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## Health and Safety Management Policy

### **General Health And Safety Statement**

#### **Introduction**

It is the policy of Solo Group to develop a positive health and safety culture throughout the organization because we believe that high standards of health and safety are necessary for company efficiency and competitiveness.

To achieve this the company will continually strive to identify all workplace hazards and take appropriate measures to eliminate or control risks to employees and others affected by our operations by applying positive control standards and provision of information, training and supervision as needed.

Employees at all levels are reminded that they have a duty, commensurate with their position, to ensure that the company's health and safety policy is observed. In particular they are required:-

- To take reasonable care for their own health and safety at work and of those who may be affected by their actions, or by their omissions.
- To co-operate with their employer to ensure that any duty, or requirement, for health and safety imposed upon their employer by law is performed or complied with.
- To co-operate with any other holder of health and safety duties (such as contractors or other employers working at our premises, and other employers when you are working at their workplaces) as far as is necessary to enable them to perform their duties.
- Not to intentionally, or recklessly, interfere with or misuse anything provided in the interests of health, safety or welfare.
- To report to supervisory staff hazardous conditions or defects in the company safety arrangements.

The company recognises that it has the ultimate legal responsibility for health and safety. Accordingly the Managing Director accepts overall responsibility for policy formulation and implementation. In turn all levels of management and all supervisors are responsible for carrying out those health and safety duties placed upon them. The Managing Director will ensure that the safety plan includes sufficient resources for the successful implementation of the Health and Safety Management Policy.

Development of the Health and Safety Management Policy will be conducted through normal business meetings where health and safety will be given standing equal to other activities of the business.



The company will appoint a number of competent persons to assist the company directors in implementing this policy. The Safety Officer's role is to provide independent and authoritative advice to managers with individual responsibilities for health and safety.

Name:	Mr Gary Elkin
Position:	Managing Director
Signature:	
Date:	

### **Health And Safety Objectives**

The objectives to be met in ensuring the success of this policy are:-

- To actively involve employees at all levels in ensuring a competent workforce that continually operates safe and efficient working methods. This will reduce lost time from accidents, sickness and absence with the consequent benefits of high morale and increased productivity. It will also help in creating a public image of a well-run, safe and trusted business.
- To set standards that will at least meet the relevant statutory requirements for health and safety, product safety and environmental matters as these may affect our employees, customers, contractors and their employees and the public at large.
- To review and, where appropriate, develop these standards in the light of changes in technology, industry practices and legislation.
- To co-operate with the appropriate authorities and technical organisations on the formulation of standards and means of compliance.
- To ensure that the potential health and safety factors and environmental effects are assessed for all new products, activities and acquisitions.
- To inform employees of their health and safety responsibilities and provide sufficient information, instruction and training to enable them to be aware of and avoid the hazards to which they are exposed.
- To ensure that contractors working under the control of subsidiary companies within the group are informed of its standards, and that appropriate procedures exist for monitoring compliance without detracting from the legal responsibilities of the contractors.
- To ensure that the company's established machinery is used for employee consultation and participation on matters affecting health and safety at work.
- To ensure as far as reasonably practicable safe plant, safe systems of work and the elimination of any foreseeable hazard which may result in injury, occupational health illness, property damage, process loss, fires, security loss and environmental damage.
- To ensure that these objectives are being fulfilled through auditing company activities.

### **Individual Responsibilities**

#### **Managing Director - Mr Gary Elkin**

- *Policy Makers*



The key role of the Chief Executive and Managing Directors is to devise and formulate the company safety policy, establishing strategies to implement the policy and integrating these into the general business mission. They are required to specify a structure for planning, measuring, reviewing, auditing and implementing the policy and any supporting plans.

Their key Tasks regarding Policy are to:

- Formulate and issue a written statement of the general health and safety policy and strategic objectives that will give direction to employees and encourage the development of a positive safety culture.
- Provide a policy for the systematic approach to the identification of risks and the allocation of resources to control them, which in turn will minimise financial losses arising from avoidable unplanned events.
- Set up an effective organisation to recruit and retain competent employees and provide the necessary resources to update employee competence as and when necessary.

Their key Tasks regarding Organisation are to ensure an organisation for controlling and implementing the arrangements concerning health and safety with a clear definition of the responsibilities of each individual within that organisation.

Their key Tasks regarding Co-operation are to encourage co-operation between all levels within the Company and ensure that a mechanism exists for employee participation in setting, developing, planning, measuring, auditing and reviewing and implementing of performance standards.

Their key Tasks regarding Co-operation are to provide through written statements of general health and safety policy, discussion of business and employee Health and Safety Committees the organisation to communicate health and safety standards throughout the Group.

Their key Tasks regarding Co-operation are

- Set measurable and achievable health and safety objectives which take account of all foreseeable risks connected with any company business activities.
- Provide sufficient resources with which to achieve the health and safety objectives.
- Direct resources for suitable training and supervision as regards the identification and elimination or reduction of risks.
- Require monitoring and reviewing of health and safety standards implementation by means of a recognised health and safety audit system.

### **Functional Directors and Departmental Managers**

- *Planners*

The key role of functional directors and departmental managers is to: produce plans to support the Health and Safety Policy; identify specific health and safety objectives to be achieved within fixed time periods; establish standards for measuring, reviewing and auditing the safety policy arrangements; co-ordinate specialist advice necessary for implementing the policy and arrangements and participation by employees; keep themselves up-to-date with changes in health and safety legislation and good management practices relevant to the organisation; and allocate responsibilities for health and safety within their area of authority.

Their Key Tasks regarding Policy are to actively encourage the implementation of health and safety standards by visible leadership. Provide for the elimination or minimising of risks to



employees or others from work activities. Implement the standards concerning recruitment and training that ensure employee competence.

Their Key Tasks regarding Organisation are to ensure that the organisation for implementing the company policy is adequate to enable efficient control and effective monitoring/reviewing of standards.

Their Key Tasks regarding Control are to:

- Allocate responsibilities for the implementation of plans and for reporting on performance.
- Delegate health and safety responsibilities to people with the necessary authority and competence, allocating them sufficient time and resources to carry out their duties effectively.
- Ensure that employees are held accountable for their health and safety responsibilities and are motivated by target setting or similar methods.
- Provide adequate supervision, instruction and guidance.
- Take appropriate remedial action where shortfalls in standards are indicated by reports on performance.
- Arrange, where necessary, assistance from specialists and competent persons.

Their Key Tasks regarding Co-operation are to encourage co-operation of employees and safety representatives by:-

- Involving them in department policy development, planning, implementing, measuring, auditing and reviewing of health and safety performance;
- Complement any general health and safety arrangements by issuing departmental rules for specific operational activities; and
- Ensure that co-operation between contractors and employees occurs at all stages of projects and works.

Their Key Tasks regarding Communication are to secure effective communication by means of written material and face-to-face discussion such as departmental meetings and supervisor briefings, etc.

Their Key Tasks regarding Competence are to:

- Ensure competence by applying the company policy on recruitment, selection, placement, transfer, training and the provision of adequate specialist advice; and
- Award works contracts to contractors who are competent and meet the standards set by the company.

Their Key Tasks regarding Planning and Implementation are to:

- Set targets for achievement of the company health and safety objectives;
- Set standards for actions necessary to develop and maintain a positive health and safety culture in four key areas – control, competence, communication and co-operation;
- Ensure that hazard/risk assessments are carried out and that the control measures considered necessary are being implemented; and
- Maintain the necessary health and safety documentation to meet current legislation and company standards.

Their Key Tasks regarding Risk Information are to ensure that arrangements exist for:-



- Briefing of employees on risks to them identified by risk assessments.
- Briefing of employees who may be exposed to serious or imminent danger.
- Provision of information to non-employees concerning on-site hazards.
- Provision of information to employees concerning hazards brought on site by contractors.
- Co-operation and exchange of information between contractors, sub-contractors and the company at all sites.

Their Key Tasks regarding Training are to arrange health and safety training of all employees within their functional responsibility, the minimum standard being that set out in the company health and safety training plan.

Their Key Tasks regarding Performance Measurement are to:

- Ensure that active and reactive monitoring of standards are applied and, where identified as necessary from such monitoring, ensure that procedures, systems of work and other control measures are reviewed; and
- Co-operate with the Group Safety Officer during audits of health and safety management.

### **Managers – Engineers – Supervisors**

- *Implementers*

The key role of managers, engineers, supervisors and those with equivalent responsibilities is to implement the operational plans, procedures and systems required by the company's Health and Safety management Policy within their areas of responsibility; and provide feedback to planners and policy makers on performance to keep them aware of successes or deficiencies in plans, standards, procedures or systems.

Their Key Tasks regarding Policy are to ensure that employees are aware of the company's Health and Safety Management Policy, and to ensure that employees are briefed on all sections of the policy relating to their employment and that they have reasonable access to this policy document.

Their Key Tasks regarding Organisation are to provide the means and support necessary for employees (and others reporting to them) to understand and carry out their duties in a safe manner and without risks to health.

Their Key Tasks regarding Implementation are to:

- Take personal responsibility for ensuring the safety of all employees within their areas of responsibility and others who may be affected by company operations.
- Implement the company operational plans and procedures for their area of responsibility inclusive of those for serious and imminent danger.
- Ensure safe and healthy work sites or work places which do not create risks to employees or others.
- Ensure that the company's products or services do not in themselves create risks to others.
- Ensure health and safety co-operation between employees and contractors on shared sites.

Their Key Tasks regarding Performance Measurement are to implement the procedures for measuring performance through active and reactive monitoring, and provide feedback on performance, including successes, failures and any deficiencies in plans, procedures and systems.



Their Key Tasks regarding Audit and Performance Review are to participate in arrangements for auditing and reviewing the health and safety management system.

Their Key Tasks regarding Co-operation are to participate in health and safety meetings when required to do so, and also to participate in devising operational systems, procedures and instructions as regards the control of risks, and in devising and operating monitoring and/or auditing activities.

Their Key Tasks regarding Communication include the implementation of the procedure for health and safety communications within their area of responsibility.

Their Key Tasks regarding Competence are to implement the policy relating to competence within their area of responsibility.

Their Key Tasks regarding Risk Assessment and Control are to implement the risk assessment and control section of the policy ensuring that suitable and sufficient assessments are made of the risks to the health and safety of employees and others who may be affected by company operations.

Their Key Tasks regarding Competent Persons are to advise their functional managers when there is a need for their assistance in ensuring that the protective and preventative measures identified by risk assessment are undertaken correctly.

Their Key Tasks regarding Arrangements to Meet Specific and Relevant Health and Safety Regulations are to implement the standards set out in the Health and Safety Management Policy document and other supporting systems which have been established to enable the company to meet the requirements of all relevant health and safety legislation.

### **Group Safety Officer**

The key role of the Group Safety Officer is to liaise with the policy makers on Health and Safety Management Policy formulation and development; promote a positive safety culture which will secure effective implementation of established performance standards and the policy in general; and monitor and review the company safety management system, preparing reports and analysis of safety systems as necessary.

Their Key Tasks regarding Policy are to assist those responsible with the formulation and communication of the health and safety management policy. Maintain adequate information systems to keep abreast of relevant law (civil and criminal) and with developments in general safety management practice.

Their Key Tasks regarding Implementation are to Organisation are to provide independent and authoritative health and safety advice to those identified within the organisational structure.

Their Key Tasks regarding Implementation are to:

- Establish and maintain a health and safety document control system.
- Establish and keep up-dated organisational and risk control standards in relation to premises, plant, substances, equipment, procedures, systems and people.
- Establish and maintain procedures for reporting, investigating, recording and analysis of accidents and incidents.
- Establish and maintain adequate and appropriate systems for monitoring and auditing safety management and safety performance.



