

Health & Safety Policy

Including
Environmental Statement

Prepared by John Custance
Complete Health & Safety Ltd
Reviewed June 2016
To be reviewed before end June 2018

Iron Designs Limited
8 Church Road
Portslade
East Sussex
BN41 1LA

Tel: 01273 423685

Table of Contents

1.	General Statement of Policy.....	4
2.	Organisation & Responsibilities.....	6
2.1.	Organisation for Managing Health and Safety	6
2.2.	Responsibilities of Managing Director – Richard Higglesden.....	7
2.3.	Responsibilities of Safety Coordinator	7
2.4.	Responsibilities of Operations Manager.....	8
2.5.	Responsibilities of Director and Accounts Manager	9
2.6.	Responsibilities of External Safety Advisors	9
2.7.	Responsibilities of Employees / Self Employed Subcontractors	10
3.	Health and Safety Arrangements.....	11
3.1.	Communication and Consultation.....	11
3.2.	Health & Safety Information	11
3.3.	Safety Training and Induction	12
3.4.	Co-operation and Care.....	13
3.5.	Monitoring and Review of Health & Safety Policy	13
3.6.	Inspection and Monitoring	13
3.7.	Annual Inspection / Audit.....	14
3.8.	Safety Advice.....	14
3.9.	Hazard Reporting	14
3.10.	Risk Assessments	15
3.11.	Safe Systems of Work / Method Statements	16
3.12.	First Aid	16
3.13.	Accident Procedures	17
3.14.	Accident Investigation	17
3.15.	Reporting Accidents and Incidents to the HSE.....	18
3.16.	Construction (Design and Management) Regulations.....	18
3.17.	Managing Subcontract Companies	20
3.18.	General Fire Precautions in the Premises.....	21
3.19.	Emergency Evacuation Procedure at the Premises.....	22
3.20.	General Fire Precautions on Site	22
3.21.	Work Equipment.....	23
3.22.	Abrasive Wheels / Angle Grinders.....	23
3.23.	Hand / Arm Vibration Syndrome (HAVS)	24
3.24.	Lifting Equipment & Lifting Operations.....	25
3.25.	Electricity at Work.....	26
3.26.	Personal Protective Equipment.....	26
3.27.	Manual Handling Operations.....	27
3.28.	Display Screen Equipment.....	28
3.29.	Control of Hazardous Substances.....	28
3.30.	Health Surveillance	29
3.31.	Working at Height.....	30

3.32.	Confined Spaces	32
3.33.	Asbestos on Site	33
3.34.	Noise at Work	33
3.35.	Workplace & Welfare.....	34
3.36.	Cleanliness and Waste Disposal	34
3.37.	General Storage and Stacking	35
3.38.	Driving on Business.....	35
3.39.	Company Vehicles.....	36
3.40.	Use of Mobile Phones and Electronic Devices in Vehicles	36
3.41.	Drugs and Alcohol Abuse	36
3.42.	Smoking	36
3.43.	Work Related Stress	36
3.44.	Workplace Violence and Aggression	37
4.	Environmental Policy.....	38

1. General Statement of Policy

Iron Designs Limited is committed to ensuring the health and safety of everyone who works for the Company and also of everyone who may be affected by the Company's work activities, including visitors, clients, contractors, and the general public.

This policy sets out the arrangements that are necessary to achieve the above while complying with the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and all other applicable legislation.

The Company will ensure, so far as is reasonably practicable, that:

- Safe equipment is provided and safe systems of work are devised and implemented
- Adequate arrangements are in place for the safe use, handling, storage and transport of materials, substances and equipment
- Sufficient information, instruction, training and supervision is given to ensure the health and safety of employees and others affected by their actions
- A safe workplace, including a safe means of entering and leaving workplaces, is provided and maintained
- The working environment is without risks to health and adequate welfare facilities are provided

It is Company policy to consult with employees on health and safety issues before updating or modifying any part of the health and safety policy and to provide training and information, as appropriate. The Company will do as much as is reasonably practicable to ensure that health and safety arrangements are adequately resourced at all times.

This policy can only be successful with the active co-operation of employees, who have responsibility for taking care of themselves and others, following safe working procedures and reporting any safety issues as soon as possible.

This policy will be reviewed annually and revised as necessary in response to changes in legislation or methods of working.

Signed

Richard Higglesden – Managing Director

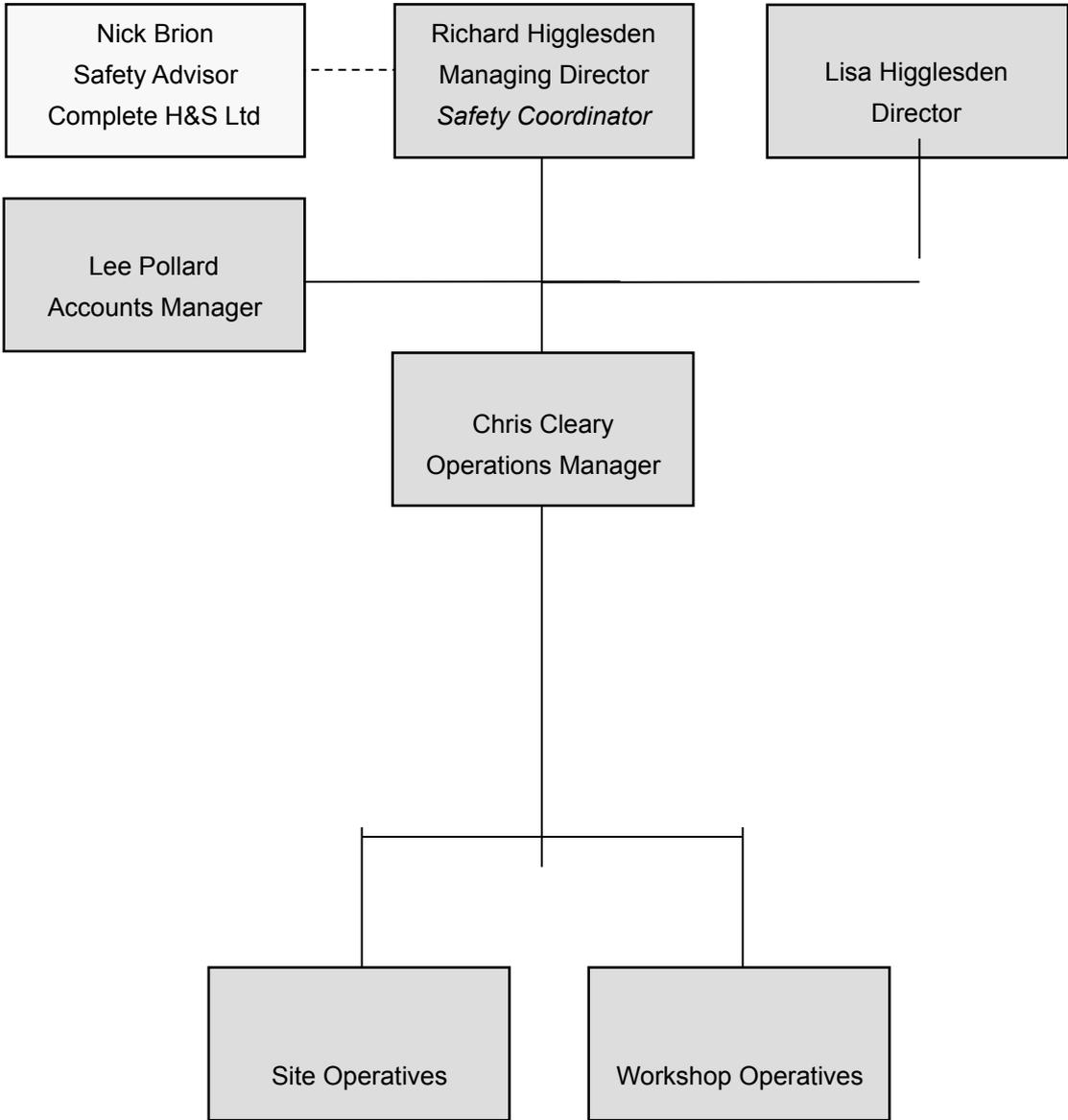
Date1st June 2018.....

