

Health and Safety Policy Document

September 2024

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Amendments and Review Record

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1. Health and Safety General Policy Statement

1.1. The Objectives and Principals

The objective of this health and safety policy is to prevent, insofar as is reasonably practicable to do so, during the course of work or duties being undertaken, any accidental occurrence resulting in:

- Injury to any person.
- Damage to, or loss of any plant, equipment, property, materials or products.
- Delays in any processes or operation.
- Events that may otherwise be detrimental to efficiency and/or prestige.
- Adverse impact upon the environment.

The Policy is applicable to all employees. This includes the employees of Sub-Contractors, Self Employed Persons, Consulting Practices and the Client.

The application and promotion of the Policy is the responsibility of Senior Management of this Company. Whilst duties and tasks may be delegated, the overall responsibility remains that of Senior Management to ensure that the Company complies with all relevant statutory health and safety legislation, common law and Approved Codes of Practice.

All Company employees, regardless of their status, are expected to abide by the principles of this Policy as and where applicable. We also expect the co-operation of all those mentioned within the Scope section of this Policy to work in such a way that accidents to themselves and others will be prevented.

Individuals can make important contributions to the development and implementation of policies and arrangements. The company will give all opportunities for participation in this process and actively encourages involvement of employees either directly or through their representatives.

To ensure that this Policy can be successfully implemented, the Company and its Directors will provide such reasonable funds as is necessary.

1.2. Precautions and Planning

Suitable and adequate measures shall be taken to safeguard any person, plant, equipment, property, material or product likely to be exposed to any known or suspected hazards associated with or arising out of the processes, tasks or operations being undertaken. We will take into account at tendering stage, those factors which assist in eliminating injury, damage and waste.

All activities shall be conducted in a responsible manner and so planned and controlled that the possibility of unplanned events occurring is reduced to the practicable minimum. It is recognised that accident prevention is a joint responsibility of all employees including managers and supervisors and that to understand their joint responsibilities, good communication and consultation will be necessary.

1.3. Information, Training and Instruction

Information from risk assessments, performance monitoring activities, employee feedback and advice from our designated Health and Safety Consultants, will be used to identify the health and safety training needs of employees. An effective system for the communication of health, safety and welfare information will be maintained so that employees are made aware of the known or suspected hazards associated with or arising out of the work or duties assigned to them.

Where necessary employees will also be suitably trained or instructed to enable them to carry out their tasks in a healthy, safe and efficient manner. Training will be conducted internally or externally by qualified competent tutors/instructors.

Employees will be trained in the safe use of plant/equipment which they will be using for their work by the appropriate Plant Operators course where required. Where certification is not required, employees will be instructed on how to use plant/equipment safely, directly by the a suitably qualified internal trainer or manufacturer/supplier/hirer.

To ensure all the Company's employees are kept up-to-date with safety matters the Company has access to a library of safety information, Codes of Practices and Health and Safety Legislation etc. This library will be maintained with up-to-date information and changes in Law etc. The requirements of any Statutory Legislation or Code of Practice applicable to the processes or operations being undertaken and/or the premises that they are undertaken shall be observed.

Effective communication with our employees

We are committed to involving our employees and others in the continual cycle of improvement for our health and safety management. Good communication is essential to achieving our high standards of quality and health and safety compliance with the added values of employee inclusion and better morale throughout the workforce.

We promote an 'open door' policy for our employees, by which, they are encouraged through their inductions, to arrange face to face contact with line management and senior management to discuss health, safety and wellbeing. During any such sessions, managers will at all times, listen and engage with the employee, ensuring their point of view is considered and taken seriously. Managers will be expected to respond to any such meeting within a reasonable timeframe ensuring the points raised are adequately dealt with.

We recognise that effective health and safety communication is a two way tool. By involving our employees in the development of systems, the selection of work equipment, personal protective equipment, and or in the fact finding process of activity/process evaluation, we can be more efficient in the delivery of successful results.

We will ensure employees receive appropriate information, and continue to receive updates as they occur on the following:

At induction

- Company values and commitments
- Company Structure
- Policies and Procedures
- Significant Alerts, Risks or Changes

We will maintain and monitor formalised methods of communication such as:

- Staff/team meetings (Company or Site)
- Employee Inductions & Site Inductions
- Regular training/refresher training
- One to One appraisals and meetings
- Company Newsletters
- Site Inspections and feedback opportunities
- Posters
- Toolbox talks
- Accident/incident investigation findings and actions
- Evaluation and feedback forms

1.4. Health, Safety and Welfare

Adequate provision shall be made for the Welfare needs of employees whilst carrying out their tasks and duties and any hazard to health associated with the work shall be the subject of strict precautionary measures.

1.5. Measuring, Monitoring, Reviewing and Auditing

All activities and the use of related plant, equipment and materials etc., which affect the safety of that place of work, shall be inspected in accordance with legal requirements; Reports will be made and distributed to those concerned as necessary. Safety Inspections and other activities to measure, monitor and review health and safety performance, and conduct audit the effectiveness of the health and safety management system; will be carried out by competent personnel.

To support the company's current proactive monitoring and inspection program the company will:

- **Senior Management site inspections.** Will conduct periodic unannounced health and safety visits on the company works. This will be conducted as a minimum quarterly.
- **Contracts Manager.** Upon appointment the contracts manager will conduct regular health and safety inspections across the full range of activities undertaken by the company. These inspections shall record the site address and the supervisor responsible.
- **Health and Safety Advisor.** Under instruction from the company our health and safety advisors will complete site safety inspections as required.

SF

For and on behalf of: **Lowestoft Town Council**

Sarah Foote
Town Clerk

Date: 27 Sep 2024

2. Health and Safety Organisation

The inter-relationship of the various parties involved in the management of safety is shown in the following diagram.

