follows:

- For frames and lenses- the cost of the basic appliance (the cost of tinted lenses, special coatings or designer frames will not be reimbursed).
- For current eyesight test fee- for the sight test performed by an optometrist.
- Users who already wear spectacles for normal use, and who need additional special spectacles solely for DSE use may opt to combine the two requirements (e.g. by purchasing variable focal type lenses) but will only be entitled to claim the cost of a basic pair of spectacles which would otherwise have been necessary. Such claimants will be required to produce evidence of what the lenses and frames solely for DSE use would have cost had they been purchased as a separate pair of spectacles.
- The cost of spectacles with corrective lenses solely for DSE use is limited to the basic cost of prescription spectacles and lenses. Unless exceptional circumstances can be demonstrated, and accepted by the Directors prior to the commitment to purchase.

Arranging eyesight testing

We will specify the provision of user eyesight tests and or corrective appliances by a particular optician, thus allowing management to choose and negotiate locally for the type of service to be provided. We may also make use of the services provided by, for example, many safety spectacle suppliers.

The entitlement of a user to an eyesight test and consequential correction does not extend to them having a right of choice of a particular optometrist or other professional to provide the service or to insist on a particular type of spectacle frame or lens.

Eyesight tests will be available to all users of potential users at the expense of the Company, as required by law. Eyesight tests will be repeated at a frequency recommended by the

optician/optometrist.

Agencies, or other providers, will be asked to confirm that temporary employees, have had suitable tests and have corrective spectacles, when retained for work with DSE.

Electrical Equipment

Introduction

It is our policy to ensure that all electrical equipment meets current health and safety requirements under the relevant legislative requirements, and to ensure that obligations in relation to the safe provision and use of electricity in the workplace are fulfilled.

This procedure covers the selection, maintenance and inspection of electrical equipment, the measures to be taken to ensure the proper use of such equipment and the information, instruction, and training to be given to employees.

Procedure

The Operations Manager or Project Manager responsible for implementing this procedure will carry out or delegate such functions as necessary to ensure the effective day-to-day operation of our safety arrangements in respect of elements listed below.

Responsibilities will be allocated to:

- Ensure that all hazards relating to the supply and use of electricity in the workplace, together with the risks resulting from exposure to those hazards are suitably and sufficiently assessed and that exposure is reduced to as low a level as reasonably practicable.
- Ensure that all personnel carrying out work on electrical systems are trained and competent to do so.
- A competent person shall be appointed to carry out routine regular testing of all portable appliances in use in the workplace.
- A competent person shall be appointed to ensure that all items of electrical equipment, which may become charged, are used at the lowest possible power output and protected by the use of a current limitation device.
- The Operations Manager or Project Managers will ensure that any electrically powered equipment, service or portable apparatus in use is of a type approved for use by Company employees, and meets the requirements of appropriate legislation and standards, and is used, tested and maintained to a safe standard and in accordance with the control measures outlined below.
- The fixed systems will be installed to appropriate standards and legislative requirements, and will be maintained and tested at intervals as specified by the manufacturer.
- Portable apparatus will be maintained and tested at intervals specified by the manufacturer. All equipment requiring to be operated on site will be either battery rechargeable or 110v, where possible.
- All maintenance and testing of electrical plant and portable equipment is to be carried out by employees or contractors who have been trained and certificated as competent.
- All power supplies will be fully isolated and locked in the “off” position whilst work is in progress on the circuit or system.
- Battery power banks will be of an approved construction, fitted with safety isolators and provided with adequate ventilation extraction.
- Suitable personal protective equipment (PPE) and safety equipment will be provided.
- All electrical equipment as defined above shall be electrically tested and tagged in accordance with the procedure and at intervals specified unless the testing interval has

been varied by the completion of a risk assessment.

- The in-service safety inspection and testing of electrical equipment is only to be conducted by personnel who are competent to test electrical equipment.

It is the supplier's responsibility for the initial electrical safety of the new equipment. It is not necessary to inspect or test the new equipment when it is placed in-service. However, it is the responsibility of the Managing Director to ensure that the item is tagged indicating the next test date.

Where inspection and testing of electrical equipment identifies equipment that fails to comply with the criteria set out in the regulations, the equipment shall be withdrawn from service immediately. An Out of Service Tag must then be attached to the faulty equipment in accordance with the Energy Isolation Tags and Lock-Off Procedure, and the equipment either appropriately disposed of or sent for repair.

Contractors shall not use electrical equipment on any site unless testing of their electrical equipment has been carried out in accordance with the regulations. The relevant Operations Manager or Project Manager may request from the contractor, may request from the contractor, from time to time, verification that electrical items have been tested as contractors may not necessarily tag their electrical equipment.

User Checks

Before using an item of electrical equipment, the employee will critically look for damage to the outside of the equipment and any connecting cables and plugs/socket. Any defects will be reported to the Operations Manager or Project Manager. If equipment is suspect, it must not be connected to the electrical supply and not used until repaired/inspected/tested, as appropriate, by a competent person.

Visual Checks

This does not have to be undertaken by an electrician. Visual inspections will be carried out by any sensible employee provided they have been given appropriate training and have acquired sufficient experience.

A visual inspection shall be conducted with the equipment DEAD, and shall ensure that:

- There is no damage e.g. cuts and abrasions (apart from light scuffing) to any cable covering.
- There is no damage to any plug e.g. the casing is not cracked or pins bent or misaligned.
- There are no non-standard joints including taped joints in any cable.
- The outer covering (sheath) of the cable is securely gripped where it enters the plug or equipment, and that the coloured insulation of the internal wires is not showing.
- The equipment shows no sign of having been used in an environment where it is not suitable.
- There is no damage to the outer cover of the equipment, e.g. obvious loose parts, screws missing or cracks in the casing.
- There are no signs of overheating (burn marks or staining).
- The equipment is labelled as being within its current test date.

Testing by a Competent Person

Electrical testing will be undertaken by a competent person with knowledge, experience, and training in testing electrical equipment.

In addition to the visual inspections required in the previous section, double insulated electrical equipment shall undergo periodic visual inspection by a competent person.

Single insulated (earthed) equipment shall be subject to a periodic electrical test and visual inspection as appropriate.

Equipment leads that can be totally disconnected from equipment and supply shall be subjected to periodic test and visual inspection.

Periodicity

The frequency of inspection and testing depends on the equipment type, its usage, and the operating environment. Where the inspection/testing regime is picking up a number of faults then consideration shall be given to increasing the frequency of inspection and testing.

Equipment Register

A register of all portable electrical appliances, labelling all equipment with a unique ID number and details of the date of next inspection/test shall be maintained.

The register shall be used to assist the person who conducts the tests to determine the quantity and location of the items. The register shall be kept up to date and retained in an appropriate location.

The minimum requirements for an equipment register will include:

- The description of the piece of equipment.
- An asset number or equipment serial number (unique identifier).
- Location of the equipment or equipment keeper (person responsible for its whereabouts).
- Frequency of visual inspection/testing.
- Date of next inspection/test.
- Details of any inspection/test failures.

Labelling

A visible label will be affixed to each item of electrical equipment that passes the test/inspection. The label shall display the date when the next test/inspection is due.

Electrical Isolation

Introduction

Every year, people working on construction sites suffer electric shock and burn injuries some of which, tragically, are fatal. A number of these accidents are a direct consequence of not implementing safe isolation procedures. The Company is committed to complying with the Electricity at Work Regulations 1989 and implementing safe isolation procedures for our work. We will only employ trained, competent, approved electricians to carry out our electrical work.

Procedure

To comply with Regulation 13 of the Electricity at Work Regulations, work on electrical systems needs to be carried out while the equipment is isolated or 'made dead'. This includes securing the means of disconnection in the OFF position, putting a notice or label at the point of disconnection, and proving dead at the point of work using proprietary voltage detectors.

Site Safety Management

It is essential from the outset that effective management and control of the electrical system, apparatus and equipment used on site is achieved and maintained, thereby ensuring that the hazards and risks that can arise are minimised.

An authorised person should be appointed, with responsibility for the supervision of the installation of switchgear, equipment, cables, jointing, etc. throughout the contract. The authorised person should also have responsibility for the safe working practices of the operatives, as well the control of appointed sub-contractors. Sub-contractors must provide appropriate method statements and Risk Assessments for their works.

The authorised person may delegate (in writing) their authority in total or for specific tasks and procedures to competent persons that have the appropriate training and competence to allow them to perform these tasks and procedures.

Once switch-rooms and risers are made available by the main contractor for the services installation to proceed, and before installation of equipment commences, it should be ensured that suitable doors are fitted to all switch-rooms and riser entrances and that heavy-duty locks, or padlocks, and keys are provided.

Also ensure that access doors are locked when not working in these areas. Plant and materials should not be stored in electrical switch-rooms or electrical risers.

Always try to avoid energising any outgoing electrical distribution services until the distribution switchgear and all connected circuits are complete and have been inspected and tested. If live services are required by others, distribution boards and circuits should only be energised following a written request from the main contractor or agent and with the agreement of the authorised person for the installation. Once distribution services are energised, where necessary, implement the safe isolation procedures explained in the rest of this procedure.

Before energising any final circuit (eg lighting, power, etc.) it should be checked that the wiring system within the area has been completed and equipment, including luminaries and accessories, fitted. This check should ensure that earthing arrangements and protective conductors including equipotential bonding are in place, and that the final circuit is tested as far as possible. If the service in question is energised for the testing and commissioning of equipment/system, it must be switched OFF and locked upon completion of this work, unless stated otherwise on the written instruction and agreed with the authorised person.

When live services are provided prior to final commissioning, warning signs should be displayed on each item of live switchgear, plant and along cable routes that pass through the work areas in exposed positions. This is particularly important where switchgear and cables are exposed to damage that may be caused by other trades or environmental conditions.

Persons or trades entering completed and energised areas, working under instructions from the main contractor or client agent, must be made aware of the extent of the live services within the respective areas by the electrical contractor, main contractor or client agent.

Site Isolation Practice

For work on LV electrical equipment or circuits, it is important to ensure that the correct point of isolation is identified, an appropriate means of isolation is used and the supply cannot inadvertently be reinstated while the work is in progress. Caution notices should also be applied at the point(s) of isolation, and the conductors must be proved to be dead at the point of work before they are touched.

A fundamental principle is that the point of isolation should be under the control of the person who is carrying out the work on the isolated conductors.

The means of isolation can be an adjacent local isolation device such as a plug and socket, switch disconnecter, circuit breaker, fuse etc., as appropriate, which is under the direct control of the competent person carrying out the work. These devices can be used without further precautions provided there is no foreseeable risk that the supply could be reinstated by others.

When there is no such local means of isolation or there is a risk of reinstatement of the supply as above, the circuit or equipment to be worked on should be securely isolated by one of the following methods:

Isolation using a main switch or distribution board (DB) switch-disconnector

Isolation of equipment or circuits using the main switch or DB switch-disconnector is the preferred method. The point of isolation should be locked off using a unique key or combination retained by the person carrying out the work. In the case of multiple isolations on a DB, a multi-lock hasp can be used to prevent access to a main isolator until such time that all persons working on a system have completed their work and removed their padlocks from the hasp.

If locking-off facilities are not provided on the relevant switch then a locked DB door or locked switch-room door is acceptable provided the key or combination is unique, and is retained by the person doing the work. Again, multi-lock hasps can be used to control multiple isolations, although a key box or similar system may be needed to retain and control access to the main door key.

Where it is intended that more than one person will be working on circuits supplied from a DB (ie multiple isolations) and a multi-lock hasp cannot be used to secure the main point of isolation, individual isolation of each circuit by one or more of the methods shown below is recommended, to prevent inadvertent reinstatement of the supply. The principle is that each person carrying out such work should have control of their own point(s) of isolation and not rely on others to prevent inadvertent energisation.

Isolation of individual circuits

Where it is not practical to isolate a distribution board, individual circuits supplied from it can be isolated by one of the methods described below, depending on the type of protective device used. However, bear in mind the overriding advice to avoid energising any outgoing electrical distribution services, preferably until the distribution switchgear and all connected circuits are complete and have been inspected and the relevant tests carried out.

If any items required to carry out the procedures recommended below are not manufactured for the DB in question or cannot be obtained through retail/trade outlets, it is acceptable to disconnect the circuit from the DB as long as the disconnected tails are made safe by being coiled or insulated. Suitable labelling of the disconnected conductors is important to prevent the supply being re-instated, particularly if other electricians are present.