- Keep managers informed of the successes or otherwise of health and safety performance standards.
- Arrange or carry out safety training of employees and contractors as required by managers.
- Impromptu visits to operational work sites and engineering projects, reporting deficiencies to the relevant managers and contractors working on company sites.

Their Key Tasks regarding Performance Measurement are to implement the procedures for performance measurement through periodic auditing of the company health and safety management systems and preparation of any necessary action plans for managers.

Their Key Tasks regarding Co-operation are to:

- Encourage co-operation of all employees by active promotion of a positive health and safety culture at all times;
- Liaise with contractors on health and safety matters,
- Provide all necessary information to contractors regarding risks to them by company operations and gain information from contractors as to risks to employees from contractors' work activities; and
- Provide information to all persons necessary to plan or implement the company health and safety standards.

Their Key Tasks regarding Communication are to:

- Secure effective communication internally by means of written material, publicity promotions, attendance at departmental meetings, circulation of health and safety leaflets, circulars, etc. and adequate internal training.
- Liaise externally with organisations such as the Health and Safety Executive, Environmental Health Officer, Local Authorities, contractors and others in our industry on all matters relevant to health and safety.
- Produce a quarterly health and safety report for circulation to managers and employee-elected safety representatives.

Their Key Tasks regarding Competence are to implement the company policy relating to competence, and keep abreast of all relevant law, codes of practice, official guidance, recognised standards, etc.

### **All Employees**

The key role of employees is to comply with relevant plans, procedures and systems in the company's Health and Safety Management Policy and, where necessary, to bring to the attention of their elected representative and superior any situation which could place employees or others at risk or in imminent danger.

Their Key Tasks regarding Policy are to keep themselves aware of their responsibilities regarding health and safety and meet those responsibilities in all aspects of their duties.

Their Key Tasks regarding Organisation are to assist their supervisors, managers and the company in meeting their duties under legislation by actively participating in all aspects of health and safety rules within the company.



Their Key Tasks regarding Implementation are to assist in ensuring safe and healthy work sites by co-operation with supervisors and managers on all aspects of health and safety. In addition they should also:

- Report all potentially hazardous situations likely to cause injury or damage.
- Report all injuries and dangerous occurrences.
- Ensure that company work activities, products or services do not create risks to anyone and report to their supervisor any which do create risk.
- Be aware of risks to themselves from work activities.
- Co-operate with changes in work practice where necessary due to changes in materials, plant, procedures, systems or technology.
- Ensure that they are aware of the company's emergency procedures for serious and imminent danger.

Their Key Tasks regarding Co-operation are to

- Participate, when required, in briefing meetings and any other meeting which discusses health and safety.
- Participate in ballots for electing safety representatives or welfare representatives to present their views at safety committee meetings.

Their Key Tasks regarding Communication are to:

- Digest the health and safety procedures and written instructions provided to them by the company.
- Report to their supervisors/managers any observations or concerns as regards health and safety management or risks to staff or others.

Their Key Tasks regarding Competence are to inform their supervisors/managers of any situation where they consider that insufficient training and instruction have been given to enable them to carry out work without placing themselves or others at risk, and further to be aware of the competent persons appointed by the employer for specific duties under health and safety. (e.g. First Aiders, Fire Officers, Safety Representative etc.)

Their Key Tasks regarding Risk Assessments are to remain aware of the significant risks to health and safety connected with their work activities, and of the controls, procedures and systems they must apply to minimise the risks to themselves and others. Assist the company when required in identifying and reporting hazards, and in any investigation or assessment of the associated risks and risk controls.

## **Principal Arrangements for Health and Safety Management**

### **Health and Safety Assistance**

As required under The Management of Health and Safety Regulations 1992, the following have been appointed as 'competent persons' in respect of health and safety:-

<b>Group Safety Officer</b>	Mr Davey Young
<b>Group Personnel Manager</b>	Mr Gary Elkin



## **Consultation with Employees**

The Group will ensure that procedures are in place to consult with employees and provide information on matters of health and safety. Employee-elected safety Representatives will be given training and allowed the use of Group resources, including reasonable time to carry out their role during their normal working hours.

Employee-elected representatives within Solo Group shall hold office for a period of 2 years unless they wish to resign at an earlier date. In the event of a resignation the departments concerned will elect a replacement representative. Formal meetings between representatives and management will be held quarterly in March, June, September and December when health and safety matters in need of discussion will be included on the agenda.

- *Duty To Consult And Provide Information*

Regulations held by management at each site identify matters on which employees or their representatives must be consulted. Managers and Safety Representatives are to familiarise themselves with these details. Employee Representatives will be introduced to these Regulations during company training.

## **Guidelines For Raising Matters Regarding Health And Safety**

The procedures to be applied in dealing with health and safety matters locally are:

1. Individual employees are to raise matters of safety that they consider relevant to themselves with their immediate supervisors who will quickly settle such matters as far as they are able to within the scope of their authority.
2. Individuals not satisfied with the action taken under (1) are to refer the matter to their Safety Representative who will take the matter up with the department/function managers on behalf of the individual concerned. In situations where there are no elected representatives the individual will need to take the matter up directly with their manager.
3. Should a Safety Representative be dissatisfied with the action taken under (2), or if they consider the matter reported has wider implications, a matter may be placed on the agenda of the next Health and Safety or staff meeting.
4. Notwithstanding the above procedure, which is to be followed wherever possible, matters serious enough to require immediate attention of the Group Safety Officer may be raised by an employee at any time and dealt with as appropriate. It is to be remembered, however, that line management must be given every opportunity to deal with health and safety problems.
5. Where Safety Representatives wish to carry out workplace inspections, they are to arrange the timing of these with the line manager responsible for each area to be inspected. On completion of an inspection, the relevant Representatives and managers shall agree any actions necessary to improve health and safety and produce a written record to this effect. Representatives should then report back to the employees they represent and, if necessary, report to the next Health and Safety or staff meeting.

Department Managers and Safety Representatives are to consult at 3 monthly intervals regarding any general safety topics within the department. These meetings may be conducted on an informal basis but one of the parties involved shall take written notes of what was discussed and what action can be expected. Health and Safety matters requiring immediate action are dealt with in item (4) of the above Guidelines For Raising Matters Regarding Health and Safety.



Safety Representatives are to provide written hazard reports on all cases where they consider there is a need remedial action by the company. Managers are to record the action taken (or to be taken) prior to returning the report to the Representative concerned. The Representative may then consider the decision with the manager before reporting back to those represented. A copy of the endorsed report is to be forwarded to the Group Safety Officer for information in order that he may keep the Health and Safety Management Committee informed of all risk controls being implemented throughout the Group.

### **Health And Safety Essentials**

In the design and selection of plant/equipment, storage facilities, vehicles, engineering and laboratory equipment, protective clothing and anything else used in work activities, the suitability of such plant, equipment and structures for safe operation and use is of prime consideration.

Design, operating and general behavioural rules are set out in operating instructions, safe works procedures manuals or posted on notice boards as appropriate for the many activities conducted. These rules cover statutory, company and specific local requirements and industry best practice.

It is essential that all employees are aware of the general and specific rules that apply to their job. By the issue and up-dating of such rules, training and practice in the requirements management aims to ensure that no failure in compliance will occur through lack of knowledge. The specific rules which refer to work activities are contained in the following documents:-

- Relevant legislation and statutory instruments (available through Safety Officer).
- Codes of practice/regulations and HSE guidance (available through Safety Officer).
- Manufacturers' instructional manuals.
- Subsidiary Company or Group Safe Working Procedures.
- Subsidiary Quality Manuals.
- Plant and 'site' operational and maintenance manuals.
- Risk Assessments as recorded by all departments.
- Industry best practice standards.

### **Employee Involvement**

Every employee has a general statutory duty to take reasonable care for the safety and health of themselves and others who may be affected by their acts or omissions, and to co-operate with their employer, so far as is necessary, to enable the latter to fulfil the statutory obligations.

The successful implementation of the Health and Safety Management Policy depends on the active support and co-operation of all employees to an extent that goes beyond the statutory requirement. Arrangements to create a climate that ensures the continuing involvement and co-operation of all employees are detailed later throughout this document. It is essential that all employees perform their work diligently and well, and that in doing so they: comply with the issued rules and work permits; use and not misuse anything provided in the interests of safety and health; and report to the appropriate manager any occurrence or defect which appears to present a risk to safety or health.

Employees are reminded that contravention of health and safety legislation is a criminal offence that could result in prosecution of individual employees as well as or instead of the Company.



## **Health And Safety – Good Practice**

No machine, item of plant or equipment is to be operated by any person unless the person has been trained and authorised to do so. Persons under 18 years of age may only operate machinery, equipment or plant under direct supervision of a competent authorised person.

- All machine guarding is to be in place and correctly adjusted prior to use of the machinery.
- Competent and authorised personnel may only carry out repairs, maintenance or adjustments to machinery, plant or equipment.
- All defects, malfunction or damage to machinery, plant or equipment must be reported immediately.
- No machine, plant or equipment is to be left unattended whilst in motion, unless it is designed to operate in this manner under normal circumstances.
- Substances are to be used, stored and transported in accordance with written instructions on the container and/or set out in the company COSHH information file.
- All hazard notices, warning signs and general information notices are to be read and the information displayed complied with.
- Safety equipment, clothing and facilities provided are to be used in accordance with instructions and not wilfully misused or damaged.
- Site housekeeping is to be of the highest standard at all times and waste disposed of by container or vehicle.
- All spillage of materials or substances, etc. are to be cleared up immediately.
- All emergency procedures relevant to the work area are to be obeyed and emergency routes, exits and equipment kept free from obstruction.
- Report all used or damaged fire fighting equipment immediately.
- Report all accidents/incidents that cause damage or injury. Seek first aid or medical assistance where necessary.
- Workstations provided are to be designed so as not to put at risk the health or safety of employees or others.
- Plant, equipment and machinery subject to statutory inspections are to be inspected/examined at the relevant intervals.

## **Work At Other Companies' Premises**

Employees who are required to work at the premises of other companies are to be made fully conversant with the safety rules applicable to the relevant premises. Those employees attending premises where specialist training is necessary prior to carrying out work (e.g. off-shore), are to attend training and be assessed as competent in the necessary procedures prior to carrying out work on the premises/site concerned.

## **First Aid Facilities**

The company will provide first aid facilities and equipment at least to the standard laid down in the Approved Code of Practice L74 1997.

The company standard is to provide first aid boxes at principal work places where people are employed and first aid kits on vehicles for employees who work in isolated or peripatetic conditions, at transient sites or with potentially dangerous tools.



Sufficient numbers of qualified first aiders shall be appointed at all principal workplaces and within those departments where employees are expected to work under transient/peripatetic conditions. Transient/peripatetic workers will also be trained in "Save a Life" techniques to provide them with immediate response skills in the event of injury.

Safety information notices are posted at company premises informing staff of appointed first aiders' names and locations. In the event of an injury necessitating treatment, employees are to contact the person in charge of the first aid equipment so that treatment may be administered.

First aid boxes and kits will be regularly checked (minimum 3 monthly) and the contents up-dated. The checks are to be carried out using the form included in the box or kit.

Managers at principal workplaces are to nominate a first aider or appointed person to take charge of the first aid facilities under their control.

Maintenance and upkeep of vehicle first aid kits shall be the responsibility of the employee to whom the vehicle is allocated. Checks are to be carried out regularly (minimum 3 monthly).

The duties of the first aider/appointed person/vehicle drivers are to:-

- Ensure stocks of first aid items are kept up-dated
- Ensure accidents are recorded in the Accident Report Book
- Inform managers of all treatment

### **First Aid Kit Contents and Checklist**

First aid kit checks are necessary to ensure availability of the equipment for emergencies.

