



Piled Foundations & Underpinning

Managing Health & Safety in

# **COHESION PILING LIMITED**

# **HEALTH & SAFETY POLICIES & RESPONSIBILITIES**

# Manual One - Health & Safety Policies & Responsibilities

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# **PART ONE**

# **GENERAL POLICY STATEMENT**

## COMPANY DESCRIPTION

Cohesion Piling Company Ltd provides specialist piling and underpinning solutions throughout the UK and provides clients with assistance from the earliest stages of a project through to completion.

From feasibility studies to construction, Cohesion Piling Company design and manage all aspects of the project, including:

- Bored CFA piles
- Bored SFA piles
- Top driven pre-cast concrete piles
- Top driven tubular steel piles
- Bored mini-piles
- Bottom driven cased mini-piles
- Odex piles
- Micro-piles
- Traditional underpinning
- Piled raft underpinning

## STATEMENT OF GENERAL POLICY

### General

Cohesion Piling Company Limited recognises that complying with the Health and Safety at Work etc. Act 1974 (and regulations made under it) is a legal requirement, not a matter of choice.

### Our policy is to

- Prevent accidents and work-related ill health, so far as is reasonably practicable.
- Provide adequate resources to control health and safety risks arising from work activities.
- Maintain safe and healthy premises, provide and maintain plant, machinery and equipment, and ensure safe storage, handling and use of substances.
- Ensure systems are in place to properly assess risk, maintain, monitor and, where necessary, improve safety and health performance throughout all areas of our activities.
- Implement emergency procedures in case of fire or other significant incident.
- Ensure there is adequate first aid provision and report incidents required by law.
- Provide sufficient information, instruction and training to ensure employees are competent to carry out their work.
- Ensure there is adequate supervision commensurate with risk and complexity of task.
- Properly communicate and consult on health and safety matters at all levels of the business.
- Work closely with contractors, suppliers and other stakeholders to ensure adequate levels of health and safety performance are achieved and maintained.

### Review

This policy, and the way it is operated, will be reviewed annually or more often if the business changes in nature and size or we believe it is no longer valid  
Any revisions made to improve safety performance will be effectively communicated to employees and all other interested parties.

Name: John Robins

Signed:



Position: Director

Date: 1<sup>st</sup> August 2019

Name: Gary Kime

Signed:



Position: Director

Date: 1<sup>st</sup> August 2019

# **PART THREE**

## **ARRANGEMENTS - POLICY STATEMENTS**

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## POLICIES

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# ACCIDENT REPORTING AND INVESTIGATION POLICY

## Overview

The company recognises that there are legal duties to report specified injuries, diseases and dangerous occurrences, and that it makes good moral, legal and financial sense to investigate accidents and incidents to identify what went wrong and determine what steps must be taken to prevent it happening again.

### It is our policy to:

- Record all employee injuries in the Accident Book and instruct staff on the correct procedure to be followed.
- Keep records of all accidents and incidents involving non-employees occurring on our premises, or as a part of our undertaking including details of their status, e.g. visitor, contractor, member of the public, etc.
- Ensure that where required, incidents reportable under RIDDOR are done so within the statutory reporting period via the HSE website or alternatively (for fatal and specified injuries *only*) to the Incident Contact Centre (ICC).
- Maintain records of occupational ill health where appropriate.
- Thoroughly investigate accidents, including serious 'near-miss' incidents to prevent a recurrence and learn lessons where relevant, using the following steps:
  - Gather information.
  - Analyse the information.
  - Identify suitable risk control measures.
  - Implement an appropriate action plan.
  - Monitor its effectiveness.
- Revise risk assessments where necessary via feedback from the investigation process above.
- Inform all appropriate personnel of the outcome/actions to be taken.

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### Principal legislation

Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)  
Health and Safety (First Aid) Regulations 1981 (as amended)  
Management of Health and Safety at Work Regulations 1999



# ALCOHOL AND DRUGS POLICY

## Overview

Our aim is to provide a safe and healthy working environment for all employees, contractors and visitors.

We recognise that if we knowingly allow an employee under the influence of alcohol and/or drugs to continue working and this puts the employee and/or others at risk we, as the employer, can be liable to prosecution.

For the purpose of this Policy, illegal drugs are those substances for which no prescription has been obtained.

## It is our policy to

- Inform our employees and, where appropriate, contractors working on our behalf, that they must not arrive for work under the influence of alcohol or consume alcohol - on or off the premises - during working hours. ('At work' also includes the driving of, or being in charge of, vehicles used on company business)
- Ensure our employees understand that the use of illegal drugs, misuse of prescribed/legal drugs or other medications, and the taking of alcohol, can lead to unacceptable risk both to those under the influence, and those affected by them
- Inform all employees that if they are prescribed medication, they must check with their GP or healthcare professional that the medication will not affect their ability to work or drive safely
- Ensure that employees understand the relationship between taking prescribed drugs, the legal limits in force for specified prescription drugs and being impaired whilst driving – whether above or below the prescribed limits - which could result in their arrest
- Report any occurrence of the supply, selling or possession of illegal drugs to the Police
- Inform employees that being convicted of an alcohol or drug related crime must be reported to the company at the earliest opportunity
- Make clear that if an employee comes to work whilst under the influence of alcohol, or otherwise consumes alcohol either on or off the premises during their shift in breach of this Policy, it will result in the disciplinary process being instigated. This may lead to summary dismissal on the grounds of gross misconduct
- Notwithstanding the above, where an employee informs the company in confidence that they have an alcohol or substance abuse problem, we will encourage and support them in seeking appropriate counselling and treatment

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### Principal Legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)

Management of Health and Safety at Work Regulations 1999

Equality Act 2010

Road Traffic Act 1988

Drug Driving (Specified Limits) (England and Wales) (Amendment) Regulations 2015

# ASBESTOS POLICY

## Overview

The company recognises that building owners and those in control of non-domestic premises have a duty to manage the asbestos-containing materials (ACMs) within their buildings by implementing an asbestos management plan.

### It is our policy to:

- Identify whether any part of our premises has ACMs and assume that material may contain asbestos until there is evidence that it does not.
- Assess the risk to potential exposure from ACM fibres.
- Take action to prevent or reduce the exposure of persons to below the Control Limit for all types of asbestos.
- Prepare a suitable written plan for all asbestos related work.
- Keep an up-to-date written record/register on the location of all ACMs.
- Provide adequate information, instruction and training to employees.
- Take measures to ensure external contractors appointed by us are informed, implement and follow, agreed control measures and industry guidance.
- Monitor and record the condition of asbestos materials.
- Recognise that depending on risk, work on some ACMs may be restricted to HSE licensed companies that must follow an approved notification procedure, and carry out the work inside segregated work areas using specially trained operatives who are subject to medical surveillance.
- Understand that some types of non-licensed work with asbestos have additional requirements such as notification of work, medical surveillance and record keeping.
- Where necessary we will keep brief written records of non-licensed work which has to be notified, such as a copy of the notification with a list of workers on the job, plus the level of likely exposure of those workers to asbestos.
- Ensure any of our workers doing notifiable non-licensed work (NNLW) with asbestos are under appropriate health surveillance by a doctor.

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### Principal legislation

Control of Asbestos Regulations 2012 (CAR)  
Management of Health and Safety at Work Regulations 1999  
Hazardous Waste Regulations 2005  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CDM 2015 [DESIGNER] POLICY

## Overview

We recognise that the role of designer involves preparing or modifying designs for construction projects, or arranging for, or instructing, others to do this, and that subsequently, a designer's decisions can affect the health and safety of all those involved in constructing a building and those who use, maintain, refurbish and eventually demolish it.

As such, we will ensure our skills, knowledge, experience (SKE) and, where relevant, organisational capability, match the work required to be carried out.

### It is our policy to:

- Make sure the client is aware of the client duties under CDM 2015 before starting any design work.
- When preparing or modifying designs:
  - take account of any pre-construction information provided by the client (and principal designer, if one is involved)
  - eliminate foreseeable health and safety risks to anyone affected by the project (if possible)
  - implement measures to reduce or control any risks that cannot be eliminated.
- Provide design information to:
  - the principle designer (PD) (if involved), for inclusion in the pre-construction information and the health and safety file
  - the client and principal contractor (PC) (or the contractor for single contractor projects) to help them comply with their duties, such as ensuring a construction phase plan (CPP) is prepared.
- Communicate, cooperate and coordinate with:
  - any other designers (including the PD) so that all designs are compatible and ensure health and safety, both during the project and beyond
  - all contractors (including the PC), to take account of their knowledge and experience of building designs.