Objectives for managing Health, Safety and the Environment

- To establish and maintain effective systems and plans for managing the health, safety and welfare of all employees and, in addition, for managing the environmental impact of our operations; to ensure that all risks are properly assessed and controlled, so far as is reasonably practicable
- To establish and maintain clear written standards and procedures to control the risk to health, safety and the environment and to ensure that they are adhered to
- To ensure that all Company employees are competent and able to perform their tasks safely, through the provision of adequate training, information and supervision
- To maintain an effective system of consultation with our clients, suppliers and contractors on health, safety and environmental issues
- To record and investigate all accidents, ensure appropriate corrective actions are taken to prevent recurrence and to continually improve the accident record year on year
- To promote an increased awareness of safety and a responsibility for the environment amongst all employees
- To maintain an effective system of monitoring and reviewing health, safety and environmental performance.

2. Organisation & Responsibilities

2.1. Organisation for Managing Health and Safety



2.2. Responsibilities of Managing Director – Richard Higglesden

The **Managing Director** of the Company is responsible for the health, safety and welfare of employees and others affected by the Company's activities and has overall responsibility for ensuring that:

- Adequate and effective arrangements for planning, organisation, control and monitoring for safety are implemented in accordance with relevant legislation
- Sufficient financial, labour resources and time are available to meet statutory requirements
- All employees receive adequate instruction, information, training and supervision to achieve the requirements of this policy
- Suitable equipment, procedures and other control measures are to be provided to prevent or reduce risks to health and safety
- Employees are fully aware of this policy and their duties in relation to health and safety
- Employees are consulted and their views considered prior to implementing changes that may affect their health and safety
- All reported health and safety issues are reviewed and remedial action applied when necessary
- Risk assessments are undertaken in accordance with statutory requirements
- Competent health and safety advice and support is available
- The Company Health and Safety Policy is reviewed annually with the External Health & Safety Advisors

2.3. Responsibilities of Safety Coordinator

The **Managing Director** also takes on the role of **Safety Coordinator** for the Company. As **Safety Coordinator** he is specifically responsible for:

- Implementing the arrangements set out in this policy and monitoring the safety performance across the Company
- Organising and co-ordinating site work on a daily bases to ensure minimum risk to the health and safety of employees or any who may be affected by the Company's activities
- Ensuring compliance with the Company safety policy and relevant regulations, and the site health & safety plan where applicable
- Ensuring risk assessments, method statements and safe systems of work are adhered to and all registers and records are kept up to date
- Ensuring that all plant and equipment, procured or hired for the Company, is suitable for the intended task, complies with statutory safety standards and is CE marked as appropriate
- Ensuring work equipment is regularly serviced and maintained
- Investigating accidents and implementing measures to prevent re-occurrence with the assistance of the **Operations Manager**
- Ensuring that employees are aware of their health and safety responsibilities and comply with the requirements of the policy
- Identifying employee training needs in respect of health and safety

- Ensuring new employees receive suitable and adequate induction training
- Ensuring suitable health and safety information is provided to employees
- The selection and provision of suitable Personal Protective Equipment to employees
- Ensuring there are adequate first aid provisions in the Company
- Ensuring the accident book is kept in a safe place and ensuring that accidents are entered in the accident book
- Reporting accidents and dangerous occurrences at work to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Co-operating with statutory authorities (ie HSE Inspector)
- Setting a good example of behaviour with regard to health, hygiene and safety
- Listening to employees and subcontract Company employees concerns in relation to health & safety and act accordingly

The **Safety Coordinator** also has responsibilities as employees (see sections 2.8)

2.4. Responsibilities of Operations Manager

The **Operations Manager** for the Company **Simon Tucknott** will undertake any duties delegated by the **Managing Director** and is specifically responsible for:

- Listening to employees concerns in relation to health & safety and act accordingly
- Implementing the arrangements set out in this policy and continually monitoring and improving safety performance on site
- Ensuring compliance with the Company Safety Policy and relevant regulations and the Construction Phase Plan where applicable
- Organising and co-ordinating workshop and site work on a daily basis to ensure minimum risk to the health and safety of employees or any persons who may be affected by the Company's activities
- Ensuring that employees and any suppliers / subcontractors are aware of their health and safety responsibilities and comply with the requirements of the policy
- Ensuring that suitable health and safety information is provided to employees suppliers and subcontractors
- Ensuring that risk assessments are undertaken and method statements produced
- Ensuring that employees and suppliers / subcontractors on site are aware of the findings of the risk assessments, and ensuring control measures, including the use of Personal Protective Equipment that (PPE), are used at all times
- Ensuring that risk assessments, method statements and safe systems of work are adhered to and that all registers and records are kept up to date
- Ensuring that subcontractors produce and adhere to risk assessments and method statements
- Ensuring that work equipment is adequately inspected and maintained in accordance with statutory requirements on site
- Ensuring that all plant and equipment, procured or hired for the Company, is suitable for the intended task, complies with statutory safety standards and is CE marked as appropriate

- Ensuring that work equipment on site is used correctly by authorised, trained staff
- Ensuring that materials are stored safely on site
- Maintaining a tidy site with safe access and egress
- Setting a good example of behaviour with regard to health, hygiene and safety

The **Operations Manager** also has responsibilities as an employee (see sections 2.8)

2.5. Responsibilities of Director and Accounts Manager

The **Director – Lisa Higglesden** and **Accounts Manager – Lee Pollard** are responsible for:

- Supporting the Managing Director in his duties
- Maintaining staff records
- Administration of transportation including obtaining proof of driving licenses and insurance details, and ensuring the information is reviewed and held on file
- Obtaining information from self employed and sub contract companies and maintaining records of questionnaires
- Arranging health and safety training and keeping suitable records
- Ensuring that all training records are maintained
- Filing records of premises risk assessments including fire risk assessment
- Filing equipment maintenance and inspections records
- Keeping PPE issue and inspection records
- Keeping records of DSE assessments
- The security of all accident report forms and completed accident and RIDDOR report forms
- Issuing employees with an annual health & safety questionnaire
- Filling of Health Surveillance records in Personnel Files in the Office and retained for 40 years.
- Setting a good example of behaviour with regard to health, hygiene and safety

The **Office Administrator** also has responsibilities as employee (see sections 2.8)

2.6. Responsibilities of External Safety Advisors

The Company's nominated **External Safety Advisors** will:

- Meet with the **Managing Director** as required to review/audit the Company's health & safety management system
- Ensure the Company H&S Policy reflects the Company's operations and organisation and is compliant with current legislation
- Assist the company in preparing health & safety plans, general risk assessments and method statements, as required
- Identify H&S training requirements as part of the review process and provide H&S training as required
- Provide health & safety advice and support as required
- Assist the company in undertaking accident investigations as required

2.7. Responsibilities of Employees / Self Employed Subcontractors

All **employees** have a duty to co-operate with the employer under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and all other related regulations.

Self employed subcontractors will comply with all aspects of this policy as though they were employees. Conversely the Company will treat **Self employed subcontractors** as though they were employees.