Appointed persons and/or vehicle drivers are to ensure kits are checked at least 3 monthly and the contents updated.

This form when completed is to be forwarded to your supervisor/manager to obtain the equipment deficiencies.

#### **First Aid Box Contents**

<b><i>Kit A - stock for up to 50 persons:</i></b>	
• Medium Sterile Unmedicated Dressings:	◆ 8
• Large Sterile Unmedicated Dressing:	◆ 4
• Extra Large Sterile Unmedicated Dressing:	◆ 4
• Sterile Eye Pad:	◆ 4
• Triangular Bandage:	◆ 2
• Individually wrapped sterile adhesive dressings WATERPROOF:	◆ 2 (10 in packet)
• Individually wrapped sterile adhesive dressings FABRIC:	◆ 2 (10 in packet)
• Safety Pins:	◆ 2 (6 in packet)
• Safety Pins:	◆ 10 (2 in packet)



• Guidance Card:	◆ 1
• Non-alcohol sterile wipes:	◆ 1 (10 in packet)
• Non-alcohol sterile wipes:	◆ 1 (6 in packet)
• Aids Hygiene Kit:	◆ 1
<b>Additional Items Where Risk Assessments Consider Them Necessary (Not Held Inside First Aid Kits)</b>	
• Eyewash 500mm diffuser:	◆ 2
• Eyewash double diffuser holder:	◆ 1

**All Operational Vehicles Are To Carry Eyewash Facilities**

<b><i>Kit B Vehicle Kit:</i></b>	
• Medium Sterile Unmedicated Dressings:	◆ 3
• Large Sterile Unmedicated Dressing:	◆ 1
• Extra Large Sterile Unmedicated Dressing:	◆ 1
• Sterile Eye Pad:	◆ 1
• Triangular Bandage:	◆ 2
• Individually wrapped sterile adhesive dressings WATERPROOF:	◆ 2 (10 in packet)
• Individually wrapped sterile adhesive dressings FABRIC:	◆ 1 (10 in packet)
• Safety Pins 6 in packet:	◆ 1
• Safety Pins 2 in packet:	◆ 3
• Guidance Card:	◆ 1
• Non-alcohol sterile wipes 10 in packet:	◆ 1
• Non-alcohol sterile wipes 6 in packet:	◆ 1
• Aids Hygiene Kit:	◆ 1
• Additional Items Where Risk Assessments Consider Them Necessary (Not Held Inside First Aid Kits)	
• Eyewash 500mm diffuser:	◆ 2
• Eyewash double diffuser holder:	◆ 1

**All Operational Vehicles Are To Carry Eyewash Facilities**



## Health Surveillance

Where risk assessments of company operations identify a need for health surveillance due to hazardous chemicals, etc., employees will be expected to co-operate and inform their manager/supervisor of any exposure they have suffered so that the necessary action may be taken to prevent a recurrence of the incident.

The services of the company doctor will be sought where exposure to substances/chemicals necessitates a medical inspection and/or diagnosis of the exposure effects. Where considered necessary, the services of the Employment Medical Advisory Services or that of competent Occupational Health Advisers will be engaged should particular health problems arise from company works activities.

The company will actively promote health campaigns sponsored by the Health Education Authority and, wherever possible, invite to company premises health surveys or x-ray services so that employees may take advantage of such schemes.

### Procedures

A number of operations/activities carried out by the company will require monitoring by managers for signs of ill health within the workforce. Some ill health problems which may occur are:-

<b>Illness</b>	<b>Indications</b>	<b>Sources</b>
Noise induced deafness / Tinnitus - constant noise in the ears.	Determined only by periodic (2 yearly) audiometry tests.	Noisy machinery or equipment.
Repetitive Strain Injury or Upper Limb Disorder	<ul style="list-style-type: none"> <li>Pain in the affected limb or neck and shoulder.</li> </ul>	Use of VDU equipment or other repetitive work.
Vibration White Finger	<ul style="list-style-type: none"> <li>Tingling sensation in finger and lack of blood circulation to extremities</li> <li>swollen and numb fingers.</li> </ul>	Use of road breakers and percussive equipment
Carpal Tunnel Syndrome	<ul style="list-style-type: none"> <li>Extreme pain in lower arm/wrist.</li> <li>Pins and needles sensation in fingers.</li> </ul>	<ul style="list-style-type: none"> <li>VDU work.</li> <li>Use of vibratory machinery/equipment.</li> </ul>
Leptospirosis	Flue like symptoms and persistent headache.	Work in areas where employees come into contact with rats' urine.
Asthma	Long-term cough and respiratory difficulties	Dusty work or vehicle/machinery fumes.
Skin/Acne/Rashes etc	Skin discolouration/dryness, etc.	Corrosive chemicals, tar, bitumen etc.

*Where risk assessments indicate possible employee exposure to health risks, managers are to ensure that health checks are carried out and records of any exposure kept.*



### **Manual Handling Operations**

Many work activities include the need for manual handling of materials, etc. The Company will provide training on manual handling and, where requested by managers, carry out on-site assessment of risks to employees from specific operations. Employees who suffer from health problems that may affect their capability during manual handling tasks are required to report to their managers how these may limit their capability to lift. Managers shall confirm if employees have problems affecting their lifting capability and take this information into account during the preparation of any assessment involving the employee.

### **Emergency Plans**

The company has prepared an emergency plan document and all relevant staff should familiarise themselves with any requirements they need to meet under the plan. Incident rehearsals/practice of procedures will take place from time to time. Up-dating of the emergency plan will be co-ordinated by the Technical Assistant (Emergency Planning Co-ordinator).

### **Vehicles and Plant**

Company-owned vehicles or plant may only be driven by employees and others in possession of an appropriate valid driving licence (CITB, CTA or equivalent) and authorised to do so by the company. This applies on private property and the public highway. Company commercial vehicles are to be used only for authorised journeys and persons not employed by the company are not to be carried as passengers in vehicles excepting cars that allow for private use.

### **Provision and Use of Work Equipment**

'Work Equipment' is broadly defined to include everything from a hand tool to a complete plant.

'Use' includes starting, stopping, installing, dismantling, programming, setting, transporting, maintaining and cleaning.

- All work equipment provided for use shall comply with the existing statutory safety requirements at the time of the intended procurement. Company specifiers and purchasers who intend putting any equipment into use are to first consult the manufacturer/supplier over the suitability of the equipment for its application and assess the hazards/associated risks from its intended installation, location, use, maintenance and operation.
- Records of all maintenance as recommended by the manufacturer/supplier and repairs throughout the equipment's service life are to be kept by the user department.
- User departments are to provide adequate information, instruction and training not only to the operator but also to those supervising or managing the operator. This means that the workforce are to have easy access to all relevant health and safety information and written instructions about the plant or equipment which they are operating or using.

### **Procurement and Purchasing Controls**

The Group subsidiary companies shall within their procurement procedures incorporate controls to ensure that lack of information does not lead to accidental losses through injury, illness, damage or premature equipment failure. The most cost-effective procedure is to bear safety considerations in mind right from the start. Company specifiers and purchasers must in all cases apply a purchasing standard/statement that ensures consideration of occupational safety and health protection and provision of the necessary information and training by the supplier before a



purchase is approved. This procedure is to be applied by management using an in-company working group.

The purchasing policy to be applied by all subsidiary companies shall ensure that:

- All new products, materials, substances and equipment are reviewed (risk assessed) for safety considerations prior to purchase as well as prior to being put into use.
- Safety specifications are obtained with all tenders for supply and included on all orders raised.
- Suppliers/manufacturers are audited for quality and health and safety on a regular basis as well as on revision or renewal of contracts for supply.
- Safety information regarding machinery and equipment installation, use and maintenance shall be obtained from the suppliers.
- Data sheets giving the chemical composition and hazardous properties of all substances shall be obtained from suppliers.
- An assessment of all substances, including details of safe use, safe storage, safe disposal and first aid treatment, shall be carried out and employees informed prior to use of substances.
- Where necessary the manufacturer/supplier shall be directed to carry out training of staff on the operation and maintenance of the equipment.

### **Workplace Health, Safety and Welfare**

Subsidiary companies will take such steps as are necessary to meet current legislation. Rest rooms, where provided, are not to be used for storage of equipment or other items or materials. Segregated facilities will be provided for non-smokers where smoking is allowed on the company premises. Managers are encouraged to agree and adopt a non-smoking policy at all company premises. Due account will also be taken of lighting, ventilation and other facilities to ensure a safe and healthy environment.

### **Substances/Materials Hazardous to Health (COSHH)**

The company is aware that certain substances/materials may cause bodily harm by inhalation, ingestion, skin contact or absorption through the skin. Suppliers' Health Hazard Data sheets are to be acquired for all items purchased. Prior to putting into use a substance/material an assessment shall be carried out to determine any health risks and whether control measures are necessary to guard employees against harm from the substance or material. These assessments are to be recorded on the COSHH Assessment form, stocks of which are available from the Group Safety Officer. Further information on COSHH is contained in the Health and Safety Instructions Manual.

### **Safe Systems and Method Statements**

Where complex or potentially hazardous works are to be undertaken by either labour or contractors, safe systems of work documentation and method statements are essential. Departmental managers are to arrange that either they, or nominated persons, take responsibility for ensuring that safe system documents and method statements include all necessary safety points. These documents are contained within the Company's Construction Design and Management Safety Plan (Construction Phase) standard documentation pack or may be obtained from the Group Safety Officer.



Employees are to be fully briefed on the safe system/method of work decided upon and shall be issued with a copy of the document for reference during the work.

### **Permits to Work**

Where the nature of the work necessitates introduction of a Permit to Work (eg Entry and Work in a Confined Space), guidance for managers is provided at the beginning of the Health and Safety Instructions Manual. Full use should be made of the forms and advisory information contained in this section concerning the various works where permits need to be employed.

### **Active Monitoring of Safety Performance by Workplace Inspection, Checks and Audits**

Managers and Supervisors are to measure the performance of their department on a continuous basis. Assistance will be provided by the Group Safety officer or other appointed competent persons and, where considered necessary, by external health and safety consultants.

#### Active Monitoring

- Inspection of the workplace/sites on a daily basis in conjunction with visits for other reasons by managers and supervisors.
- Joint inspection on a three-monthly basis with employee representatives. These inspections will include all plant and work activities. Checklists should be used to remind inspectors of the control measures identified as necessary by risk assessments.
- Actioning of hazard reports from employees in general and from employee representatives.
- Regular meetings with employee representatives to discuss health and safety matters.

#### Procedures Compliance

Each department will have access to the current health and safety arrangements and works health and safety instructions. Managers should check departmental compliance with the standards set out in the instructions.

#### Performance Monitoring

All employees with direct duties for health and safety and safety monitoring will themselves be subjected to performance monitoring by their immediate managers.

Each department will appraise the information from risk assessments and ensure that risk control measures, including health surveillance, at their workplaces are reviewed to ensure they are suitable and sufficient.

Managers and supervisors will observe employees to ensure that they are complying with the company works procedures and/or safe systems of work. Deviations are to be investigated and, where a serious health or safety risk is found, reassessment of hazards and employee re-training should be carried out so that the risk can be controlled.

Functional directors/department managers will prepare an annual report on the health and safety performance of their departments for submission to the Managing Director.

A health and safety tour should be carried out by each department manager at least on an annual basis. Managers are encouraged to invite a colleague from another department to participate in order to provide an independent assessment of compliance.

#### Safety Inspection



Safety inspections are to be carried out by department managers and should generally be conducted using a checklist. Inspections may involve:-

A general inspection of a complete site or department.