Ensure that if we work on a project for a domestic client with more than one contractor and the domestic client does not appoint a PD that the role of PD is carried out by the designer in control of the pre-construction phase.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Construction (Design and Management) Regulations 2015 (CDM)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CDM 2015 [COMMERCIAL CLIENT] POLICY

## Overview

We recognise that we have a legal duty to conduct our undertaking in such a way that persons not in our employment - such as contractors (and those employed by them – including the self-employed), are not exposed to injury or ill health.

We acknowledge that CDM 2015 applies to all 'construction work' which means the carrying out of any building or civil engineering construction such as new build, demolition, dismantling, refurbishment/fitting out, extensions, conversions, general repair, and includes some less obvious types of work such as commissioning, renovation, decoration, assembling pre-fabricated structures, high pressure cleaning and maintenance work on fixed installations such as gas, electrical or IT/telecommunications.

We also recognise that CDM 2015 brings within its scope new and enhanced obligations on clients and other duty holders (our other CDM policies refer as appropriate).

### It is our policy to:

Prior to contractors or their sub-contractors being employed to carry out work for us, we will ensure that they are given clear information of hazards likely to be encountered, including areas where there may be specific dangers, or which must not be entered unaccompanied.

For those projects we undertake as client with only *one* contractor we will ensure:

- That the work required is clearly specified.
- References are taken up wherever practicable.
- Workers have the right skills, knowledge and experience (SKE).
- The contractor provides appropriate information, instruction, training and supervision.
- A written construction phase plan (CPP) is produced (proportionate to project complexity).

Where a project involves *two or more* contractors, we will ensure all of the above *and*:

- A principal designer (PD) and principal contractor (PC) is appointed
- A health and safety file is produced.

Where work is scheduled to last longer than 30 working days AND have more than 20 workers working simultaneously at any point in the project OR exceeds 500 person days, we will ensure all of the above is in place and, as client, we will notify the project to the Health and Safety Executive (HSE).

In addition, we make sure that there are appropriate arrangements for staff welfare; this includes toilets and an area to take breaks.

Monitor contractors' activities to ensure the agreed procedures are followed in practice.

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### Principal legislation

Construction (Design and Management) Regulations 2015 (CDM)  
Management of Health and Safety at Work Regulations 1999  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CDM 2015 [CONTRACTOR] POLICY

## Overview

We recognise that when working in a contractor capacity i.e. when directly carrying out, or managing construction work, all parties must have the skills, knowledge, experience (SKE) and training to carry out the work safely and without risk to health.

### It is our policy to:

- Not accept an appointment unless we have the SKE to perform the role for which we are appointed.
- Not carry out construction work on a project unless satisfied that the client is aware of their duties under the Regulations.
- When we are the only contractor working on a project, we will take account of the general principles of prevention when planning the work, estimate the time required for the various phases and prepare the construction phase plan (CPP).
- Manage and monitor all work carried out, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them, and estimate the time required for the various phases of the project.
- Make sure that all workers under our control have a suitable, site-specific induction, unless this has already been provided by the principal contractor (where relevant).
- Provide adequate supervision, information and instructions to workers under our control.
- Not to start work on site unless reasonable steps have been taken to prevent unauthorised access.
- Ensure suitable welfare facilities are provided from the start for workers under our control, and maintain them in a clean condition throughout the work.

When carrying out projects involving **more than one** contractor we will also:

- Coordinate our work with the work of others in the project team.
- Comply with directions given by the principle designer (PD) or principal contractor (PC) and report back any dangerous conditions.
- Comply with parts of the construction phase plan (CPP) relevant to our work.

Additionally, if working as the only contractor for a *domestic client* we will take on the client duties, as well as our own as contractor.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Construction (Design and Management) Regulations 2015 (CDM)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Personal Protective Equipment at Work Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CDM 2015 [PRINCIPAL CONTRACTOR] POLICY

## Overview

We recognise that when appointed principal contractor (PC) by a client to control the construction phase of a project involving more than one contractor, we have an important role in managing health and safety risks throughout the construction phase.

To comply with this duty, we will ensure our skills, knowledge, experience (SKE) and training, together with (where relevant), organisational capability, match the work required to be carried out.

### It is our policy to:

- Plan, manage, monitor and coordinate the entire construction phase.
- Take account of the health and safety risks of everyone affected by the work (including members of the public), in planning and managing the measures needed to control them.
- Liaise with the client and principal designer (PD) for the duration of the project to ensure that all risks are effectively managed.
- Prepare a written construction phase plan (CPP) before the construction phase begins, implement, and then regularly review and revise it to make sure it remains fit for purpose.
- Have ongoing arrangements in place for managing health and safety throughout the construction phase.
- Consult and engage with workers about their health, safety and welfare.
- Ensure suitable welfare facilities are provided from the start and are well maintained throughout the construction phase.
- Check that any other contractors we appoint have the SKE and, where relevant, the organisational capability to carry out their work safely and without risk to health.
- Ensure all workers have site-specific inductions, and any further information and training they need.
- Take steps to prevent unauthorised access to the site.
- Liaise with the PD to share any information relevant to the planning, management, monitoring and coordination of the pre-construction phase.

Additionally, if working for a domestic client involving more than contractor, we will take on the client duties as well as our own as PC, unless the domestic client has appointed an architect or other designer.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Construction (Design and Management) Regulations 2015 (CDM)  
Control of Asbestos Regulations 2012 (CAR)  
Work at Height Regulations 2005  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Personal Protective Equipment at Work Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CDM 2015 [PRINCIPAL DESIGNER] POLICY

## Overview

We recognise that when appointed as principal designer (PD) by a client we are responsible for taking control of the pre-construction phase of any project involving more than one contractor, and that we have an important role in influencing how risks to health and safety are managed throughout a project.

We understand that design decisions made during the pre-construction phase have a significant influence in ensuring the project is delivered in a way that secures the health and safety of everyone affected by the work.

### It is our policy to:

- Plan, manage, monitor and coordinate health and safety in the pre-construction phase and, in doing so, we will take account of relevant information (such as an existing health and safety file) that might affect design work carried out both before and after the construction phase has started.
- Help and advise the client in bringing together pre-construction information, and provide the information that designers and contractors need to carry out their duties.
- Work with any other designers on the project to eliminate foreseeable health and safety risks to anyone affected by the work and, where that is not possible, take steps to reduce or control those risks.
- Ensure that everyone involved in the pre-construction phase communicates and cooperates, coordinating their work wherever required.
- Liaise with the principal contractor (PC), keeping them informed of any risks that need to be controlled during the construction phase.
- Ensure that on a domestic client project where the domestic client does not appoint a principal designer, the role of PD is carried out by the designer in control of the pre-construction phase.

Also, when working for a domestic client, in addition to our own duties we will take on the client's duties if a written agreement between both parties to do so is in place.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Construction (Design and Management) Regulations 2015 (CDM)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# CONFINED SPACES POLICY

## Overview

The company recognises that entry into confined spaces can be extremely dangerous, and intends to make access/egress and working in defined confined spaces as safe as is reasonably practicable. This not only applies to our own employees, but also to where we control the work of others, such as contractors working on our behalf.

### It is our policy to:

Aim to prevent deaths, injuries and ill health caused by work in confined spaces by applying three principles:

1. Avoid entry to confined spaces e.g. by doing the work from the outside
2. If entry to a confined space is unavoidable, follow a safe system of work giving priority to eliminating the source of any danger before deciding what precautions are needed for entry
3. Put in place adequate emergency arrangements before the work start.

To achieve our aims above, we will:

- Establish whether the area is defined as a 'confined space'
- Consider the hazards that may be present
- Carry out a risk assessment, taking into consideration the following factors:
  - Previous contents/residues/contamination
  - Oxygen deficiency and oxygen enrichment
  - Physical dimensions and the integrity/strength of the structure
  - Chemicals
  - Sources of ignition and flammable substances and materials
  - Electricity/static
  - The ingress or presence of liquids
  - Presence of excessive heat/noise/vibration
  - Solid materials which can flow
  - Other hazards present on the confined space exterior
  - Competence, training and supervision.
- Select and use suitable equipment that is properly maintained, examined and tested as necessary.
- Implement a written safe system of work and, where appropriate, a written Permit to Work (PTW) system, ensuring the PTW is an extension of the safe system of work, not a substitute for it.

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### Principal legislation

Confined Spaces Regulations 1997

Management of Health and Safety at Work Regulations 1999

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Electricity at Work Regulations 1989

Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)

Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH)

Personal Protective Equipment at Work Regulations 1992 (PPE)



# CONSULTATION WITH EMPLOYEES POLICY

## Overview

We recognise that effective consultation and communication between employees and management at all levels, is an essential step in promoting and maintaining a positive corporate health and safety culture.