2.1. Person Responsible for Health and Safety

- **The Person Responsible for Health and Safety, Shona Bendix, is responsible for the overall effectiveness of the Company's Safety, Health and Welfare Policy:** and the annual review and amendment of the Policy, or as may be necessary in the light of correct developments. They will ensure that regular reports are made regarding the Company's safety performance, accident record and of significant events affecting or arising out of the Company's operations. They are also responsible for the assessment of injury, loss or damage, risks and liabilities relating to the Company's operations and adequacy of insurance cover. Additionally, they must ensure adequate resources including finances are made available for safety measures.
- **Management of Health and Safety at Work Regulations 1999:** The responsible person, will provide adequate provisions within the Company for the assessment of risk, preventive measures, protection, emergency procedures, adequate health and safety surveillance and provide employees with information and training about the workplace health and safety.
- **Construction (Design and Management) Regulations and Approved Code of Practice:** In compliance with CDM2015 consideration will be given to the basic principles of risk reduction at all stages of a project. This includes proof of competence for all employees and sub-contractors, arrangement for coordination of health and safety during planning and execution, and improved communication between the various parties involved in a project, including those working on sites.
- **Competency of Personnel:** They will ensure that Senior Management's competency is adequate for the duties required of them.
- **Managers and Officers Compliance:** To ensure that competent managers are given the duty of keeping the Head Office library of safety information and the COSHH product files in order and up to date, and that the appointed Safety Offices, Fire Officers, First Aiders etc., are carrying out their duties in a proper manner.
- **Provision of Use of Work Equipment 1998, Lifting Operations and Lifting Equipment Regulations 1998, and Workplace Health, Safety and Welfare Regulations 1992:** To ensure that competent managers are given the duty of keeping in good, safe order the Company's premises, offices, storage areas, the yard and workshops, eating areas, toilets and washing areas, access ways, machines, equipment, vehicles, materials etc.
- **The Safety Representatives and Safety Committees Regulations 1977/The Health and Safety (Consultation with Employees) Regulations 1996 (HSCER):** To provide arrangements for a good working relationship with the Safety Representatives and Safety Committees established in accordance with the current legislation (SI 1977 No. 500).
- **Safety Induction and Safety Awareness Training:** To ensure that adequate provisions are in place for all employees, self-employed and sub-contractors etc., to receive Safety Induction and Safety Awareness training before they start work for the Company. To ensure that adequate safety betting arrangements are in place for all potential new employees.
- **Responsible Person:** Undertake the role of or appoint a suitably competent person to undertake the role of Responsible Person in compliance with the requirements of the Regulatory reform (Fire Safety) Order 2005.

2.2. Managers

- **General Requirements:** Managers are responsible for the effectiveness of incorporating the Health and Safety Policy and Procedures throughout our operations to ensure correct safe development.
- They are to apply the principles of the Policy to the operations under their control and ensure that any defects or faults brought to their notice are suitably corrected. They are to co-operate and liaise with the Safety Officers/Consultants, Principal Designers and The Health and Safety Executive etc., with regards to safety measures.
- They are required to have joint Health and Safety consultation with employees and to report regularly or as often as necessary to the person responsible for health and safety on our Safety Performance and compliance.
- **Managers Awareness of Safety Standards:** To be familiar with and to observe all Regulations, Codes of Practices and British Standards applicable to their work and related industries.
- **Company Safety Policy:** To ensure employees, sub-contractors and suppliers under their control, observe the Company's Health and Safety Policy and that all requirements necessary for effective compliance will be provided for.
- **Safety Appraisal:** Managers will also be responsible for ensuring Sub-Contractors, self-employed persons and supplier's safety arrangements are adequately vetted to ensure that their safety arrangements are in accordance with the company's Health and Safety requirements.
- **The Management of Health and Safety at Work Regulations 1999 & The Construction (Design and Management) Regulations 2015:** Managers are to ensure compliance with the regulations for maintaining in a safe order our places of work, premises, offices, storage areas, access ways, machines, equipment and materials etc.
- **Protecting the General Public:** Ensure the general public are not put at any risk or hazard from our operations and that security arrangements are kept in order at all times.
- **Fire:** To ensure that fire precautions and emergency evacuation procedures for our premises and places of work are maintained in order and complied with.
- **Health and Safety (First Aid) Regulations 1981:** Managers are to ensure that First Aid and Welfare arrangements for our premises/places of work are maintained in order.
- **Safety Inspections/Audits:** Institute an inspection procedure to ascertain that all activities under their jurisdiction are undertaken in a controlled safe manner with due regard for statutory obligations and approved Codes of Practice.
- **Statutory Records:** To ensure that statutory records and reports procedures are carried out, i.e., Registers for Lifting Appliances and Lifting Gear. Thorough Examinations and maintenance records for plant and equipment, The Construction Design & Management Regulations 2015, Inspection Report for Working Platforms and Excavations, etc.
- **The Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (R.I.D.D.O.R.):** Ensure details of accidents that may occur are entered in the Accident Books/Safety File regardless of whether or not such accidents involve sub-contractors, employees, visitors or members of the general public and to complete any further documents as may be required by the Regulations and forward such documents to the Head Office.
- They are to ensure that all accidents, dangerous occurrences, are investigated thoroughly and that suitable remedial measures are taken to prevent re-occurrence. For guidance on action to be taken in the event of an accident, contact the Safety Advisors immediately.
- **Displaying Statutory Information:** Managers must ensure that notices provided by the Company are displayed in a proper manner in places that are appropriate and easily accessible to all personnel concerned, i.e., Health and Safety Law Notices and safety signs for work areas, the Company Safety Policy, Appropriate Insurance Cover Notes and where applicable, the Form F.10 on sites, etc.
- **The Safety Representatives and Safety Committees Regulations 1977 and Health and Safety (Consultation with Employees) Regulations 1996:** Maintain a good working relationship with the Safety Representatives and Safety Committees established in accordance with the current Legislation. Consult with all employees not already represented by Trade Unions Safety Representatives with particular regard to evaluation of safe working procedures.
- **Client's Safety Requirements:** Ensure that employees are made aware of the Client's Safety requirements, i.e., the Client's Safety Policy, Conditions of Contract and Safety Procedures, restrictions on working practices.
- **Discipline:** Reprimand and discipline any employees and Sub-Contractors who are careless in regard to their own or others safety.
- **Personal Protective Equipment at Work Regulations 1992:** Managers are to provide appropriate protective clothing and safety equipment to employees and to ensure that employees and all those mentioned in the Scope section of the policy use protective clothing and equipment as and when required. PPE should always be regarded as the 'last resort' to protect against risks to safety and health, engineering controls and safe systems of work should always be considered first.
- **Visitors, including Suppliers, Delivery Drivers, Representatives, etc:** Ensure all visitors are made aware and comply with our safety requirements.
- **Competency of Personnel:** Managers are responsible for ensuring that Company personnel, including Sub-Contractors and Self-employed persons under their control, are adequately competent to carry out the work required of them. This includes ensuring that all Company personnel, sub-contractors and self-employed persons, receive Safety Induction where appropriate before starting work.
- **Assessments:** Managers are responsible for ensuring that all appropriate Assessments are carried out for the operations under their control. i.e., Risk Assessments, COSHH Assessments, Manual Handling Assessments, Noise Assessments, Display screen Equipment etc. Health and Safety risks must be reduced to a practical minimum. These Assessments shall form the basis of a Safe Method of Work Statement. For guidance and assistance contact the Safety Officer.
- **Safe Method of Work Statements, Safety Data Sheets, Engineering Designs and Drawings etc:** To instruct employees in precise terms as to work methods, this should outline the hazards associated with the job and detail any safety provisions required.
- **Welfare Facilities:** Will not start works until all welfare facilities are confirmed as adequate suitable for the works to be conducted: During any works ensure canteen, toilets/washing and drying facilities etc. are adequate and kept clean.