An inspection of one specific area of a site, a particular operation or controls for a particular hazard (e.g. fire precautions).

Whatever method is used, the deficiencies highlighted by the inspection should be prioritised and corrected as soon as is reasonably practicable. Where a statutory requirement is breached the deficiency must be corrected as soon as possible.

#### Employee Participation

Employee-elected safety representatives are empowered to carry out workplace inspections and shall be encouraged to do so on a regular basis having first agreed a day and time with the department manager concerned.

Situations where safety representatives may exercise their rights to carry out inspections are:-

- Planned general workplace quarterly inspections
- A substantial change in conditions of work
- Notifiable accidents, diseases or dangerous occurrences (in conjunction with management)
- Inspection of documents

The employer is required to keep records regarding workplace health and safety under a statutory provision (but not individual health records). The company will co-operate with safety representatives by allowing them reasonable time during working hours to carry out their duties.

#### Inspection/Audit Report Procedure and Documentation

Audits are to be reported and actioned as set out in the procedure shown later in this section. Findings of all audits are to be recorded on the Audit Form available from the Group Safety Officer.

The Risk Assessment Form, also available from the Group Safety Officer, should be used to record information as necessary during an audit from which the summary and action plan is formed. The summary and action plan is to be used for information to employees as required in the Management of Health and Safety Regulations 1992.

Hazard reporting is to be conducted using the form and procedure set out in the section of this policy dealing with Consultation with Employees.

#### Plant And Equipment Checks

Department managers are responsible for ensuring that the checks of premises, equipment, substances and work systems listed in the health and safety management audit record book are completed on a 3-monthly rotation and are forwarded to them for inspection on dates below:-

**31<sup>st</sup> March each year**

**30<sup>th</sup> September each year**

Function managers are responsible for ensuring that various periodic checks of equipment and machinery are carried out and that the necessary records are kept, some of which are prescribed registers.



Static Cranes	<ul style="list-style-type: none"> <li>◆ Check prior to any use.</li> <li>◆ Examined by Lloyds every 14 months.</li> <li>◆ Tested after repairs and major modifications.</li> </ul>
Forklifts	<ul style="list-style-type: none"> <li>◆ Check weekly.</li> </ul>
Hiabs	<ul style="list-style-type: none"> <li>◆ Check weekly.</li> <li>◆ Tested 4 yearly or after major repairs.</li> </ul>
Mobile Cranes	<ul style="list-style-type: none"> <li>◆ Check weekly</li> <li>◆ Tested 4 yearly or after major repairs.</li> </ul>
Excavators	<ul style="list-style-type: none"> <li>◆ Check weekly</li> <li>◆ Tested 4 yearly or after major repairs.</li> </ul>
Fire Extinguishers	<ul style="list-style-type: none"> <li>◆ Check weekly.</li> </ul>
Cable Locators	<ul style="list-style-type: none"> <li>◆ Check prior to any use.</li> <li>◆ Check every six months.</li> </ul>
Portable Electric Tools	<ul style="list-style-type: none"> <li>◆ Check prior to any use.</li> <li>◆ Check every three, six or twelve months depending on conditions of use.</li> </ul>
First Aid Kits	<ul style="list-style-type: none"> <li>◆ Check weekly.</li> <li>◆ Check every three, six or twelve months.</li> <li>◆ Note: Drivers are responsible for vehicle First Aid Kits</li> </ul>
Air Receivers	<ul style="list-style-type: none"> <li>◆ As per intervals on written scheme.</li> <li>◆ Check every 12 months.</li> </ul>
Chlorine Pipework	<ul style="list-style-type: none"> <li>◆ As per company work procedure - 1 yearly or 5 yearly</li> <li>◆ (subject to written scheme).</li> </ul>

Prescribed registers shown below must be kept up-dated.

Form F31	<ul style="list-style-type: none"> <li>◆ General Register</li> </ul>
Form 2346	<ul style="list-style-type: none"> <li>◆ Abrasive Wheels (register of employee to mount wheels)</li> </ul>
F91 PT1 B	<ul style="list-style-type: none"> <li>◆ Excavations</li> </ul>
F91 PT1 D	<ul style="list-style-type: none"> <li>◆ Excavator Inspection company owned machines</li> </ul>
F91 PT1	<ul style="list-style-type: none"> <li>◆ Hired Plant</li> </ul>
F91 PT1 C	<ul style="list-style-type: none"> <li>◆ Lift Appliances,</li> <li>◆ Forklifts,</li> <li>◆ Hiabs,</li> </ul>



	<ul style="list-style-type: none"> <li>◆ Mobile Cranes,</li> <li>◆ Static Cranes (Supply),</li> <li>◆ Lifting Appliances on Pick-Up Vehicles,</li> <li>◆ Scaffolding</li> <li>◆ Portable Davits;</li> <li>◆ Written Scheme of Examination (Pressure Vessels)</li> </ul>
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In addition to the foregoing registers, certificates such as test or inspection certificates supplied by examiners are held by the Maintenance Manager at the premises where the equipment is installed/used.

Copies of test certificates relating to lifting gear/appliances purchased or re-tested must be forwarded to our insurers (insurer A) as soon as possible so that the schedule of insurance may be up-dated.

All new air receivers/pressure systems must be notified to our insurers (insurer B) so that they may be entered on the policy and a written scheme drawn up. All disposals of receivers should also be notified. These notifications are to be carried out through the Group Safety Officer.

**The Control of Substances Hazardous to Health Regulations (COSHH)** requires inspection of equipment used in control measures and certain protective clothing/equipment. Those items used by the company requiring inspection under COSHH are listed below. Function Managers are responsible for ensuring servicing and inspections are carried out.

Equipment	Use	Daily	Operational Check	Six Months	Twelve Months
CABA Breathing Apparatus	Treatment Plant	check daily prior to use	Yes	Service	Service
Full Face Cannister Mask	Treatment Plant	check daily prior to use	Yes	Service	Service
Exhaust Fans	Treatment Plant	No	Yes	No	Service
Gas Leak Detector	Treatment Plant	Prior to Use	Yes	Service	Service
Fume Extractor	Welding	Prior to Use	Yes	Service	Service
Fume Cabinets	Chemical Lab	Clean as per maintenance instructions	Clean and inspect as per BS7258	Service	Service

**Note:** All inspections and servicing/repairs are to be entered in the equipment log book.



### **The Control Of Legionellosis**

HSE 70, on the control of legionellosis including legionnaires disease, requires employers to:

- a) Identify and assess sources of risk
- b) Prepare a scheme for preventing or controlling the risk
- c) Implement and manage precautions
- d) Keep records of the precautions implemented

Managers are required to ensure that water storage and distribution within the premises under their control is subject to routine inspections and that any disinfection or remedial work is carried out. These inspections are to be carried out once a year and the necessary records kept.

The main problem areas within company premises will involve storage tanks and shower units, including emergency showers.

### **Fire Prevention and Action on Serious Imminent Danger**

All subsidiary companies will comply with The Fire Precautions (Workplace) Regulations 1997 which direct owners/occupiers of works premises to assess the risks and put into place adequate fire safety precautions at premises not already regulated by existing fire legislation. For premises covered by the Fire Precautions Act 1971, where a Fire Certificate will be in existence for the premises, the company also requires fire risk assessments but changes to control measures must not be made without the approval of the local fire authority.

Those employees delegated responsibility for managing premises shall ensure that fire precautions as listed below are implemented taking into account the size, layout and use of the premises.

- Undertake a fire safety assessment and identify the control measures necessary.
- Identify and provide an adequate means of fire detection and of warning people in the premises.
- Implement a visitor/contractor register and accompaniment procedure where required during their time in the premises.
- Provide and maintain (by regular inspection and servicing) adequate fire fighting equipment.
- Draw up and post fire emergency instructions and ensure those using the premises understand how to carry them out.
- Clearly sign all escape routes, fire equipment and alarm points throughout the premises.

#### **Specific Duties**

These duties are common throughout the Group and are mandatory under this policy. Managers in control of premises are required to ensure that the precautions listed are below are implemented.

- Fire drills are carried out twice yearly and records kept.
- Fire alarms are tested weekly and records kept.
- Emergency lighting is tested every 3 months and records kept.
- Training of staff is carried out yearly and records kept.



- Fire extinguishers are in position and safety pins/devices are in position. Extinguishers are inspected/serviced by contractors yearly. Department checks to be carried out quarterly.
- Fire escape routes checked regularly for any obstructions.

#### Fire Prevention

Fire prevention is the responsibility of all staff and precautions taken by staff are as below.

- Keep heat sources (such as electric fires) and combustible materials separate.
- Do not overload electrical circuits, or use non approved fitments (multi-socket adapter plugs) or obvious defective electrical appliances.
- **Report all defects.**
- Switch off and isolate where possible all electrical appliances at the end of the working day.
- Ensure good housekeeping and do not allow accumulation of combustible materials.
- Strictly control the use of flammable substances and always follow the manufacturer's instructions for use.
- Hot work carried out by craftsmen/contractors must be carried out under Permit to Work conditions.
- Use and storage of highly flammable liquids and gases must comply with the relevant regulations.

#### Fire Emergency Action

Fire drills are a necessity to ensure that all employees are aware of what action is expected of them if there is a fire and evacuation of the premises is necessary. Employees are to ensure that all visitors to the premises are escorted to safety. Notices are posted at all company manned premises showing the relevant assembly point and fire officer for the premises. Briefly the fire instructions require action as below.

- Raise the alarm.
- Call the Fire Brigade. (Switchboard Operator.)
- Fight the fire if possible. (Do not put yourself at risk.)
- Prevent the spread of fire (close doors and windows.)
- Evacuate the building and move to the designated assembly point.

Managers with health and safety responsibilities at each manned company premises are to ensure that Fire Officers are appointed for that premises; that they are aware of their duties in the event of a fire; and that all other staff know the location of the assembly point.

Employees/visitors/contractors will not be permitted back into the building until instructed to do so by the Fire Brigade or the senior manager/supervisor present on site, who will have first ensured the premises are safe to enter.

#### Treatment Gas Installation Emergency

Emergency instructions for guidance of employees and others are displayed at all sites where stored or generated gas may be accidentally released and create a risk. Persons not trained in dealing with such emergencies or having the necessary protective equipment (Compressed Air Breathing Apparatus) are to move to the designated assembly point and not return to the affected premises until told to do so by a manager/supervisor.



Instructions on dealing with a gas escape are posted at all relevant sites as information for those who need to deal with an escape. These employees must be made conversant with the actions they must take and be exercised on implementing the actions.

## **Risk Assessment**

The Group is committed to achieving and maintaining high standards of health and safety for all employees, visitors, the public and contractors. To do this, subsidiary companies are to identify hazards associated with their operations which threaten health and safety, evaluate the risks which arise from those hazards and put into place sensible, practical precautions which will protect against them. This process is termed **risk assessment**.

Risk assessments will be carried out periodically as a check on our performance against statutory standards and relate to the buildings and sites we occupy, the equipment we use and the methods of work we employ.

Assessments shall be conducted by use of questionnaires circulated to employees, task study and analysis, and reference to **BS 8800 a guide to occupational health and safety management systems (risk assessment section)** which is the standard to be adopted when assessing health and safety risks. The relevant pages of BS 8800 are issued to all managers and supervisors. Employees must be involved in the assessment procedure so that account is taken of how a task is performed rather than how the assessor thinks it is done. All hazards where the risk is considered moderate and above will need the implementation of further control measures.