### It is our policy to:

- Expect management at all levels to encourage and cultivate methods of cooperation, consultation and communication between the company and all its employees.
- Promote and implement effective measures to improve good health and safety performance.
- Investigate all complaints made by employees who have concerns relating to their health or safety at work.
- Implement a process that informs employees that where an individual has concerns regarding his or her own health, safety or welfare they shall, in the first instance; raise the matter with their immediate manager or supervisor.
- Implement a process that informs employees that where a concern relates to a group of employees, a nominated representative for that group shall raise the matter with the manager or supervisor directly responsible for the day-to-day operations within that area.
- Recognise that whilst line managers will deal with any issues raised as soon as is reasonably practicable, it may be necessary for further investigation and/or consultation to be carried out.
- Ensure that in circumstances where an immediate action or decision cannot be taken, all interested parties will be kept informed of progress being made within a reasonable time period.
- Accept that adherence to this policy does not, in the event of a failure to reach a mutually agreeable conclusion, preclude an employee seeking remedy through the company's formal grievance procedure.

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### Principal legislation

Health and Safety at Work *etc* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety (Consultation with Employees) Regulations 1996  
Safety Representatives and Safety Committees Regulations 1977  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Construction (Design and Management) Regulations 2015 (CDM)

# CONTRACTOR [NON-CDM] POLICY

## Overview

We are committed to ensuring that contractors (including the self-employed) carrying out work for the company are not exposed to injury or ill health.

### It is our policy to:

Prior to contractors starting work for us we will ensure that they are given clear information of hazards likely to be encountered, including areas where there may be specific dangers, or which must not be entered unaccompanied.

Effectively communicate and cooperate with contractors to ensure their activities do not put our employees and other persons on our premises at risk from their activities.

Check that contractors' work is properly planned, organised, and where necessary supervised, and then monitor their activities to ensure the agreed procedures are followed in practice.

Before employing a contractor, the following procedure will be implemented:

- Clearly specify what work is required.
- Take up references wherever practicable.
- Use only approved, qualified, trained and competent contractors, and carry out reasonable checks to ascertain they hold appropriate and current insurances.
- Obtain risk assessments and associated control measures proportionate to the task, including creating or reviewing our own risk assessments and procedures where relevant.

**Note:** In this Policy 'contractor' refers to non-CDM work and relates to other areas of contracted out activities, such as:

- General cleaners/window cleaners.
- Service/maintenance/IT engineers/catering.
- Temporary/agency workers, etc.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Regulatory Reform (Fire Safety) Order 2005 (RRFSO)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# DISPLAY SCREEN EQUIPMENT (DSE) POLICY

## Overview

The company recognises that workers using DSE can suffer avoidable postural and visual problems, fatigue and stress, if risks are not adequately controlled.

### It is our policy to:

- Ensure, as far as is reasonably practicable, that the use of DSE on company business does not cause adverse health conditions or significant risk of injury.
- Identify users or operators, and those about to become users – this includes not only those whose normal work is to habitually use DSE at company workstations, but also homeworkers and laptop/tablet/iPad and other handheld computer system users.
- Analyse workstations, laptops and hand-held devices (such as tablets etc.) to ensure they meet the minimum standards as set out in the DSE Regulations.
- Carry out a risk assessment of people's work using competent personnel to assess the suitability of:
  - Display screen, keyboard, mouse, peripheral equipment and software.
  - Chair, desk, work surface, workspace and tripping hazards.
  - Lighting, reflections/glare, noise, heat, humidity and overall workstation suitability and comfort.
- Provide adequate breaks from on-screen activity.
- Provide adequate health and safety information and training not only for those already using DSE, but also those about to start using such equipment.
- Provide and pay for users eye and eyesight tests, and special corrective appliances (where needed for screen-viewing distance), if requested.
- Review the assessments if a major change occurs to the workstation, equipment or software, or the workstation is relocated.
- Encourage all users of DSE to report any concerns they may have about equipment, desks, chairs, work methods, environment, etc. or, any health problems believed to be related to their work.

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### Principal legislation

Health and Safety (Display Screen Equipment) Regulations 1992 (as amended) (DSE)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Electricity at Work Regulations 1989  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Management of Health and Safety at Work Regulations 1999

# ELECTRICITY POLICY

## Overview

We recognise that faults in electrical wiring systems and portable appliances account for a significant amount of fires in premises, and can also lead to electric shock resulting in burn injuries, or fatalities.

### It is our policy to:

- Identify and manage the risks associated with the fixed wiring installation, portable electrical appliances and other sources of electricity, e.g. static.
- Ensure our fixed wiring installation is subject to formal inspection and test by a competent person at periods advised by the competent person.
- Seek competent advice before making any changes to the electrical installation.
- Subject all portable electrical appliances – including extension cables, fixed or transportable electrical plant and machinery to routine inspection e.g. pre-use ‘user’ checks and a more formal inspection and test regime by a trained, competent person at intervals identified from risk assessment, coupled to recommended industry guidance.
- Where practical, use cordless, rechargeable, hand-held power tools, or equipment operating at 110V with a working RCD protector in the circuit.
- Protect all hazardous installation components from unauthorised access or tampering by secure coverings/access panels and providing clear signs indicating danger.
- Train personnel to ensure they know how to avoid electric shock, potential fire situations and how to report damaged or defective equipment promptly.
- Emphasise the importance of visual checks, as tests only record the condition of equipment and wiring at that *particular point* in time of the test.
- Ensure only approved electrical equipment is brought onto the premises or used for company business.
- Keep an appropriate record of all training, maintenance and inspection and test programmes and activities.

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### Principal legislation

Electricity at Work Regulations 1989

Management of Health and Safety at Work Regulations 1999

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Building Regulations 2000 Part P (as amended)

# FIRE POLICY

## Overview

The company, through the Responsible Person (RP), recognises that fire safety is a key part of good business management, and it is therefore our objective to focus on appropriate fire prevention and protective measures, underpinned by a suitable and sufficient fire risk assessment process.

### It is our policy to:

- Undertake a fire risk assessment in order to evaluate the risks from fire and explosion to people and premises and keep it up-to-date.
- Implement measures for fire protection and prevention, including management arrangements to plan, organise, control, monitor and review fire safety measures.
- Take additional measures as appropriate to ensure fire safety where flammable or explosive materials are used, produced, stored, or transported.
- Consider who may be especially at risk; for example, persons who may have a disability, or who may need other special help.
- Provide fire fighting equipment, an adequate means of raising the alarm and fire detection equipment where appropriate.
- Provide unobstructed and adequately illuminated escape routes, signage and fire assembly point.
- Maintain facilities and equipment in good repair and working order.
- Draw up appropriate general precautions and a fire plan.
- Inform employees and others about fire risks and the necessary precautions.
- Where required, provide specific fire training - taking into consideration the workers' capabilities as regards health and safety when entrusting tasks to them.
- Test (sound) the alarm weekly, and carry out practice evacuation drills at least annually.
- Keep records of tests, drills, equipment maintenance and training.
- Where appropriate, appoint one or more Competent Persons (CP) to assist the RP in implementing the above arrangements.

Additional fire arrangements information is contained in the Company Fire Manual.

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#### **Principal legislation**

Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Fire Safety (Employees' Capabilities) (England) Regulations 2010

# FIRST AID POLICY

## Overview

The company recognises that by providing adequate first aid facilities, equipment and personnel, we may reduce the immediate impact of injuries and/or ill health that occur in the workplace.

### It is our policy to:

- Commensurate with our risk-based needs, appoint and train suitable numbers of first aid personnel. There may be a combination of skill levels i.e.:
  - Certificated First Aid at Work (FAW) – higher skill level, and/or;
  - Certificated Emergency First Aid at Work (EFAW) – lesser skill level, and/or;
  - Non-certificated Appointed Persons (instead of a certificated first aider) where the risk is low, or to provide temporary emergency cover if certificated personnel are absent due to unforeseen circumstances.
- Determine our first aid needs, by considering in the assessment:
  - Workplace hazards and risks – including any specific or non-routine risks.
  - The company's accident history.
  - Likely distribution of the workforce, such as remoteness from emergency assistance, travelling, working on other sites, lone workers, etc.
  - Annual holidays, courses and other planned absences of first aiders / appointed persons.
- Identify and select a competent training provider to deliver our first aid training based on the needs assessment findings and appropriate due diligence checks.
- Provide and maintain adequate first aid facilities, equipment and signage.
- Maintain a Data Protection Act (DPA) compliant company accident record book (see also our Accident Reporting and Investigation Policy).
- Inform our employees of what first aid arrangements are in place.
- Clearly display the location and names of first aid personnel, along with appropriate and clear procedures for reporting accidents, obtaining treatment, summoning an ambulance, or taking injured personnel to hospital.