2.3. Supervisors/Foremen

- **General Requirements:** Supervisors are to organise works under their control so that it is carried out to the required standard with minimum risk to the workforce, equipment and materials. To be familiar with the Acts, Regulations, Approved Codes of Practice and local arrangements applicable to the work on which their Personnel are engaged and insist those Regulations and Codes of Practices are observed.
- **Co-operation and Liaison:** Supervisors are to co-operate and liaise with the Safety Officers/Consultants, Principal Designers and The Health and Safety Executive etc., with regards to safety measures ensuring that any defects or faults brought to their notice are suitably corrected.
- **Site Welfare Facilities:** Ensure adequate welfare arrangements are in order for the following, First Aid, toilets/washing and canteen facilities, etc.
- **Safety Induction/Safety Awareness Training:** To ensure that all personnel under their control have received Safety Induction and Safety Awareness Training.
- **Safe Method of Work Statement:** To instruct Personnel under their control in precise terms as to work methods in accordance with Safe Method of Work Statements, COSHH and Risk Assessment etc. for the site, detailing the hazards and the safety provisions.
- **Competency of Site Personnel:** To ensure that personnel under their control are adequately competent to carry out the work required of them.
- **Discipline:** Restrain and restrict persons from taking unsafe risks, discourage horseplay and reprimand those who fail to consider their own well-being and that of others around them.
- **Personal Protective Equipment Regulations 2022:** To ensure that all Personnel under their supervision wear all appropriate safety clothing and Personal Protective Equipment where required. Set a good personal example by wearing the appropriate personal protective equipment as stipulated in the site safety rules.
- **Plant and Equipment Safety:** To ensure that all plant and equipment used or worked on by employees is healthy, safe and fully efficient, is guarded and equipped with safety devices and tested in accordance with all the current Regulations. To check that periodic thorough examinations, tests, inspections and maintenance have been carried out for plant/equipment supplied to Personnel. To ensure that all unsafe plant defects noticed or brought to their attention are dealt with promptly, dangerous plant should be put out of service until it can be properly repaired.
- **Reporting Defects:** To report any defects in plant/equipment or any other health risk to their Supervisor where required.
- **The Reporting of Injuries, Disease and Dangerous Occurrence Regulations 2013 (RIDDOR):** All accidents and dangerous occurrences must be reported to Management immediately so that advice regarding the procedures can be given. Ensure details of accidents that may occur are entered in the respective Company Accident Books/Safety File regardless of whether or not such accidents involve sub-contractors, employees, visitors or members of the general public.
- **Alcohol and Drugs Policy:** Ensure that no person found under the influence of or in possession of alcohol or an illegal drug is removed from the premises and/or areas under their control and inform them that they may be subjected to disciplinary measures. Ensure that no-one smokes in designated 'No Smoking' areas instruct perpetrators to extinguish the cigarette immediately in a safe manner.

2.4. Employees/Self Employed

- **Health and Safety at Work etc. Act 1974:** It shall be the duty of every employee whilst at work to take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work. With regard to any duty or requirement imposed on their employer, or any other person by or under any of the relevant statutory provisions, they are to co-operate so far as it is necessary to enable that duty or requirement is performed or complied with. No person shall intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.
- **Company Health & Safety Policy:** Read and ensure a full understanding of the our Health and Safety Policy and carry out work in accordance with the Policy and Legal requirements.
- **Safety Induction:** Ensure a Safety Induction is received before starting work for us. This should be given to by the immediate supervisor, which will include details of the our Safety Policy and details regarding the Health and Safety requirements of the works expected.
- **Safe Method of Work Statement:** Ensure an understanding of the Safe Method of Work drafted for the tasks to be undertaken and carry out the work in the correct designated area. Whenever ambiguity of a particular safety requirement occurs, staff are expected to ask the Supervisor for clarification.
- **Control of Substances Hazardous to Health:** Before using substances that could be hazardous to health ensure an understanding of the requirements provided on safety data sheets and COSHH Assessments. The Supervisor should give this information before starting any such works.
- **Plant/Equipment and Tools:** Only operate Plant/Equipment for which you have been thoroughly trained on. Use the correct tools and equipment for the job. Ensure that they are supplied to you accompanied with the operators instruction and check that they are safe and fully efficient, that they are guarded and equipped with safety devices where required and tested in accordance with all the current Regulations. Do not use unsafe defective plant/equipment until it has been put back in good safe condition. Do not attempt to repair or maintain plant and equipment unless you have been properly trained to do so, particularly when it may involve the removal of safety guards or live electrical work. Ensure that guard protection is always in place where required.
- **Reporting hazards:** Report hazards to your Supervisor immediately and warn other persons that could be at risk.
- **Injuries:** Any injury to yourself or others must be reported to your Supervisor immediately.
- **Personal Protective Equipment at Work Regulations 2022:** Wear all appropriate safety clothing/equipment as and when required by the safe working method statement.
- **Work in a safe manner at all times:** Do not take risks, which could endanger yourself or others. Do not play potentially dangerous practical jokes, engage in horseplay or otherwise indulge in reckless or careless behaviour.
- **Alcohol, Drugs, Smoking:** If you are found under the influence of or in possession of alcohol or an illegal drug you will be removed from Company premises and/or areas of work under the Company's control and would be subjected to appropriate disciplinary measures which could include dismissal for serious offences. If you are found smoking in a designated 'No Smoking' area you will be instructed to extinguish the cigarette immediately in a safe manner and will be subjected to disciplinary measures.

2.5. Sub-Contractors

- **General Requirements:** To carry out works efficiently and safely and strictly in accordance with the requirements of The Health and Safety at Work Etc., Act 1974 and all other statutory requirements, Approved Codes of Practices. To produce safety procedures for their operations incorporating their own Company's Safety Policy commitments.
- **Undertake a Risk Assessment:** For the works that they will be engaged in outlining the hazards associated with the works and detailing the safety provisions required.
- **Safe Method of Work Statements:** These must be produced and submitted, detailing the Method of Work and the Safety Precautions that will be required to be taken in accordance with the Works Risk Assessment.
- **COSHH:** Provide full COSHH Assessment information on any hazards associated with equipment or materials they use before starting work for the Company.
- **To Appoint a Safety Supervisor:** Who will ensure that works are carried out in accordance with the works safety procedures and to observe all our rules and regulations and encourage good safety practice when undertaking their works.
- **First Aid and Welfare Facilities:** To set-up and maintain an efficient and adequate system of first aid and welfare facilities for their employees unless shared welfare facilities are provided by others.
- **Co-operation:** To co-operate with our Management team, and the Client's personnel in the furtherance of their duties and maintain good working relationship with safety representatives and safety committees established in accordance with current legislation, in addition to other contractors etc.
- **Competency of Personnel:** To ensure that work is carried out by suitable and competent Personnel and to ensure that they are properly supervised and trained.
- **Safety Induction:** We require all employees of Sub-Contractors to receive Safety Induction before they start work.
- **Discipline:** To reprimand and discipline any of their employees who are careless in regard to their own or others safety. (Note: We will not hesitate to instruct the removal of offenders from works).
- **Personal Protective Equipment and Clothing:** To provide appropriate protective clothing and safety equipment and to ensure that their employees use both clothing and equipment at all times when required by Law.
- **Statutory Registers and Forms:** To complete all statutory registers and forms.
- **Reporting Hazards and Accidents:** To report all hazards to our Management team and to report all accidents encountered by their employees to us and comply in full with the requirements of the RIDDOR Regulations 2013 with regard to reportable incidents.