It should be remembered that work carried out inside a live DB is regarded as live working when there is access to exposed live conductors. In this case the appropriate precautions should be taken as described in HSG85 with respect to Regulation 14 of the Electricity at Work Regulations.

Isolation of individual circuits protected by circuit breakers

Where circuit breakers are used the relevant device should be locked-off using an appropriate locking-off clip with a padlock which can only be opened by a unique key or combination. The key or combination should be retained by the person carrying out the work.

Note - Some DBs are manufactured with 'Slider Switches' to disconnect the circuit from the live side of the circuit breaker. These devices should not be relied upon as the only means of isolation for circuits as the wrong switch could easily be operated on completion of the work.

Isolation of individual circuits protected by fuses.

Where fuses are used, the simple removal of the fuse is an acceptable means of disconnection. Where removal of the fuse exposes live terminals that can be touched, the incoming supply to the fuse will need to be isolated. To prevent the fuse being replaced by others, the fuse should be retained by the person carrying out the work, and a lockable fuse insert with a padlock should be fitted as above. A caution notice should also be used to deter inadvertent replacement of the fuse. In addition, it is recommended that the enclosure is locked to prevent access as stated above under '**Isolation using a main switch or distribution board (DB) switch-disconnector.**'

Note - In TT systems, the incoming neutral conductor cannot reliably be regarded as being at earth potential.

This means that for TT supplies, a multi-pole switching device which disconnects the phase, and neutral conductors must be used as the means of isolation. For similar reasons, in IT systems all poles of the supply must be disconnected. Single pole isolation in these circumstances is not acceptable.

Electrical Permits to Work

An electrical permit-to-work must be used for work on HV systems that have been made dead and can be useful in certain situations for LV work. These permits are primarily a statement that a circuit or item of equipment is isolated and safe to work on. They must not be used for live working as this can cause confusion. Details on the use of these permits, including an example form, are given in HSG85.

Caution Notices

In all instances where there is a foreseeable risk that the supply could be reinstated as above, an appropriate "caution" notice should be placed at the point of isolation. For DBs with 'multiple isolations' a single suitably worded notice on each DB, such as the example shown below, would suffice:

CAUTION: THIS DISTRIBUTION BOARD HAS A NUMBER OF CIRCUITS THAT ARE SEPARATELY ISOLATED. CARE SHOULD BE TAKEN WHEN REINSTATING THE SUPPLY TO AN INDIVIDUAL CIRCUIT THAT IT HAS BEEN CORRECTLY IDENTIFIED.

Proving Dead Isolated Equipment or Circuits

Following isolation of equipment or circuits and before starting work it should be proved that the parts to be worked on and those nearby, are dead. It should never be assumed that equipment is dead because a particular isolation device has been placed in the off position.

The procedure for proving dead should be by use of a proprietary test lamp or two pole voltage detector as recommended in HSE Guidance Note GS38, Electrical test equipment for use by electricians. Non-contact voltage indicators (voltage sticks) and multi-meters should not be used. The test instrument should be proved to be working on a known live source or proprietary proving unit before and after use. All phases of the supply and the neutral should be tested and proved dead.

Additional Precautions

New installations

New installations can be a particular hazard as some of the circuits or equipment may require to be modified after the installation has been energised. It is therefore important that every protective device is correctly identified at each distribution board before any energising takes place, and safe isolation procedures, such as locking-off circuit breakers as described above, are adopted, particularly where a number of electricians are working on the same installation.

The practice of placing PVC insulating tape over a circuit breaker to prevent inadvertent switch-on is NOT a safe means of isolation.

Neutral conductors

Care should be taken when working on neutral conductors of circuits. The practice of 'borrowing' neutrals, ie making use of the neutral of one circuit for use on another circuit, is not permitted by BS 7671. This dangerous practice, however, is not uncommon. Lighting and control circuits are the most common examples where this practice is found. In these circumstances the neutral conductor can become live when the conductor is disconnected, if a load is connected to that circuit.

It is also difficult to identify specific neutral conductors in 'bunches' of single core cables, eg where enclosed in trunking or conduit, and care should be taken when severing such cables that the correct conductor has been identified. If doubt exists, live working measures, such as the use of eye protection, electricians insulating gloves, insulated tools etc, should be employed until the circuit has been proved dead.

Proving dead unused or unidentified cables

Where there is uncertainty regarding isolation when removing unidentified cables or proving dead an 'unused' cable, particularly where insufficient conductor is exposed to enable the use of test probes, those conductors should be assumed to be live until positively proven to be dead and any work carried out on them should employ live working practices until the conductors are proved dead.

Clamp meters can be used as a means of identifying cables by testing for current flow in the conductors.

Non-contact voltage indicators (voltage sticks) can also be useful in these situations to test for voltage where cables without a metallic sheath are to be identified. However, once insulation is pared using live working practices to reveal the underlying conductors, contact

voltage detectors should be used as the means of proving dead.

Fire Safety

Introduction

Fire can have a devastating impact on both people and property. It is vital that we adequately control the risks from fire at our premises and at the properties or sites where the Company undertakes projects.

We will comply with the requirements of the Fire Safety Order 2005 and adopt the Joint Code of Practice laid down in Fire Protection Association guidance "*Fire Prevention on Construction Sites*".

Procedure

Responsibility for implementing this policy lies with the Directors who will delegate such functions as necessary to ensure the effective day-to-day operation of our safety arrangements in respect of fire matters.

In order to fulfil legal requirements, the Company will:

- Carry out a suitable and sufficient fire risk assessment.
- Review the assessment if circumstances change.
- Ensure there are adequate means of escape from the premises and worksites and that they are maintained.
- Ensure there are adequate fire detection, control and alarm systems in place.
- Ensure there are an adequate number of firefighting appliances e.g. extinguishers, and that they are checked and maintained.
- Inform employees of the Company fire safety policy and procedures in the event of a fire.
- Post the appropriate fire safety signs - fire exits, fire exit direction signs, and fire action procedures.
- If fire exit routes or other means of escape are to be altered in any way, make sure this is acceptable to the fire authority before making any alterations.
- Ensure Fire Log Book is kept up to date.

The Company acknowledges that despite these measures it cannot be assumed that fire will never break out. Systems will be in place to deal with this eventuality, and these will be regularly scrutinised to ensure that they are adequate.

All employees shall be given suitable instruction in basic fire prevention measures. Any employees involved in processes or activities that give rise to special fire hazards shall be given appropriate training in avoidance of fire.

Employees will report any concerns they have about fire hazards, to the Operations Manager or Project Manager, so that the Company can take the appropriate measures to eliminate the problem.

In order to minimise the risk of outbreak of fire; the four most important measures are to:

- Ensure that there is adequate security to prevent the risk of arson.
- Regularly inspect, test and maintain all electrical installations and electrical appliances.
- Restrict smoking to designated areas.
- Control hot works on construction sites.

In the event of fire, the safety of life shall override all other considerations, such as saving property and extinguishing the fire.

The three most important actions are to:

- Raise the alarm.
- Summon the emergency services.
- Evacuate the building.

The Company does not require persons to attempt to extinguish a fire, but extinguishing action may be taken if it is safe to do so. Guidance on the circumstances under which firefighting will be avoided or discontinued will be included in employees' fire safety training.

Immediate evacuation of the building must take place as soon as the alarm has been raised. All occupants, on evacuation, will report to the pre-determined assembly point(s).

Re-entry of the building is strictly prohibited until the fire brigade officer in charge (or equivalent) declares it is safe to do so. Silencing of the fire alarm system should never be taken as an indication that it is safe to re-enter the building.

Employees should report any concerns regarding fire procedures, so that the Company can investigate and take remedial action if necessary.

These arrangements will be reviewed at least annually and on any significant change in the business or the premises. Improvements and alterations may be carried out, following advice from the Fire Prevention Officer, our insurers, or our health and safety advisor.

The Company will ensure the following fire control measures are in place:

- Inspection of the structure of the premises for fire safety is carried out annually.
- Fire detection equipment to be installed and inspected regularly.
- Fire alarms will be tested weekly.
- Fire suppression apparatus will be inspected regularly.
- Emergency lighting will be provided as appropriate.
- Fire extinguishers will be placed at clearly labelled fire points.
- Emergency exit routes and signs to be kept clear at all times.
- Employees will be trained in the use of extinguishers, procedures for fire drills and evacuation.
- Records of training, induction, drills, alarm tests and fire certification to be kept on the premises and up to date in the fire control log book.
- Supervision and monitoring of visitors, including contractors.
- Precautions in respect of disabled people will be implemented.

Employees are reminded that they have a legal obligation to inform the Operations Manager or Project Manager of situations where they see serious and imminent danger to health and safety, OR any matters where they see a shortcoming in our arrangements for health and safety protection.

Fire Prevention on Site

It is our policy to carry out works so as to eliminate risk from fire and, to this end, have adopted the Joint Code of Practice laid down in the Fire Protection Association guidance "*Fire Prevention on Construction Sites*" as follows.

- Fire extinguishers, fire notices, fire detection, alarm systems and fire exit signs will be provided for all working areas.
- A site fire risk assessment will be prepared for each project.
- Materials and rubbish stored on site will be kept to a minimum.
- Rubbish will be cleared from the site on a regular basis and site working and access areas kept clean.
- Where flammable material or LPG must be kept on site, they will be stored in fireproof cages/containers away from fire exit routes and potential fire hazards.
- Site accommodation will be half-hour fire resisting construction and Class 1 spread of flame, and protection materials shall generally meet '*Class 1 spread of flame standard*'.
- A "No Smoking" rule will be imposed on all sites, even in external areas.
- We will operate a "Hot Works Permit system" particularly where the works involve a naked flame.
- In the event of a fire the person discovering the fire shall raise the alarm and immediately report the situation to the Operations Manager or Project Manager.
- All skips will be secure and lockable and kept away from buildings.
- A person may attack the fire with the appliances provided only if they are trained to do so and as long as there is no risk to themselves or others.
- If the fire cannot be safely tackled then all persons shall immediately leave the site by the nearest egress and report to the person in charge of the assembly point; normally the Operations Manager or Project Manager.
- The person in charge shall make a record of all those who have vacated the building and ensure that the emergency services have been called.

Emergency Procedures on Site

- The emergency arrangements for each site will be explained to inductees as part of the site induction, and details posted on the Site Safety Notice board.
- This site will have a dedicated Operations Manager or Project Manager, First Aider(s) and Fire Warden.
- A site emergency can be one or more of the following: fire, accident, bomb threat or any other incident deemed an emergency by management.
- In the event of a fire emergency all operatives are required to proceed immediately to the Fire Assembly Point and remain there until they have been accounted for and given permission to leave. No one is allowed to stop to gather tools or leave the site without notice. Any visitors to site will be accompanied at all times and informed of the emergency procedure.
- As fire arrangements are subject to change as construction progresses, either the Site Fire Warden or the Site Manager has a duty to bring this to the attention of site operatives and contractors.
- In the event of any of the emergency services being required to attend site, either the Site Fire Warden, Operations Manager or Project Manager must make available the layout of the building with current fire escape routes and details of any flammable chemicals stored on site.
- Where fire evacuation tests are carried out and persons are found not to be co-operating

in evacuating the building, this will be viewed seriously and raised with individual concerned to prevent reoccurrence. One of the regular failures in this practice is where commissioning is taking place and the alarms are continually triggered and the reaction is complacent – the need to continue to evacuate even where the alarm is suspected to be false will be reinforced by Site Management.

First Aid

Introduction

The Company is committed to ensuring that measures are in place to provide adequate first aid arrangements in the event of an accident.

Procedure

This procedure outlines the management of first aid in the Company workplaces and specifies the minimum requirements for the provision of first aid services including first aid officers and their training, first aid equipment and first aid facilities.

We are committed to providing sufficient numbers of first aid personnel to deal with accidents and injuries occurring at our premises, and will:

- Carry out an assessment of first aid needs for the office and each project, looking in particular at the personnel, equipment and facilities required.
- Assess risks to employees and make appropriate first-aid arrangements to deal with the risks.
- Reassess the first-aid provisions for each project, or whenever there is a relevant change in the workforce or the hazards to which they are exposed. When there have been significant changes, we will revise our arrangements accordingly.
- Ensure that contractors working on our behalf either have sufficient first-aid provision, or if their work involves no special risks, the contract may include their use of our facilities, by agreement.