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### Principal legislation

Health and Safety (First Aid) Regulations 1981 (as amended)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# FLAMMABLE AND EXPLOSIVE SUBSTANCES POLICY

## Overview

We aim to implement adequate measures for the protection of all personnel from fire and explosion risks related to flammable substances and potentially explosive atmospheres in the workplace – colloquially referred to as ‘dangerous substances.’ This Policy only applies to substances that cause harm as a result of their flammable or explosive properties; it doesn’t apply to substances that cause harm to health, this is covered in our Hazardous Substances Policy.

### It is our policy to:

- Where a dangerous substance is or is liable to be present within our workplace, carry out an assessment of the risks to employees and others that arise from the substance.
- Carry out a risk assessment where a potentially explosive atmosphere occurs, i.e. an atmosphere that could become explosive due to local and operational conditions.
- Provide measures to eliminate or reduce risks as far as is reasonably practicable, such as replacing dangerous substances with a less dangerous substance where possible, operating permit to work (PTW) procedures, monitoring of contractors activities, etc.
- Classify places where explosive atmospheres may occur into zones and mark the zones where necessary.
- Ensure flammable substances are correctly packaged/contained, labelled, handled and transported.
- Provide equipment and procedures to deal with accidents and emergencies.
- Provide sufficient information to show that the workplace and work equipment will be safe from risk of fire and explosion during handling, operation and maintenance, supported by adequate employee training and supervision.

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### Principal legislation

Dangerous Substances and Explosives Atmospheres Regulations 2002 (DSEAR)  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Management of Health and Safety at Work Regulations 1999

# HAZARDOUS SUBSTANCES POLICY

## Overview

We place a strong emphasis on prevention of exposure to hazardous substances in order to prevent workers suffering ill health. Where prevention is not reasonably practicable, then exposure will be adequately controlled by the application of good practice and principles.

### It is our policy to:

Eliminate or reduce hazards to health as far as is reasonably practicable, and ensure that remaining exposure to substances hazardous to health is adequately controlled.

Implement the following actions for all work operations that generate, or could potentially generate, hazardous substances in the workplace:

- Assess and evaluate substances used, or about to be used, to identify potential toxic, harmful, corrosive and irritant effects – taking account of those substances assigned workplace exposure limits (WEL).
- Where applicable, take account of how substances are transported, stored, handled, processed and disposed of, including equipment, training and supervision requirements.
- Ensure employees are informed of the risks to health identified in the assessments, know and put into practice the precautions necessary to eliminate or control any potential risks to health or safety, including the use and maintenance of protective equipment.
- Maintain a current inventory of substances and applicable up-to-date Material Safety Data Sheets (SDS).
- New substances or activities will not be introduced into the workplace without first checking whether it is already in use elsewhere or has been previously assessed, the priority being to eliminate, or change to a less harmful alternative.
- Ensure there are appropriate spillage, emergency and environmental protection procedures in place and that personnel required to carry out these tasks are adequately instructed and trained.
- Provide appropriate health surveillance where assessment shows it is required and that the process is adequately monitored and records maintained.
- Record the significant findings and review the assessment if working practices change.

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### Principal legislation

Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH)  
Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations (REACH)  
Management of Health and Safety at Work Regulations 1999



# HEALTH SURVEILLANCE POLICY

## Overview

We recognise health surveillance is about watching out for early signs of work-related ill health in our employees exposed to particular health risks.

### It is our policy to:

- Through the risk assessment process, determine what health hazards requiring an element of health surveillance remain after applying control measures.
- Identify who requires health surveillance, how often and the method to be used, by checking against specific health and safety regulation requirements and HSE guidance.
- Ensure a responsible person is appointed to manage and monitor the surveillance requirements, supported by information and training proportionate to the requirement.
- Where necessary, use only qualified and competent occupational health professionals to determine the appropriate level, frequency and surveillance procedure to be applied.
- Collect, update, and use, data and information for determining and evaluating hazards to health.
- Involve our employees at an early stage of the process to ensure they understand their role and can be confident there are safeguards to protect them if evidence of ill health is found.
- Where necessary obtain employee consent for certain surveillance procedures and provide assurances that their medical information is treated in confidence.
- Follow employment and data protection laws to ensure we do not discriminate against disabled candidates or others potentially requiring health surveillance.

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### **Principal legislation**

Management of Health and Safety at Work Regulations 1999  
Equality Act 2010  
Data Protection Act 1998  
Working Time Regulations 1998  
Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH)  
Noise at Work Regulations 2005 (NAWR)  
Control of Vibration at Work Regulations 2005  
Control of Asbestos Regulations 2012 (CAR)  
Control of Lead at Work Regulations 2002 (CLAW)  
Ionising Radiations Regulations 1999 (IRR)

# HOUSEKEEPING STANDARDS POLICY

## Overview

We recognise that many of the hazards arising from an untidy workplace can be eliminated by a sound approach to housekeeping that encourages and empowers employees to take pride in their workplace.

### It is our policy to:

- Nurture and develop a culture to encourage employees to maintain a clean, neat and tidy workplace wherever practicable, so that there is a place for everything and everything is in its place.
- Implement an approach and systems of work that will eliminate or, at least minimise, potential sources of injury, such as:
  - ❑ Slipping on spillages that have not been cleaned up.
  - ❑ Slipping on floors being cleaned.
  - ❑ Slipping due to snow/ice conditions in external areas of premises and building entrances
  - ❑ Tripping over items left across, or obstructing walkways or stairs.
  - ❑ Tripping on damaged or worn floor surfaces.
  - ❑ Tripping by stepping back onto tools, cables, waste, etc. carelessly left in the work zone.
- Recognise that applying basic, sound housekeeping measures that eliminate obstructions or poor storage arrangements can also help to eliminate or minimise hazards relating to:
  - ❑ Falls from height – e.g. having insufficient space to manoeuvre safely, etc.
  - ❑ Fire – e.g. excess flammable materials, blocked fire routes and exits, etc.
  - ❑ Vehicle accidents – e.g. restricted visibility, striking objects in path, etc.
  - ❑ Manual handling – e.g. poor handling environment, restricted posture, etc.
  - ❑ Falling objects – e.g. carelessly stacked/unstable objects, etc.
- Plan to ensure each part of the workplace is 'owned' so that someone takes responsibility for monitoring tidiness.

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### Principal legislation

Health and Safety at Work *etc.*, Act 1974 (HSWA)

Management of Health and Safety at Work Regulations 1999

Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)

Work at Height Regulations 2005

# INFECTIONS CONTROL POLICY

## Overview

We aim to ensure, so far as is reasonably practicable, that our workers are protected from exposure to infections that can be caught at work and that all staff are suitably informed, instructed and trained in prevention and protective control measures.

### It is our policy to:

Implement appropriate systems to manage and monitor the prevention and control of infection by using risk assessment as a tool to identify tasks and environmental conditions that could be a potential source of infection to our workers and others affected by our business activities.

Fully involve all staff in the process of preventing and controlling infection.

### We will:

- Adopt measures to eliminate or reduce risks as far as is reasonably practicable.
- Provide specific training on hygiene and cross-contamination controls where appropriate.
- Provide up-to-date information relating to infectious diseases, how they can be passed on and the symptoms to watch out for.
- Ensure that clothing worn by staff (including relevant PPE) when carrying out their duties is clean and fit for purpose.
- Implement safe working practices for staff – in writing where appropriate.
- Carry out health surveillance and where necessary maintain records of occupational ill health
- Ensure that where required, incidents reportable under RIDDOR or other statutory reporting of diseases are done promptly.
- Monitor activities to ensure that high standards of basic hygiene are always maintained.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999

Health and Safety at Work *etc.* Act 1974 (HSWA)

Control of Substances Hazardous to Health Regulations 2002 (as amended) COSHH

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

# LIFTING EQUIPMENT POLICY

## Overview

We acknowledge that lifting equipment that is inappropriate, of poor quality, defective, or used incorrectly by untrained and/or unsupervised personnel, can result in serious or fatal injuries.

### It is our policy to:

Ensure that all lifting equipment under our control is:

- Sufficiently strong, stable and suitable for the proposed use. Also, the load and anything attached to it, e.g. lifting points, etc., is suitable.
- Positioned or installed to prevent the risk of injury, e.g. from the equipment or its load falling or striking people.
- Visibly CE marked, together with its safe working load (SWL) and/or working load limit (WLL) as appropriate, and any other information to be taken into account for its safe use. Accessories, e.g. slings, clamps etc., are to be similarly marked.