All **employees** will therefore:

- Comply with the Company safety policy, risk assessments, method statements and safe systems of work
- Comply with the site health & safety plan and site rules on CDM notifiable projects
- Co-operate with both employer and management and follow instructions
- Use the appropriate plant, tools and equipment as instructed and not misuse
- Ensure that guards are in position whilst plant and portable equipment are in use
- Keep tools, equipment and PPE in good condition and report defects
- Report any accident, dangerous occurrence or condition to one of the **Safety Coordinator**
- Ensuring materials and substances are stored safely and comply with statutory requirements
- Maintaining a tidy site with safe access and egress to places of work
- Take all reasonable steps to ensure the safety of themselves and others
- Avoid improvised arrangements and suggest safe ways of reducing risks
- Not interfere with or misuse anything provided for them in the interests of health, safety and welfare
- Wear appropriate clothing, footwear and PPE conducive to the work
- Raise any health & safety concerns with the **Safety Coordinator** or **Operations Manager**
- Report immediately any defective plant and equipment to the **Safety Coordinator** or **Operations Manager** and do not use until repaired
- Inform the **Safety Coordinator** if they suffer from any allergy, health problem or are receiving medication likely to affect their work ability to do manual handling tasks

Any breach of these requirements will be treated as a breach of contract and appropriate disciplinary action will be taken. The taking of any reasonable action to safeguard the health, safety and welfare of themselves and others will not result in any form of disciplinary action.

3. Health and Safety Arrangements

3.1. Communication and Consultation

The Management of the Company will communicate to employees their commitment to safety and ensure that employees are familiar with the contents of the Company health and safety policy.

Communication and consultation will take place by providing written or verbal information from this policy, by project meetings, by memos, tool-box talks and general daily interaction and supervision process.

Relevant Legislation and Information:

Consultation with Employees Regulations 1996

3.2. Health & Safety Information

All new employees will receive induction training when they join the Company.

As part of the induction process employees will be provided with:-

- a copy of this policy
- a health & safety handbook
- relevant risk assessments and procedures
- information on workplace hazards, emergency procedures and first aid arrangements

The employee health & safety handbook will include key aspects of the Health & Safety Policy and includes emergency procedures, "Do's and Don'ts", safe systems of work, diagrams of safe lifting techniques and other key health and safety information.

Employees will receive information about specific site hazards and site rules during the site induction process on construction projects.

Employees will also receive information when:

- There are proposed changes that may affect their health and safety;
- There are changes to work procedures or working patterns;
- New plant and work equipment is being procured or hired;
- There are changes as a result of new or revised legislation

The Company will retain a number of useful and relevant HSE documents/leaflets for reference in the Health & Safety File retained in the main office and site office.

Employees will be encouraged to read the Health & Safety Law poster which provides key information about employer's responsibilities and employee's rights. The Company will also display a copy of the Company's Policy statement and Employer's Liability (Compulsory Insurance) Certificate.

Copies of these documents will be displayed on the notice board in the main office.

Relevant Legislation and Information:

Health & Safety at Work Act 1974

Health & Safety Information for Employees Regulations 1989

Employees Liability (Compulsory Insurance) Act 1969

3.3. Safety Training and Induction

All new employees will be given induction training in the following:

- Fire and emergency evacuation procedures on site
- Arrangements for First Aid
- Procedures for reporting hazards, accidents, dangerous occurrences, incidents of violence and occupational ill-health and problems in safety arrangements
- Safe use of any equipment

The person responsible for giving Company inductions will be the **Safety Coordinator**.

All employees working on site will undertake site specific induction when starting work at the site.

The persons responsible for giving site inductions and retaining induction records will be the **Operations Manager** and records of site induction will be retained on site.

All employees will be trained in safe working practises and procedures prior to being allocated any new role. Training will be provided on the safe use and maintenance of work equipment where necessary.

Employees will be encouraged to bring to the attention of management any training courses or training needs which they think might be appropriate.

A formal review of training needs will be undertaken by the **Safety Coordinator**.

All employees will be trained and updated in health and safety and the specific hazards of their work on a regular basis. Special training will be given for specialist roles / tasks i.e. first aid.

The **Operations Manager** will be responsible for maintaining records of training which will be filed in Health and Safety File in the main office.

Relevant Legislation and Information:

Health and Safety at Work Act 1974 Section 2(2c)

The requirement for training appears in all health and safety regulations

3.4. Co-operation and Care

If the Company is to build and maintain a health and safe working environment, co-operation between workers at all levels is essential.

All employees are expected to co-operate with management and customers on safety matters and to accept their duties under this Policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform their duties under this Policy.

Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and of all other people affected by operations of the Company.

Relevant Legislation and Information:

Management of Health & Safety at Work ACOP 1

3.5. Monitoring and Review of Health & Safety Policy

The Policy will be reviewed annually by the **Managing Director** and the **Safety Advisor** to ensure that all of the information given in it is still valid. Advice will be obtained from the Company's safety advisors to ensure that the Policy remains compliant with legislation.

Any updates or amendments will be brought to the attention of the employees, and information, instruction and training provided where necessary.

Relevant Legislation and Information:

Health and Safety at Work Act 1974 Section 2(3)

Management of Health & Safety at Work Regulations 1999

3.6. Inspection and Monitoring

The **Operations Manager** will undertake informal monitoring of health and safety on site during site visits.

The **Operations Manager** will also be responsible for undertaking formal monthly inspections using a Site Inspection Checklist Form

The **Safety Coordinator** and the **Operations Manager** will undertake formal monthly inspections on selective projects using a Site Inspection Report form.

Copies of the site inspection report will be filed in the H&S file in the office.

Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and identify areas where revision of the policy may be necessary.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Construction (Design and Management) Regulations 2015

3.7. Annual Inspection / Audit

The Company's nominated **Safety Advisors** will audit the safety management system annually to:-

- a) Ensure that the Health & Safety Policy remains up to date and effective
- b) Ensure that the safety management system is being implemented correctly together with any recommendations for improvement

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.8. Safety Advice

Advice on health and safety and occupational health matters will be available from the Company's nominated **Safety Advisors**:-

Complete Health & Safety Ltd
Unit 4 Elm Business Units
67 Chartwell Road
Lancing Business Park
Lancing, West Sussex
BN15 8FD
Telephone: 01273 833919
Email: info@complete-hs.co.uk

Additional advice may also be obtained from the HSE Website – www.hse.gov.uk

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.9. Hazard Reporting

It is the policy of the Company to eliminate hazards from the work place wherever possible.

All employees have a duty to report any unsafe or unhealthy working conditions, practices or arrangements. The **Safety Coordinator** and the **Operations Manager** will take immediate remedial action to eliminate or minimise the risk and will take the necessary long-term action to prevent future occurrences.

If an employee is concerned that the Company is not doing enough, the Company accepts that the employee ultimately has the right in law to approach the Health and Safety Executive/Local Authority as detailed on the Health and Safety Law poster in the main office.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.10. Risk Assessments

It is the policy of the Company to comply with the statutory requirement for risk assessment as set out in the Management of Health & Safety at Work Regulations.

The Company will carry out suitable risk assessments for all tasks undertaken in the Company and significant risks will be identified, documented and risks reduced to the lowest level, so far as is reasonably practicable.

The Company will prepare site-specific risk assessments for all CDM notifiable projects and where site conditions, hazards and risks vary.

The **Managing Director** has overall responsibility for ensuring that the Company has a risk assessment programme in place.

The **Safety Coordinator** is responsible for ensuring that risk assessments are prepared for the premises and ensuring that the findings of the risk assessment process are communicated to employees.

The **Operations Manager** is responsible for undertaking site surveys and preparing site specific risk assessments on larger projects.

The **Operations Manager** will ensure that employees are made aware of the significant findings of the risk assessment process and the necessary control measures before commencing work.

Master copies of Risk Assessments for the premises will be filed in the Health and Safety File.

Copies of the site risk assessments for projects will be filed in the Job File in the main office and with the Principal Contractor on site.