2.6. Health and Safety Consultants

- We have appointed C&C Consulting Services Ltd to advise Management on matters relating to safety and health, i.e., relevant legislation, Codes of Practices and guidance material, fire precautions, the suitability of safety equipment and accident reporting procedures.
- **Health and Safety Inspections:** Where instructed, monitor by inspection of the workplaces and operations, workshops and accommodation, the safety and health performance of employees and to provide regular feedback on such inspections and other monitoring activities to the Senior Management.
- **Statistical Analysis:** To prepare statistical analysis in accidents and causation classification, with recommendations on preventative measures.
- **Investigate and Report Accidents:** To investigate and report on major injuries, notifiable dangerous occurrences, serious occupational ill-health, other accidents and incidents and to attend and report on legal proceedings in which we or Sub-Contractors working on our behalf may be involved.
- **Promoting Safety:** To promote good working relations with the Health and Safety Executive and other enforcing Authorities and to strive at all times to achieve with the co-operation of Management, compliance with current Legislation.

2.7. Other Persons

All persons, having responsibilities which relate to and necessitate their presence on our premises or work sites are to;

- **Observing Safety Rules:** All persons must observe the our safety rules and the instructions given by persons enforcing the Company's Health and Safety Policy.
- **Starting Works on Company Premises:** Work on our premises must not be started until all relevant safety rules are read, understood and accepted. Before starting work on Company premises show proof of full insurance cover for all risks.
- **Liaise with a Company representative:** All personnel must liaise with a Company representative before starting work on any of the Company's premises.
- **Notification of Hazards:** Notify the Company of any processes or materials, which will be used, that may present a hazard to the health and safety of the Company's employees etc.
- **Safe Means of Access:** Notify the Company of any hazards that may be encountered in obtaining a safe means of access and egress whilst on any of the Company's premises.
- **Do not interfere with or misuse** anything provided in the interest of health, safety and welfare.
- **Alcohol, Drugs, and Smoking:** Anyone found under the influence of or in possession of alcohol or an illegal drug will be removed from Company premises and/or areas of work under the Company's control and the matter would be reported to the employees Company. Likewise, anyone found smoking in a designated 'No Smoking' area will be instructed to extinguish the cigarette immediately in a safe manner and the matter would be reported to the employees Company.

3. Arrangements

3.1. General Company Policies and Procedures

3.1.1. Accident and Reporting Policy

We are committed to eliminating all accidents, injuries and incidents involving employees and third parties that may be affected by our operations. In pursuance of this goal it is essential that a comprehensive accident and incident recording system is in place and that all accidents, injuries and near misses are recorded, reported, analysed and followed up with a positive action.

Reporting and investigation are considered an essential reactive measurement and control tool to prevent a recurrence of similar events and circumstances.

This section of the policy sets out the responsibilities of staff and the procedures to be complied with following accidents and incidents involving our operations.

Internal Reporting: The Internal Incident reporting system will apply to all individuals working on behalf of the business. It also applies to near miss occurrences – i.e. incidents in which there is no resulting injury and for incidents where only property damage is the outcome.

Accident Book: Following any work-related accident or incident, regardless of how trivial it may seem, to an employee or visitor, the company accident book must be completed.

In addition to the above employees working on a client's premises or site must comply with the site accident book/reporting procedures conveyed during the site safety induction.

It is the responsibility of the individual to report accidents and incidents in which they are involved. Where this is not possible, a supervisor or colleague should report the accident or incident on their behalf.

Near Misses: These are incidents that have not resulted in any injury or damage to either persons or property. The fact that there was no material consequence however does not remove the need to record and report the incident. Often the lack of injury or damage is more due to good fortune than design, it is essential therefore, that these events are identified and controlled before a similar incident results in a more serious consequence.

We fully embraces a positive near miss reporting culture and actively promote and encourage the participation of all of our employees in ensuring that these events are reported when encountered.

It is our policy to report to a Manager, Supervisor or direct to the person responsible for health & safety any incident that an individual perceives to be a near miss. It also expected of all site-based employees to comply 100% with the near miss reporting policy of the client or principal contractor.

Near misses will not be recorded in the accident book, however upon receiving a report they will trigger an internal investigation process which will be completed by a Manager. The process will be recorded on an internal report. Upon completion, it will be forwarded to the person responsible for health and safety. They will ensure that the Health & Consultants have received a copy.

Minor Injuries: These are injuries, which either require very basic first aid treatment or no treatment at all. Injuries associated with this category fall outside the scope of RIDDOR 2013 and the prescribed reporting procedures that must then be followed. They may not prevent the person from carrying out their normal duties. Minor Injuries will trigger an entry into the accident book and an internal investigation process which will be completed by a Manager. The process will be recorded on an internal report. Upon completion it will be forwarded to the person responsible for health and safety. They will ensure that the Health & Consultants have received a copy

In every case the Manager must carry out an investigation into the causes and preventative measures required to be taken to prevent a recurrence. The level of investigation will be determined by the severity or seriousness of the accident or incident. For further advice or guidance, contact the Health & Safety Consultants.

It is the responsibility of the Manager to ensure that where actions have been identified to prevent a recurrence, they have been implemented.

External Reporting: Reporting of an accident must be carried out in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). The online form F2508, must be used for reporting to the HSE any death, injury, or dangerous occurrence as detailed by the Regulations.

Facts and evidence regarding accidents and dangerous occurrences should be obtained as soon as possible. A copy of all accident documentation, photographs etc., must be sent to the Head Office 'Accident File'. Ensure the Company Accident Book is completed for every accident/illness.

Reporting of Accidents (Management Responsibilities): Listed below is the action to be taken in reporting the different categories of accidents and dangerous occurrences in accordance with the RIDDOR Regulations 2013.

Incident Reporting Helpline

There is a single telephone number and address for reporting workplace accidents and cases of ill-health under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR).

The Incident Contact Centre allows employers to report specified injuries, cases of ill-health and dangerous occurrences to the enforcing authorities by telephone without the need to follow up the report in writing. The centre also allows employers to report accidents to the enforcing authorities by email or via the Internet for the first time.