Additionally, we will also ensure that:

- Lifting operations are properly planned, and carried out in a safe manner by people who are trained, competent and adequately supervised.
- Operators carry out examinations of equipment for obvious defects each time it is used, and that there is a robust defect reporting procedure in place.
- Where equipment is used for lifting people it is marked accordingly, and it is safe for such a purpose, e.g. all necessary controls are place to eliminate or reduce risk.
- Where appropriate, before lifting equipment (including accessories) is used for the first time, it is thoroughly examined at the relevant statutory periods, or at those intervals laid down in an examination scheme drawn up by a competent person.
- Following a thorough examination or inspection of any lifting equipment, we receive a report by the competent person so we can take any appropriate action.
- Adequate and legible records are maintained covering purchase, use, maintenance, training and disposal of all work equipment.

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### Principal legislation

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Supply of Machinery (Safety) Regulations 2008  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# LONE WORKING POLICY

## Overview

The Company recognises that lone workers may face unusual and difficult problems and we will take all reasonably practicable steps to protect their health, safety and welfare.

### It is our policy to:

- Not allow lone working where risk assessment identifies unacceptable risks that cannot be reduced by effective control measures.
- Ensure all staff employed in lone worker positions have received comprehensive training, and that they must satisfy the responsible manager that they are competent, medically able and sensibly oriented in all aspects of the work they are expected to carry out.
- Provide appropriate training to cover:
  - The detailed duties of the job.
  - Safety aspects of all equipment/machinery to be used.
  - Any restrictions and/or prohibitions to be observed, including what equipment/machinery they must not operate or activities they must not carry out.
  - How to recognise and deal with hazardous locations, working at height, or lifting operations that require two or more people, etc.
  - Emergency procedures, such as fire, accident, illness, physical attack; what action they should take and any specific arrangements for summoning help to be implemented.

It is a requirement that all responsible managers must ensure that relevant safe working procedures are in place and, where necessary, set down in writing and copies given to lone worker employees.

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### **Principal legislation**

Electricity at Work Regulations 1989 (EWR)

Confined Spaces Regulations 1997

Management of Health and Safety at Work Regulations 1999

Health and Safety at Work *etc.* Act 1974 (HSWA)

# MANUAL HANDLING POLICY

## Overview

The company recognises the debilitating injury and ill health effects that can occur from certain manual handling activities. However, we also acknowledge that in practice, all manual handling within the organisation cannot be totally eliminated. Our objective therefore, is to reduce the risk of injury from manual handling activities by avoiding, where reasonably practicable, the need for employees to carry out those manual handling operations that can lead to significant injury.

### It is our policy to:

Operate the fundamental principle of avoiding manual handling by employing other means such as using mechanical aids. However, if this is not feasible, or doesn't fully remove the hazard posed, then a manual handling risk assessment will be carried out, taking account of:

- The load.
- The task.
- The environment.
- The characteristics of the individual.

Risk assessments will be undertaken by personnel with sufficient knowledge and training to enable them to be completed realistically and competently, and will aim to:

- Identify the hazards and evaluate the problems likely to occur during the work taking account of the task, load, working environment and capacity of the individual.
- Establish measures necessary to deal with problems identified and recommend action to reduce the risk of injury to the lowest level reasonably practicable. This may take the form of changes to working practices, provision of lifting aids, information, training, assistance/team lifts, etc.
- Consider proposals for any new operations, or modifications to existing methods of work, to ensure manual handling implications are taken into account at an early stage. For example where other hazards are combined, such as work at height, confined spaces, etc.
- Employees are expected to report any concerns about manual handling, and are encouraged to make suggestions for improvements to their work activities.

The designated responsible person will ensure assessments are undertaken and reviewed as necessary.

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### Principal legislation

Manual Handling Operations Regulations 1992 (as amended)  
Management of Health and Safety at Work Regulations 1999

# MIGRANT WORKERS POLICY

## Overview

Notwithstanding our statutory duty to prevent illegal working, we, as an employer that hires legal migrant workers, recognise they have the same protection and responsibilities under health and safety laws as do the GB workforce.

### It is our policy to:

Clarify and agree the relationship and respective responsibilities for health and safety between the company and our migrant workforce.

Formalise our practical arrangements for the day-to-day management and supervision of workers in writing so as to avoid any misunderstanding or confusion.

### Before migrant workers start work:

- Take account of any special qualifications or skills needed for the job.
- Think about the extent of English language skills required.
- Consider what information, instruction and training will need to be provided at the workplace, by whom and how.
- Adapt current accident reporting systems (e.g. RIDDOR and in-house procedures) to include information on nationality.
- Ensure risk assessments take account of migrant worker issues where they are prevalent.

### During employment:

- Provide information for migrant workers on their rights and responsibilities.
- Train supervisors and induction teams to improve their cultural awareness and competence in communicating to migrant workers.
- Translate signage, labelling and instructions into priority languages as appropriate
- Ensure migrant workers are represented during management meetings, etc.
- Review the effectiveness of control measures to ensure they remain appropriate and are being implemented correctly.

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#### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999

# NOISE POLICY

## Overview

The company recognises that occupational deafness and other distressing noise- induced conditions can have a profound and permanent effect on people's lives.

### It is our policy to:

Aim to prevent, or reduce the risk of damage to the hearing of employees, and others at work, from exposure to noise. We will:

- Identify if, where and when, there is likely to be a noise hazard, and those workers and others likely to be exposed to the hazard.
- Evaluate the risks, taking account of the levels of exposure to noise (averaged over a working day or week), and/or the **maximum** noise (peak sound pressure) to which employees are exposed in a working day.
- Take specific action at the following values:
  - The lower exposure action value (LEAV) - 80 dB(A), and/or peak sound pressure of 135 dB.
  - The upper exposure action value (UEAV) – 85 dB(A), and/or peak sound pressure of 137 dB.
  - The exposure limit value (ELV) - 87 dB(A) (taking into account the effect of wearing hearing protection and which **must not** be exceeded), averaged over a day or week and/or peak sound pressure of 140 dB.
- Implement reduction control measures through a programme of engineering, work organisation or other means.
- Provide employee information, instruction and training as appropriate.
- Carry out health surveillance where identified.
- Record the findings, and review and revise the assessments as necessary.

Where it is not reasonably practicable to eliminate or reduce noise levels at source by engineering or other means, workers will:

- Be provided with and **advised** to use, ear protection if they are exposed to noise at or above the first action level (LEAV), but below the second action level (UEAV).
- Be provided with and be **required** to use, appropriate ear protection if they are exposed to noise at or above the second action level (UEAV/ELV).

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### Principal legislation

Control of Noise at Work Regulations 2005 (NAW)  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Management of Health and Safety at Work Regulations 1999



# PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

## Overview

The Company will provide workers with personal protective equipment (PPE) only as a last resort when other risk protection methods are not reasonably practicable.

### It is our policy to:

- Provide suitable PPE where risk assessment shows it to be necessary.
- Provide PPE free of charge.
- Select, purchase and provide only PPE showing the CE mark identifying it as satisfying specific safety, testing and certification requirements.
- Where protective equipment is provided for personal issue, maintain a suitable issue record.
- Ensure PPE is replaced if damaged, worn or lost.
- Provide suitable storage facilities for PPE when not in use.
- Ensure PPE is suitable and appropriate for the task, taking account of any other equipment or clothing required to be used in combination.
- Check that PPE correctly fits, and is comfortable for the person using it.
- Carry out 'Fit Testing' for respiratory protective equipment (RPE) where appropriate.
- Ensure there is adequate information, instruction and training for workers using and supervising the use of PPE.
- Rigorously enforce the correct use of PPE by appropriate monitoring and supervision arrangements.

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### Principal legislation

Personal Protective Equipment at Work Regulations 1992 (as amended)  
Work at Height Regulations 2005 (WAH)  
Management of Health and Safety at Work Regulations 1999  
Control of Substances Hazardous to Health Regulations 2002 (as amended) COSHH  
Control of Asbestos Regulations 2012 (CAR)  
Control of Lead at Work Regulations 2002 (CLAW)  
Control of Noise at Work Regulations 2005  
Ionising Radiation Regulations 1999 (IRR)

# PRESSURE SYSTEMS [USERS] POLICY

## Overview

As users of pressurised plant we recognise that if a piece of plant or equipment fails and violently ruptures the consequences can be devastating.