It is important for employees to understand the difference between hazard and risk. A hazard is "something which could cause harm" and a risk is "the potential severity of the hazard combined with likelihood, high or low, that someone will be injured by the hazard".

The risk assessment documentation will include a detailed explanation of the risk evaluation criteria used for establishing high, medium or low risk.

Risk assessments will be reviewed:

- At an agreed review date, normally annually
- When there are any changes to equipment or procedures
- When there are changes as a result of new or revised legislation
- Following any accident or incident

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999 Regulation 3

A number of other Regulations also have a specific requirement for risk assessment

3.11. Safe Systems of Work / Method Statements

All site work will be carried out in accordance with the safe systems of work documented in the handbook and method statements, a copy of which will be provided in the health & safety pack which resides in Company vehicles.

All employees will be informed, instructed and/or trained in the safe systems of work (see above).

Site specific method statements will be prepared by the **Operations Manager** when required by **Clients** and for all significantly hazardous activities such as work at height and lifting operations. The Company will generally not prepare method statements for routine work with low hazards and risks.

Method statements will include, as a minimum, the following information:

Description of work; sequence of operations; supervisors; plant and equipment used; PPE required; First Aid requirements; emergency procedures; safety of third parties and waste disposal.

The **Operations Manager** will be responsible for ensuring that the method statements are implemented and ensuring that site operatives read and comply with the document.

The Company will request and review method statements from subcontractors before commencing work on site.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

3.12. First Aid

It is the policy of the Company to comply with the Health & Safety (First Aid) Regulations.

An adequate number of employees will be trained in first aid at work or emergency first aid at work in order to provide a reasonable level of first aid cover at site.

The **Managing Director** has overall responsibility for ensuring that the First Aid Policy is implemented.

An appropriate number of **Employees** will be trained in first aid at work or emergency first aid at work.

First Aiders will receive refresher training at least once every 3 years.

Suitable first aid kit(s) will be located in the following location(s):

- In the office
- On the site in the main office

Employees will be informed about first aid procedures during induction.

The **Operations Manager** will be responsible for regularly checking and restocking the first aid kits.

All operatives working on site will be required to carry mobile phones, which should be used to call an ambulance or other assistance in the case of an emergency.

Relevant Legislation and Information:

Health & Safety (First Aid) Regulations 1981

First Aid at Work ACOP (L74)

3.13. Accident Procedures

All accidents on site are to be recorded in the site accident book. The **Site Supervisor** is responsible for contacting the **Safety Coordinator** to notify him of any accidents on site as soon as possible after an accident.

The **Safety Coordinator** will ensure that all accidents on site are also recorded in the Company accident book which is kept in the main office.

The **Operations Manager** has responsibility for ensuring the accident book is kept in its designated location, completed as required and ensuring that the removable pages are filed securely in Health and Safety file in accordance with the requirements of the Data Protection Act 1998.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Data Protection Act 1998

3.14. Accident Investigation

The Company views accident investigation as a valuable tool in the prevention of future accidents/incidents. In the event of a RIDDOR reportable accident, the accident will be investigated and a report drawn up by the **Safety Coordinator**, with assistance from the **Operations Manager** and **Safety Advisor**, as appropriate. The accident report will detail:

- The circumstances of the accident including photographs and diagrams whenever possible
- The nature and severity of the injury sustained
- The identity of any eyewitnesses
- The time and location of the incident
- The date of the report

All eyewitness accounts will be collected as near to the time of the accident as reasonably practicable. Any person required to give an official statement has the right to have a lawyer or other representative present.

The completed report will then be analysed to discover the underlying or root causes and what action should be taken to prevent a recurrence.

The accident report will be filed in the Health and Safety file.

A follow up report will be completed after a reasonable time examining the effectiveness of any new measures adopted.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.15. Reporting Accidents and Incidents to the HSE

In the case of an over 7 day injury, occupational illness or dangerous occurrence which is reportable under RIDDOR (Reportable Injuries, Diseases and Dangerous Occurrences Regulations) the **Safety Coordinator** will ensure that the HSE Incident Contact Centre is notified within 15 days using the online form at website www.riddor.gov.uk.

In the case of a fatality or a specified injury the **Safety Coordinator** will ensure that the HSE Incident Contact Centre is notified immediately by phone on 0845 3009924 or using the online reporting facility. The **Managing Director** will ensure a copy of any reportable injury, disease or dangerous occurrence report is kept on file in the office and retained for a minimum of three years. The report will include the date and method of reporting, the date, time and place of the event, personal details of those involved and a brief description of the nature of the event or disease.

The Company accepts that failure to report these types of accidents or incidents could result in a criminal prosecution. (For more information about RIDDOR look at <http://www.hse.gov.uk/riddor/index.htm>)

Relevant Legislation and Information:

Reporting of Injuries, Diseases and Dangerous occurrences Regulations 2013

HSE leaflet 'RIDDOR' HSE31

3.16. Construction (Design and Management) Regulations

The CDM Regulations are intended to ensure the complete safety of any building from design through construction and working life to, ultimately, demolition.

The CDM 2015 Regulations apply to both **domestic** and **commercial** projects. A “notifiable” project is one which lasts more than 30 working days and has more than 20 workers working on the project at any one time, **or** exceeds 500 person days.

When there is more than one **Contractor** involved in a project, regardless of duration, then the project will require a **Principal Contractor** and **Principal Designer** to be appointed by the **Client**. Specific duties as applicable to the Company are detailed below.

3.16.1. *Worker Duties*

For all **Workers** working on all types of domestic or commercial projects **Workers** must:

- Be consulted about matters which affect their health, safety and welfare;
- Take care of their own health and safety and others who may be affected by their actions;
- Report anything they see which is likely to endanger either their own or others' health and safety;
- Cooperate with their employer, fellow workers, contractors and other duty holders;
- Comply with legal health and safety requirements for construction sites.

3.16.2. *Contractor Duties*

On all types of construction projects the Company will:-

- Plan, manage and monitor own work and that of workers and subcontractors
- Co-operate and co-ordinate activities with the other duty holders
- Appoint competent contractors and workers
- Provide the right supervision
- Consult with workers
- Prepare a Construction Phase Plan (when the Company is the only Contractor on site)
- Ensure welfare facilities are provided
- Ensure a site induction is provided
- Ensure the site is secure
- Provide information to the **Principal Contractor** (where applicable), **Workers** and **Subcontractors**
- Comply with the specific requirements in Part 4 of the CDM Regulations

3.16.3. *Principal Contractor Duties*

When appointed as **Principal Contractor** the Company will:-

- Ensure the **Client** is aware of their duties (on commercial projects), has prepared a Client Brief and has appointed a **Principal Designer** before starting work
- Liaise and co-operate with the **Principal Designer** during the preconstruction and construction phase
- Plan the construction phase and prepare the construction phase plan
- Ensure welfare facilities are provided
- Provide site induction
- Ensure the site is secure
- Appoint competent **Contractors** and **Workers**
- Ensure adequate arrangements in place for managing and supervising

- Engage **Contractors** and **Workers** – through information, communication, consultation, co-operation and co-ordination
- Maintain health and safety standards and monitor risks on site
- Provide information for the health & safety file to the **Principal Designer**
- Liaise with the **Client** and **Principal Designer** throughout the project, including during the pre-construction phase

3.16.4. CDM Responsibilities in the Company

The **Directors** will be overall responsible for the planning, management and control of projects.

The **Operations Manager** will be responsible for the management and control of health and safety on site.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

CITB Industry Guidance for Principal Contractors

CITB Industry Guidance for Contractors

CITB Industry Guidance for Workers

CITB GE700 Section A8

3.17. Managing Subcontract Companies

The Company uses the services of **Subcontract Companies** at times. Under the CDM Regulations the Company is responsible for ensuring that the work undertaken by the **Subcontractor** is carried out safely and without risk to employees or others affected by the **Subcontractor's** acts or omissions, so far as is reasonably practicable.