To achieve these aims, we recognise our legal obligation to make sufficient provision for first aid to employees, including those travelling or working away from our premises, therefore we will:

- Provide adequate and appropriate levels of first-aid equipment and facilities for our office and for each project.
- Make sure there are adequate numbers of suitable employees available for administering first-aid to employees, and ensure they are suitably trained.
- Appoint an alternative person, if the first-aider is away from the premises.
- Provide an 'appointed person', where circumstances indicate a 'first aider' is not required. This will depend on the nature of the work, the number of employees, and the location of the premises.
- Provide employees with information regarding the provision of first-aid, location of equipment, facilities and relevant personnel.

If employees have concerns about the provision of first aid within the Company, they must inform a responsible person to enable the Company to investigate and rectify the situation if necessary.

In determining the number of first aid officers required, regard will be given to the following:

- The number of persons on site.
- The nature and hours of work on the project.
- Absences and availability of a continuous service during normal working hours.
- Leave arrangements.

- Specific site hazards.

The code of practice for first aid in the workplace indicates that there will be one first aid officer for every 50 employees. More first aid officers may be required where risk assessments indicate higher risk work arrangements.

Selection of first aid officers

A first aid officer shall be designated by the Directors for an area and also be the holder of a current First Aid Certificate.

The selection process will consider the following:

- A willingness for the role.
- Demonstrated evidence of a capacity to deal with injury and illness.
- Ability to be called away from their ordinary work at short notice.
- Ability to act calmly in an emergency.

Training

Where in the performance of their duties, an employee is required to hold a First Aid Certificate, the employee will be given the opportunity to undertake an appropriate training course during normal working hours (if available). The training must be supported by the relevant Line Manager and the relevant cost centre shall fund course fees.

Training must be provided by an accredited trainer.

Signage

Appropriate signage will be in place to indicate where first aid kits are located and the responsible officer and contact number.

Records

First aiders shall record all treatment in a first aid incident register which shall be kept in each first aid kit. First aid records must be kept for a minimum period of 3 years.

First Aid Kits

First aid kits will be located in readily accessible and prominent locations and in all work vehicles.

Assessment of hazards in a work area may indicate that additional modules are required to be included into the first aid kit e.g.:

- Eye module.
- Burns module.
- Remote area module.

The first aid kit container will:

- Be made of impervious material and dustproof.
- Be capable of being sealed and be fitted with a carrying handle.
- Never be locked.
- Clearly marked with the words "FIRST AID", and a white cross on a green background.
- Contain a list of the contents, emergency telephone numbers and the extension of the

nearest first aid personnel.

- Be kept clean.

The contents of kits will vary according to the number of employees served by each kit and the nature of the work area and be determined by the risk assessments.

Emergencies

Ambulance and emergency services can be contacted by dialling 999. Any mobile can be used to dial emergency services. Once contacted you must inform the operator of the emergency service required e.g. police, fire, or ambulance. If you are calling from a mobile phone, you will need to inform the operator the town you are calling from then wait to be connected.

Hot Works

Introduction

On occasions we may need to apply heat as part of our operations. We are classifying this activity as hot works and will adapt the following procedures.

We will also liaise with our clients to ensure we are also meeting any site-specific requirements including the completion of a hot work permit.

Procedure

This procedure highlights the steps that the Company will take when required to undertake hot works on a project.

- Where we identify that hot works may be required we will inform the client and request a copy of any site specific rules or procedures that may affect the works. We will also ensure that arrangements are in place for the temporary isolation of any fire alarm and detection system.
- Any hot work will be subject to a site specific risk assessment and method statement.
- Only trained and competent workers will be engaged in hot works.
- When the workers arrive on site they will sign in and complete any necessary hot works permit to work documentation.
- The worker will ensure the risk assessment and method statement are suitable and sufficient and make any necessary changes.
- Workers will either be inducted to site or familiarise themselves with the site arrangements for fire and emergencies.
- All equipment used will be suitable for the task, well maintained and in good condition.
- All combustible material of a portable nature shall be removed from the site of operations and floors swept clean of combustible materials. Flammable substances such as paints and adhesives must be removed from the hot work area.
- Combustible floors, walls, ceilings etc. must be protected by wetting down and covering with damp sand or covered or screened by sheets of non-combustible material (e.g. fire guard blankets), whichever is suitable.
- Where work is above floor level, non-combustible curtains or sheets suspended beneath the work to collect sparks.
- All gaps in walls and floors through which sparks could pass covered with sheets of non-combustible materials.
- Means for fire extinguishing must be in close proximity to the “Hot Work” operation. If a fire point is not in the immediate vicinity, then portable fire extinguishing equipment must be available at the site of operations.
- Ensure that the correct Personal Protective Equipment is worn in relation to the task being carried out. This will include Proban overalls, gloves and suitable eye protection.
- All hot works will be undertaken by a minimum of two workers and one will act as a fire watch.
- Smoke/heat detectors that could be affected by the “Hot Work” operation must either be isolated or “Bagged off”. In both cases, the client must be informed that smoke/heat detectors are not in operation. When the work has been completed the smoke/heat

detector must be put back into operation as soon as is practicable.

- Workers must identify the nearest fire alarm/telephone point and ensure they know what to do in the event of a fire or other emergency.
- Ensure that no hot works are undertaken on or near any pipe work.
- Workers must remain on-site for at least one hour after the work has been completed and returned to a safe condition. Fire checks must be carried out during this hour and engineers should not leave site until the works are deemed safe.

Lifting Operations and Equipment

Introduction

This procedure outlines the responsibilities and activities required to ensure all health and safety management responsibilities associated with the use of lifting equipment comply with the Lifting Operations and Lifting Equipment Regulations 1998.

The Operations Manager or Project Manager responsible for implementing this procedure will carry out or delegate such functions as necessary to ensure the effective day-to-day operation of our safety arrangements in respect of elements listed below:

These functions will include ensuring that:

- An inventory is made of all lifting equipment and accessories.
- All lifting equipment and lifting operations are risk assessed and lifting plans / safe systems of work developed.
- Where necessary, lifting equipment is thoroughly examined by a competent person at the appropriate intervals.
- Regular checks of lifting gear, chains, ropes and slings are carried out and recorded and that any faults are reported.
- Any faults found with lifting gear, chains, ropes and slings are rectified and recorded.
- Hire equipment is checked and provided with the necessary certification.

Procedure

The Company recognises it has a duty to maintain lifting equipment, which is safe and suitable for use.

All lifting equipment will be selected for its suitability by design, construction, or adaptation for the work it is intended to do.

The Company will assess the location in which the lifting equipment is to be used and take account of any risks arising from particular circumstances. The lifting equipment selected must be suitable for the process and conditions of use.

All lifting equipment will be traceable and certified where applicable in accordance with current legislation and Company policy. The Safe Working Load (SWL) will be stamped on the equipment and/or on the equipment tag and accompanying certification.

All lifting equipment will be inspected and tested in accordance with current legislation and Company procedure by a competent person prior to being used. Suitable maintenance and test records will be kept.

All lifting equipment purchased will be examined by a competent person to ensure that it is free of patent defects and will be accompanied by the relevant maintenance/test records and certification. All lifting equipment in use on the premises will be registered and maintained and tested by a competent person in accordance with statutory regulations.

Suitable records of test, inspection and maintenance will be kept in the site or office safety management system.

Lifting equipment will only be used by Company employees who have received the relevant information, instruction, and training on the safe use of that equipment.

All lifting equipment, which has been identified as defective or non-compliant with the required test or maintenance schedules will be withdrawn from use and quarantined until

such time full compliance can be achieved.

All maintenance, test records and certification must accompany the lifting equipment up on its return to stores.

Any failure of lifting equipment must be reported immediately to the Managing Director and relevant authorities (RIDDOR).

Positioning and Installation

Lifting equipment will be positioned or installed to reduce the risk of:

- The equipment or load striking a person.
- The load drifting uncontrollably.
- The load falling freely.
- The load being released unintentionally.
- Striking a power line (Not used within 10 metres).

Access to hoist ways or shafts will be adequately fenced at places where employees may fall down them. Gates and doors will be provided at all landings and kept closed except when loading and unloading. Interlocks will be fitted to prevent the lift moving until the gates are closed. A cage will protect the base of hoist ways.

Lifting Equipment Used for lifting persons

Effective measures will be taken to ensure that all lifting equipment used for lifting persons is:

- Used in such a manner to prevent persons being crushed, trapped, struck or falling from the carrier.
- Fitted with suitable devices to prevent the carrier falling.
- Suitable for freeing any person trapped in the carrier so that they are not exposed to danger.

Examination and testing

- Lifting equipment will be subjected to thorough examination by a competent person when it is installed; periodically during its life and following an accident, significant change in use or after a long period of use.
- The person carrying out the examination will have appropriate practical and theoretical knowledge and experience of the equipment to be examined in order to detect defects or weaknesses and determine their significance to the safety of the equipment.
- Tests required on lifting equipment will be identified and carried out by the competent person.
- All lifting equipment will be examined in accordance with an examination scheme drawn up by the competent person.
- Lifting equipment used for lifting persons will be thoroughly examined at least every 6 months.
- Lifting accessories (e.g. shackles, slings hooks etc) will be thoroughly examined at least every 6 months.
- All other lifting equipment will be thoroughly examined at least every 12 months.

Records of examinations and tests

- The person carrying out the thorough examination will notify the user of any defect that could become a danger and prepare a report in writing of the thorough examination. The competent person will send a copy of any report of a defect involving a risk of serious personal injury to the relevant enforcing authority. The user will ensure that the equipment is not used unless the defect has been rectified.
- Records of thorough examinations of lifting equipment will be kept until the lifting equipment ceases to be used.
- Records of thorough examination of lifting accessories will be kept for at least two years.
- All records of thorough examinations and tests will be available for inspection by the relevant enforcing authority.

Lone Working

Introduction

Whilst as a business we aim to eliminate lone working, there may be an occasion when an employee may need to work alone. It will be the responsibility of all employees to ensure that they comply with these procedures and to ensure that their whereabouts are known whenever they are away from their normal workplace. This will assist in the provision of safe systems for employees working alone and working away from base, and for emergency situations.

We will identify and assess the risks to all employees who work alone and/or in remote or hazardous locations, and to take steps to avoid or control the risks identified.

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

When work is carried out in places that are not under our direct control, we will provide additional measures, such as information, instruction, and training, to ensure employees' safety on such premises.

We will obtain all relevant information from the persons in control of visited premises, covering any of their activities that may affect our employees.

When any of our employees are on other premises for anything other than short periods, we will ensure that those in control of the premises are aware of the proposed activities of our employees, by means of a risk assessment.

The Company shall identify all types of work processes which require employees to work alone and where they would be unable to readily summon assistance in the event of injury, illness, violence, or other emergency. It may include working alone out of normal hours.

Monitoring and Communication

Formal arrangements shall be made with employees to work alone through the provision of adequate and reliable system(s) for ensuring regular monitoring. A system for ensuring regular communication with the person must be provided and maintained.

Risk Assessment

An assessment of the risks associated with the working alone situation shall be completed in consultation with employees or their representatives or relevant personnel to identify potential and existing deficiencies and to formulate practical solutions to manage working alone situations.

The risk assessment will take into consideration such factors as:

- Special risks that the workplace / site inherently presents.
- Safe egress and access from the workplace.
- Temporary access equipment can be safely handled by one person.
- Personal security.
- If women are especially at risk.
- If young persons are especially at risk.
- The medical fitness and suitability of the individual to work alone.
- What training is required to ensure competency in safety matters.

- What supervision the person will need.
- Emergency procedures that are in place.

When working on the premises of others, the responsible person will ensure that there are arrangements in place to:

- Make all employees aware of the hazards they may face.
- Obtain relevant information on emergency procedures.
- Ensure that welfare arrangements are adequate.
- Ensure that employees know the procedures to follow for communicating and liaising with personnel on the client's premises.

Safe Operating Procedures

Safe operating procedures shall be developed for the circumstances involving working alone and shall include consideration of:

- The procedure for security.
- The system for communication and communication equipment.
- Planning prior to departure including equipment.
- Itinerary and contact arrangements.
- Emergency contact telephone numbers.
- The vehicle and contingency plan for vehicle breakdown.
- Actions of personnel if lost, injured, suffer an illness or violence.
- The procedure for response to an incident.
- Any special training required (e.g. first aid, vehicle maintenance).
- Requirements of other health and safety procedures.
- Exclusion of certain activities such as hot works, work at height, electrical work and work in confined spaces etc.

Manual Handling

Introduction

We will ensure that exposure to hazards in relation to manual handling is either prevented, or, where this is not reasonably practicable, adequately controlled. This duty is extended to any other person, at work or not, who may be affected by our activities.

This procedure outlines the management of manual handling hazards to assist in the prevention of injury and ill health and covers all manual handling operations for all activities involving significant loads.