Subsidiary companies are to ensure that assessments are carried out by competent and trained persons and conducted to a plan which will achieve the minimum requirements below:-

<b>Initial Review:</b>	<ul style="list-style-type: none"> <li>Classify all work activities and determine how much has already been done in risk identification, control and documentation.</li> </ul>
<b>Carry out Generic Assessments:</b>	<ul style="list-style-type: none"> <li>Identify whether all statutory requirements, approved codes of practice, guidance notes and best practice have been accounted for in the present method of work.</li> <li>Record this information as minimum standard Generic Assessments for reference by employees and managers.</li> </ul>
<b>Site Specific Assessment:</b>	<ul style="list-style-type: none"> <li>Carry out an on-site assessment to determine how the work will be conducted and whether any significant hazards with associated risks are apparent.</li> </ul>

Implement all control measures identified by existing generic assessments which relate to the tasks to be undertaken.

Introduce measures to control all other hazards evident on site and relating to the existing conditions and tasks to be undertaken and which are not covered by existing generic assessments.

**All risk assessments are to be recorded and the employees affected informed** of the assessment content and requirements. There will also be occasions where work undertaken on other employers' sites will necessitate the company providing risk information to the employer concerned.



#### Basic steps in risk assessment:-

- classify all activities: prepare a list of work activities covering premises, plant, people and procedures, and gather information about them;
- identify hazards: identify all significant hazards relating to each work activity.

#### Consider **who** might be harmed and **how**;

- determine risk: make a subjective estimate of risk associated with each hazard assuming that planned or existing controls are in place. Assessors should also consider the effectiveness of controls and the consequences of their failure;
- decide if the risk is tolerable: judge whether planned or existing OH&S precautions (if any) are sufficient to keep the hazard under control and meet statutory requirements.
- prepare a risk control action plan (if necessary) to deal with any issues found by the assessment to require attention. Ensure that new and existing controls are implemented and are effective;
- review the adequacy of the action plan, re-assess the risks on the basis of the updated controls and check that the risks are tolerable;
- review assessments periodically and/or on significant change of circumstances affecting how the activity is done.

**Tolerable** means that risk has been reduced to the lowest level that is reasonably practicable.

#### Documentation

A number of regulations direct that risk assessments be carried out, those relevant to Group operations are listed below:-

- Management of Health and Safety Regulations (General Activity Risk Assessments.)
- Manual Handling Operations Regulations.
- Noise at Work Regulations.
- Display Screen Equipment at Work Regulations
- Control of Substances Hazardous to Health Regulations
- Protective Clothing and Equipment Regulations
- Signing and Guarding for Street Works
- Fire Precautions (Workplace) Regulations
- Construction Design and Management Regulations
- Control of Asbestos at Work Regulations
- Control of Lead at Work Regulations

The proforma for recording of assessments is shown later in this document and may be freely copied for use when carrying out assessments.

The use of hazard prompt lists is encouraged and subsidiary companies are to draw up prompt lists taking into account the character of their work activities and locations where the work is carried out.

#### Risk Assessment: New Works And Refurbishment Of Existing Structures



Designers of structures have duties under The Management of Health and Safety Regulations and The Construction Design and Management Regulations to ensure wherever possible that hazards are avoided from constructing, operating and maintaining any structure they design.

For example, a hazard/risk consideration on a main laying project would be:-

The positioning of the main, any meters, covers, control valves, fire hydrants and washouts etc. to account for future repairs maintenance, operation, reading or repairs. The most significant hazard will be in most instances from traffic, therefore structures should be positioned as far as reasonably practicable to protect employees from the risk of contact with the traffic during any of the above operations. Positioning of the main will also have a bearing on the risks to which those carrying out the initial laying operation will be exposed.

There are many other hazards which need consideration. Assistance can be obtained from documents drawn up to deal with such projects and which are available from the Group Safety Officer.

### **Visual Safety Display Equipment**

To secure the health and safety of staff so far as is reasonably practicable, the company will, in consultation with staff and their representatives:

- Carry out an assessment of each workstation, taking into account the display screen equipment, the furniture, the working environment and the employee.
- Take all necessary measures to remedy any risks found as a result of the assessment.
- Take steps to incorporate changes into the employee's work schedule throughout the working day to prevent intensive periods of on-screen activity.
- Review software to ensure that it is suitable for the task.
- Arrange for the free provision of eye tests where an employee reports a visual problem when using VDU equipment and the employee is a designated "User" under the Display Screen Regulations 1992.
- Arrange for the supply of any corrective appliances where the appropriate optician confirms that they are required specifically for working with display screen equipment.
- Advise employees, and agency staff required to use display screen equipment, of the risks to health and how these are avoided.

### **Eyesight Tests And Provision Of Spectacles**

Where an employee experiences visual difficulties, and has good reason to believe that these may be caused by work with a display screen, the company will offer the opportunity for an eyesight test.

### **Job Changes**

Where an employee transfers, or is promoted or otherwise moved, to a job involving the use of display screen equipment, he or she will be entitled to an eyesight test should the necessity arise. This entitlement also applies where display screen equipment becomes a significant part of the work for an employee not previously considered as a regular user.

### **Regular Eyesight Tests**



Employees who are specifically users of display screen equipment will be invited to undergo an eyesight test at intervals of not more than five years. All such tests must be arranged through the company.

#### Cost Of Testing

All agreed costs of eyesight tests will be met by the company, provided that the testing has been arranged through the company. Where an employee obtains a test independently and without the knowledge of the company, even if the test is specifically related to display screen use, the company shall not be responsible for the costs incurred.

#### Pre-Employment

All new employees with eyesight difficulties must, when taken into employment by the Group, provide him/herself with suitable spectacles prior to taking up employment that involves VDU work. Thereafter, regular eyesight tests and provision of spectacles apply as in all other paragraphs of this policy.

#### Provision Of Spectacles

Spectacles, where an eyesight test indicates they are required, shall be provided at company expense and will be of a frame type and style set by the company. Alternatively, a payment equivalent to the cost of these spectacles may be made to the employee who will then provide his or her own spectacles in his or her own preferred style.

#### Care And Replacement Of Spectacles

Employees will be personally responsible for the safekeeping of spectacles. The spectacles are supplied in accordance with a statutory requirement, in the interest of health and safety. It is an offence to interfere with, or misuse, anything provided in the interest of health and safety. Employees are expected to show the same degree of care for spectacles as for any other item of safety equipment.

#### Rest Breaks

Users of display screen equipment are encouraged, and will be expected, to take the opportunity of breaks from work with the equipment so as to prevent the onset of fatigue. To achieve this objective the company will seek to encourage changes of activity into the working day. Department managers are expected to assist in achieving the objective through advising and assisting staff to plan their daily work activities.

#### Radiation And Pregnancy

Scientific research has concluded that no health risk exists from radiation to a pregnant person, or person seeking to become pregnant, when using VDU equipment. Consequently, there is no need for them to avoid working with VDUs. However, should an employee have a genuine concern the company may, after taking into account the effect of any resultant disruption, allow an employee to transfer duties temporarily.

### **Safety Administration**

#### **Safety Management Communication**

Within the Group, communication is essential both to keep employees informed of the business's safety performance and to build a shared understanding of safety priorities and needs. This will be achieved using regular meetings involving committees working to attain predefined objectives,



and personal communication with employees at local level through departmental discussion and action to improve health and safety. Managers and supervisory staff shall be encouraged to maintain regular and frequent personal contact with employees to give relevant advice and agree risk controls. A formal system of raising health and safety matters, which is to be actively encouraged by managers, is defined earlier in this document and is considered an important means of health and safety communication.

#### Health And Safety Management Group

This committee meets under the chairmanship of the Managing Director with the following long-term objectives:-

- Update the Group Health and Safety Policy in the light of new legislation/ information.
- Consider the validity of any perceived deficiencies in safety management reported by any sub committee.
- Prioritise any deficiencies for correction.
- Identify any costs of correcting deficiencies and authorise the necessary funding.
- Allocate responsibility for implementation of corrective action.
- Monitor the progress and completion of any corrective action.

#### Subsidiary Company And Department Meetings

Local meetings are an important means of ensuring effective communication of health and safety information to all levels of employees. Managers and supervisors are encouraged to hold short meetings such as yard briefings whereby employees are updated on new information or existing work methods. These meetings will, through time, achieve a positive safety culture within the company and ensure that the safety message is communicated to all staff. A number of situations when safety should be discussed are:-

- Weekly briefing and staff meetings with employees run by supervisory staff (toolbox talks).
- Monthly meetings involving Function Managers and Supervisors.
- Monthly meeting of Departmental Managers.
- Subsidiary Company and/or Departmental Health and Safety Committee meetings.
- Departmental level meetings with elected safety representatives.
- Joint Consultative Committee meetings.

#### Subsidiary Company Departmental Health And Safety Committees

The Group recognises that consultation with its employees on health and safety is of high importance and encourages employees to become involved in the improvement of health and safety management and standards. Subsidiary Company and Departmental health and safety meetings are a necessary vehicle for successful communication and addressing problems at the level most affected.

Meetings will take place at agreed intervals with the following objectives:-

- Reviewing the existing arrangements for safety
- Proposing suggestions and actions for health and safety improvements
- Monitoring new equipment, processes and changes which may significantly affect employees' health and safety



- Examining safety audit reports
- Monitoring safety training plans and implementation
- Keeping up to date and ensuring that new information is available to those affected
- Advising managers on any defects in the company health and safety arrangements and assisting with implementing remedial action

#### Health Safety And Welfare Meetings

Elected safety representatives shall, where the situation dictates, raise at these meetings matters of health and safety affecting employees whom they represent and which remain unresolved at local level. A condition of raising such matters is that all avenues to resolve the matter at local level have been exhausted.

#### Information To Employees and On Which Elected Representatives Are To Be Consulted.

Managers are to make arrangements to brief employees on the information listed in this section. Relevant information can be obtained from the contents of existing generic risk assessments, health and safety information sheets, the Group Employee Health and Safety Handbook , Subsidiary Company Safety Policy and Rules documentation and, where applicable, Departmental Safety Information Booklets. Employees are to be issued with the Handbook. This policy documentation must be made available at convenient locations for reference by all employees. Departments may call upon the assistance of the Group Safety Officer when carrying out briefings required in this section which must inform each employee about:

- The risks to the employee's health and safety identified by any risk assessment.
- The preventative and protective measures applicable to all risks identified.
- The procedures for evacuation of the premises in the event of serious and imminent danger.
- The identity of the appointed competent person in respect of health and safety and any other person with specific health and safety duties inclusive of those nominated to oversee any evacuation procedure. Others include First Aiders etc.
- The risks notified by any contractor working on the site or in the premises which might affect company employees.
- The company arrangements for obtaining competent advice on implementing health and safety laws.
- The planning and organisation of health and safety training.
- The health and Safety consequences of introducing new technology or changes to procedures or equipment etc. into company operations.

#### Sources of Health and Safety Information

Managers and other employees shall be kept updated on health and safety matters through participation in meetings mentioned earlier in this document. Further communication of health and safety information throughout the company will be disseminated as necessary by circulation or display on notice boards of:-

- Various health and safety publications.
- Group Safety Officer's quarterly report.
- Reports on health and safety incidents in the Group or other relevant companies.
- Health and Safety Instruction Manuals (Safe Works Procedures).

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Regional Offices: London – Birmingham – Manchester – Newcastle – Belfast – Cardiff



- HSE (Health and Safety Executive) reports and notices and other publications.
- Environmental Health Department reports and notices and other publications.
- Minutes of Health and Safety Committee meetings.
- Minutes of Joint Consultative Committee meetings.
- Risk Assessments and Health and Safety Audit reports.
- Health and Safety in-house training events.
- Prescribed notices.
- Prescribed registers and certificates.
- Company employee Health and Safety Information Booklets.
- Statutory Instruments and Regulations.