The Company will ensure that **Subcontractors** are competent before any work is started. To achieve this, some or all of the following information will be requested from the Subcontractor depending on the size of the **Subcontractor** and the size / nature of the work.

- Health & Safety Policy
- Copies of risk assessments, method statements and any documented safe systems of work
- Copies of Insurance Policies
- Details of competence of key employees (ie qualifications, experience, training)
- Details of membership of professional or trade bodies

The information will be obtained by the **Operations Manager** and reviewed and held on file by the **Safety Coordinator**.

Prior to commencing any work on site, a **Subcontractor** will be required to submit a suitable risk assessment and method statement for review by the **Safety Coordinator**. The **Subcontractor** must

ensure that these documents are brought to the attention of contractor employees to ensure that the work can be carried out safely.

Subcontractors are required to co-operate with, and to follow, any reasonable instructions given by the Company in the interests of health and safety.

The **Safety Coordinator** will bring to the attention of the **Subcontractor** any specific hazards, specific requirements for safe working and site rules or provide any specific health and safety guidance, training or information.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

3.18. General Fire Precautions in the Premises

The **Managing Director** has overall responsibility for ensuring that suitable fire precautions are implemented and maintained and that a fire risk assessment is undertaken in accordance with the Fire Regulations.

Employees will be instructed to remain vigilant with consideration given to guarding against things that can fuel a fire (e.g. cardboard, paper, clothing etc) and ignite a fire (heaters, electrical equipment etc).

Employees working in the premises will be made aware of the location of fire extinguishers, other fire precautions and the emergency exit routes during the Company induction briefing.

Signs will be positioned above each extinguisher to make it clear about which type of extinguisher to use in the event of a fire.

A fire exit is located at the main entrance to the Company building. Everyone in the Company will be made aware that exit doors and corridors must never be blocked locked or used as storage space.

The day to day informal inspection of the premises will be undertaken by the **Safety Coordinator** to identify any shortcomings in fire arrangements.

The Company will provide employees with information in the safe use of fire extinguishers. Employees are only expected to tackle a fire themselves if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should leave the building immediately.

The fire extinguishers will be serviced and tested annually by **an approved fire equipment servicing company**

Employees must abide by the no smoking policy in the premises and at client's premises.

Employees will be instructed not to store or allow combustible materials to accumulate in the workplace as this can result in a fire hazard.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety Order) 2005

Fire Safety Risk Assessment: Guide 1 Offices & Shops

3.19. Emergency Evacuation Procedure at the Premises

In the event of the fire, the person discovering the fire will shout 'FIRE'. On hearing the alarm all employees will leave the building by the front door and assemble at the designated assembly point in the farm yard.

Suitable fire action signs will be positioned in a key and prominent location in the premises.

The appointed **Fire Marshall** is the **Safety Coordinator**

The **Fire Marshals** will be responsible for ensuring safe evacuation; they will be the point of contact with the emergency services.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety Order) 2005

Fire Safety Risk Assessment: Offices & Shops

3.20. General Fire Precautions on Site

Operatives working on construction sites will be given details of the fire precautions and procedures during site induction.

Operatives working in housing association sites will be make themselves aware of the premises fire precautions when they arrive on site.

On CDM notifiable projects, the fire precautions will be outlined in the Health & Safety Plan. Suitable fire extinguishers will be located at strategic points throughout the site.

Operatives will only be expected to tackle a fire themselves if it would pose no threat to their personal safety to do so. If the situation is dangerous, or potentially dangerous, then the site operative should leave the building immediately.

Operatives will be required to abide by the smoking policy on the site. Smoking will only be permitted in external designated areas to be advised during site induction.

Operatives will be instructed to not store or allow combustible materials to accumulate in the workplace as this can result in a fire hazard.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety) Order 2005

Construction (Design and Management) Regulations 2015

3.21. Work Equipment

It is the policy of the Company to comply with the Provision and Use of Work Equipment Regulations.

The **Safety Coordinator** and **Operations Manager** will be responsible for selecting/hiring appropriate and CE marked work equipment.

The **Safety Coordinator** and **Operations Manager** will ensure that all equipment is serviced and maintained in good working order in accordance with the equipment manufacturer's recommendations and statutory requirements using approved servicing companies. A limited amount of cleaning and maintenance will be undertaken by **authorised operatives** subject to risk assessment.

Risk assessments will be undertaken on work equipment with significant risks. The risk assessments will take into account the risks during maintenance, fault finding etc as well as general use.

All employees will be provided with adequate information and training to enable them to use work equipment safely.

The use of any work equipment with significant risks will be restricted to authorised persons.

Where equipment has been provided with covers/guards and interlocks, the covers/guards and interlocks will be kept in good working order and used at all times.

All employees will be provided with such personal protective equipment (PPE) as is necessary to protect them from the dangers of using work equipment. PPE will be issued as a last resort, the management having first considered whether risks can be eliminated or reduced by other more permanent means.

All work equipment will be clearly marked with health and safety warnings where appropriate.

Relevant Legislation and Information:

Provision and Use of Work Equipment Regulations 1998 (PUWER)

3.22. Abrasive Wheels / Angle Grinders

It is Company policy to ensure that anyone who is expected to use either portable or fixed abrasive wheels is made aware of the hazards and trained to operate the equipment safely.

The **Managing Director** and **Operations Manager** will ensure that the right type of abrasive wheel is available for the work being undertaken.

No employee will be permitted to mount or set an abrasive wheel unless they have received training and have a certificate of competence. Any training will be provided by an approved training provider.

Guards are fitted for the protection of operators and they must not be removed or interfered with in any way. Any employee found interfering with, or misusing, an abrasive wheel may be disciplined. The equipment will be maintained by competent persons in accordance with manufacturer's recommendations.

Should an employee believe any abrasive wheel to be dangerous or unsafe to use, they should remove it and report it so that arrangements can be made for it to be inspected by a competent person.

Relevant Legislation and Information:

Provision and Use of Work Equipment Regulations 1998 (PUWER)

HSE leaflet HS (G) 17 'Safety in the Use of Abrasive Wheels'

3.23. Hand / Arm Vibration Syndrome (HAVS)

It is company policy to comply with the Control of Vibration at Work Regulations.

The Company will take all reasonably practicable steps to reduce the likelihood of any employee contracting the condition known as Hand / Arm Vibration Syndrome.

The **Operations Manager** will select vibrating equipment with preference given to equipment with the lowest published vibration emission levels.

Vibrating equipment will be well maintained to ensure that the levels of vibration do not increase over time and use.

Where vibration levels are not known for particular equipment, a look up chart will be referenced to establish the approximate vibration levels for that equipment. The chart will be positioned in a prominent position in the office.

The **Safety Coordinator** will assess the use of hand held vibrating equipment and ensure that employees are not exposed to daily exposure levels in excess of 5.0 m/s² (A8) so far as is reasonably practicable.

The HSE website <http://www.hse.gov.uk/vibration/hav/vibrationcalc.htm> will be used to calculate daily exposures.

The Company will ensure that employees using vibrating equipment are provided with suitable equipment, suitable gloves, have adequate rest breaks and a place for warming hands in cold weather.

Employees will be provided with information on recognising symptoms of HAVS and informed about the measures required to reduce the risks.

Employees will be instructed to report any signs of HAVS or any concerns with the equipment being used.

Relevant Information:

Control of Vibrations at Work Regulations 2005

HSE leaflet INDG175 Controlling the risks from hand arm vibration

3.24. Lifting Equipment & Lifting Operations

It is the policy of the company to comply with the Lifting Operations and Lifting Equipment Regulations.