Fatal and specified incidents may be notified by telephone to the National Incident Contact Centre between the hours of 8.30 a.m. and 5.00 p.m. on weekdays, without the need to follow up with a report

Telephone the Incident Contact Centre on: **0345 300 9923**

Reporting of all other incidents under RIDDOR must be submitted via the relevant online interactive form, available on the HSE Website - www.riddor.gov.uk. On-line forms are:

- F2508 Report of an injury

- F2508 Report of a Dangerous Occurrence
- F2508A Report of a Case of Disease
- OIR9B Report of Injury Offshore
- OIR9B Report of a Dangerous Occurrence Offshore
- F2508G1 Report of a Flammable Gas Incident
- F2508G2 Report of a Dangerous Gas Fitting

3.1.2. Alcohol & Drugs Policy

Anyone found under the influence of or in possession of alcohol or an illegal drug must be removed from Company premises and/or areas under the Company's control and would be subjected to disciplinary measures. Anyone found smoking in a designated 'No Smoking' area must be instructed to extinguish the cigarette immediately in a safe manner and be subjected to disciplinary measures. Special consideration must be given to Client conditions and requirements regarding this subject when working on their premises/Contracts.

Random drug screening may be carried out on employees engaged on safety critical work. If tests prove positive for alcohol or drugs, this would be classified as a breach of the Company Health and Safety Policy and would therefore result in disciplinary procedures, which could include dismissal. The Company as the standard will use the standards for a positive test shown below for Drugs and Alcohol generally. Company Management should check the standards of positive tests with all the Company's Clients and if there are standards for positive tests lower than the figures below, then those lower standards will be adopted by the Company for that particular Client.

Employees should note that it might take more than 24 hours for alcohol in blood to disperse. Employees should carefully consider this aspect, particularly those who are engaged on safety critical work, or those employees engaged on Contracts where the Company's Clients specify very low acceptable alcohol levels.

Any Company employee found under the influence, or in possession of illegal drugs whilst at work, will be removed from site immediately and the matter reported to the Police. This type of offence will be classified as a major breach of the Company Health and Safety Policy, which would result in the employee being dismissed.

Company Standards: All employees required to work on the Company's premises/Contract are required to be formally briefed on the Drugs and Alcohol Policy. Each employee receiving the standard Company's pack of documentation, which is inclusive of the Drugs and Alcohol Policy, are to receive briefings covering this subject as a part of their Induction for the Contract works prior to starting work.

Records required to be kept on Alcohol and Drugs Policy briefing, i.e., a Register.

Positive screening results

For the purpose of the standards, means screening for:

The presence of drugs, other than medication, which does not affect the work performance.

For the purpose of the standard, means screening for:

- More than 80 milligrams of alcohol in 100 millilitres of blood, or
- More than 35 micrograms of alcohol in 100 millilitres of breath, or
- More than 107 milligrams of alcohol in 100 millilitres of urine.

3.1.3. Fire Policy

We will meet with our obligations under the Regulatory Reform (Fire Safety) Order 2005 and nominate a Responsible Person. A fire risk assessment will be completed for the Head Office and other permanent places of work. Fire risk assessments for construction sites will be undertaken by the Principal Contractor. Significant findings within the fire risk assessment will be addressed accordingly to reduce the risk and the consequences of fire within the premises.

It is important that all staff constantly remain vigilant in the prevention and detection of fire on the premises. If you consider there is a potential fire hazard inform your immediate Supervisor/Manager immediately. Should a fire start, do not panic, shout out loud "Fire, Fire, Fire" and go to the nearest fire alarm point immediately and raise the alarm so that all other persons in the building are made aware of the danger.

After the alarm is raised, providing you have been trained in the use of fire extinguishers and as long as there is no personal risk, attempt to extinguish the fire using one of the extinguishers sited around the premises. Ensure that you use the correct fire extinguisher for the relevant type of fire; for example, do not use water extinguishers for electrical fires.

Leave the building by the nearest safe Fire Exit. Do not stop to collect personal belongings.

After leaving the building, go to the main assembly point; do not leave the fire assembly area until you have given your name to the person calling the register roll who will give any necessary further information. Do not re-enter the building.

The main fire assembly point is situated: Outside the building in the main yard area.

The person in charge of evacuation of the building in the event of a fire must be made known to all employees. This person is to take the employees attendance register and the visitor's book to the fire assembly point to assist the roll call.

If the fire cannot be controlled quickly with the aid of extinguishers, the Fire Service should be called using the emergency number (999). The Reception Staff should carry this out where possible. If the telephone system is not working or a phone is not accessible, go to one of the adjoining buildings to make the call.

If the fire is spreading ensure occupants of adjoining buildings are made aware of the potential danger.

Be familiar with the position of the fire alarm points as well as the location of extinguishers.

General precautions to prevent fires:

- Ensure all equipment that can cause a fire is handled with the utmost care
- Do not leave any naked flames unattended
- Extinguish cigarettes and matches properly and do not smoke in No Smoking Areas
- Do not discard cigarette ends or any hot items into bins or containers; use ashtrays
- Ensure all electrical machinery and equipment is switched off after use
- Ensure that gas appliances are properly turned off after use
- Store gas and oxygen cylinders in a proper manner in the designated area
- Substances that have the potential of causing a fire must be used and stored correctly
- Ensure that the Company premises have adequate fire protection to reduce the possibility of the spread of a fire where appropriate

3.1.4. First Aid Policy

We will ensure adequate first aid provisions are made for our employees.

General Company Requirements for First Aid: Management should ensure the Company's legal requirements for first aid is fully complied with. Provisions for first aid vary depending upon the nature of the works and the number of personnel employed. First Aid should be able to be catered for without difficulty at all of our premises and locations of work.

Where personnel etc., are working on site, Management should negotiate arrangements with Principal Contractors whenever possible. Where gangs of workers are to be supplied to sites to carry out works, one should be a Trained First Aider. Where the Company has lone workers, special consideration should be given to the Accident Section of this Policy section.

First Aiders: First Aiders must be properly trained by an HSE approved training body.

Emergency First Aid Qualified Person (EFAW): For construction sites, where there are less than five employees, there is no statutory duty to have a First Aider, but the Employer must ensure that an 'appointed person' is present to take charge of the situation if a serious injury or major illness occurs.

First Aid Kits and Boxes: All premises and places of work should have an appropriate amount of complete first aid kits. First aid kits/boxes must be easily accessible for the first Aiders/appointed persons. Boxes/kits should be checked frequently to ensure they are fully stocked and that all items are in a useable condition. First aid boxes/kits locations must be clearly identified with a first aid sign. Only specified first aid contents are allowed in first aid kits/boxes as detailed in the HSE Guidance Notes.

First Aid Record: All first aid cases that are treated must be recorded in the accident book.

3.1.5. Driving for Work Policy

This policy seeks to provide appropriate guidelines to ensure that we comply with our statutory duties to manage the risks associated with driving for work and as such applies to all employees required to undertake driving activities on behalf of company, regardless of the ownership of the vehicle used.

The principles of this policy shall apply to all work situations where driving is involved.

Whilst driving for work purposes, employees must comply with road traffic legislation, be conscious of road safety and demonstrate safe driving and other good road safety habits.