### **Employee Competence**

It is the policy of the Group to recruit and retain competent employees. Effective job performance can only be achieved by good selection and development of staff. Managers in their business planning shall implement systems that allow a combination of education, skills training, information provision and specialist advice to assist staff in carrying out their duties effectively and safely at all times. The extent to which any of these factors is required will depend upon the individual's specific health and safety responsibilities and nature of their work.

### **Recruitment And Placement**

The Group Personnel Manager, in conjunction with Department Managers, is responsible for the formulation and implementation of the recruitment policy and the competence of all involved in recruitment. The effectiveness of the policy must be continually monitored to ensure that:

- Individuals involved in recruitment and selection have the necessary interviewing skills.
- All jobs are analysed for physical requirements (such as lifting ability) and mental requirements prior to interviews being conducted.

This procedure will:-

- Minimise the risk of placing individuals in jobs they are incapable of doing;
- Identify any pre-existing problems which could be aggravated;
- Provide a database for future reference and comparison;
- Reduce the possibility of absenteeism and employee turnover;
- Improve quality, efficiency, safety and morale.
- Interviewers have available to them job specifications, including details of any critical tasks and of tasks where responsible safety behaviour by the recruit is particularly important.
- Interviewers keep complete, accurate records and make follow up checks on any claims of experience, skills or knowledge which are important in the selection.

### **Pre-Employment Health Checks**

Recruits will be required to undergo a pre-employment medical and, when necessary, to undergo certain tests as set out in section 2.2 of the Company Hygiene Code distributed by the Quality Assurance Department. A pre-requirement for prospective operational employees is that they are subjected to an audiometry and lung function examination.



Other staff recruited into the Group will, prior to an offer of employment, be required to complete a health questionnaire (the proforma of which is available from the Personnel Department).

#### Competence Of Managers

Managers are expected to ensure they obtain sufficient knowledge to enable them to recognise situations with potential to cause damage or harm, and to design and implement effective preventative or protective actions. The level of competence required of managers in health and safety will depend on the extent to which they must be involved in the planning and implementation of risk assessment and control measures.

#### Competence Of The Safety Officer

The Group Health and Safety Officer is the appointed "competent person" under the management of Health and Safety Regulations 1992 to assist the Group in achieving compliance with statutory requirements and implementing this health and safety policy.

Competence is to be demonstrated by the Group Safety Officer by holding a technical qualification or by working towards the qualification, and by meeting the required educational standard and level of experience as set by the company.

#### Job Descriptions

Where specific duties regarding health and safety are placed upon employees, these will be written into their job description. All employees have the general health and safety responsibilities as set out for various job categories in the section of this policy covering "individual responsibilities".

### **Health and Safety Training**

The Group shall provide employees with the necessary skills and information to carry out their jobs in accordance with recognised best practice and statutory standards necessary for efficient production, quality and safety. To achieve this, subsidiary companies/departments are to identify and meet their own training needs and quality requirements by:

- Identifying the training needs for statutory compliance and employee competence relating to each post.
- Formulating training plans and programmes to meet the requirements above.
- Measuring the effectiveness of the training and adjusting the content or means of delivery where necessary.

#### Training Needs Identification

Responsibility for ensuring that each employee receives the necessary health and safety training rests with the employee's manager. The Group Safety Officer will consult managers and assist in identifying training requirements on a basis of those groups below:-

- Specified individuals with crucial health and safety responsibilities
- Managers and supervisors
- Employee-elected Safety Representatives
- New recruits, younger inexperienced employees and agency staff
- Employees exposed to new or increased risks
- All other employees



Subsidiary company/department training plans will be co-ordinated with the assistance of the Group Personnel Manager and the Group Safety Officer. All training plans must be approved by the relevant Managing Director who will authorise the provision of adequate resources to carry out the training. Training plans will be distributed throughout the Group so that all subsidiaries may take advantage of training available.

#### Training Requirements

Training is an important means of achieving competence and helps convert information into safe work practices. Situations where all Group employees must be trained or retrained are listed below:-

- A statutory requirement.
- Induction into the company and job.
- Emergency procedures (regular practice in the drill).
- A change of work equipment, system of work or technology
- A change of responsibility or work activity
- As necessary for on-going professional development
- Where an employee takes on extra responsibilities (eg first aider)
- Where a risk assessment identifies a need.

#### Induction Training

Induction of new and young employees, including those on work experience programmes etc, is covered later in this policy document and is to be followed by all managers who recruit staff (see section on "induction of new employees").

#### On-going Training

Effective job performance depends on good selection, training and development of staff. The NVQ assessment, which is a system based on competence and aims to achieve a universal standard within a job function, will be adopted where it is applicable to operations in subsidiary companies. Training in other aspects of health and safety will be carried out using a modular approach with the objective that all employees within a job function obtain a similar level of competence in a time span set by management.

*Line managers and supervisors* are responsible for the actions of employees and, due to the far reaching implications of this responsibility, must be trained to:

- Apply the relevant health and safety legal requirements and company policy.
- Formulate and implement safe systems of work.
- Apply effective supervision of employees and working activities.
- Identify any areas of weakness in the company health and safety arrangements.
- Apply the procedures of discipline related to failures in health and safety compliance.
- Recognise their own limitations in experience and knowledge and where/from whom to get assistance.
- Communicate with all levels of employee/management within the company on matters relating to health and safety.



*Other employees (operatives, craftsmen and technicians etc.)* need to fully understand the requirements and the arrangements for ensuring their health and safety. They need to know how to discharge their responsibility to work safely without creating risks to themselves or others. They also need to know how to report deficiencies in the company health and safety arrangements. Their training will cover:

- What their duties are under health and safety law.
- What the in-house safety arrangements are, including company policy and any emergency evacuation rules.
- Safe working practices relating to their job, including use of personal protective clothing and equipment.
- Hazard identification and avoidance.
- Specialist training (e.g. CITB Certificate of Achievement, NRASWA, etc.)
- How to report health and safety problems.

*Employee Elected Safety Representatives*, who have a role which supports management in monitoring the health and safety management system, must be trained in addition to the above to:

- Carry out their role as required under the Health and Safety (Consultation with Employees) Regulations 1996.
- Hazard spotting and reporting using company systems.
- Communicating with managers on health and safety.

#### Means Of Training

- External courses at venues/premises organised by recognised training organisations.
- In-company training carried out by visiting trainers from recognised organisations and/or carried out by competent company trainers.
- On the job training.
- Manufacturers' training courses and briefings.
- Distance learning courses.

### **Reactive Monitoring of Safety Performance by Accident/Incident Report and Investigation**

#### Reporting

All injuries, dangerous occurrences or cases of industrial disease are to be reported to management in order that the circumstances surrounding the event can be investigated and corrective action applied to prevent recurrence. Reporting duties are as follow:-

#### All Employees

- Each employee is responsible for reporting without delay any injury or ill health condition sustained at work, or arising during the working period.
- Each employee is responsible for reporting to his supervisor or manager, any accident, incident or potential source of hazard of which he is aware. A hazard/potential hazard report form is provided for use on such occasions. A sample of the report is shown in the section of this policy dealing with Guidelines for Raising Health and Safety Matters.

#### Managers



- Managers are responsible for ensuring that all accidents are reported to the Group Safety Officer to enable, where necessary, an investigation of the circumstances.
- The accident reporting system that complies with The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) is set out later in this section and is to be followed by managers and other employees.

#### Analysis Of Accidents And Incidents

It is the Group policy that a record of injuries, diseases and dangerous occurrences shall be kept and that these records shall be analysed to determine trends and/or a failures in work practices or systems. Where such deficiencies are identified they shall be corrected through updating work practices/procedures, substituting materials or equipment and, where necessary, improved training to update employee competence.

#### Accident Reporting

Company procedures following any accident/incident are as below:-

<b>Incident</b>	<b>Inform</b>	<b>Other Action or Documentation</b>
Death	<ul style="list-style-type: none"> <li>• Managing Director</li> <li>• Department Manager</li> <li>• Safety Officer</li> <li>• HSE (By Telephone)</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> <li>• Assist HSE with investigation.</li> <li>• Log incident/accident in Accident Book B1 510</li> <li>• Send completed company Accident Report to Safety Officer (within 5 days)</li> <li>• Form 2508 sent by Safety Officer to HSE</li> </ul>
Major Injury	<ul style="list-style-type: none"> <li>• Company Managing Director</li> <li>• Department Manager</li> <li>• Group Safety Officer</li> <li>• HSE (By Telephone)</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> <li>• Assist HSE with investigation.</li> <li>• Log incident/accident in Accident Book B1 510</li> <li>• Send completed company Accident Report to Safety Officer (within 5 days)</li> <li>• Form 2508 sent by Safety Officer to HSE</li> </ul>
Notifiable Dangerous Occurrence	<ul style="list-style-type: none"> <li>• Company Managing Director</li> <li>• Department Manager</li> </ul>	<ul style="list-style-type: none"> <li>• Keep incident scene undisturbed and safe until accident has been investigated.</li> </ul>



	Group Safety Officer • HSE (BY TELEPHONE)	• Assist HSE with investigation. • Log incident/accident in Accident Book B1 510 • Send completed company Accident Report to Safety Officer (within 5 days) • Form 2508 sent by Safety Officer to HSE
Injury resulting in over 3 days off work or unable to carry out normal duties	• Department Manager • Group Safety Officer	• Complete Documentation as above
Accident -- no time off	• Department Manager • Safety officer	• Log in Accident Book B1 510 • Forward completed company Accident Report to Safety Officer
Reportable Disease	• Department Manager • Group Personnel Manager • Group Safety Officer	• Report disease to HSE after doctor's written diagnosis/statutory sick form • Complete all documents as for major injury etc.

HSE CONTACT TELEPHONE NUMBERS ARE DISPLAYED ON POSTERS IN EACH WORKPLACE

### **Accident Investigation**

The Group policy concerning accident investigation is that all 'time off' accidents be investigated and their causes determined. The objectives of a company investigation are:-

- To ensure appropriate action is taken to prevent recurrence of similar incidents.
- To gather information for use in any criminal or civil proceedings.
- To confirm or refute industrial injury claims over the incident.
- To prepare notifications to be made to the HSE or other enforcing agency.
- Laying the blame is not an objective of the investigation and should be avoided. Where disciplinary action is necessary, management will need to follow employment policy procedures. Discipline will probably be unnecessary on most occasions.

Accident investigations will be carried out by the Group Safety Officer. Managers and other employees will be expected to assist in any investigation and make available all information, witnesses, plant, materials, equipment and premises which have a bearing on the incident. Questions which will need to be answered before any investigation can be considered complete are:-

- What are the root causes of the accident?



- Who was involved?
- When did it occur?
- Where did it occur?
- Why did it occur?
- How could it have been prevented?
- How can a recurrence be prevented?

If all seven questions cannot be answered, then it may be necessary to re-examine certain witnesses with a view to obtaining further information.

The incident investigation will, in all probability, reveal underlying causes. Dealing with the underlying causes will involve managers and the Group Safety officer in reassessing existing practice and implementing change such as:-

- Review of the risk assessment and controls relevant to the operation.
- Further formal procedures to be drawn up for certain work operations.
- Training programmes to be introduced or amended.

Guidelines prepared for operations which perhaps do not justify the preparation of formal procedures or training programmes.

- Instructions more clearly defining responsibility and accountability.
- The introduction of new methods, plant, machinery or equipment.
- Improving or extending preventive maintenance.
- Introducing additional check procedures or special monitoring of certain operations.

#### Accident Follow-Up Action

Should any change to existing practice be recommended as a result of an accident investigation, it is the responsibility of the Department Management to monitor its effectiveness. Elected Safety Representatives shall be given the opportunity to have input into any reviews carried out.