Procedure

All tasks involving manual handling hazards in Company workplaces and on site shall be identified in accordance with the Risk Assessment Procedure. Manual handling hazards shall be detailed and recorded on the Job/Task Register.

We will ensure that:

- With the assistance of Operations Manager, Project Manager and employees, all routine and emergency manual handling activities are listed.
- A manual handling assessment will be carried out for all activities where there is significant risk of injury.
- An evaluation of the working arrangements, including mechanical aids, against the risk of injuries is carried out.
- For each manual handling task an evaluation will be made of the loads being handled, the frequency of handling and the nature of the movements required.
- Checks on the health of the individuals performing the tasks– pregnant workers, people with back conditions – are carried out, although it will be remembered that employees have an obligation to advise you of any condition which exacerbates their risk.
- Checks on the accident book and other records are made to see if back strain injuries are occurring.
- Manual handling assessments are recorded.
- A review of training against work activities is identified.
- A log of proposed actions to reduce risks is created.

Risk assessments associated with all manual handling tasks will be completed using our Manual Handling Risk Assessment Form.

If a manual handling task is assessed as being a risk to health and safety, such steps as are reasonably practicable shall be taken to eliminate or control the risk.

The preferred strategy for the management of manual handling hazards is to:

- Eliminate risk or where possible re-design the tasks to remove as much as possible the manual handling elements identified to be a significant risk; and
- Where possible provide mechanical aids to assist employees to safely perform the manual handling tasks.

Where work requirements are such that manual handling remains a component of the work task, manual handling training shall be provided to employees in correct biomechanics and posture and the manual handling methods needed to do the work safely.

The Company will ensure the following arrangements and procedures for manual handling operations are followed:

- Work areas and sites will be kept in good condition, free from slipping and tripping hazards with clear access to the load.
- Wherever straightforward, loads will be split into smaller loads to reduce the likelihood of injury.
- Gloves and safety footwear will be provided at the expense of the business, where identified as necessary in the risk assessment.
- The distance loads have to be carried must be reduced to the minimum, including taking the work activity, e.g. unpacking, to the load if necessary.
- Where distances are excessive, manual handling must be used and the activity cannot be taken to the load, e.g. heavy materials moved between machining operations, resting areas will be designated to allow the handlers to pause and rest.
- Wherever reasonably practicable, manual handling tasks will be automated or mechanised.
- Loads of any weights that are large enough to obscure vision, e.g. empty boxes, must not be carried manually. They will be placed on trolleys or pallet trucks, as necessary, and pulled so that the operator has a clear view of the route.
- Loads must not be stacked above chest level by hand. A suitable, stable platform must be used to stand on.
- Passenger lifts will be utilised on sites as opposed to carrying materials up and down stairs.
- Employees who are engaged in manual handling operations will be trained in the correct techniques, including team lifting and kinetic handling, and any additional techniques for special loads.
- Employees who are not employed for manual handling operations will not be allowed to carry them out without suitable and sufficient training.

Mobile Workers

Introduction

As we operate across the UK, we rely on using Company vehicles, including vans, to transport our employees, our materials, and our work equipment. We will ensure that the same level of safety management will apply to our activities on the road, as to our site and office operations.

Procedure

Driving long distances or driving for long periods of time can involve significant risk to employees. Applying appropriate procedures in relation to driving practices and vehicle selection will minimise risk and contribute to protecting the health and safety of Company employees.

We shall identify where employees may be exposed to driving long distances or for long periods of time and undertake a risk assessment. Reasonable and practicable measures to minimise the risks of driving shall be implemented.

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:

Risk Minimisation

Consideration will be given to the following elements to minimise the risks:

- Exploring other alternatives to driving, for example teleconferencing or video conferencing.
- Apply a rigorous assessment of whether the travel is really needed.
- Using haulage companies wherever practical.
- Selecting safer vehicles with options such as ABS brakes, air bags etc.
- Using driving lights during daytime (vehicles will preferably be fitted with daytime running lights).
- Staying overnight when driving long distances to work.
- Ensuring all vehicles are roadworthy and properly maintained.
- Checking the vehicle condition before leaving and having repairs completed where appropriate.
- Ensuring loose items are secured and either in boots or behind bulkheads in vans.
- Ensuring items carried outside the vehicle e.g. roof racking, are secure.
- Ensuring trailers do not exceed towing capacity of tow bar of vehicle; and ensuring trailer braking systems are operational.
- Ensuring that the employee has the necessary licence to drive the vehicle.
- Providing training for employees in safe driving practices.
- Ensuring employees are familiar with the class/type of vehicle being driven.
- Ensuring drivers do not operate mobile phones while driving. The only exception to this is

the use of a hands-free phone which may be used for emergency purposes only for a duration of no more than 5 minutes.

Fatigue avoidance/other risk factors

- Ensure 15 minute rest breaks are undertaken for every 2 hours driving.
- Share the driving work load.
- Insisting on overnight stay for excessive travel distances.
- Employees shall not drive vehicles after taking alcohol or medication that may induce drowsiness.

The Operations Manager or Project Manager will ensure that they know the whereabouts of employees under their control and of any foreseeable risks to their health and safety.

Employees are not entitled to drive on Company business until they have written confirmation that they are entitled to do so from the Directors.

We will monitor the effectiveness of this procedure and investigate any road incidents, as part of continual improvement in safety performance. The procedure will be reviewed annually.

Requirements on employees

It will be the responsibility of all employees to ensure that they comply with these procedures whenever they are away from their normal workplace. This will assist in the provision of safe systems for employees working away from home and for emergency situations.

To ensure proper standards of competence, we require all employees to make a valid and appropriate driving licence available for inspection as soon as reasonably possible after taking up employment and thereafter on request or on a regular basis. Any changes in circumstance to the employee's licence must be reported to the Directors.

All our employees are expected to be aware of, and comply with, general road safety law, and to take reasonable care of themselves, passengers and the public while driving.

Although the Company is fully responsible for the safety of its own vehicles, employees will advise their Operations Manager or Project Manager if they have any concerns about the safety of a Company vehicle.

Use of own vehicle

Employees who use their own vehicle for work related to the Company will be confident about the vehicle's general condition. If unsure, they will seek competent advice. The vehicle will have a current MOT and be suitably insured for business use. It will also be serviced at designated intervals and subject to a weekly check.

Company vehicles

Company vehicles will be inspected regularly and properly serviced. If the vehicle is 3 years old and above it must have a current MOT.

Planned/preventative maintenance will be carried out in accordance with manufacturers' recommendations.

Vehicle safety equipment will be properly fitted and maintained.

Drivers

Company drivers will need present a current driving licence, valid for the vehicle to be driven,

prior to driving on Company business. This will need to be presented to the Directors every 6 months.

Drivers meet the knowledge and eyesight requirements in the Highway Code (using proper corrective eyewear if required).

Training needs will match driving requirements and will be continually assessed, including any need for drivers' refresher training.

Mobile Phones

The use of mobile phones, whilst driving is strictly forbidden. Mobile phones will only be used when the driver has safely stopped or with the use of hands-free phone kits (receiving calls only). Any employees encouraging the use of mobile phones while driving may be subject to disciplinary action.

Driver Safety

The use of seat belts is required by all vehicle drivers, if a seat belt is fitted to the vehicle, it must be worn. Passengers are also required to wear seat belts where these are fitted. If possible, seat belts will be of the three-point inertial type, lap belts are acceptable for passengers travelling in a middle seat. In some circumstances e.g. off-road driving the use of safety harnesses will be considered.

Speed limits will be adhered to on public roads, Company premises and client sites.

Keep car doors locked when travelling in urban areas.

Keep all valuables out of sight, if possible, when travelling and when parked.

Keep the vehicle well maintained and with a surplus of fuel for the planned journey.

In such circumstances keep a container of water for screen washing or radiator use (additional drinking water and foodstuffs may also be required). Depending on the driving conditions expected and location an emergency kit such as: shovel, jump leads, tow rope or chain, survival kit, spare vehicle parts, extra wheels and emergency flares may also be required.

Keep a basic first aid kit, fire extinguisher and torch in the vehicle, if possible.

A mobile telephone is also recommended, if possible.

Try to avoid eye contact with, gesturing at or confronting other drivers, do not drive aggressively or in any other way provoke other road users.

Never pick up hitchhikers.

Inattention to the road is the most common cause of road accidents. Mobile or cellular handheld telephones must not be used while driving a vehicle. Stop the vehicle in a safe location before using a handheld telephone. Do not attempt to read a map, documents or take notes while driving.

Tiredness is a major cause of road accidents, ensure when driving you take regular breaks, if it is unsafe to stop, open windows and turn up the radio (if available) until you have an opportunity to stop in a safe location.

If you believe you are being followed, drive to a police station or a crowded place, if possible.

If anyone stops to confront you, do not stop, if at all possible, keep the doors and windows locked and summon help as soon as it is safe to do so.

Noise at Work

Introduction

Due to the nature of our work using construction related tools and equipment, exposure to noise is to be expected. We will ensure that employees and others affected are protected, so far as is reasonably practicable, against risks of the adverse effects from noise, whilst engaged in Company related activities.

This procedure outlines the responsibilities and activities required to ensure all health and safety requirements are carried out associated with noise.

This procedure covers all aspects of health and safety management associated with carrying out business activities or processes involving noise. It also covers all Company employees, or any other personnel associated with our business activities or processes.

Procedure

The Company 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 eliminated or reduced to an acceptable level.

The Company also recognises that noise levels below those which cause hearing damage, in site 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 or on site as a health and safety issue, we will:

- Take all necessary steps to investigate the circumstances.
- Take corrective measures where appropriate.
- Advise the employee(s) of the actions taken.

Whenever a problem arises caused by noise in the workplace or on site, employees must inform the Operations Manager or Project Manager immediately.

Workplace and site noise levels shall be minimised by design, engineering controls at the source, and/or by documented administrative controls.

Noise assessments – We shall carry out regular noise risk assessments and noise level surveys where appropriate of noisy areas, processes, and equipment. 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.

Prevention – 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.

Reduction of Noise Exposure Levels – 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 80dB(A) is not exceeded. The Company accepts that the use of hearing protectors is a last resort and is committed to continuing to seek and introduce alternative methods for reducing noise exposure levels wherever possible in the future.

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. It 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.

Hearing Protection Zones - We shall where deemed necessary, designate, and clearly mark out 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 whilst inside these zones.

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 the Operations Manager or Project Manager.

Working in high levels of noise without proper protection can cause irreversible damage to hearing. Even at lower levels noise can cause disturbance and stress. The risk of noise harming personnel can be minimised by taking the following precautions:

- Avoid making unnecessary noise.
- Co-operate fully when noise assessments are being performed, so that measurements are as accurate and realistic as possible.
- Use all equipment and follow all procedures designed to reduce noise exposure levels. Do not modify or interfere with any such equipment without authorisation and ensure that it is properly maintained.
- Always wear the hearing protection provided when required to do so (e.g. in marked hearing protection zones). Make sure that hearing protectors are properly fitted and kept in a good state of repair.
- Promptly report any problems caused by noise at work and all situations which may lead to increases in noise exposure levels, such as defects in equipment or changes in working practices.
- Inform a responsible person of training needs related to noise and participate fully in training provided.

Training

We will instigate a training programme for all employees who are exposed to noise at or above the lower exposure action value and will ensure employees participation in such programme.

Information provided in the training programme will be updated to be consistent with changes in protective equipment and work processes. As a minimum, training for each employee 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. The Operations Manager or Project Manager will also be given appropriate training.

Record Keeping

Records will be kept of the following:

- Noise exposure assessment reports, including details of the workplace, areas and tasks assessed, the results of assessments, date carried out, who conducted the assessment and the resulting action plans.
- Actions taken as a result of noise exposure assessments, with dates.
- Changes in working practices which affect noise exposure levels e.g. working hours, new equipment, introduction of noise reducing measures etc.
- The provision of training in hearing conservation and noise control.
- Complaints from employees concerning the effects of noise.
- Action taken as a result of such complaints.

Monitoring

We shall monitor noise exposure and provide protection against the effects of noise exposure.

Monitoring will be repeated whenever a change in site activity or process increase noise exposures to the extent that additional employees may be exposed at or above the upper exposure action value; or the attenuation provided by hearing protectors being used by employees may be rendered inadequate.

Instruments used to measure employees' noise exposure will have been calibrated to ensure measurement accuracy.