The following actions will be viewed as serious breaches of conduct and dismissal may be a consequence:

- drinking or being under the influence of drugs or alcohol whilst driving
- driving while disqualified or not correctly licensed
- reckless or dangerous driving causing death or injury
- failing to stop after a crash
- acquiring demerit points leading to suspension of licence
- any actions that warrant the suspension of a licence.

Also, non-disclosure of criminal convictions, which may include one of the above, will be considered a breach of terms and conditions and may result in dismissal.

Driving for Work is defined as travelling from your site base for the purpose of work on our behalf. This includes employees travel between our offices, sites and/or other premises, but does not include travelling from your home to your main base. It may include journeys which start from home where it is not practical to attend your work base first, such as travelling out of the area. This definition includes all driving for work, regardless of whether or not mileage payments are claimed for the journey.

All Employees shall:

- inform their line manager immediately if, for any reason, their licence is no longer valid
- ensure their insurance policy includes business cover for the amount and type of business mileage they undertake; employees who do not have business insurance are able to drive to and from work, nothing in between
- ensure that their vehicle is taxed and has a valid MOT if applicable
- report any road safety problems including crashes, incidents, fixed penalty notices, summons and convictions for any offence to their line manager
- present their original driving licence for inspection when required
- co-operate with any reporting and investigation procedures in the event of an accident or incident
- never drive defective vehicles
- adhere to all policies relating to the use of lease and/or pool cars
- be aware of what action needs to be taken in an emergency situation ensure they are physically fit to drive
- never drive while under the influence of alcohol or drugs if it could impair their ability to do so
- remember that some prescription drugs can adversely affect the ability to drive and check with doctor or pharmacist
- never undertake using a mobile phone while driving unless with approved fitted hands free kit (as outlined below)
- drive within speed limits and to the speed dictated by conditions, which may mean driving at less than the limit ensure that suitable breaks are included to prevent fatigue
- Consider the use of other, more sustainable methods of transport to support green/sustainability agenda whilst also reducing time spent driving and associated risks.

Vehicle Checks: Appropriate routine vehicle safety checks should be undertaken on any vehicle used for work purposes, regardless of whether it is a private vehicle, a leased vehicle or a company owned vehicle.

Use of Mobile Telephones whilst Driving: It is illegal to use a mobile telephone in the car at any time when the ignition is on, unless fitted with a hands-free facility. This includes when stationary at traffic lights or when parked on or adjacent to roads when the engine is running. No employee should use a mobile phone or portable hands-free kit whilst in the driving seat of a vehicle and the ignition is on, unless their life was in danger and they needed to contact the emergency services on 999 and to stop would exacerbate the situation.

Only car fitted hands free kits are acceptable. Whilst driving, making calls with a car fitted hands free kit must be restricted and kept to a minimum. When answering incoming calls, employees should inform the caller that they are driving or set up in advance an auto answering function of the mobile phone such as a messaging service. Employees should be aware that even though the use of fixed hands-free kits is not illegal, there is still a possibility of prosecution if a law enforcement officer believes that they were not in full control of the vehicle. For this reason, usage should be kept to a minimum whilst driving.

Any use of a hand-held mobile device is strictly prohibited whilst the car engine is switched on. The use of any hand-held mobile device for reading or responding to emails is strictly prohibited whilst the car ignition is switched on.

Driver's Health: Under no circumstance should employees drive for work when their ability to drive safely is affected. No employee should drive at work when they are under the influence of alcohol or drugs if they could impair their ability to do so. This includes, prescribed and over the counter medication. Where there are any concerns, an employee may be referred for specialist advice.

Employees are reminded of the requirement to inform the DVLA of any condition or illness that could impact upon their ability to maintain a driving licence (either directly or via their own GP).

Driver's Safety: Employees should consider whether a road journey is really necessary or whether alternative methods of transport can be utilised.

Employees should ensure that necessary journeys are scheduled to a realistic timetable and planned to take into account of the essential need for rest periods, delays due to road works and any weather limitations/restrictions.

Fines: Employees will be responsible for any speeding, parking or other infringement fines and for any associated legal costs.

Monitoring: Compliance with this policy will be monitored by the person responsible for health and safety as part of our management systems audit. Ongoing monitoring will also be undertaken to identify any potential changes in legislation and/or relevant Codes of Practice, following which the policy will be updated and submitted to the relevant committee for approval.

3.1.6. Young Persons Policy

No person under the age of 18 is allowed to drive, or operate any mechanical vehicle, machinery or plant unless being trained under the close supervision of a competent person. Under no circumstances is a young person permitted to use a chainsaw when working for us.

Site management must be informed if any young persons are brought onto any construction site where the company may be working.

The Management of Health and Safety at Work Regulations 1999 requires us to assess the hazards that may put a young person at risk, there we will:

- Assess risks to young people, under 18 years old, before they start work
- Take into account their inexperience, lack of awareness of existing or potential risks and immaturity
- Address specific factors in the Risk Assessment
- Provide information to parents of school-age children about the risk and the control measures introduced

Our Risk Assessment will determine whether the young person should be prohibited from certain work activities, unless:

- they are over minimum school leaving age and it is necessary for their training
- risks are reduced so far as is reasonably practicable and proper supervision is provided by a competent person.

3.1.7. Environmental Policy

It is one of our objectives to run our operations avoiding unnecessary or unacceptable effects on the environment. Any effects will be minimised as far as practicable. Environmental considerations will be given equal importance to the more traditional business issues such as production, research, sales, safety and finance.

The Company will work towards achieving its environmental objectives by:

- Minimising the impact of all its operations on the local and global environment and the quality of life of the local communities in which the Company operates
- Meeting all relevant statutory regulations
- Maintaining the cleanliness and appearance of premises to the highest practical standards
- Aiming for efficient use of all resources used in its operations and by reduction of waste through process improvements. Recycling of material is continued wherever feasible and further positive steps are taken to conserve resources, particularly those that are scarce or non-renewable
- Working with suppliers to ensure that the products and the services they supply are environmentally acceptable
- Providing the necessary information to enable Employees to operate the processes properly and with minimal effects on the environment.

3.1.8. Equal Opportunity Policy

We acknowledge the desirability of equal opportunities for employment and the observance of the codes of practice as far as it is reasonably practicable.

The intention of the policy is to see that no job applicant or employee receives less favourable treatment on the grounds of disability, sex, marital status, race, colour, nationality or ethnic or national origins, or is disadvantaged by unreasonable conditions or requirements.

Individuals should be selected, promoted and treated on the grounds of their performance, attitude and abilities. All suitably qualified Employees will be given equal opportunity to progress within the organisation.

All those who come into direct or indirect contact with Employees or applicants for employment should ensure that they understand this policy and recognise the part they have to play in its fulfilment.

It is the policy of the Company to encourage the employment and career development of disabled persons. No unnecessary limitations are placed on the type of work that they can perform.

Full and fair consideration will be given to disabled applicants for employment; existing Employees who become disabled will have the opportunity to re-train and continue in employment wherever possible.