Any deficiency still apparent must be brought to the attention of the Group Safety Officer for further review and, where necessary, correction.

#### Employee Elected Safety Representatives

Elected Safety Representatives are by company policy entitled to carry out an investigation of accidents and hazardous situations. Representatives are allowed to carry out such an investigation once the accident scene is safe. The company recognises that Safety Representatives may wish to carry out an independent investigation and keep the results confidential for future use.

### **Personal Protection**

#### **Personal Protective Clothing & Equipment (PPE) and Safety Appliances**

The Group will provide personal protective equipment to reduce residual risks to a tolerable level where the risk is from a work activity cannot be adequately controlled by other means such as engineering controls. Training of employees in the correct use of the equipment and its limitations will be carried out as necessary taking into account any statutory requirements.



The implementation of this policy requires total co-operation of all employees and the involvement of elected Safety Representatives in consultation on matters regarding the suitability of equipment. Departmental Managers are responsible for implementation of this policy.

#### Health And Safety Arrangements

Subsidiary companies and/or departments will, having duly consulted Employee Representatives:

- Carry out an assessment of proposed PPE to determine its suitability for the risks identified.
- Where two or more items of PPE are used simultaneously, ensure they are compatible and that no item reduces the protection offered by the other.
- Implement steps for the maintenance, cleaning, repair and suitable storage of the PPE and for ensuring the PPE does not cause the user to be subjected to other risks.
- Provide or replace necessary PPE at no cost to employees.
- Inform all employees of the risks which exist and re-assess activities where changes to the works process or substances make this necessary.
- Investigate complaints and take action concerning PPE suitability or defects.

#### Employee Responsibilities

Employees must:

- Use PPE only for its intended purpose and only in accordance with training provided.
- Not misuse any PPE issued.
- Carry out maintenance and hygiene precautions as required.
- Inform a responsible person immediately of any defects (supervisory staff or manager)
- Keep statutory records updated in any log book which is provided.

#### Information And Training

Subsidiary companies and/or departments will give sufficient information, instruction and training to ensure the health and safety of workers using PPE. This includes temporary staff, work experience personnel and contractors as well as direct employed staff. Managers and supervisory staff responsible for users of PPE will also receive appropriate training.

Minimum information and instruction necessary for competency of staff is:

- The risks the PPE is controlling and the purpose of its use
- The way the PPE controls the risks and its limitations
- The way to use the PPE so that it is effective
- The pre-use tests necessary to ensure the equipment is functioning correctly
- How to maintain the PPE in good working order and repair
- Any documentation to be completed and kept

#### Safe System Of Work

The use of PPE is an important means of controlling risks in certain working environments. Employees are to be instructed that they follow the manufacturers' and in house instructions on correct use of any equipment provided for their use. The procedure below is to be observed when using PPE:



- Ensure that the PPE fits properly and that it is comfortable.
- Carry out all pre-use tests/checks as set out in the manufacturer's instructions.
- Report all defects. Do not use defective PPE.
- Ensure items of PPE are compatible when using more than one item of PPE simultaneously and their effectiveness is not reduced.
- Inform your manager/supervisor if you are not trained on any PPE you are expected to use.
- Report any symptoms of discomfort or ill health whilst using PPE.

#### Visitors

Managers are responsible for ensuring that provisions are in place to provide visitors with the PPE necessary for those risks which the visitor will be exposed to whilst on company premises.

#### Eye Protection

The requirements are laid down in the 'Protection of Eyes' Regulations 1974. Where subsidiary company operations necessitate wearing of eye protection, employees must be provided with and wear the necessary PPE. These operations include handling dusty materials, hazardous liquids, cutting and grinding with abrasive wheels, using hand tools and powered tools on materials which may fragment, welding and cutting operations, laboratory work and trimming wires on circuit boards. This list is not exhaustive and risk assessments may identify other situations where eye protection will be required.

#### Hearing Protection

The 'Noise at Work' Regulations 1989 define action levels based on personal daily noise exposure levels of employees. The first action level corresponds to a personal daily noise exposure level (LEPd) of 85 dB(A); a second action level corresponding to 90 dB(A) and a third defined level is a peak pressure sound of 140dB(A) or 200 pascals.

The policy of the Group is to reduce noise levels at source by controls other than provision of PPE. Those responsible for designing installations and/or purchasing equipment and machinery must, prior to placing any purchase order, consult suppliers as to the likely noise levels from their equipment/machinery and obtain written documentation as to the design noise levels. Should these noise levels not be achievable after installation then the contract must place a duty on the supplier to correct the hazard at their expense. The Group's standard for maximum noise emission from any equipment or machinery is 80 dB(A) with sound reduction hoods fitted should they be necessary.

Where noise levels of existing equipment and machinery lie between the first and second action level, the company will carry out assessments of the levels, implement any reasonably practicable noise reduction measures by engineering and efficient maintenance of the equipment. Where the residual noise level:

- remains above 85 dB(A), the company will provide hearing protection for use by employees at their discretion;
- exceeds 90 dB(A), the company will provide hearing protection which employees must use, mark a hearing protection zone with the relevant statutory signs and enforce the use of hearing protection within the zone.



Assessments of noise levels will be carried out during general risk assessment programmes and at the request of managers or elected Safety Representatives where they have raised a hazard report via a manager.

As a rough guide, should it be necessary for anyone to shout to be heard at a distance of up to 2m away, then it can be judged that a noise level assessment is required and that hearing protection is to be worn.

### **Respiratory Protection**

As with protection against noise, the policy of the Group is to reduce risks to the employee by tackling hazards at source. This is achieved by use of local ventilation and extraction systems (LEV), fixed or portable, as required. However, some operations may also necessitate the use of respiratory equipment. Respiratory protective equipment (RPE) can vary between disposable dust masks/respirators, canister full face masks and compressed air breathing apparatus (CABA). Risk assessments will determine which type of RPE is necessary for any particular activity/task.

Use of **disposable dust masks/respirators** is to be confined to low risk operations and exposures recommended by the manufacturer. Advice is to be sought from the manufacturer prior to making use of this type of protection. There is no need for statutory record keeping with this equipment, however users will require monitoring to ensure contaminated masks are disposed of.

**Full face canister respirators** are to be used where the exposure is likely to need a higher level of protection, such as maintenance operations carried out by Alpha Industries Ltd employees. This equipment requires checks that are a statutory requirement under COSHH. These are to be monitored and enforced by managers. Log books have been issued for the recording of these checks.

**Compressed air breathing apparatus (CABA)** shall be used by trained employees in an emergency situation, such as entry into an area where a toxic gas leak has occurred, or where confined space entry necessitates its wearing. As with full face canister masks, checks and record keeping are statutory requirements. Compliance must be monitored and enforced by managers.

In all instances, managers/supervisors need to assess the hazard and the suitability of protection needed where the risk to employees cannot be reduced sufficiently by other controls.

### **Foot Protection**

Employees shall be issued with safety boots/shoes and wellingtons if involved in operations where injuries to the foot could occur. Footwear provided to Alpha Industries Ltd operations employees must provide protection to the toes and underfoot against penetration by sharp objects. Protection to minimise risk of injury from electric shock is achieved from purchasing footwear with high resistivity soles. Issues to craftsmen should give protection against ingress by diesel and/or lubricating oils, etc.

### **Body and Hand Protection**

The Construction (Health, Safety & Welfare) Regulations 1996 require provision of adequate and suitable clothing to employees as protection against inclement weather conditions. Operations where employees are exposed to substances, etc. will be provided with the necessary protection to combat specific hazards identified by risk assessments.



Hand protection of various types are listed on the subsidiary company activity risk assessments and shall be provided as required.

### **Head Protection**

The requirements are laid down in the Construction 'Head Protection' Regulations 1989. All company staff are to wear safety helmets where there is a foreseeable risk of injury to the head other than by falling. Certain works make the wearing of safety helmets absolute and include working in excavations 1.2 m or over deep, in close proximity to excavators, lifting appliances or other construction plant, on sites where overhead work is in progress, designated hard hat sites, confined space work and any other situations where managers or supervisors decide the need.

Safety helmets are not to be used where the manufacturer's date stamp on the helmet indicates that the helmet is over two years old. Departments should carry out regular inspections of helmets and implement a change programme.

### **Hi-Visibility Clothing**

It is a requirement of 'The Code of Practice' Safety at Street Works and Roadworks that persons working on/or near the carriageway wear Hi Visibility clothing. Supervisory staff are to ensure those attending worksites covered by the code of practice comply.

### **Safety Harnesses**

Where it is not practicable to provide platforms or gangways with guard-rails at levels above 2m, safety harnesses are to be worn. Similarly, when working in certain confined spaces safety harnesses shall be worn.

Company risk assessments identify situations and locations where it will be necessary to use safety harnesses. Where they do not already exist, the provision of suitable anchorage-points is the responsibility of the owner department.

At locations where fixed ladders are not guarded by safety hoops, fall arrest systems may be used as an alternative safety measure when using such ladders. Inspection of these systems is to be carried out by a competent person every 12 months.

## **Contractors**

### **Control of Contractors**

Where the Group retains occupier's liability, the subsidiary company or its agent will plan, co-ordinate, control and monitor the activities of contractors so as to effectively minimise the risks presented to employees and other persons affected by contractors' works. Subsidiary companies will only use contractors who have proved able to discharge their primary responsibility to safeguard their employees and others who may be affected by their works. This will be administered in the form of an approved list of contractors which will describe the contractors' capabilities and limitations. Should it be necessary to invite tenders from contractors not on the approved list, then their competency in health and safety should be assessed by provision of information as listed on the company pre-qualification documents for contractors.

#### **Provision of Information**

The company recognises that contractors will only be able to tender allowing for the necessary health and safety resources if they are provided with suitable information prior to tender.



Therefore, the company undertakes to provide information concerning existing hazards on site prior to tender.

#### Safety Rules and Procedures

Where the Construction Design and Management Regulations (CDM) are applicable, the contractor selected to carry out the work will produce a **Construction Health and Safety Plan** for approval **prior to construction work beginning**. The contractor shall be responsible for all health and safety aspects of construction work relating to the project.

The subsidiary company representative appointed to the project shall, prior to construction work starting, arrange that contractors' staff are briefed on the hazards and safety procedures relevant to the site.

In shared work places, the principal contractor on site shall be instructed to arrange the exchange of relevant information arising out of risks from sub-contractors works and ensure all those who may be affected are informed.

#### Reporting

All subsidiary company employees have a duty to report danger from whatever source to their manager or supervisor who will:-

**STOP THE WORK IF SERIOUS AND IMMINENT DANGER IS FORESEEN, AND**

Notify the person appointed to co-ordinate the work, or the department, by telephone followed by a written report.

Where contractors' employees are in danger, bring this to the attention of the contractors' supervisory staff and then inform the person appointed by the subsidiary company to co-ordinate the project.

#### Supervision

The Group recognises its duty to plan, co-ordinate and monitor contractors' work activities, but the primary responsibility to supervise the contractors' work and workforce lies with the contractor. Provision of adequate supervision by the contractor will be a key factor in all contracts.

Where contractors are employed on a provision of labour only basis, the duty of supervision falls on the subsidiary company/department awarding the contract. The contractor concerned will be expected to supply competent persons, the qualifications/certification of whom must be confirmed by the subsidiary company/department prior to employing them. Contractors employed under these terms are to be briefed by supervisors on the relevant in-house health and safety procedures before starting work.

#### Safe Systems of Work

Accountabilities must be clearly defined so that all parties know, accept and understand what they are responsible for in advance of work beginning by agreement of a method and systems such as permits to work.