The **Safety Coordinator** will be responsible for hiring lifting equipment or lifting services from reputable companies. They will ensure that any lifting equipment selected for use on site is suitable for the task while having adequate strength and stability. The **Operations Manager** will also ensure that adequate information on the safe and proper use of the equipment is obtained from the supplier.

The **Managing Director** and **Operations Manager** will be responsible for ensuring that adequate maintenance, inspections, examinations and tests of lifting equipment used on site have been undertaken by the Principal Contractor using a competent person/ organisation and will also ensure that appropriate records and reports are available before any lifting operation.

Lifting accessories will be examined and tested at least once every 6 months while lifting equipment will be examined and tested annually, in accordance with statutory requirements.

Risk assessments will be carried out on the use of the lifting equipment and all lifting operations will be planned, undertaken and supervised by competent persons. Method statements will be prepared by competent people for all lifting operations.

Employees who are expected to use the lifting equipment will be provided with suitable information, instruction and training in the safe operation of the equipment.

All operators must ensure that the specified safe working loads (SWL) of the lifting equipment or accessories are not exceeded. Operators of the lifting equipment must be aware that it must not be used in a way, or for a purpose, for which it is not intended.

Any defective lifting equipment will be reported to **Safety Coordinator** immediately and taken out of service.

A label will be fixed to the equipment to clearly identify it as being out of service.

The **Safety Coordinator** will ensure that any failure of the lifting equipment, even if no one is injured, is reported to the HSE under RIDDOR (see policy on RIDDOR).

Relevant Legislation and Information:

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

3.25. Electricity at Work

It is the policy of the Company to comply with the Electricity at Work Regulations.

The regulations stipulate that anyone working with electricity must be competent to do so. Therefore only qualified electricians are authorised to undertake any electrical work in the premises.

Employees will be instructed to switch off electrical equipment immediately if they notice a problem with electrical equipment and report the situation to the **Safety Coordinator**, who will arrange for a suitably qualified electrician to check the equipment.

All portable electrical equipment used by the Company will be subject to regular inspection and test to ensure it remains safe to use. Employees will be encouraged to inspect equipment before use.

Portable electrical equipment will be subjected to inspection and or test by a competent person at the following intervals:

Type of Equipment	User Checks	Formal Visual Inspection	Combined Inspection & Testing (PAT Test)
Mobile Equipment in Office (ie kettles)	N/A	N/A	Recommend Annually
Static Equipment in Office (ie computers)	N/A	Annually	N/A
Portable Equipment used on site	Before Use	N/A	6 monthly

All portable electrical equipment will be tagged with a date for re-inspection and test. Employees will be instructed to take out of service any equipment found without a date or an expired date report it to the **Safety Coordinator**.

The fixed electrical installation in the premises will be checked by a qualified electrician at least once every 5 years.

Relevant Legislation and Information:

The Electricity at Work Regulations 1989

3.26. Personal Protective Equipment

It is the policy of the Company to comply with the Personal Protective Equipment at Work Regulations. All employees, who may be exposed to a risk to their health and safety while at work, will be provided

with suitable properly fitting and effective personal protective equipment (PPE) – such as safety boots, eye protection and gloves. PPE will always be considered as a last resort or as a back up to other control measures.

Employees will be required to use PPE as identified by the risk assessments.

All PPE provided by the company will be properly assessed and selected by the **Safety Coordinator** prior to provision.

The Company will not charge employees for the issue of PPE, the exception being safety footwear which will be procured by employees and to which the Company will provide a contribution to the cost.

All employees who are required to use PPE will receive information and instruction on the use, maintenance and purpose of the equipment. The Company will provide facilities for the correct storage of the PPE whenever necessary. Employees will be instructed to report any defects with PPE and not use it until replacement PPE has been issued.

The Company will endeavour to ensure that all PPE provided is used and used properly by its employees.

The **Operations Manager** will be responsible for keeping records of PPE issued to employees. Records will be retained in the Health and Safety Files.

Relevant Legislation and Information:

Personal Protective Equipment at Work Regulations 1992

3.27. Manual Handling Operations

It is the policy of the Company to comply with the Manual Handling Operations Regulations.

Manual handling operations will be avoided as far as is reasonably practicable. Where it is not possible to avoid manual handling operations, an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned.

The **Safety Coordinator** and **Operations Manager** will be responsible for assessing significant manual handling risks during the project planning stage

Site Supervisors will be responsible for day to day assessments of manual handling on site.

The assessment will identify measures that will reduce the risk of injury to the lowest possible level possible. Priority will be given to providing mechanisation where practicable.

All employees who undertake manual handling tasks will be trained in safe manual handling techniques.

Relevant Legislation and Information:

The Manual Handling Operations Regulations 1992

3.28. Display Screen Equipment

It is the policy of the Company to comply with the Health and Safety (Display Screen Equipment) Regulations.

The **Managing Director** will ensure that each person who is a designated “user” of computer workstations undertakes a Workstation Assessment to ensure that the risks to their health and safety is minimised by meeting the workstation requirements as set out in the Schedule of the Regulations.

Workstation assessments will be undertaken soon after an employee joins the Company, following any changes to the workstation or work environment and at 3 yearly intervals.

The **Operations Manager** will ensure that any identified actions are implemented and filing workstation assessments in Health and Safety Files.

The Company will take all reasonably practicable steps to ensure the risks to the users of computers are eliminated or reduced to the lowest possible levels.

Computer users will be advised to undertake other tasks, take rest breaks etc to enable them to have 5 to 10 minutes break away from the screen or keyboard every hour.

Eyesight tests will be provided for Computer users on request.

Where computer users require corrective equipment specifically for using computers at work, the Company will provide funding towards a pair of glasses or contact lenses, the amount being equivalent to the cost of procuring a basic pair of glasses.

All computer users will be given appropriate and adequate training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

Relevant Legislation and Information:

The Health and safety (Display Screen Equipment) Regulations 1992

HSE Leaflet: Working with VDUs INDG36

3.29. Control of Hazardous Substances

It is the policy of the Company to comply with the Control of Substances Hazardous to Health (COSHH) Regulations.

A COSHH assessment will be conducted on work involving exposure to hazardous substances. It will be the responsibility of the **Safety Coordinator** and **Operations Manager** to ensure COSHH assessments are undertaken.

The assessment will be based on manufacturers' safety data sheets and the Company's knowledge of the work process. The findings of the COSHH assessment will be filed in the Health and Safety File and with the Health and Safety Plans.

The Company will take all reasonably practicable steps to ensure that exposure to hazardous substances is minimised and adequately controlled in all cases. The Company will follow the HSE's COSHH Approved Code of Practice (ACOP) to ensure adequate precautions are implemented. By applying the precautions outlined in the ACOP, the Company will ensure that the Workplace Exposure Levels are not exceeded.

Employees who come into contact with hazardous substances will receive information about the hazards and information and training on the safe handling and use of the substance.

COSHH assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

Relevant Legislation and Information:

Control of Substances Hazardous to Health (COSHH) Regulations 2002

3.30. Health Surveillance

The Management of Health and Safety at Work Regulations 1999 and Control of Substances Hazardous to Health Regulations 2002 require the Company to conduct occupational health surveillance programmes where employees may be at risk of contracting a disease or adverse health condition related to the work they are doing. The requirement for health surveillance will be established through the risk assessment process or following reports of work related illness.

The purpose of health surveillance is to detect any health problems at an early stage and to evaluate the effectiveness of controls.

The **Operations Manager** will issue employees with an annual health & safety questionnaire which includes first line questions about any occupational health symptoms.

If any employee responds with an answer that would suggest that further investigation is required, then the **Safety Coordinator** will arrange for further investigations to be undertaken by a qualified occupational health specialist.