### It is our policy to:

Prevent serious injury from the hazard of stored energy as a result of failure of a system or any of its components.

This will be achieved by:

- Assessing if a job can be done another way without using pressurised equipment, or not using high pressure when low pressure will do.
- Providing safe and suitable plant, equipment and tools.
- Establishing the operating parameters ensuring the characteristics of the relevant fluid in the system and the safe operating limits of the equipment are known and followed.
- Fitting suitable protective devices and ensure they function properly, such as safety valves, bursting discs, electronic appliances, etc and that they are adjusted to their correct settings and are in good working order at all times.
- Carrying out suitable whole-system maintenance that includes programmes that considers factors such as age, usage and the environment in which it is operated, ensuring any modifications or repairs must be planned and do not cause danger.
- Providing appropriate training so that anyone who operates, installs, repairs, maintains, inspects or tests our pressure equipment has the necessary skills and competence to carry out the job safely – including relevant refresher training.
- Ensuring there is a written scheme of examination (WSE) for all pressure vessels, fittings and pipework to be used by the competent person carrying out the examination and that appropriate records are kept – your insurance provider may be able to assist with this requirement.
- Establishing and providing clear instructions on what to do in an emergency.
- Providing manufacturer's operating instruction/manuals in English and where appropriate sufficient safety information is translated for non-English speaking workers.

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### Principal legislation

Pressure Systems Safety Regulations 2000 (PSSR)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc* Act 1974 (HSAWA)

# PRIVATE CARS DRIVEN FOR WORK POLICY

## Overview

The company recognises that driving private cars for work can result in fatal or serious injury if risks are not adequately assessed and controlled.

### It is our policy to:

- Conduct a risk assessment to identify what controls are needed to ensure our drivers and their vehicles can operate with minimal risk to themselves, passengers, pedestrians and other road users in general.
- Instruct drivers to check the general condition of the vehicle before each journey, and that they clearly understand it is their responsibility to ensure it is in a roadworthy condition at all times.
- Implement procedures to check that private cars used on company business are correctly insured, taxed and (where appropriate) have a current MoT certificate, including the requirement for drivers to show their licences at least annually to the company to ensure they are still valid.
- Instruct all employees driving on company business that they must not make or receive calls from a hand-held mobile phone, or be otherwise distracted whilst driving such as texting, eating, drinking, reading, etc.
- Where other employees travel in a private vehicle driven on company business, instruct the driver that the vehicle must be smoke-free at all times.
- Ensure our drivers fully understand that they must not be under the influence of alcohol or impaired through drugs when driving (our Alcohol & Drugs Policy cross refers).
- Inform our drivers that tiredness kills, and that if feeling tired during long journeys, to stop and take a short break approximately every 2 hours driving for about 15 to 20 minutes.
- Ensure a robust communication, consultation and reporting mechanism is in place for all incidents and/or driver concerns to be investigated and addressed.
- Monitor and review the risk management system to ensure controls remain effective in line with business operational developments and commitments.

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#### **Principal legislation**

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Road Safety Act 2006 (as amended)  
Smoke-free (Exemptions and Vehicles) Regulations 2007

# RADON POLICY

## Overview

We recognise that radon levels that exceed 400 Becquerels per cubic metre (Bq m<sup>-3</sup>) in the workplace can present significant occupational health risks and that as an employer, we are obliged to assess any potential risks to staff while at work and to take appropriate remedial action.

### It is our policy to:

Implement a five-point plan for our premises that are below ground level or are in an identified radon Affected Area:

1. **Measurement** - Test for radon on the ground floor and occupied basements.
2. **Surveillance** - Continue monitoring until remedial action is complete.
3. **Risk assessment** - Set priorities for action based on radon levels.
4. **Mitigation** - Complete remedial action within six months.
5. **Maintenance** - Conduct periodic testing and routine checks.

We will designate a responsible member of staff to oversee progress with protection measures and inform staff of the significant findings relating to risk.

Where necessary, we will seek competent advice to assist with the provision of a measurement and surveillance service.

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### Principal legislation

The Ionising Radiations Regulations 1999 (IRR)  
The Management of Health and Safety at Work Regulations 1999  
The Health and Safety at Work *etc.* Act 1974

# RISK MANAGEMENT POLICY

## Overview

We believe that without risk there is no progress; but there is a fine line between innovation and safety.

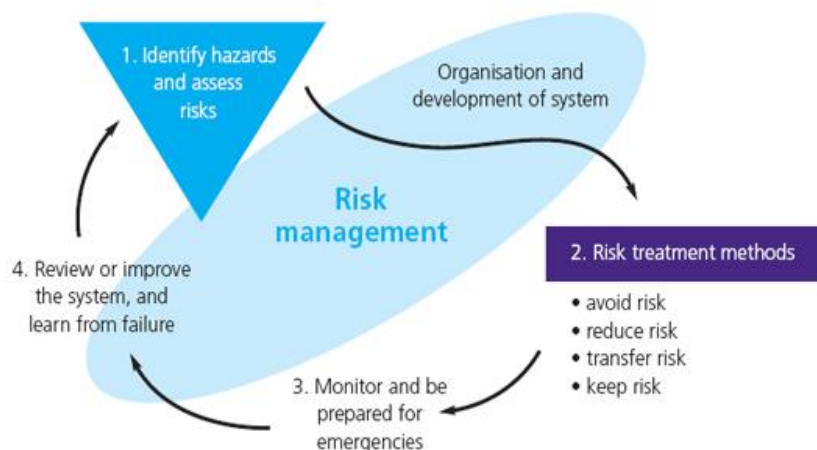
As such, we recognise that effective risk management can help to protect our staff and our business, and key to this is the process of risk assessment.

Our reason for conducting risk assessments is to ensure that we have adequately considered the things that can go wrong in the workplace and their likely consequences and, they are therefore, fundamental to the overall successful management of health and safety risks.

## It is our policy to:

- Ensure that our workers, the public and others affected by our activities are properly protected by managing our risks effectively and responsibly.
- Balance benefits and risks, with a focus on reducing real risks – both those which arise more often and those with serious consequences.
- Empower workforce innovation and learning - not stifle it.
- Understand that failure to manage real risks responsibly is likely to lead to legal sanctions.
- When carrying out risk assessments, ensure we involve the right people – those who understand the risk assessment process as well as those who are involved in the task or area being assessed.
- If risks cannot be eliminated, implement adequate and effective controls – such as safe systems of work – to reduce risks to as low a level as is reasonably practicable.
- Educate individuals to understand that as well as the right to protection, they also have to exercise personal responsibility.

Use as a tool to achieving our objectives the 'Risk Management' model shown below:



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## Principal legislation

Health and Safety at Work *etc* Act 1974

Management of Health and Safety at Work Regulations 1999

# SMOKING POLICY

## Overview

The company recognises there is a statutory smoking ban imposed throughout the UK where there are enclosed, and/or substantially enclosed workplaces - including work vehicles/company cars used by more than one person (even at different times), which places a legal responsibility on us to prevent people from smoking.

### It is our policy to:

- Take reasonable steps to ensure employees and others working, or visiting our premises, are aware that the premises and vehicles are legally required to be smoke-free.
- Ensure no one smokes in smoke-free premises or vehicles.
- Display at least one appropriate 'No Smoking' sign in the premises and in company vehicle cabs.
- Assess any increased fire risk from employees or others gathering outside entrances to smoke, or smoking surreptitiously.
- If practical, to accommodate those staff and visitors who wish to smoke, provide an external safe smoking area, distant from combustible materials and with suitably designed bins or buckets for smoker's discarded materials – this will be frequently monitored and cleared of waste materials.
- Consistently enforce the Policy and if necessary, eject visitors from the premises if the Policy is breached.
- Inform employees and responsible managers that any breach of this policy will not only invoke the company disciplinary procedure, but may also result in fixed penalty fines and possible criminal prosecution against not only those smoking, but also those allowing smoking within their area of control.

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### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Smoke-free (Premises and Enforcement) Regulations 2006  
Smoke-free (Exemptions and Vehicles) Regulations 2007  
Smoke-free (Penalties and Discounted Amounts) Regulations 2007  
Smoke-free (Vehicles Operators and Penalty Notices) (Amendment) Regulations 2015  
Smoke-free (Signs) Regulations 2012  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Regulatory Reform (Fire Safety) Order 2005 (FSO)

# STRESS POLICY

## Overview

Stress may be defined as an adverse reaction some people may have to excessive pressures or other types of demand placed on them. This may be due to work or factors outside work. We also believe while there may be beneficial effects of reasonable pressure and challenge, there can sometimes be a distressing reaction to demands or pressures. If stress is intense, or continues for prolonged periods of time, it can have adverse effects on both physical and mental health, and employers have a responsibility to consider the impact stress may have on employees.