3.1.9. Risk Assessment Policy

We recognise our duty conduct risk assessments for works activities. The purpose of these risk assessments is to identify the risks to health, safety and welfare of our employees, as well as others affected by the activities, in order that measures can be taken to either:

- remove such risk to health and safety from the workplace or
- reduce those risks to as low a level as practicable

In order to comply with The Health and Safety at Work etc. Act, 1974 and the Management of Health and Safety at Work Regulations, 1999, we require that written risk assessments be compiled by designated Company personnel on activities that could be deemed to, or do, present a health and safety risk to either our own employees or others affected by our activities. This will include as a minimum all of our work sites and projects.

Such assessments will be held at places where the risk is likely to be encountered and measures will be taken by this Company to ensure that the assessment findings and precautionary measures to be taken are communicated to persons at risk to which the assessment refers.

All risk assessments compiled will be subject to review if the designated person suspects that the assessment is no longer valid, or if there has been a significant change in the matters to which the assessment relates. This will include times where projects progress as the programme develops.

Where it is assessed the risk of an activity is high and remains high following the implementation of control measures and specialist guidance, alternative methods of working will be adopted.

3.1.10. Corporate Manslaughter/Homicide Act Policy

The Act sets out an offence for convicting our company, where a gross failure in the way our activities are managed or organised which results in a person's death.

Our management systems and practices will be examined, providing a more effective means for prosecuting the worst corporate failures to manage health and safety properly.

Prosecutions will attempt to prove a fatal activity was managed or organised in a grossly negligent manner, it will look at any systems and processes for managing safety and how these were operated in practice.

A substantial part of the failure within the organisation must have been at a senior level. Senior level means the people who make significant decisions about the organisation or substantial parts of it.

Penalties: If we are guilty of the offence we will be liable to an unlimited fine. The Act also provides for courts to impose a publicity order, requiring the organisation to publicise details of its conviction and fine. Courts may also require an organisation to take steps to address the failures behind the death (a remedial order).

We understand the impact this Act has on our business activities and accept that by ensuring the duties of care owed by employers under the Health and Safety and Work Act 1974 and other legislation, the potential of negligent failings at any level within the company can be fully controlled.

In ensuring that management systems remain effective at all times we will ensure that our auditing and review policy is fully implemented. Management systems will be reviewed periodically and will be formally audited at least every 2 years. All risk-based controls and method statements will be reviewed before every contract of work commences. Compilers and auditors are to ensure that their work is signed and dated and that periodic reviews take place during the contract period.

Site Audits and snap inspections are to be conducted by contracts managers and safety consultants as agreed, where items are identified as requiring action to make safe or comply with standards etc, an action plan is to be implemented and the contracts manager will ensure all points are rectified in line with the time frames noted.

3.1.11. Work Safe Policy

Working safely requires the establishment of safe systems of work, delivered by a competent workforce demonstrating the correct safety behaviours. Employees, or anyone working on our behalf, is expected to carry out any task where the risk to themselves or any other person is considered to be unacceptable.

Our Work-safe, or Refusal to Work Policy, empowers each member of staff with the absolute right to refuse to carry out work if they feel it is not safe to do so. Refusal to work on the grounds of Health and Safety is free from any disciplinary action and will not affect, in any way, their future prospects within the company

All refusals to work will be responded to positively & promptly and the employee raising the Work-safe procedure will be engaged by management throughout the process.

Managers and staff are encouraged to report any unsafe acts or conditions, which they have witnessed through the site reporting mechanism and also through our company reporting procedure.

Any situation leading to an individual refusing to work for Health and Safety reasons must be reported, in the first instance, to the senior person on site as soon as possible, explaining that you have invoked the Work-safe policy and why you have stopped work.

The person in charge shall, in discussion with the employee, make an assessment of the situation and determine the course of action required.

An agreement should be reached that there has been a suitable and sufficient risk assessment of the task, the system of work is safe and that the work can be restarted.

If a safe method of work cannot be agreed, the work will not be restarted and the person in charge shall report to the Managing Director, for further instruction. No work should be recommenced until the issue causing concern has been addressed.

Details of all refusals to work must be passed to the person responsible for health and safety who will log the event and track it to its resolution. Refusals to work on health and safety grounds will be reported on at Board level.

3.1.12. Slavery & Human Trafficking Policy

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. This Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our initiative to identify and mitigate risk:

- Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes
- We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain

It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

We have at our disposal the following Key Performance Indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of premises Audits by Safety, Health and Environmental Managers and consultants
- Use of labour monitoring and payroll systems to check eligibility of employees in the UK
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

3.1.13. Health Surveillance Policy

Health surveillance is about systematically watching out for early signs of work-related ill health in employees exposed to certain health risks. It means putting in place certain procedures to achieve this. These procedures may include:

- Simple methods, such as looking for skin damage on hands from using certain chemicals
- Technical checks on employees, such as hearing tests
- More involved medical examinations

Some health and safety regulations also require us to provide health surveillance for employees.

We recognise our duty to make arrangements for health protection and surveillance and employees are required to co-operate. There may be requirements for health surveillance to continue even after cessation of the exposure, but this is for diseases that have a long latency period (such as asbestos-related disease).

It is our policy to:

- Carry out risk assessments under the Management of Health and Safety at Work Regulations and any other applicable Regulations in order to decide if health surveillance is appropriate
- Place affected employees under suitable health surveillance where the risk assessment(s) indicate that health surveillance is appropriate
- Consult with employees and, where applicable safety representatives, over the proposed arrangements for health surveillance and for the need for affected employees to participate in these arrangements
- Inform affected employees, and where applicable safety representatives, of the health risks and of the health surveillance procedure
- Ensure that the person carrying out the health surveillance procedure is competent to undertake the task
- Ensure that the results of health surveillance are suitably recorded and that the records are kept readily available for inspection by any person who has a right to see them
- Suitably action any recommendations made as result of health surveillance and if necessary review the associated risk assessment
- Treat an individual's health surveillance records as confidential information
- Inform employees, and where applicable safety representatives, of the collective results of health surveillance, but ensuring that no individual is identified
- Ensuring that health surveillance records are retained for statutory retention periods

Noise: The Noise at Work Regulations 2005 will be complied with. Noise assessments will be carried out as appropriate and action taken as identified necessary. First priority should be to reduce noise levels and exposure to noise. Hearing protection should be used where other means of controlling noise has failed.

We will assess noise levels, reduce noise and exposure to noise and provide employees with information about the risk of noise, their responsibilities and how to obtain and look after ear protectors.

Where noise levels are such as to expose operatives to in excess of 80db(A) averaged over a working day, assessments will identify those operatives and/or activities that will require the provision of suitable noise reduction techniques and/or the use of ear defenders. Such assessments may be specific to site or related to the work activity. Operatives will ensure that the precautions suggested are implemented.