Health Surveillance

Health surveillance is a programme of systematic health checks that identifies early signs and symptoms of work-related ill health and so allows action to be taken to prevent its progression. It is also useful in monitoring the effectiveness of our controls, though it is not in itself a control measure or a substitute for controlling risk at source. Suitable health surveillance usually means regular hearing checks (audiometric testing).

"If the risk assessment indicates that there is a risk to health"

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.

Exposure Reduction

When employees' exposure exceeds that listed below, feasible administrative or engineering controls will be utilized. 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 purposes of this procedure, an 8-hour time weighted average (TWA) of 85dBA measured on the A scale at slow response or, equivalently, a dose of fifty percent shall be considered the upper exposure action value level.

For all employees exposed to noise at or above the upper exposure action value we shall:

- Make hearing protectors available at no cost to the employees. 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.
 - Lower exposure action values:
 - daily or weekly exposure of 80 dB
 - peak sound pressure of 135 dB

The Permissible Noise Exposure limits in above shall be subject to the following conditions:

- Follow more stringent guidelines, when required by local regulations.
 - Upper exposure action values:
 - daily or weekly exposure of 85dB
 - peak sound pressure of 137dB

Levels of noise exposure which must not be exceeded:

- Exposure limit values:
 - daily or weekly exposure of 87 dB
 - peak sound pressure of 140 dB

If an exposure action value is exceeded, we will:

- Reduce exposure to noise below the exposure limit value;
- Identify the reason for that exposure limit value being exceeded; and
- Modify the existing Company and technical measures.

If the variations in noise level involve maxima at intervals of 1 second or less, it will be considered to be continuous.

Purchasing and Acquisition

We will introduce a positive purchasing and hire policy to purchase and hire equipment with the lowest levels of noise output as is reasonably practical to undertake the work.

We will only purchase and hire equipment from reputable suppliers who can furnish us with relevant and extensive noise exposure data for their equipment.

Occupational Health

Introduction

As well as protecting the safety of our people we will, as far as is reasonably practical, protect their health and well-being. We will protect all personnel from the occupational diseases and illnesses through the identification, evaluation and control of health hazards present in the workplace.

The Company is committed to providing an effective occupational management system to discharge its duties under the various pieces of legislation and will introduce a formal system of assessment and controls in support of this policy as and when required.

Procedure

We recognise that some general occupational health hazards and working conditions have the potential to cause ill-health and we will introduce measures to identify what issues our employees are exposed to in the course of their work.

Wherever we can, we will introduce procedures in relation to the occupational health hazards, to ensure that the health of our employees is not affected in any way.

Where there are working conditions, which have a detrimental effect on the health of our employees, we will change the working conditions to a suitable and less hazardous environment wherever possible or reduce risks with suitable control measures.

We will assess all working conditions and environments on site. We will review our control measures, to ensure that the management controls are still appropriate and effective.

Information, instruction, and training will be provided for all employees who may be exposed to health hazards. The necessary information and training will also be provided for any non-employees working on site who may also be exposed.

We will minimise exposure to occupational health hazards by implementing the following measures:

- Identification of all working conditions and occupational health hazards used or generated during our activities.
- Create an inventory of all occupational health issues.
- Source information about the hazardous situations and conditions.
- Assess the risks to health of any activity, which results in exposure to occupational health hazards to health.
- Monitor exposure levels to ensure we remain within safe workplace exposure limits.
- Carry out regular health and wellbeing surveillance on our workforce that are exposed to occupational health risks.

Health Monitoring

Where required, by risk assessment and from workplace monitoring results, we will ensure that those who are exposed to hazardous substances, fumes and dust are subject to regular health monitoring in the form of lung function and breathing checks by a competent physician at least annually.

We will also undertake to carry out audiometry, eyesight and skin checks for all our site-based employees.

Permit to Work

Introduction

A Permit to Work is a formal system which is used by the Company to provide the proper control necessary for non-routine work to be conducted in hazardous areas or in hazardous conditions.

Non-routine work, such as maintenance, cleaning, equipment installation and refurbishment can produce health and safety risks over and above those normally encountered in the workplace.

Our Permit to Work system is designed to check that all eventualities have been considered when planning and organising such activities and is an important means of minimising any risks involved.

Procedure

The Permit to Work will involve the following steps:

- List the items which need to be checked before work can proceed.
- Prevent work if conditions fail to meet the accepted standard.
- Limit the times of work before repeat tests/inspections need to be carried out.
- Prevent other types of work in near-by areas when a permit is in operation.
- Specify precautions to be taken (e.g. use of PPE).
- Display the Permit to Work at the work site and control the work area to ensure that all personnel are aware of the permit's operational requirements.
- Ensure that the Permit to Work covers all personnel on the site (employees and sub-contractors).

The Company shall operate a Permit to Work system for all high-risk work carried out on site, all employees and sub-contractors are expected to comply with the requirements of any permit which is in operation.

Company employees working in occupied client sites are expected to comply with all requirements of any Permit to Work which is in operation on that premises.

Where no such permits are in operation, Company employees will operate our Permit to Work procedures. If employees experience any problems with the operation of the Permit to Work system, they must immediately inform the Operations Manager, Project Manager, or an appropriate responsible person to ensure that the Company can investigate and correct the situation.

The Company will, in conjunction with employees:

- Plan the work to be carried out and consider the potential risks.
- Determine the need for permits systems to decide whether the current permit system(s) in operation should apply or whether a new type of permit is required.
- Determine equipment needs and make available the equipment required for test work and permit implementation.
- Audit permit use and compliance.
- Regularly review permit operation, modify permits as necessary and implement follow up action if failure incidents occur.

The Permit to Work must contain information on:

- The nature of the work to be performed.
- The place work is to be carried out and the plant/equipment required.
- The hazards present and how best to avoid these hazards, however, the person carrying out the work must still be alert to the possibility of hidden dangers.
- The action to be taken in an emergency situation and any emergency equipment/personnel required.
- Any tests, inspections and preparations required prior to starting the work, on completion of the work and the frequency of testing during the work taking place, if required.
- The period of time in which the work must be completed, with a provision for extending the time allowed.
- The personnel competent to carry out the work.
- Personnel to be notified of the work being conducted.
- Personnel to be notified of the work area being made safe after completion of the work.
- Signature of the responsible person indicating that they are satisfied that the correct procedures and conditions have been established.

The Permit to Work itself will be considered as an agreement between the Company and the person receiving the permit. In particular the person receiving the permit must understand that they have to comply with the permit in every detail and that the person authorising (signing) the permit has complete and absolute control.

Since Permits to Work are the most formal and detailed method of ensuring safe systems of work, their use shall be reserved only for situations where:

- The potential hazards involved are severe.
- The precautions necessary are complex and need positive re-enforcement.

In situations where the hazards are only minor and a Permit to Work is not required, it is still important that the employee to be conducting the work reports to their Operations Manager or Project Manager before starting maintenance or non-routine work.

It is important to note that Permits to Work will not prevent accidents unless:

- Their need and use has been established.
- Their requirements have been adhered to.
- Personnel are aware and competent.
- Appropriate equipment is available for testing and implementation.

Permit Authorisation and Competency to Perform Work

It is vital that both the responsible person (person who signs the Permit to Work) and the personnel conducting the work know exactly what they are required to do. In appointing a responsible person (authorised to sign Permits to Work) the Company shall consider the following:

- The age of the person involved (they must be a fully mature and a responsible person).
- Their training, experience and qualifications.
- Their knowledge of the particular plant/equipment/hazardous work process involved.

- Their ability to control the situation and personnel involved.

It is the responsibility of this responsible person to assess the competence of the personnel assigned to carrying out the work, to ensure that the work is conducted safely.

Training

We will provide the necessary information and appropriate training to ensure that employees, supervisors, contractors, and visitors are fully aware of the permits in use and are competent to undertake the tasks and test requirements detailed in the permits.

Training objectives for employees are:

- Employees must fully understand the principles behind and the need for Permits to Work.

To ensure employees are familiar with:

- The different types of permit which may be used.
- Permit applications and limitations.
- Permit methods of operation.
- To ensure that persons initiating and operating the permit systems are competent to do so.
- To ensure that the responsible person has enough information to enable:
 - Work to be carried out in a safe manner.
 - Compliance with legislation.
 - Adequate training to be provided for relevant employees.
 - Compliance with Company Health and Safety Management System and procedures.
 - All relevant health and safety issues are to be taken into account when planning work.

In addition to the above, the Operations Manager or Project Manager must be able to:

- Consider Permit to Work requirements when planning work.
- Regularly review permits and procedures to ensure that they are still efficient and effective.
- Introduce new types of permit if required.
- Ensure that adequate and suitable training is provided for all personnel.
- Ensure that contractors adhere to their own and Company permits systems.
- Ensure that any equipment specified for permit implementation is provided, serviced and calibrated.

Record Keeping

Permit to Work systems are required to reduce risk and to demonstrate compliance with legislation. Training records shall include the following information:

- Name of employee.
- Date and duration of training.
- Course details.

- Outcome of training and details of competent persons.
- Name of trainer.
- Review date.

In order to ensure that permit outcomes are successful, records of the following shall be kept:

- Details of permits in general use on working sites.
- Training provided - subjects covered, names of those trained and the levels of training given.
- Servicing and maintenance records relating to equipment used e.g. gas/oxygen detecting equipment, respiratory protection, protective clothing and rescue/emergency equipment.
- Incidents where permit procedures “failed” so that permit modifications can be considered.

Personal Protective Equipment

Introduction

This procedure outlines the requirements and practices for the management of Personal Protective Equipment (PPE) to assist with the correct selection, supply, use, replacement, maintenance, training, and storage.

The person responsible for implementing this procedure will carry out or delegate such functions as necessary to ensure the effective day-to-day operation of our safety arrangements in respect of elements listed below.

These functions will include ensuring that:

- Overall responsibility is assigned for ensuring that PPE meets the required standard.
- Responsibilities for care and maintenance of PPE are allocated.
- Regular inspections of PPE are carried out and a system is in place to ensure appropriate use of equipment.

Procedure

The need to provide Personal Protective Equipment (PPE) shall be determined from the process of hazard identification, risk assessment and development of risk control measures.

These shall be completed to ensure that the provision of PPE is an appropriate control option.

PPE shall conform to all legislative standards and/or industry standard requirements or guidelines.

We will in consultation with employees:

- Carry out an assessment of proposed PPE to determine its need and suitability.
- Take any necessary measures to remedy any risks found as a result of the assessment.
- Ensure that where two (or more) items of PPE are used simultaneously, these are compatible and are as effective when used together as they are when used separately.
- Arrange for adequate accommodation for the correct storage of PPE.
- Implement steps for the correct maintenance, cleaning and repair of PPE.
- Train employees in the safe use of PPE for all risks within the Company.
- Replace PPE which has been provided to meet statutory obligations, as necessary and at no cost to the employee.
- Inform every employee of the risks that exist in their workplace.
- Reassess as necessary if substances used or the workplace change.

The following procedures will be observed when using PPE:

- Ensure that protective clothing fits properly and adjust PPE so that it is comfortable when working, including face fit testing for those using Respiratory Protective Equipment (RPE).
- Make sure the PPE is functioning correctly, if not report the defect.
- When two (or more) items of PPE are used together, these are compatible and that their combined use does not reduce their effectiveness.

- Employees, the Operations Manager or Project Manager must report symptoms of ill health or discomfort immediately.
- Inform a responsible person of any training needs.

Where an employee raises a matter related to health and safety in the use of PPE, we will:

- Take all the necessary steps to investigate the circumstances.
- Take corrective measures where appropriate.
- Advise the employee of the action taken.

Where a problem arises in the use of PPE the employee must:

- Inform a responsible person immediately.
- In the case of an adverse health condition, advise their own general practitioner.

Assessing suitability of PPE

To allow the right type of PPE to be selected, the different hazards in the workplace need to be considered carefully. This will enable an assessment to be made of which types of PPE are suitable to protect against the hazard and for the job to be done.

In all cases the following will be considered when assessing the suitability of PPE:

- Is it appropriate for the risks involved and the conditions at the place where exposure to the risk may occur? E.g. eye protection suitable for chemical mists will not provide adequate protection for a welding operation.
- Can it be adjusted to fit the wearer correctly?
- Has the state of health of those who will be wearing it been taken into account?
- What are the needs of the job and the demands it places on the wearer? E.g. the length of time the PPE needs to be worn or requirements of visibility or communication.
- If more than one item of PPE is being worn, are they compatible? E.g. does the particular type of respirator being used make the correct type of eye protection difficult to fit correctly?

Maintenance

PPE needs to be well looked after and be properly stored when not in use e.g. in a dry, clean cupboard or in the case of smaller items such as eye protection in a box or case.