## It is our policy to:

Consider and assess the impact work-related stress may have on both physical and mental health on our employees, and where appropriate the company will:

- Provide relevant training or information for managers on the issue.
- Provide adequate resources to enable managers to implement this policy.
- Operate the policy in line with the principles of good health and safety and employment law practice.

Therefore:

- We will inform employees that if they think they may be suffering from significant stress for reasons connected with their working conditions or workload, they are to approach their manager, who should deal with the issue promptly and in the strictest confidence while making reasonable efforts to reduce any work-related stress condition.
- Where appropriate, formal stress counseling may, if reasonably practicable, be arranged by the company.
- On return to work from any period of stress-related illness, the company will take account of medical advice (if appropriate and available), and the needs of the employee and the business when determining which duties are most appropriate.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# TRAINING POLICY

## Overview

We recognise that training staff in health and safety will help reduce risks to people and assist the business retain a competitive edge. We see adequate and appropriate training as not only enabling our employees to work safely, but also as a route to developing a competent and efficient workforce.

We also understand that training is not a substitute for proper risk control, but may be appropriate as a temporary measure of control until permanent improvements can be made.

### It is our policy to:

- Provide appropriate employee induction, job specific, and refresher training to achieve and maintain satisfactory standards of competent health and safety performance.
- Support our workforce training programme with adequate information, instruction and supervision arrangements appropriate to the job activity, taking account of a workers ability, experience, age, or special needs.
- Pay particular attention to essential training requirements identified through the risk assessment process for example, work where significant risks are present.
- Ensure management are aware of their responsibilities to plan and organise training to ensure correct and safe standards are attained through the most economical use of time and resources and who they should contact for further.
- Provide clear information to managers on who to contact should they need to obtain advice and guidance on training available both inside, and outside, the company.
- Inform employees they are expected to assist managers/supervisors by bringing to their attention any training needs that may have lapsed, and to fully participate in company training programmes.
- Maintain appropriate records of training.
- Monitor and review our training to ensure our employees are equipped with the skills to enable them to carry out their jobs without detriment to their health or safety.

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#### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Corporate Manslaughter and Corporate Homicide Act 2007  
Apprenticeships, Skills, Children and Learning Act 2009



# VEHICLES AT WORK POLICY

## Overview

The company recognises that vehicles at work can be a major cause of fatal and serious injury if risks are not adequately assessed and controlled.

### It is our policy to:

- Conduct a risk assessment to identify what controls we need to implement to ensure vehicles can operate with minimal risk to drivers, pedestrians and other road users, whether operating in our own premises, on third party premises, or on the public road system.
- From our risk assessment findings, implement a vehicle risk management system in three key areas:
  1. Safe driver – licensing, competence & training
  2. Safe vehicle – selection & maintenance of vehicles and equipment.
  3. Safe site – design for safe segregation of people, reversing, parking, loading/tipping, lighting, signage and operating surface maintenance.
- Ensure there are a robust communication, consultation and reporting mechanisms in place for all incidents and/or driver concerns to be investigated and addressed.
- Instruct all company vehicle drivers that they must not make or receive calls from a hand-held mobile phone, or be otherwise distracted whilst driving such as texting, smoking, eating, drinking, reading, etc.
- Implement procedures to ensure all vehicles used for company business are correctly maintained, legally compliant and that all drivers hold current licences for the type of vehicle and/or operators certificates for vehicles or equipment.
- Follow guidance issued via bodies such as the Road Haulage Association (RHA), Freight Transport Association (FTA), Driver and Vehicle Standards Agency (DVSA) (previously VOSA), Vehicle Certification Agency (VCA) and Health and Safety Executive (HSE) etc. regards current good industry practice or legal requirements.
- Monitor and review the risk management system to ensure controls remain effective in line with business operational developments and commitments.

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### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)  
Management of Health and Safety at Work Regulations 1999  
Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)  
Road Safety Act 2006 (as amended)  
Health and Safety (Safety Signs and Signals) Regulations 1996  
Smoke-free (Exemptions and Vehicles) Regulations 2007

# VIBRATION – HAND ARM [HAV] POLICY

## Overview

We recognise hand-arm vibration (HAV) comes from the use of hand-held power tools and holding materials being processed by machines, is the cause of significant ill health (painful and disabling disorders of the blood vessels, nerves and joints), and that the emphasis of the Regulations is on control and taking action to prevent disease.

## It is our policy to:

- Consult our workforce to establish situations where the use of power tools and/or processes are potential causes of ill health and identify early symptoms of disease.
- Commit to reducing vibration exposure by conducting a suitable tool/vibration risk assessment and analysis to establish if the daily exposure action value (EAV), or the daily exposure limit value (ELV) is being exceeded.
- Eliminate the risk or reduce exposure to a level as low as is reasonably practicable by seeking new or alternative work methods or equipment such as by changing the work process to avoid the need to use hand tools, or changing to better tools with lower vibration and good ergonomic design.
- Assess the suitability of tools at the purchase stage and choose equipment with little or no risk of vibration.
- Ensure all tools and equipment is properly maintained.
- Ensure employees know how to report any defects or operating issues that could give rise to vibration and that suspect items are removed from service until either repaired or replaced.
- Provide the correct personal protective equipment (PPE), such as gloves, to ensure fingers and hands are kept warm.
- Promote vibration risk awareness to employees as part of the company's health and safety information, instruction and training procedures.
- Provide health surveillance to any employees who regularly exceed the EAV and maintain health records.
- Review how we work if anything changes that may affect exposure to vibration and take action if vibration levels increase.

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### Principal legislation

Control of Vibration at Work Regulations 2005 (CVWR)

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Management of Health and Safety at Work Regulations 1999

Health and Safety at Work *etc* Act 1974 (HSAWA)

# VIBRATION – WHOLE BODY [WBV] POLICY

## Overview

We understand that whole-body vibration (WBV) can be transmitted through the seat or feet of employees who drive some work vehicles, over rough and uneven surfaces as a regular part of their job and large shocks and jolts may cause health risks including back-pain.

### It is our policy to:

Take action to prevent risk from exposure to vibration, by considering whether there are other ways or vehicles/equipment that would eliminate the exposure to the vibration, especially where large shocks and jolts are involved.

Where the above isn't possible, reduce the exposure to as low a level as is reasonably practicable following a risk assessment involving:

- Observation of specific working practices.
- Reference to relevant information on the probable magnitude of the vibration corresponding to the equipment used in the particular working conditions.
- If necessary, measure the magnitude of vibration to which our employees are liable to be exposed.
- Concluding whether employees are likely to be exposed to vibration at or above an exposure action value (EAV) or above an exposure limit value (ELV) and, where the ELV is being exceeded, take immediate action to reduce levels to as low as is reasonably practicable.

Explore and implement any simple, non-technical and common sense measures that can be introduced to reduce exposure to vibration in line with the risk assessment findings.

Assess the suitability of vehicles and other mobile equipment at the purchase or hiring stage and select only those with low levels of vibration such as, considering the choice of seat (including suspension seats); the choice of tyres; ensuring regular maintenance of vehicles (including their seats and suspension).

Ensure good maintenance of roads and ground conditions throughout our site to suit the vehicles and machines that use them.

Provide health surveillance to any employees who regularly exceed the EAV and maintain health records.

Promote vibration risk awareness to employees as part of the company's health and safety information, instruction and training procedures.

Review how we work when anything changes that may affect exposure to vibration and take action if vibration levels increase.

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### Principal legislation

Control of Vibration at Work Regulations 2005 (CVWR)  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)  
Management of Health and Safety at Work Regulations 1999  
Health and Safety at Work *etc* Act 1974 (HSAWA)

# VIOLENCE AT WORK POLICY

## Overview

The company is fully committed to ensuring that all reasonably practicable measures are implemented to protect the health, safety and welfare of all employees, visitors and contractors and will not tolerate violent behaviour of either a physical or verbal nature from its staff, or other persons in the workplace.

### It is our policy to:

- Ensure that potential violence towards employees is adequately assessed and controlled in the same way as any other workplace risk.
- Inform employees that they have a duty not to threaten or otherwise endanger fellow employees or other persons in the workplace, and that they are to report any incident that occurs to management as soon as possible.
- Liaise, where necessary, with the employers of any contract staff working on the premises in order to discuss how any risks of violence that may arise to those staff can best be dealt with.
- Where assessments shows it necessary, provide staff at risk with adequate training in understanding and dealing with aggression in the workplace.
- Ensure that employees know that they should not put at risk their personal safety, or the safety of others, in order to protect company property and if there is a danger of violent assault, the police should be contacted by the most practicable means.
- Investigate all reported incidents of violence in order that appropriate strategies to prevent recurrences may be devised, and to establish if the incident is notifiable to the enforcing authority under RIDDOR.