All plant, equipment, personal protective equipment, etc. are to be provided by the contractor unless exceptional circumstances dictate otherwise, in which case any such items loaned by the company need written authority from the owner manager. The item must be in sound condition and the contractor must be competent in its use.



### Elements of Contractor Site Rules

The Group/contractor pre-work agreements concerning site rules are to include the elements shown below:-

- Site safety policy and activity risk assessments.
- Procedures for high risk activities such as work in confined spaces, work at heights, electrical work, excavations, etc.
- Method statements.
- Communication arrangements with the subsidiary company appointed person.
- Site access arrangements, vehicle restrictions and material storage areas.
- Local emergency procedures and instructions.
- Accident and dangerous occurrence reporting arrangements.
- Risks from company plant, premises and personnel which may affect the contractor staff.
- The existing environment, e.g. services, existing structures, etc.

### Project Record Keeping

To demonstrate its commitment to effective management of contractors the subsidiary company/department will, for all, projects maintain the following records:-

- Information provided by the contractor as evidence of his competency in health and safety.
- Contractor works specifications and method statements.
- Records of all safety communications with the contractor.
- Minutes of all meetings with the contractor or his representatives.
- Copies of agreements enabling the use of scaffolding, etc. supplied and erected under other contracts.
- Copies of any statutory inspection records, test certificates, etc. supplied by or to the contractor.
- Agreed product quality protection procedures for connection and test running of new apparatus and structures with existing.
- Copies of all risk assessments carried out by the contractor in compliance with the Management of Health and Safety and/or The Construction Design and Management Regulations.
- Copies of Permits to Work (for monitoring compliance and implementation).
- Copies of all site safety audits carried out by the contractor's appointed competent person.
- The Project Safety File to include as built, as installed and materials incorporated. Operation and maintenance manuals provided.

## **The Construction (Design and Management) Regulations**

### Application Of The Regulations

Major construction/building projects will usually necessitate the employment of outside competent companies or persons in all duty holder posts. There are various configurations of combined duties which can take place on projects, all of which should be agreed at the outset. Reference to



conditions concerning combined duties should be made using the publications available from the Group Safety Officer.

#### Application Of The CDM Regulations (Criteria)

- Will the construction work involve five or more people at any one time?
- Will the construction phase take more than 30 days or 500 person days? (HSE notifiable project).
- Will the work involve any demolition, regardless of numbers of workers?
- All demolition work.
- Designer's duties will apply on all projects.

#### Responsibilities

Managers planning projects that fall outside the typical works programmes are required to determine, with the aid of the Group Safety Officer, whether CDM compliance is necessary. Where compliance is found to be necessary, the appointment of competent duty holders must take place 'as soon as reasonably practicable.' Pre-qualification questionnaires to assist with competency enquiries are available from the Group Safety Officer.

Managers issuing competency questionnaires are to ensure, with assistance from the Group Safety Officer, that relevant checks of the information provided are carried out.

Where compliance with CDM is necessary, managers must ensure that construction work does not begin prior to a suitable and sufficient safety plan being developed by the Principal Contractor.

#### Conditions Of Appointment

Duties placed upon appointees from outside the Group must be understood clearly by all parties. Conditions of appointment are to be set out as shown in the company's Conditions of Appointment Forms available from the Group Safety Officer. The documents are to be agreed and signed by the parties concerned. Where the situation dictates, the text may be altered to include any extension of the duties placed upon the Planning Supervisor beyond those set out in the Regulations. Principal Contractor duties are set out in the company general Conditions of Contract prepared by the Commercial Manager/Engineers.

#### Competence

Managers are required to ensure that suitable competent persons/organisations are available internally or from outside agencies, who will be available to carry out designer and planning supervisor responsibilities.

#### Notification

All projects/works where the construction phase will take 30 days or 500 person days are to be notified to the HSE. Notification is to be made by the planning supervisor using the F10 Rev form available from the Group Safety Officer.

#### Documentation

All projects/works, whether direct labour or contracted out, will require varying levels of documentation governed by the complexity of the project/works

Documentation packs available are:-

- Project Pre-Tender Safety Plan. (SC format)



- Project Construction Safety Plan. (SC format)
- Construction Work Pre-tender Designer & Construction Plan. (OS format)

#### Provision of Information

The subsidiary company (client) is to provide information necessary to enable the appointed planning supervisor to ensure that a pre-tender safety plan is prepared. A CDM Toolkit information file distributed to the relevant subsidiary companies/departments gives guidance on what is to be included in the safety plan.

#### Legislation

Not all works will fall within the full terms of the CDM Regulations. Should this situation arise, managers are required to apply the Management of Health and Safety Regulations 1992 to ensure safe operational sites.

Other regulations which should be considered when designing and/or carrying out construction works are:-

- Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1992
- Personal Protective Equipment Regulations 1992
- Manual Handling Operations Regulations 1992
- Chemicals (Hazard Information and Packaging for Supply) Regulations 1994
- Supply of Machinery (Safety) Regulations 1992
- Control of Substances Hazardous to Health Regulations 1994
- Electricity at Work Regulations 1989
- Noise at Work Regulations 1989
- Construction (Health, Safety and Welfare) Regulations 1996
- Construction Head Protection Regulations 1989

### **Induction of New Employees**

#### **Induction Training**

The Group will ensure that all new employees, including young persons on schemes such as work experience, are given sufficient induction training to ensure they are conversant with the health and safety risks associated with the work on which they will be employed. The training will be carried out at company/department level and include the general information listed on Form SC/Induction 001. The employee shall be briefed on risks specific to their employment as job training progresses. Any relevant written risk assessment shall be given to the employee at the initial briefing.

Subsidiary companies are to be aware of the statutory restrictions imposed upon work undertaken by young persons and will comply with these restrictions. During any placement, the young person will be given similar status to all other employees.

The Personnel and Departmental Managers have the responsibility for ensuring that the provisions of this policy are met.



### **Health and Safety of Pupils on Work Experience.**

The department and school/college etc. shall agree in advance:-

- the department and school/college etc. responsibilities.
- the activities in which the young persons will be employed.
- activities which the young person will not undertake.
- any special arrangements (eg medical grounds such as hearing impairment etc.)
- time and place of the induction of the young person.
- issue of protective clothing etc. (if necessary).
- levels of supervision and visits by school staff.
- how incidents involving young persons will be dealt with and review of the placement.

### **Risk Reduction**

Areas and/or activities to which young persons are not to be exposed (unless undergoing recognised training with suitable competent supervision) and to which children are not to be exposed at any time are:-

- dangerous machinery. (eg powered guillotine, grounds equipment etc).
- mechanical lifting operations.
- work over or adjacent to deep water.
- climbing operations.
- construction site visits (unless authorised by the Principal Site Contractor).
- activities involving high noise or vibration levels.
- work or entry into excavations and any high risk confined space.
- work or entry into areas where exposure to toxic substances is foreseeable.
- climbing operations.
- construction site visits (unless authorised by the Principal Site Contractor).
- activities involving high noise or vibration levels.
- work or entry into excavations and any high risk confined space.
- work or entry into areas where exposure to toxic substances is foreseeable.
- entry into areas isolated for electrical maintenance work, eg around open panels etc.
- work involving possible exposure to biological or chemical agents, or any substance categorised as a carcinogen.

### **Safe Systems of Work**

All new employees shall be fully briefed (inducted) prior to any placement. The briefing shall be undertaken by the Subsidiary Company Managers/Supervisory staff and shall include:-

- introduction to the manager responsible for the employee.
- introduction to the Health and Safety Policy and department safety rules.
- issue of any relevant safety information.
- prohibited areas and/or activities (include dangerous machinery).



- hazardous substances (warning labels, data sheets and signs).
- lifting heavy objects.
- housekeeping.
- electrical equipment hazards.
- use of protective clothing and equipment.
- emergency procedures (fire alarm, emergency exits, evacuation).
- first aid and accident reporting (first aider location).
- hygiene.
- how to obtain further information and advice.

### **Provision Of Information**

Schools and colleges etc may require information concerning any risk assessments carried out to protect their placement. Should managers require assistance in ensuring assessments are completed and available, they should seek assistance from the Group Safety Officer immediately placements are initiated.

#### **Definitions**

Young Person under the age 18 yrs.

Child not yet reached the national school leaving age.

### **Lone Working**

#### **Management Guidance**

Whilst generally there is no legal prohibition on people working alone, it is not the Group's intention to place any of its employees at risk, or allow any employee to place him/herself at risk, when working alone. The Group is committed to ensuring the health, safety and welfare of all employees, including those who work alone.

The purpose of this section is to provide guidance that enables managers to develop and implement specific procedures for minimising risks in appropriate situations.

#### **Assessing the Risk**

Managers are to ensure assessments are carried out on all work activities to determine which activities are being carried out under lone working conditions and as to check whether existing work methods are safe. Where people work alone, special considerations in assessing their activities include:-

##### **The Task**

Can the job be done safely by one person working alone, taking into account present safe systems of work, procedures and training the employee has been given?

Even if the main work content can be done by a lone worker, can one person safely handle any equipment, covers or materials/substances?

Is the person medically suitable to work alone? Do you know which of your employees have health problems that could possibly place them at risk?

##### **The Area**



Are there special problems associated with where the work is to be undertaken? (eg. Remote location or away from the vehicle communication systems, difficult access etc.)

Some safe systems of work and procedures, such as those for confined space entry and those for gas operations, already specifically exclude lone working and must be enforced by managers.

Managers' risk assessments must identify any need to provide extra communication equipment so that employees may be able to make contact in the event of emergencies and so that supervisors can monitor lone workers' progress throughout the day.

### **Planning the Work**

All work is to be properly planned and co-ordinated. This becomes especially important when employees are required to work alone, whether the work is on sites operated by subsidiary companies or those belonging to housing or commercial property developers, domestic or commercial customers. Those planning work are to make enquiries with the owner/occupier in advance of the work as to whether any special rules exist for lone working at the site or premises and take these into account when planning work.

Where practical the movements of employees should be recorded. A 'daily whereabouts record' would be a reasonable method by which such a record can be implemented, provided the employee keeps supervision informed of any changes in the order of attending sites from that initially recorded. There are other methods of recording employee whereabouts, such as a log sheet or diary into which the employee's location, start time, expected job duration and finish time are recorded and checked periodically throughout the day to confirm the employee's safety.

**Managers must ensure that a system is in place to confirm that all lone workers are safe at the end of the normal working day. Managers must also ensure that a reporting system exists where lone workers are required to work beyond the end of the normal working day.**

### **Methods of Checking Employee Safety**

Regular communication between various groups/individuals is a means by which lone workers' well being and safety can be checked. Managers shall identify the method suitable to their departmental operations, acquire the necessary resources and implement the system.

Some systems which may be implemented are:-

- Twinning with a partner or partners who communicate and keep each other informed of the other's task location and expected duration of work. They would also contact each other on completion of work at a location. Any failure to communicate as planned would involve a physical check by a supervisor or the nearest employee.
- Radio and/or telephone communication with an office or the control centre on an agreed pattern, especially at the end of each normal working day, shift or period of working late.
- Where work is pre-scheduled, (eg. sample runs) the employees should log on at the start of their working day and log off at the end of their day. A nominated person should check the log at the end of the day and confirm all employees have returned safely.
- There should be a method/system to monitor the activities of employees. If an employee fails to return or report in, there should be an established procedure to check the employee's well being and safety.



### **Implementing Measures**

Department managers are responsible for designing and implementing procedures, suited to the departmental operations, that will reduce risks to the lone worker to a tolerable level.

A review of any procedures in place shall be carried out by managers periodically (eg. annually) or whenever there is a significant change in work practices.