Where employees are required to undertake critical works such as Work in a Confined Space or Slinger/Signaller duties they will be required to attend a Fit for Work Medical, paid for by the Company.

These will be renewed every four years for employees under 55 years of age and every two years for employees over 55 years of age. The **Office Administrator** will be responsible for booking all Fit for Work Medicals.

The Company will advise employees about the health surveillance procedures and outcomes following the surveillance.

Employees have a statutory duty to co-operate with their employer in health surveillance programmes deemed necessary by risk assessment or statutory provision.

Health Surveillance records will be filed by the **Managing Director** in Personnel Files in the Office and retained for 40 years. Information will be securely filed in accordance with the Data Protection Act 1998.

Any indication of increasing health effects will initiate a review into the effectiveness of existing control measures.

Relevant Legislation and Information:

Control of Substances Hazardous to Health (COSHH) Regulations 2002

Data Protection Act 1998

HSE Leaflet: Understanding Health Surveillance at Work INDG304

3.31. Working at Height

Under the Work at Height Regulations, the Company has a legal requirement to ensure that employees remain safe when working at height.

It is the policy of the Company to avoid working at height if possible. If work at height cannot be avoided then priority will be given to the provision of equipment that prevents falls (ie guard rails, scaffolding, scaffold towers, mobile elevated working platforms, podium steps). Ladders and stepladders may be used, but only after having first considered the possibility of using safe working platforms and after having fully assessed the risks associated with undertaking the work from ladders and stepladders.

The **Operations Manager** will ensure:-

- All work at height is properly planned and organised
- Those involved in working at height are competent
- The risks from work at height are assessed and appropriate work equipment is selected and used
- The risks from fragile surfaces are properly controlled
- Equipment for working at height is properly inspected and maintained

All equipment for working at height is covered by the Provision and Use of Work Equipment Regulations 1998, therefore, equipment used for working at height must be suitable for the type of work being done.

The **Operations Manager** will ensure that any equipment used for working at height is regularly inspected and maintained.

The **Operations Manager** will ensure that users of the equipment receive information, training and instruction in the safe use of the equipment.

Ladders

It is Company policy to use ladders only when other safer means of access are not practicable and where the work is light and short term (i.e. less than 30 minutes at a time).

The **Safety Coordinator** will ensure that Class 1(Heavy Industrial) or BSEN131 (light Industrial) equipment is used.

Ladders will be stored in a safe place when not in use and the Company will only permit authorised employees to use the equipment.

Any defective equipment will be reported immediately and taken out of service. A label will be fixed to the equipment to clearly identify it as out of service.

Mobile Scaffold Towers / Mobile Elevated Working Platforms / Podium Steps

Employees will be required to use Mobile Scaffold Towers, Mobile Elevated Working Platforms (MEWPs) or Podium Steps. The Company will hire suitable equipment from reputable suppliers when required.

All persons who are expected to use Mobile Scaffold Towers, MEWPs or Podium Steps will be trained in the use of the equipment.

Employees will inspect the equipment following delivery. Employees will be instructed to report any defects immediately and not use the equipment until replacement or missing parts have been delivered.

Safety Harnesses

All persons who are expected to use Safety Harnesses will be trained in the use of the equipment. The **Safety Coordinator** will ensure that safety harnesses are inspected annually by a competent person. The **Safety Coordinator** will ensure that any lanyards/harnesses are suitable for the type of work being undertaken.

Operatives will be required to inspect harnesses before use. The harness will be connected to a designated anchor point which is certified to take the load of a falling person.

Safety Harness's must only be used when at least two persons are present on site. Only one operative may use a harness, the other must remain on the ground as banks man / observer.

Operatives will be instructed to ask a manager if in doubt about using harnesses.

The **Operations Manager** will ensure that a rescue plan is prepared where there is a risk that a person could fall while using the equipment.

Scaffolding (Commissioned by others)

Employees will occasionally be required to work from scaffolding that has been commissioned by another company.

To ensure the safety of the employees using the scaffolding, the **Operations Manager** must make enquiries to ensure that:

- The equipment was erected by a competent scaffolding contractor
- A handover certificate was issued by the scaffolding contractor
- The equipment is being inspected at least once every seven days by a competent person
- A register is kept to record the inspections

The Company will provide information and training on basic scaffold safety to employees who are expected to work from scaffolding unsupervised. **Site Supervisors** and **Employees** working at the site will be instructed to visibly inspect the structure for any obvious defects and inform the **Operations Manager** immediately about any concerns with the scaffolding.

Relevant Legislation and Information:

Work at Height Regulations 2005.

Provision and Use of Work Equipment Regulations 1998 (PUWER)

3.32. Confined Spaces

There are a number of specific instances where people have to enter and work in confined spaces. In such cases Management will ensure that all works are conducted in accordance with the Confined Spaces Regulations.

Management have a legal duty, so far as is reasonable practicable, to ensure that the requirements of the Regulations are applied to work carried out by their employees and by Contractors, particularly in relation to matters which are within their control.

It is the responsibility of the **Managing director** and **Operations Manager** to conduct suitable risk assessments and put in place measures to ensure your safety whilst working in confined spaces. The priority when carrying out a risk assessment is to identify the measures needed so that entry into the confined space can be avoided in the first instance. If the risk assessment has identified high levels of risks, and work cannot be undertaken unless the confined space can be entered into, then it will be necessary for the **Managing director** and **Operations Manager** to draw up a safe system of working.

The risk assessment will need to identify the risks to those working there and others, including contractors and the general public in the vicinity, who could be affected by the work.

The Company is also required to provide information, instruction, training and supervision as is necessary to ensure the health and safety at work of any employee or contractor working in a confined space.

Relevant Legislation and Information:

The Confined Spaces Regulations 1997

Management of Health & Safety at Work Regulations 1999

HSE Leaflet: Safe Work in Confined Spaces INDG 258

Confined Spaces ACOP L101

3.33. Asbestos on Site

Under the Asbestos at Work Regulations it is the responsibility of the Company to ensure that employees working on site are not exposed to asbestos in client's premises, so far as is reasonably practicable.

There is always the possibility of encountering asbestos on sites where work is required on existing buildings. Employees will be provided with information on how to recognise asbestos, the risks concerning exposure to asbestos, and the procedures to be adopted following discovery of potential asbestos.

Under current regulations it is the Client's responsibility in commercial premises to identify, assess and control asbestos in his premises and advise the Company if and where asbestos may be encountered.

It may be necessary for employees to work near asbestos without disturbing it. In this case the **Operations Manager** will prepare a risk assessment beforehand.

Where asbestos is likely to pose a significant risk, the Company will request the Client to arrange for its removal by a licensed contractor before work commences.

Any employee discovering a substance that could be asbestos will be provided with instructions to stop immediately and inform the **Operations Manager**. Work will not start again until full assurance has been given that it is safe to do so.

Relevant Legislation and Information:

Control of Asbestos Regulations 2012

Asbestos ACOP (L143)

3.34. Noise at Work

Where necessary, the Company will comply with the Control of Noise at Work Regulations.

It is possible that work undertaken by the Company will produce noise above the lower exposure action level (80 dB(A) Lepd / Lepw). The Company will not undertake formal noise assessments as a general rule.

Should the noise levels exceed 80 dB(A) L_{epd} / L_{epw} then the **Operations Manager** will take all possible steps to lower the sound levels and exposure, and issue employees with hearing protection and advise the employees about the risks to their hearing.

In the unlikely event that the sound levels exceed 85 dB(A) L_{epd} / L_{epw} then the **Operations Manager** will notify employees and instruct them to wear the ear defenders.

Even though the sound exposure levels are likely to be below the lower exposure action level, all employees will be required to wear ear defenders when using exceptionally noisy equipment, such as abrasive wheels.