Where an employee has been the victim of a violent attack, whether physical or verbal, the company will provide appropriate support and help to the individual.

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### Principal legislation

Management of Health and Safety at Work Regulations 1999  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)  
Health and Safety at Work *etc.* Act 1974 (HSWA)

# VISITORS POLICY

## Overview

We recognise that as the employer and occupier of the premises, we have a duty of care towards all visitors with regard to their safety particularly if they are unfamiliar with our premises layout, activities and risk controls, and that their needs may be different from, and/or more onerous than, the needs of our regular employees.

### It is our policy to:

- Monitor, and where necessary, control access of visitors to ensure not only their health, safety and security, but also that of our own employees and others on the premises who may come into contact with visitors.
- Appoint specific individuals to take responsibility for visitors during their time with the company (Part 2 Responsibilities refers).
- Where it becomes an issue, extend our procedures to include uninvited visitors such as trespassers, or children, etc where we could reasonably be expected to do something to prevent exposure to danger.
- Instruct our workers to be vigilant for uninvited visitors entering the premises and, in such cases, to be polite, but firm in ensuring they are escorted from the premises.
- Ensure visitors are aware of any safety rules or procedures specific to their visit.
- Accompany visitors where appropriate or, if permitted unaccompanied access, warn them of any danger areas or other risks to their personal safety or wellbeing.
- Escort or direct visitors to a designated fire assembly point in the event of an evacuation of the premises.
- Record all injuries to visitors in line with the company's accident reporting and investigation procedure.
- Inform visitors of, and enforce, our smoking policy.
- Monitor and review visitor arrangements as part of our risk management system to ensure controls remain effective.

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#### **Principal legislation**

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Regulatory Reform (Fire Safety) Order 2005 (FSO)  
Workplace (Health, Safety and Welfare) Regulations 1992  
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)  
Occupiers' Liability Acts 1957 & 1984

# WORKING ABROAD POLICY

## Overview

The Company recognises that working abroad carries certain risk but aims to ensure that such work is properly planned and assessed so employees can work in a safe and protected environment so far as is reasonably practicable.

### It is our policy to:

- Arrange with our insurance providers to extend our Employers' Liability Insurance cover appropriate to our world-wide operations
- Plan and document all decisions to send workers abroad, showing the basis for those decisions
- Find out in advance what specific health and safety regulations apply in the country of destination.
- Assess and record risks involved in travelling to, working in, and returning from, the country of destination including personal health/medical and vaccination requirements
- Where our employees will work in premises abroad under the control of other employers/occupiers, liaise, and agree with, those third parties to consider appropriate protective measures and controls that would be reasonable under the circumstances
- Check the latest Foreign Office advice and guidance relating to political unrest or other dangers relevant to the country of destination or areas on route as part of the assessment process
- Consider ability, experience and training to ensure workers are prepared and equipped to carry out what is expected of them and that possible language difficulties have been accounted for
- Provide employees with appropriate information and training regarding what rules apply to them during the duration of their stay and check that they fully understand and are capable of implementing what measures they should take to avoid ill health, injury and other identified dangers
- Ensure there are workable arrangements for maintaining contact at all times and where appropriate, monitoring and feedback of safety or security concerns
- Decide how, if necessary, emergency evacuation will be carried out.

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#### **Principal Legislation**

Health and Safety at Work *etc* Act 1974

Management of Health and Safety at Work Regulations 1999

Corporate Manslaughter and Corporate Homicide Act 2007

# WORK AT HEIGHT POLICY

## Overview

The company's overall Policy objective is to plan, assess and implement systems and procedures that ensures all work at height can be carried out competently and safely, including ensuring all work equipment is suitable, serviceable, maintained and subject to a statutory inspection regime where appropriate.

We also recognise that where we control the work of any third party (such as contractors) working on our behalf, we both have duties under the Work at Height Regulations.

### It is our policy to:

Aim to prevent deaths and injuries caused by falls from height at work by following three simple rules:

1. We will **avoid** work at height where we can - If there is no need to, we won't.
2. If work at height cannot be avoided we will **prevent** falls by selecting and using the right access equipment.
3. We will **minimise** the impact of any fall. Where we cannot eliminate the risk of a fall, we will use work equipment or other means to minimise the distance and consequences of a fall, should one occur

Each of the above rules will be considered in the order shown.

We will only consider choosing access equipment once it has been decided that work at height is unavoidable.

Also, all work at height must:

- Be kept to a minimum
- Be properly planned and risk assessed, taking into account adverse weather conditions and what rescue measures need to be taken in an emergency.
- Where necessary, be appropriately supervised, particularly taking account of new, young or inexperienced workers
- Be carried out by someone who is trained and competent and able to complete the task safely. The competent person must be able to erect, use, dismantle or operate as appropriate the selected access equipment.

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### Principal legislation

Work at Height Regulations 2005

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Management of Health and Safety at Work Regulations 1999

# WORK EQUIPMENT POLICY

## Overview

We acknowledge that although essential to business, some types of work equipment have the potential to cause serious injury and fatalities if poorly selected, badly maintained, wrongly used, or used by untrained or unsupervised people.

### It is our policy to:

Select and provide suitable equipment for the job it has to do, supported by an appropriate risk assessment and safe controls process, that ensures:

- Working conditions and all other inter-related hazards are taken into account during the initial risk assessment and subsequent selection and provision process.
- Equipment is provided with clearly visible, easily recognisable controls, markings, warnings and (if necessary), quickly and easily operable emergency stop controls.
- Dangerous parts of machinery are effectively guarded, or persons are prevented from reaching the danger areas.
- Planning and organising allows for safe operation, adjustment, breakdown, cleaning, maintenance, etc. of machinery so that it is correctly isolated to prevent it starting without warning.
- Equipment is well maintained, in good repair and working order, and all statutory examinations and inspections are carried out with up-to-date records kept.
- Where work equipment is exposed to conditions causing deterioration, it is inspected at regular intervals and each time there is a possibility that the safety of the equipment has been jeopardised.
- Any hired-in work equipment is accompanied by a current statutory inspection and/or maintenance record if appropriate.
- Only trained, competent and authorised persons can use, clean and maintain plant, tools and equipment, with restrictions or prohibitions strictly enforced if necessary for reasons of personal health or safety.
- Appropriate on-going information, instruction and training is given to operators, supervisors, and managers, so they know not just how equipment works, but also the safe operation of all safety devices, guards, etc.
- An effective system is in place for employees to carry out and record pre-use equipment checks together with the defect reporting procedure.

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### Principal legislation

Provision and Use of Work Equipment Regulations 1998 (PUWER)  
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)  
Management of Health and Safety at Work Regulations 1999  
Employers' Liability (Defective Equipment) Act 1969



# YOUNG PERSONS POLICY

## Overview

The company recognises that there are specific requirements on us to take special care in relation to young persons in the workplace and to prevent young workers being used for work beyond their capabilities. We recognise that young workers also have particular rights and restrictions relating to rest breaks and night work.

These requirements equally apply to apprentices, and students or school age children on work experience schemes placed with the company.

We understand the definition of a young person (YP) as being someone below 18 years of age and - for health and safety purposes - a child, who has not yet reached the minimum school leaving age (MSLA).

### It is our policy to:

Ensure adequate personnel are designated and instructed in how to manage young people in the workplace before any young person starts work, and that risk assessments are carried out that will consider:

- The fitting out and layout of the workplace where the young person will work.
- The nature of any physical, biological and chemical agent hazards they could be exposed to, how long they could be exposed and to what extent.
- What type of equipment they will be required to use and the potential harm.
- Their lack of experience and awareness of existing or potential risks, or if there are learning, or behavioural difficulties.
- Any disability or medical conditions needing special consideration.
- What prohibited or restricted work and/or equipment are to be enforced.
- What personal protective equipment (PPE) is required.
- What training, mentoring/supervision requirements will be needed?
- Ensuring proper records of YPs - including any health assessments and working time requirements - are kept.
- The monitoring and review of YP arrangements as an integrated part of company operations.

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### Principal legislation

Health and Safety at Work *etc.* Act 1974 (HSWA)  
Management of Health and Safety at Work Regulations 1999  
Children and Young Persons Act 1933 (as amended)  
Working Time Regulations