All PPE will be kept clean and in good working order, the manufacturer's maintenance schedule (including recommended replacement periods and shelf lives) will be followed.

Simple maintenance can be carried out by the trainer / wearer; however, more complex, or intricate repairs will only be conducted by specialist personnel.

To avoid unnecessary loss of time, Company employees are advised to always have suitable replacement PPE readily available.

Information and Training

We will provide sufficient information, instruction, and training to ensure that the health and safety of workers using PPE. This includes temporary employees, persons gaining work experience and contractors as well as those in permanent employment. The Operations Manager or Project Manager who are responsible for users of PPE will also receive appropriate training.

Company employees will be trained in the risks presented by their work activities and how these can be controlled using PPE in the proper manner.

Users of PPE will need to understand:

- The need for PPE when a risk cannot be adequately controlled by any other means.
- The types of activity which typically require the use of PPE.
- How to use PPE properly.
- That PPE only protects the wearer, therefore, care must be taken when others are in the area.
- The requirements of PPE maintenance and storage.
- The limitations of PPE and the maximum time scales in which the equipment will give adequate protection.
- The need to report health problems, equipment defects or loss of equipment promptly to the Operations Manager or Project Manager.

The Operations Manager or Project Manager need to understand:

- How to carry out PPE assessments and the importance of responding to reports from the employee.
- How to ensure the PPE is suitable for both the task and the individual who will use it.
- The need to ensure that the combined use of two items of PPE does not reduce the effectiveness of either.
- The procedures necessary for maintenance of PPE (including cleaning).
- The possible consequences to the health of the individual arising from the refusal to use the PPE or the inappropriate use of PPE.
- Their obligations under common law towards the employee and the potential for civil claims and subsequent compensation payments.
- How to respond to employees' concerns about PPE.

Additional training

We will provide additional training:

- Whenever there is a significant or substantial alteration in procedures or substances used in the Company.
- When the task is significantly modified.
- Where there is a change in the law or in official guidance.
- Where necessary as a result of findings of scientific research or of technological advances.
- Where there is reason to believe original training may have become ineffective.

Record keeping

Records will be kept of the following:

- The results of the PPE assessment.
- Actions taken as a result of the PPE assessment.

- Inventory of PPE equipment and to whom each item has been supplied.
- The inventory of PPE equipment and to whom each item has been supplied.
- The provision of training.
- Information given to employees.
- Complaints or alleged reports of discomfort, or non-suitability of the PPE discovered following field tests or safety audits.
- Action taken in respect of these complaints.
- Manufacturers' advice with regard to compatibility of various items of PPE which are used together.
- Replacements of PPE with dates.
- Maintenance and testing of PPE equipment.
- PPE given as a personal issue.

Records will also be kept of the following:

- Name of employee.
- Date(s) and duration of training.
- Course details and results.
- Name of trainer.
- Review date.

PPE items will be purchased from suppliers who ensure that only approved PPE will be provided and include the following services:

- Advice on PPE.
- Information relating to any test results.
- Advice on personal fitting, use, cleaning, maintenance and storage of PPE.
- A range of sizes (where appropriate).
- Information on the availability and need for replacement parts.
- Demonstration of the PPE.
- Immediate replacement of any defective PPE.

Consideration shall be given to the need for protecting persons who are working nearby or passing close to hazardous areas.

Compliance with requirements to use PPE by individual(s), including employees, visitors and volunteers will be monitored. Where there is non-compliance, this shall be investigated to ascertain the reason(s) and handled in accordance with management procedures.

PPE Programme

We shall develop a PPE programme outlining:

- Approved PPE items and where they shall be worn.
- Who is required to wear it and whether it is provided for general or exclusive use.
- The type of PPE that students are required to provide themselves for practical studies or

fieldwork.

- How PPE will be issued.
- The initial training and ongoing instruction needed.
- Specific precautions that apply, e.g. cleaning/replacement.
- Replacement arrangements.
- Who is to clean and/or service the PPE.
- Signage required at the point of required use.
- What supervision will be provided.
- What regular inspections of PPE are necessary.
- Storage arrangements.

All employees required to wear PPE shall be provided with training prior to use and ongoing training where necessary.

Pressure Systems

Introduction

We will ensure the health and safety of all employees and others from the uncontrolled release of stored energy from a pressure system due to failure of the system or any part of it, so far as reasonably practicable.

This procedure covers all the elements of our pressure systems and equipment, including gas cylinders associated with carrying out Company activities or processes.

Procedure

The Company recognises its duty to supply and maintain pressure systems and equipment that are safe and suitable for use.

We will identify and assess the location in which the pressure system is to be used and take account of any risks arising from particular circumstances and keep an inventory of such systems and equipment.

We will arrange for all pressure systems to be examined by a competent person to determine:

- Safe operating limits.
- Appropriate maintenance arrangements.
- Whether a written Scheme of Examination is required and if so to draw up or approve the scheme.

Where a written Scheme of Examination exists, a competent person will examine the system in accordance with the scheme.

All existing and proposed pressure systems will be designed and manufactured from suitable materials, be suitable for the intended purpose, installed correctly and capable of being operated safely.

Suitable protective devices will be fitted to all pressure systems and kept in good working order at all times.

All pressure systems will be operated within the safe operating limits determined or approved by a competent person.

All pressure systems will be properly maintained under a programme determined by a competent person – to include a written Scheme of Examination where necessary.

Instructions will be readily available to cover emergencies.

A risk assessment will be completed for all work involving use of pressure systems – including maintenance.

Detailed records will be kept, of the initial examination report, most recent examination report, details of any modifications and repairs.

All employees involved in the operation, maintenance, etc. of pressure systems will be given sufficient information, instruction, and training.

Pressure Testing

Introduction

Due to the nature of our work the Company may periodically need to undertake pressure testing both at our premises and on our customers' sites. Wherever possible we will aim to undertake any pressure testing under controlled conditions.

When we have a requirement for pressure testing on site, we will adopt the following procedures. We will also liaise with our clients to ensure we are also meeting any site-specific requirements including the completion of a Work Permit if necessary.

Procedure

This procedure highlights the steps that the Company will take when required to undertake pressure testing on a customer's site. Pressure testing undertaken at our premises will be subject to a separate Risk Assessment and safe working procedure.

- The Company will not sanction pressure testing of any sort beyond the maximum working pressure of any air conditioning unit less 10 per cent which will be identified on the Condenser Unit (CU) nameplate.
- This procedure also applies to any pressure exerted on the evaporator which also must not exceed the Maximum Working Pressure (MWP) of that part either less 10 per cent and the lower between evaporator and CU of the two must be maximum nitrogen pressure.
- If the MWP is not shown on the nameplate then a pressure test above 12 bar must not be carried out, until you have been notified in writing of the system MWP.
- The Company will not carry out any strength-testing period and any reference to 42 bar is to be ignored.
- The Company will not pressure test beyond the system MWP less 10 per cent until further notice.
- This again must be raised in increments of 10 bar every 15 minutes carried out slowly.
- Pressure testing for R410A must never exceed 32 bar and the engineers must ensure they are using a 410A gauge and manifold set.
- Regulator gauges must be used on the nitrogen bottles with an R410A manifold and gauge set, and high-pressure hoses must only be used.
- Do not leave systems at 32 bar during trading when you have had a leak. Instead use a max of 28 bar and then wind it up to 32 bar overnight. Check the pressure the next morning to see if there has been any drop.
- When testing wind, the pressure up in increments of 10 bar and the engineers must walk the site during the incremental rises to check and listen for leaks.
- Always be safe.
- When testing after replacement technology then the pipes need strength testing to 40 bar raised in 30-minute increments of 10 bar, but this will be raised to 40 bar for a maximum of 1 hour and with all indoor areas cleared of all staff and others so it's an overnight job.
- Following this, a pressure test at no more than 28 bar can be continued for 24 hours.

Risk Assessment

Introduction

The aim of this procedure is to ensure that all the hazards and risks that are applicable to our Company, are assessed, controlled, monitored, documented, and maintained.

This procedure covers all risk assessments to be carried out in the Company in all areas including office facilities and client's sites.

We will compile a generic set of risk assessments for routine operations that **MUST** then be made site specific for all jobs. It will be the duty of our Operations Manager and Project Managers to carry out site specific 'dynamic assessments' and ensure these are added to the Site Safety File.

Procedure

This procedure outlines the requirements for the management of hazards and provides a standard model for hazard management. The procedure fulfils our duty under the regulations to identify the hazards associated with the Company's work activities, the working environment and the use of plant and equipment and also to assess levels of risk and implement appropriate risk control measures.

The identification of hazards and the assessment of risks are a key part of the Company policy for health and safety.

Risk assessments will be carried out on an ongoing basis and to be effective it is essential that all our employees and contractors co-operate wherever they can in the risk assessment process.

If at any time an employee considers that there is a serious hazard in their area or site or there are deficiencies in existing health and safety measures, or an opportunity for improvement, the employee must inform the Operations Manager and Project Managers as soon as possible.

Risk Assessment Process

The process requires:

- The identification of reasonably foreseeable potential hazards.
- A process of assessing the level of risk associated with employees' exposure to the hazard.
- The development of risk control measures and their implementation.
- A process for evaluating the control measures to ensure effective control of risk.

The basic approach to the management of risk is summarised by the following stages:

- Consider all tasks and situations.
- Break down the work operation into manageable areas.
- Make a preliminary list of activities for the duration of the works.
- Carry out an initial 'walk-through' of the site area.
- Amend the preliminary list as necessary.

At the end of the exercise review the hazards and arrange them in order of priority:

- Identify the hazards which are, or may be, involved.

- Identify those who may be exposed to the hazards.
- Analyse the risks of injury or loss from the hazards.
- Evaluate if the risk is adequately controlled.
- Eliminate or reduce the risk in line with the basic principles of hazard control.
- Implement the risk control measures.
- Monitor the measures.
- Review and feedback of any corrective actions.

Hazard Identification

The Operations Manager and Project Managers should develop a list of potential workplace hazards and detail them on a risk assessment register.

The following sources of hazard information may be utilised to identify hazards:

- Information from the CDM-C pre-construction information.
- Industry and legislative requirement information.
- Incident reports.
- Hazard inspection reports.
- Workplace hazard inspections.
- Observation of work tasks and activities.
- Consultation with employees.

Risk Assessment

For each work site the relevant generic assessments will be gathered together for routine tasks and developed to ensure they reflect the conditions of the site and the type of work being undertaken, considering the environment and current use of the site or building.

All employees and workers on the site must be taken through the assessments and ensure they understand the content. Any additional assessments must be completed prior to works commencing.

Where a contractor is undertaking works, they must provide a suitable and sufficient risk assessment and method statement prior to works commencing. These must be verified by the Operations Manager and Project Managers and included in the Site Safety File.

Plant / Equipment Assessments

Hazard identification and risk assessment shall be completed for existing plant, any proposal for the introduction of new plant or processes or the modification of plant or processes introduced to the Company.

- The hazards associated with plant shall be identified.
- A record of plant that is required to be registered shall be maintained.
- A programme for maintenance and inspection of all plant used on site will be established and maintained including a maintenance schedule.

Risk Control

Measures to eliminate or control risk shall be developed in the following order of controls,

known as the hierarchy of controls:

- Elimination - complete removal of the hazard or risk of exposure.
- Substitution - replace hazardous plant, equipment, substance or work process.
- Isolation - through distance or enclosure.
- Engineering - redesign the work area, fixing guards or maintenance.
- Administrative - standard operating procedure, supervision, training and signage.
- PPE - safety shoes, goggles, safety glasses and gloves.

Risk Assessment Review

Risk assessments will be reviewed:

- Prior to each new project.
- As a minimum at least every 12 months.
- Following an accident, near miss or occurrence of occupational ill-health.
- On the implementation of new equipment or work practices.

Contractors risk assessments and method statements will be scrutinised by the Operations Manager and Project Managers, and should the documents not be deemed suitable and sufficient they will be referred to the Directors and the contractor refused access to the site until the issue is resolved.

Monitoring Compliance

The Company will use the risk assessment process effectively and ensure that our employees and contractors work within the requirements of the assessments.

Performance against risk assessments will be monitored by regular site inspections by both the Directors and Health and Safety Advisors.

Training and Competence

Introduction

The Company is committed to providing all necessary information, instruction, training, and supervision as is necessary to ensure the health and safety at work of our employees and to enable them to work in a safe manner without posing risks to themselves or others who could be affected by their work activities.