Any employee who works in a workplace where noise levels have been assessed as exceeding 85 dB(A) L_{epd} / L_{epw} will be subject to health surveillance in the form of annual personal audiometry tests. For more details about Health Surveillance refer to earlier paragraph.

Relevant Legislation and Information:

Control of Noise at Work Regulations 2005

3.35. Workplace & Welfare

It is Company policy to comply with the appropriate regulations concerning the workplace environment.

The Company will take all reasonable steps to ensure that employees are provided with a comfortable and safe working environment with adequate space, lighting, ventilation, welfare facilities and good standards of housekeeping.

The **Operations Manager** will always enquire to ensure that there are suitable toilets and suitable washing facilities at each site as part of the planning process. If necessary, the Company will arrange to hire temporary toilets with hot and cold running water.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

Construction (Design & Management) Regulations 2015

3.36. Cleanliness and Waste Disposal

All employees will observe a high level of personal hygiene and cleanliness at all times and assist in maintaining a clean and acceptable working environment, whether in the company's premises or in the premises of others.

Waste and rubbish will not be allowed to accumulate and will be disposed of in the receptacles provided.

The Company encourages employees to take responsibility for their own working environment and to tidy up after themselves and others if necessary.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

3.37. General Storage and Stacking

No equipment, plant, furniture, tools or materials will be stored in the premises in a way likely to cause danger or hazard to themselves or others.

The **Safety Coordinator** will ensure suitable storage systems are provided and maintained within the Company's premises. Storage systems will have adequate stability and adequate structural integrity for the type and weight of materials being stored. Heavy items will be stored at lower levels, and only lighter items stored at higher levels.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

3.38. Driving on Business

Employees will only be allowed to drive Company vehicles or their own vehicles while at work if they have been authorised to do so. An authorised driver will: -

- Be at least 25 years old
- Provide a copy of both parts of their driving licence to the **Operations Manager** annually
- Provide a copy of their MOT and Insurance to the **Operations Manager** annually
- Advise the **Safety Coordinator** immediately if they accrue any driving penalty points
- Be fit to drive and advise the **Safety Coordinator** if they have a medical problem that may affect their ability to drive the vehicle safely
- Be responsible for daily vehicle checks in accordance with a written list

No person will be required to continually drive a vehicle for more than 3 hours without a rest break.

Drivers of vehicles will ensure that the carrying capacity of the vehicle under their control is not exceeded.

Drivers of vehicles shall always drive in a careful and consistent manner while complying with the Road Traffic Act, local byelaws and other relevant legislation.

All accidents will be reported to the **Safety Coordinator** and the **Operations Manager** as soon as possible.

Relevant Legislation and Information:

Health & Safety at Work Act 1974 section 2&3

3.39. Company Vehicles

The **Safety Coordinator** is responsible for ensuring that vehicles owned by the Company are kept roadworthy and in good condition, and repaired and maintained by competent vehicle servicing companies.

The Company subscribes to a suitable rescue and recovery firm. No-one will be expected to work on a vehicle in the event of a breakdown.

A travelling first aid kit and small fire extinguisher will be provided for all Company vehicles.

Relevant Legislation and Information:

Health & Safety at Work Act 1974 section 2&3

3.40. Use of Mobile Phones and Electronic Devices in Vehicles

No drivers will be allowed to use mobile phones whilst driving a vehicle, unless a hands free kit has been fitted.

Similarly, no drivers will be allowed to use text messaging systems, SAT NAVs or any other electronic equipment whilst driving a vehicle.

Relevant Legislation and Information:

The Road Vehicles (Construction and Use) (Amendment) (No 4) Regulations 2003

3.41. Drugs and Alcohol Abuse

The Company will not tolerate under any circumstances the use of illegal drugs, solvent or alcohol abuse. No employee shall be in possession of or under the influence of any illegal drug, solvent or alcohol at any time when travelling to, from or during work.

3.42. Smoking

Smoking is not allowed in the workplace, except in authorised external smoking areas.

Relevant Legislation and Information:

The Smoke Free Regulations 2015

3.43. Work Related Stress

The Company recognises that excessive workplace pressure and resulting stress can be harmful and damaging to employees' health and the Company's business performance. Occasionally, often because of an external factor such as family illness, divorce etc or sometimes because of job-related factors such as fluctuating workload or poorly defined role, the degree of stress becomes too great and individuals can suffer from inability to concentrate, disturbed sleep, feelings of not being able to cope or other stress related symptoms.

Any employee who feels that he/she is suffering from stress can consult, in complete confidence, one of the **Safety Coordinator** to resolve any work related difficulties. In addition, the Company will assist, where necessary, in obtaining professional advice and guidance where external factors are precipitating the stress.

The Company recognises that workplace stress can be effectively managed by listening and responding to employees' concerns, by providing a suitable working environment and by ensuring that employees do not have unreasonable work pressures.

A number of factors affecting levels of stress and possible solutions are documented in the HSE guide below.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

HSE guide "Work Related Stress" INDG281.

3.44. Workplace Violence and Aggression

The Company recognises that employees may occasionally face aggressive or violent behaviour. Verbal abuse, threats and bullying are the most common types of violence while physical attacks are comparatively rare. The Company realises that verbal abuse can be just as upsetting as a physical injury and that violent and aggressive behaviour can lead to low morale, absenteeism and stress as well as physical injuries.

Any employee finding themselves in a confrontational situation must report their concerns immediately to their manager. The **Safety Coordinator** will record all incidents of violence or aggressive behaviour and will monitor the situation to establish whether any additional improvements can be made to reduce further risks of violence or aggression. Any violence instigated by an employee will result in disciplinary action.

Any employee who has been the subject of violent or aggressive behaviour will be given time off as required, and support and assistance to help them come to terms with the situation and avoid long term distress. Further advice can be found in the Home Office leaflet listed below which can be obtained from the local library, police station or Citizens Advice Bureau.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Health and Safety at Work Act 1974

Home Office leaflet 'Victims of Crime'

4. Environmental Policy

Iron Designs Limited recognises the need to operate the business in a manner which reflects good environmental management. The Company is aware of the environmental impacts of its operations and will balance its business with the need to protect the local and global environment.

Our Environmental Policy shall earn the confidence of employees, customers and the general public by demonstrating our commitment to comply with all relevant environmental legislation and minimise pollution, resource use and waste, where feasible, through the continual improvement of performance in all areas of the Company.

The Company has a commitment to identify all activities that have the potential to cause an environmental impact, as well as providing adequate resources to help minimise or prevent any negative impact.

In order to achieve this commitment, we will:

- Identify all environmental impacts that the Company contributes to and establish environmental management procedures that can be incorporated into all business decisions, in a cost effective manner.
- Regularly measure and evaluate our environmental performance, and improve where necessary.
- Promote a culture of continual environmental improvement within the Company.
- Delegate the responsibility for environmental matters to the appropriate levels in the Company.
- Consistently increase the awareness and provide necessary training to all our employees and customers to ensure environmentally responsible concepts are integrated into their normal working practices.
- Demonstrate control of all our operations and ensure that all are performed with due consideration of the environment.
- Identify and mitigate against potential accidents that could result in an environmental impact, so that if an accident did occur the consequences would be minimised.
- Use products that have a negligible environmental impact, where appropriate options exist.
- Reduce the consumption of resources (energy, materials, packaging), where feasible.
- Minimise waste through a commitment to reuse, recover or recycle, where feasible.

It is our duty to ensure that good environmental management is practiced in all contracts and projects that we are involved in, and we will seek to influence customers to demonstrate a positive environmental commitment.

The Company will communicate the Environmental Policy to all employees, and it will be freely available to customers and the general public.

The **Managing Director** is personally responsible for the environmental performance of the Company and signs this policy statement in acknowledgement of this overall responsibility.

Signed

Date 2015