This procedure outlines the requirements for the management and development of health, safety and welfare training needs and identifying competencies and training requirements for our employees.

This procedure is applicable to all personnel employed by, and/or working for the Company.

Training Provision

Training enables people to acquire the skills and knowledge necessary to work in a manner that is safe to themselves and others. The degree of training required will depend on the complexity of the task that the employee is required to undertake and their existing level of competence.

The Company will define the necessary health and safety competence requirements for each employee and will develop and maintain arrangements to ensure that all employees are competent to carry out their duties and responsibilities in a manner that is safe to themselves and other persons.

The Company will identify and eliminate or control work-related hazards and risks through the implementation of a health and safety management system. The Company will use external parties to provide the necessary expertise where this does not exist in-house.

Under the arrangements referred to above, training programmes will:

- Cover all Company employees, as appropriate.
- Be conducted by competent persons;
- Provide effective and timely initial and refresher training at appropriate intervals.
- Include participants' evaluation of their comprehension and retention of the training.
- Be reviewed periodically.
- Be documented.

Training will be provided to all participants at no cost and will take place during working hours, if possible. A health and safety training programme will be established and maintained to ensure:

- All employees have an understanding of the Company's health and safety arrangements and individuals' specific roles and responsibilities.
- All employees, contractors, visitors and temporary workers undertake induction training determined by the level of risk to which they are exposed.
- Employees are aware of any site specific health and safety arrangements and hazards, risks, precautions to be taken and procedures to be followed.
- Employees know how to undertake hazard identification, risk assessment and control.
- Employees with specific roles and responsibilities receive any necessary specialised training (in house or external).

- Employees with management responsibilities undertake formal management training in the form of the Construction Skills Site Manager's and Site Supervisor's course, as appropriate.

All such training must be repeated periodically where appropriate, be adapted to take account of any new or changed risks that have arisen and be recorded.

Training Needs Assessment

A health and safety training needs analysis will be conducted in consultation with employees and the Operations Manager and/or Project Manager in order to determine the required health and safety competencies for their roles.

A training needs analysis form shall be completed and shall include skills specific to certain operational requirements as identified from position descriptions, hazard identification and risk assessments. This will also take into consideration the requirements of the Construction (Design and Management) Regulations in respect of competence in the construction industry.

Health and safety training and development needs shall be assessed against position descriptions and recorded in individual employee performance management plans.

The training identified through the training needs analysis will be prioritised in accordance with the requirements of the work.

Health and safety competency requirements for employees are to be reviewed regularly in accordance with work task requirements.

Training needs will be assessed by considering:

- The requirements of the tasks to be undertaken by the individual.
- The type of equipment the individual is expected to operate.
- The personal qualities needed in the person performing the task - including qualifications and experience.

These needs will be assessed by looking at the subject in terms of:

- Induction training for new recruits.
- General health and safety training for all employees.
- Training for the Operations Manager and Project Managers on their health and safety responsibilities (SMSTS)
- Training specific to the job or certain tasks.
- Specialised or more technical training for work with hazardous substances
- Training for employees with health and safety responsibilities, such as safety committee members, competent persons, first-aiders and fire wardens.
- Training for persons who are not strictly direct 'employees', such as contract workers or temporary workers
- Risk assessment results, feedback and reports from Operations Manager and Project Managers, the outcome of accident investigations, records of past training provision, interviews with safety representatives can all be important and useful sources of information for the assessment of training requirements and the identification of training gaps.
- Where there is insufficient skill in-house, the options are to improve employees' skills with

training programmes and to increase support, perhaps by employing a health and safety training consultant.

A training needs assessment will be carried out for all employees, and this will be reviewed annually. The review will take account of:

- The skills and knowledge specified for the job.
- Any specific operational or technical job responsibilities.
- Any specific health, safety and environmental job responsibilities.
- The employee's current level of competence/performance in respect of these areas.
- The employee's career aspirations within the Company.

Record Keeping

A record of training needs analysis and any completed training is to be maintained. Evidence of training needs analysis and completed training and development is to be made available when required for auditing purposes. All training must be signed for by the trainee personally.

Induction Training

General Induction

All new employees including those transferring from elsewhere in the Company or returning to work after a break in employment, and temporary employees, receive induction training. The induction training will include:

- Introduction to the Company.
- Introduction to the site/department and its operations.
- Health and safety policies and procedures.
- The employees' role as per the job description with particular consideration of any technical and operational responsibilities, any quality, environmental, health and safety responsibilities and any specific requirements related to the job or site work in general.
- The main hazards and control measures applicable to their place of work.
- Emergency procedures.

On completion of the induction training employees will be asked to sign a form to acknowledge their acceptance and understanding of the training given which can then be used as evidence of their capability and awareness relating to health and safety issues.

Completed induction documents will be kept in the employee's personal file.

For permanent employees, training records will be established and maintained. The employee will receive a copy of relevant induction training documents, if requested.

Site Induction

Each worksite will have a formal site-specific induction process that all persons wishing to enter the site must be taken through. As a minimum this induction will cover:

- Senior Management's commitment to health and safety.
- An outline of the project.
- The Operations Manager, Project Managers and any other key personnel e.g. first aiders.
- Any site specific health and safety risks, for example in relation to access, transport, site

contamination, hazardous substances and manual handling.

- All relevant control measures on site including site rules, permit to work procedures, traffic routes, security arrangements, hearing protection zones, PPE Requirements, housekeeping and storage arrangements, emergency procedures including escape routes and assembly points.
- First aid arrangements and facilities.
- Accident reporting arrangements.
- Details of any additional planned training (Tool-box talks etc.).
- Safety representative's details.
- Information on individual responsibilities.

Violence and Aggression

Introduction

Whilst it would be rare, due to our work on construction sites we may encounter violence or aggression in the form of verbal abuse, or at worst physical attack. Our training, risk assessments and procedures will reduce the risk of violence and aggression as far as is reasonably practical.

Procedure

We will ensure that a generic risk assessment is carried out to take account of the risk of violence or threat of violence to employees. These assessments will cover:

- Buildings
 - External lighting.
 - Building and room security.
 - Layout and content of notices providing information to clients.
- Initial client contact.
- Reception of clients.
- Late night reporting arrangements.
- Alarm procedures.
- Personal alarms.
- Visits.
- Outdoor activities.

We will ensure that these assessments evaluate the effectiveness of existing control measures and where necessary lead to the introduction of additional or alternative controls. These may include:

- Workplace modifications.
- The introduction of new or modified systems of work.
- The provision of supervision.
- Group situations.

Support will be provided as required by management and by other internal or external specialists, as appropriate.

The responsible person will ensure the completed risk assessments are reviewed whenever there is reason to believe that the risk assessment is no longer valid, e.g. as the result of accidents, inspections, employees' complaints, or enforcing authority action.

Where a risk assessment has identified the possibility of violence occurring then we shall:

- Establish procedures and arrangements to eliminate the risk of violence to employees.
- Where elimination of the risk is not possible, we will establish procedures and arrangements to minimise the risk.
- Establish procedures for reporting, investigating and documenting incidents of violence.

Instructions to employees

We shall inform employees who may be exposed to the risk of violence, of the nature and extent of the risk. This duty to inform employees includes a duty to provide information related to the risk of violence from persons who have a history of violent behaviour and who employees are likely to encounter in the course of their work.

We shall instruct employees who may be exposed to the risk of violence of:

- The means for recognition of the potential for violence.
- The procedure and arrangements which have been developed to minimise or effectively control the risk to employees from violence.
- The appropriate response to incidents of violence, including how to obtain assistance.
- The procedure for reporting, investigating and documenting incidents of violence.
- Ensuring that all other applicable procedures that may apply, such as Lone Working procedure, are enforced.

Response to Incidents

We shall ensure that corrective action is taken, as required, in response to reported incidents of violence.

We shall ensure that any employee who reports an injury or adverse symptom from an incident of violence, is advised to seek medical attention, and is assisted in any dealings with the enforcement authorities and is advised to participate in any available programmes.

We shall keep a movement register so that it can be readily determined where an employee is at any given time. All employees must co-operate in maintaining the register. Whenever a difficult visit is anticipated the movements, register must identify the client's name and the address to be visited.

Employees are requested to provide their Company with the names, addresses and telephone numbers of persons to contact in the event of an emergency. This information will be held in a secure confidential file in the head office.

Operations Manager and Project Managers, in conjunction with employees, will ensure that all employees who risk assessments have identified as being at risk of violence or aggression during their work activities, receive training covering the following:

- Management of conflict situations in which they find themselves, including the provision of assistance to colleagues. This will include:
 - Recognition of the warning signs within:
 - The aggressor's behaviour.
 - Their own behaviour appearance.
 - The environment.
 - Help them to:
 - Control/use the environment.
 - Avoid trigger conditions.
 - Adopt alternative adaptive behaviours.
 - Act on observing the early warning signals of a potentially aggressive incident.
 - Use various techniques to help diffuse incidents and prevent escalation.

Employees are required to report all acts of violence or aggression. These include incidents of verbal abuse and threats of violent action whether or not they resulted in injury.

Management will investigate these events and take all appropriate action to prevent a reoccurrence. The findings will be positively communicated to all employees who may be at risk of a similar occurrence.

Work at Height

Introduction

Wherever possible we will endeavour to work from ground level utilising suitable and sufficient control measures. Where this is not possible, we will work at height adopting the safest means as is reasonably practical.

This procedure applies to all work carried out from an area where a person could be injured when falling away from that place of work, including work carried out at or below ground level where persons may fall e.g. work around excavations. Work includes moving around the place of work including equipment used for access and egress.

Procedure

Our principles when working at height will be to:

- Avoid working at height where it is reasonably practicable to carry out the work somewhere not at height.
- Ensure all work at height that cannot be avoided is properly planned and organised, and subject to a detailed risk assessment resulting in a safe system of work.
- Ensure those involved in work at height are properly trained and competent to carry out such work, giving due regard to work equipment used for and during work at height, including safety equipment such as harnesses, soft landing systems etc.
- Provide a place where the work at height can be carried out safely and that this place of work is suitably maintained.
- Properly control the risks arising from work on and around fragile surfaces.
- Carry out all appropriate and statutory inspections of equipment used for work at height.
- Consider, when planning work at height, the effect that weather conditions may have on persons and/or equipment during that work.
- Have plans in place for rescue and retrieval of persons working at height in the event of an emergency.
- Properly control the risks of and from falling objects.
- Ensure that the risks from associated hazards such as overhead and adjacent obstructions are suitably assessed and controlled e.g. overhead cables, excavations, lifting equipment used in conjunction with or around areas of work at height, traffic and pedestrian routes etc.
- Ensure that all exposed edges are suitably protected to the correct standard for fall prevention.

Ladders

Ladders will generally only be used for access and egress to a safe working platform. The person in control of the site or work at height activities will ensure that:

- Work at height from ladders is strictly controlled (use restricted to light duty and short duration work or for access and egress).
- All ladders are of suitable and sufficient strength for the intended work.
- Ladders are placed on a firm footing, even firm surface, and that they are secured by tying or footed by another person. Where footed by a person that person must be

protected from falling objects.

- Ladders will be positioned at the correct angle (75 Deg. 1 in 4 rule).
- All ladders will be referenced and logged and subject to regular inspection before use and every 7 days when used on site. These inspections will be recorded on an inspection report form and all defects will be suitably rectified.
- Work from ladders is carried out without the need for stretching to reach a work area.
- Ladders must not be painted.
- All ladders will be stored in a suitable storage area.
- All persons using ladders are trained in safety procedures and understand the control measures.
- A landing place will be provided at intervals not exceeding 9m.
- Where ladders do not extend 1.05m above a landing place a dedicated handgrip rail will be provided.
- Ladder safety will be reinforced on site using the HSE toolbox talk on ladder and stepladder safety.

Step Ladders

Step ladders will only be used where the person in control of work has:

- Ensured operatives are aware of safe working procedures for such access equipment.
- It is not reasonably practical to use other equipment such as a working platform.
- The area around the work from step ladders is protected from unforeseen impact by vehicles etc.
- Ensured equipment has been inspected for suitability and employees trained and competent.
- Made sure that step ladder safety will be reinforced on site using the HSE toolbox talk on ladder and stepladder safety.
- Considered any safer alternatives that could be used such as podium type steps.

Access and Working Scaffolds

- We will ensure that all access and working scaffold systems are designed and erected to provide suitable and sufficient strength and stability for the tasks they are intended.
- Scaffolding systems will be erected, adapted and dismantled by, suitably selected, competent persons and will conform to EN12811 and the requirements of schedule 2 Reg 8 of the Work at Height Regulations, in relation to guardrails and edge protection systems.
- Handover certificates will be provided for completed scaffolds, all incomplete areas will be correctly signed by the scaffolding contractor.
- The requirement for material catch and fall prevention systems will be assessed and provision made where required as a result of assessment to prevent any materials falling from work areas.
- Working platforms will be installed and maintained so as to prevent slips and trips.
- All scaffolding systems will be inspected by a competent person and a written record kept

at designated intervals.

- Scaffolding must NOT be interfered with by employees, this will be treated as a gross misconduct offence.

Scaffold Towers

- Scaffold towers will be erected, dismantled and used by competent persons in accordance with manufacturer's instructions.
- Towers must only be erected and inspected by employees with a current PASMA certificate.
- Towers will be subjected to regular inspections before use and to statutory inspections when in place for periods exceeding 7 days.
- Bases of towers will be protected from traffic routes.
- Designated height to base ratios outlined in regulations will be strictly adhered to.
- All tower wheels will be locked before any person accesses the tower.
- Towers will be suitably tied where the Company risk assessment indicates this is required.
- Towers are not to be moved whilst persons or equipment are placed on them.
- Towers will be used on firm stable ground.
- Equipment must not be hauled up the outside of towers.
- Steps and ladders will not be used on the working platforms of towers.
- Where towers cannot be secured from unauthorised access they will be dismantled and stored in a secure area.

Mobile access equipment or mobile elevated work platforms (MEWPs)

- Only trained, competent persons will be authorised to operate mobile access equipment. Personal training records will be held on site. IPAF Licence holders only are permitted to use MEWPs
- All appointments will be recorded in writing.
- Records of statutory tests and inspections will be available on site.
- Areas of operation of mobile access equipment will be restricted to prevent people being struck by equipment and / or falling objects.
- Equipment will only be used on terrain for which it has been assessed as suitable.
- A suitably secured restraint or fall arrest harness and lanyard will be worn by all occupants of mobile access equipment.
- Keys to mobile access equipment will be controlled by the person in control of site.
- The maximum safe working load of equipment will be marked on sides of units.
- All baskets used in conjunction with fork lift trucks will be suitably secured against falling.
- Suitable rescue procedures will be in place to recover persons trapped in mobile access equipment.

Suspended access and working platforms (including bosun's chairs cradles and rope access equipment)

- All work involving suspended access or working platforms will be designed and planned by competent persons.
- All work using such equipment will be carried out by competent personnel.
- All safe working loads of such equipment and operating limitations will be suitably marked on the equipment or provided for communication to the person in control of its use.
- Records of all statutory tests and inspections of equipment will be available on site.
- All personal training certificates will be available on site.
- Fixed stops will be positioned on all tracked access equipment.
- All equipment will be subjected to recorded statutory inspections.

Fall arrest equipment

Where it is not reasonably practicable to provide safe working platforms, the person in control of site will ensure fall arrest equipment is provided.

- Fall arrest equipment is installed by competent persons and all handover certification and inspection and test certification is held on site.
- All fall arrest equipment will be secured to a suitable anchor point. In the case of harness attachment this will be as high as practicable above the work area to limit distance of any fall.
- Fixed anchorages such as eyebolts will be subject to periodic test and examination.
- Only trained, competent persons will use harnesses.
- All harnesses will be full body type and suitable for the task and the operative.
- Only shock absorbing harnesses will be used. Harnesses will be designed to limit free fall to a maximum of 2m.
- Harnesses will be checked before each use and will be examined by a competent person at periods not exceeding 6 months, records of these tests and inspections will be recorded and evidence available on site.
- Where practicable double hook harnesses will be used for climbing operations.
- The design, installation, modification and removal of fall arrest nets will be carried out by competent persons.
- Nets or soft landing systems will be installed to limit fall distance to lowest practicable distance.
- All fall arrest nets will be accompanied by a valid certificate of periodic test and examination.
- Fall arrest equipment will not be reused following a fall until an examination has been carried out by a competent person and any partially or wholly deployed lanyard has been reset.
- Safety nets will be inspected by a competent person before first use, after any substantial modification, after any event which is likely to have affected its strength or stability and at intervals not exceeding 7 days. The inspection records must be retained.

Fragile Materials

We will ensure that suitable steps are taken to prevent any person falling through fragile materials. The person in control of site will ensure that:

- Suitable platforms, coverings or similar means of support are used to support the weight of any person and equipment being used in those areas and that these systems provide adequate edge protection.

Falling materials

The person in control of site will ensure all practicable precautions are taken to prevent falls of materials by ensuring that:

- Materials and equipment are not thrown from height.
- Debris nets and / or scaffold fans will be used where persons cannot be excluded from areas below work at height.
- Safety helmets will be worn by employees working around areas where there is a risk of materials falling and it is not practicable to exclude them from these areas.
- Waste chutes will be used to protect the public from debris.

Work Equipment

Introduction

Procedures will be introduced to ensure that all work equipment meets current health and safety requirements under the relevant legislation, and where possible, exceeds those requirements.

The requirements of the Provision and Use of Work Equipment Regulations 1998 (PUWER) will be complied with. Equipment will be suitable for purpose, only used by trained operators, be maintained, and have all the relevant safety features including emergency stops and guards.

Information, instruction, and training will be provided for all employees who are expected to use work equipment.

Procedure

The Operations Manager and Project Managers are responsible for implementing this procedure and will carry out or delegate such functions as necessary to ensure the effective day-to-day operation of our safety arrangements in respect of elements listed below.

These functions will include ensuring that the:

- Overall responsibility for ensuring that the work equipment meets the standards required.
- Responsibilities for care and maintenance of equipment are allocated.
- Regular inspections of equipment are carried out and a system is in place to provide instant recognition and warning where danger exists by colour coding appropriate plant and equipment.

The Company recognises its duty to supply and maintain work equipment, which is safe and suitable for use.

All equipment will be selected for its suitability by design, construction, or adaptation for the work it is intended to do.

The Company will assess the location in which the work equipment is to be used and take account of any risks arising from particular circumstances. The equipment selected must be suitable for the process and conditions of use.

All work equipment will be traceable and certified where applicable in accordance with current legislation and Company policy.

All work equipment will be inspected and tested prior to use.

Suitable maintenance and test records will be kept.

All work equipment purchased will be examined to ensure that it is free of patent defects and will be accompanied by the relevant maintenance and test records.

All equipment whilst in use will be maintained and tested in accordance with statutory regulations and Company policy.

Suitable records of test, inspection and maintenance will be kept in the safety management system.

Work equipment will only be used by Company employees who have received the relevant information, instruction, and training on the safe use of that equipment.

All work equipment, which has been identified as defective or non-compliant with the required test or maintenance schedules will be withdrawn from use and quarantined until

such time that full compliance can be achieved.

All maintenance and test records must accompany the work equipment upon its return to stores.

It will be our policy to source and purchase tools and equipment that are low vibration and low noise, where this option is available. Data will be obtained prior to purchase.

Portable Electrical and Hand Tools

Various types of hand tools are used in the workplace, the five most important points with regard to safety are:

- Use the correct tool for the job.
- Report any defects found and stop using the defective tool immediately.
- Maintain the tools in a safe condition, involving regular inspection for electrically powered tools.
- Use the lowest voltage practicable.
- Make sure guards are fitted and used.

The Company will, in consultation with employees:

- Ensure that the correct tool for the job is provided.
- Ensure that tools are not misused.
- Ensure users are aware of their responsibility to maintain tools and report defects to the Operations Manager or Project Managers.
- Ensure that defective tools are taken out of use and replaced.
- Ensure that repairs are only carried out by competent personnel.
- Arrange for regular inspection of electrically powered tools, ensuring these are labelled with the next inspection due date.
- Ensure working areas are kept clear of debris and any items/materials which could prevent the safe and efficient use of tools.
- Provide suitable storage facilities for tools.

Frequent inspection of hand tools is required to ensure they are fit for use. The correct use of hand tools must also be ensured through supervision and training.

Before using hand tools, they will be visually inspected.

To ensure the safe use of portable electrical tools the following safe system of work will be implemented:

Where electrical power tools are used from a trailing lead:

- The length of the lead will be kept to a minimum.
- The cable will be capable of serving the equipment intended and heavy duty.
- The cable will be protected as far as possible from damage.
- The cable will be positioned in such a way as to prevent a tripping hazard.
- Proper guards will be fitted to all power tools which are designed to be fitted with guards.
- Power tools must be isolated from the power source before any adjustments are made (e.g. changing bits).

- Correct fuse ratings must be used for all power tools.

Training

All employees using tools and equipment will be trained in their correct use and the use of any associated equipment. Any employee who is not familiar with the correct method of operation of a tool must bring this to the attention of their manager.

Record Keeping

Records will be kept of the following:

- Issue and receipt of all tools.
- All tools returned as defective, the tool must be clearly marked and a description of the fault recorded.
- Details of the inspection of hand tools and electrically powered hand tools.
- Information, instruction and training provided to all employees using work equipment.

Working Environment

Introduction

We aim to ensure that our buildings and sites meet the health, safety and welfare needs of each employee and contractor, which may include people with disabilities, and to ensure the workplace will be suitable for use by those intended to use them.

We will provide suitable and sufficient welfare facilities from day one of all our construction projects.

Procedure

The structure of and the facilities in our buildings should already comply with relevant statutory requirements. The responsible person will implement a maintenance regime that ensures that this remains the case.

Where buildings and facilities fail to meet the required standard, the responsible person will implement procedures to ensure the standards are met.

We will ensure that all 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.

Arrangements will be put in place for such maintenance and appropriate records will be kept of all maintenance, breakdowns, and repairs.

Essential information for use in the event of an emergency breakdown will be available to designated responsible persons.

All maintenance and repairs will only be undertaken by those designated to carry them out, and that have the required level of knowledge and training to undertake the work safely.

The responsible person will undertake an assessment of the premises/workplace to be used by the Company.

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, car parks and ramps.
- Adequate lighting, both internally and externally.
- Structural condition including condition of finishes, roof, gutters, drains and the facility sewerage system.
- Internally for 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.
- Any interface with other personnel/contractors employed on the premises.
- All work activities to be undertaken, on the premises by the Company.
- Hazards relative to the health and safety of disabled persons on the premises relative to the Company activities.

The assessment will also take into accounts hazards, damages, or omissions on:

- The electricity system.
- The drinking water system and water quality.

- The fire protection system and alarms and firefighting systems.
- Fire escape routes, ventilation systems, signage, fire protection doors and exit doors.
- Lifts, stairs and passage ways and operational areas.
- Toilets, washing facilities, showers and hot and cold water systems.
- Insulation of the buildings, equipment and services.
- Record any hazards found, damages or omissions and ensure corrections are carried out.

We will ensure the following is current and available:

- Employer's liability insurance.
- Public liability insurance.
- Lift certificate.

Site Welfare

Whilst we are working on sites, we will ensure that our employees are afforded suitable and sufficient welfare facilities to include as a minimum:

- Toilet and hand washing/drying facilities.
- A rest area with tables and chairs (with back rests).
- A kettle.
- Access to drinking water.
- A microwave or similar for heating food.
- A drying room or area.

Where practical to do so and with prior agreement we may utilise the facilities provided by the client. These will be maintained in good condition and cleaned after use.

Specific Requirements:

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 at least every 3-5 years 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 on the Gas Safe Register (administered by Capita Group) 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.

Asbestos

An asbestos survey will be undertaken to determine the location of asbestos containing materials.

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 actions necessary to manage the asbestos will be documented.

Refer to separate asbestos procedure.

Disabled Access

A comprehensive access audit will be carried out for all our premises, and an action plan will be drawn up for improvements and alterations.

Our Access Plan will be monitored and reviewed as and when necessary.

Young Persons

Introduction

We actively seek to employ people of all ages within the business. We recognise that those employees (including work experience) under the age of 18 require additional levels of control with regard to health and safety, in particular on construction sites. Our risk assessment process will ensure the risks to young persons are identified and suitably controlled.

Procedure

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 and risk assessment 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.
- Works 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 persons 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.

Regular assessments will also be made on young person's progress relative to their learning, understanding, and maintaining the principles of health and safety at work through work experience.

We will ensure we do not employ young people on 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 valid.

If the young person is a 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.

Prohibitions apply to certain activities and certain types of work equipment with regard to young persons.

A list of prohibited activities and work equipment will be fully documented and issued to all Line Managers. This will be regularly reviewed.

Section 4 – INDEX FORMS

Section 5 – SUPPLEMENTS (LEGAL UPDATES)