Where noise levels exceed 85dB(A) areas affected will be established, signed and protected against unauthorised entry. Ear protection is necessary to

prevent damage to hearing. The two main types of hearing protection are disposable or re-usable ear plugs and ear muffs. Ear protection shall be provided and worn by all within the noise affected area. Employees will be provided with information on hazards of work exposing them to noise levels in excess of 85dB(A) over a working day, instructed and trained in working methods to protect their hearing, including the use of ear defenders.

Exposure to noise may cause:

- Hearing loss
- Irritation, annoyance and fatigue
- Inefficiency and lack of concentration
- Failure to hear warnings, sounds and instructions

Safeguard your hearing:

- Use hearing protection as instructed
- Trained persons should supply and fit ear protection to suit individuals needs
- Keep ear protection clean, check regularly for damage
- Replace as necessary

A self-assessment questionnaire will be issued and completed by each operative at least annually. Any symptoms or signs of hearing impairment should be brought to the attention of management. Specialist advice will be sought from an occupational health professional as necessary.

Dermatitis/Eczema: Contact dermatitis is inflammation of the skin caused by contact with a range of materials. The main signs of eczema are redness, swelling, crusting and cracking and flaking of your skin. These include detergents, toiletries, chemicals and even natural products like foods and water (if contact is prolonged or frequent). It can affect all parts of the body, but it is most common to see the hands affected.

There are two main types of contact dermatitis:

- Irritant contact dermatitis
- Allergic contact dermatitis

Irritant contact dermatitis is caused by things that dry out and damage the skin, e.g. detergents, solvents, oils and prolonged or frequent contact with water.

Allergic contact dermatitis occurs when someone becomes allergic to something that comes into contact with his or her skin. The allergic reaction can show up hours or days after contact. Common causes include chemicals in cement, epoxy resins and some foods.

The signs and symptoms of the different types of dermatitis are similar. Dry, red and itchy skin is usually the first sign. Swelling, flaking, blistering, cracking and pain can follow.

Sometimes the consequences of contact with a material are immediately visible. Sometimes contact occurs without apparent effect. However, every contact can cause minute amounts of 'invisible' damage to the skin that can build up until more serious signs are seen.

Our procedure is:

- Avoid contact with materials that cause dermatitis. Adequate Information, instruction, training and supervision will be provided
- Protect the skin. Select suitable hand protection (barrier creams), suitable welfare facilities and appropriate PPE
- Check for early signs of dermatitis. A self- assessment questionnaire will be issued and completed by each operative at least annually. Any symptoms or signs of dermatitis / eczema should be brought to the attention of management
- Specialist advice will be sought from an occupational health professional as necessary

Respiratory Disorders: Chronic Obstructive Pulmonary Disease (COPD) is a long-term illness that makes breathing difficult. The lungs and breathing tubes are damaged making it difficult to get air in and out.

Common symptoms include:

- a persistent chesty cough and phlegm
- wheeze
- more frequent and troublesome chest infections

COPD is a slow developing condition; the symptoms tend only to start becoming a problem in mid-life, usually in the late forties onwards. A wide variety of dust or fume have the potential to cause COPD if exposure is high and over a long period of time, for example studies suggest the following substances have the potential to cause COPD:

- Hardwood dust
- Mineral dust
- Silica dust
- Solvent fumes in paint
- Welding Fumes

Some of these occupations and substances are also linked to other diseases, for example, welding fume can cause fume fever and pneumonia. Some can also cause occupational asthma.

Occupational Asthma: Breathing in substances called respiratory sensitisers at work can cause occupational asthma. A respiratory sensitiser is a substance which when breathed in can trigger an irreversible allergic reaction in the respiratory system. Once this sensitisation reaction has taken place, further exposure to the substance, even to the tiniest trace, will produce symptoms. Sensitisation does not usually take place right away. It generally happens after several months or even years of breathing in the sensitiser.

The symptoms are:

- Asthma - attacks of coughing, wheezing and chest tightness
- Rhinitis and conjunctivitis - runny or stuffy nose and watery or prickly eyes

Once a person is sensitised, continued exposure can result in permanent damage to their lungs and increasingly severe symptoms. People with rhinitis may go on to develop asthma. Asthma attacks are likely to become worse and can be triggered by other things such as tobacco smoke, general air pollution or even cold air.

Respiratory sensitisers are subject to the Control of Substances Hazardous to Health Regulations (COSHH). COSHH requires the substitution of harmful products with less harmful ones. If this is not possible then you must use adequate control measures.

Many substances and processes used in the workplace create dust and fumes. All dusts and fumes are a risk to health.

Our procedure is:

- Avoid long term contact with machinery or tasks that would cause COPD/Asthma
- Adequate Information, instruction, training and supervision will be provided
- Suitable dust suppression should be provided with the machinery
- If you have any doubts about the substances or material you are to use, speak to your supervisor

Checks should include the following:

- Identify material or substances before use
- Read any information on packaging or containers or manufacturer's instructions
- Make sure you have been trained in the use of the equipment
- Clean and service all equipment after use following maintenance instructions

Select suitable equipment with dust suppression measures, and appropriate PPE as the last resort. When it is not possible to reduce the risk at source, respiratory equipment can safeguard health. It is available as:

- Disposable face masks
- Half mask respirators and full-face respirators
- Positive pressure powered respirators
- Select the correct type of respiratory equipment
- Use additional protection, such as gloves, goggles and overalls as necessary
- Other equipment is designed for specialist work, e.g. in sewers

Vibration: Whole body vibration is transmitted through the seat or feet (known as whole-body vibration or WBV). Drivers of some mobile machines, including certain tractors, fork lift trucks and quarrying or earth-moving machinery, may be exposed to WBV and shocks, which are associated with back pain. Other work factors, such as posture and heavy lifting, are also known to contribute to back problems for drivers, however further study is needed into the impact of WBV.

Hand-Arm Vibration is vibration transmitted from work processes into workers' hands and arms. It can be caused by operating hand-held power tools, such as road breakers, and hand-guided equipment, such as powered lawnmowers, or by holding materials being processed by machines, such as pedestal grinders.

Regular and frequent exposure to hand-arm vibration can lead to permanent health effects. This is most likely when contact with a vibrating tool or work process is a regular part of a person's job. Occasional exposure is unlikely to cause ill health. Hand-arm vibration can cause a range of conditions collectively known as hand-arm vibration syndrome (HAVS), as well as specific diseases such as carpal tunnel syndrome.

Our procedure is:

- Avoid long term contact with machinery that would cause HAVS. Adequate Information, instruction, training and supervision will be provided
- Select suitable vibration dampened equipment, suitable welfare facilities (warmth) and appropriate PPE as the last resort.
- Check for early signs of HAVS. A self- assessment questionnaire will be issued and completed by each operative at least annually. Any symptoms or signs of HAVS/ white finger should be brought to the attention of management. Specialist advice will be sought from an occupational health professional as necessary.

Management of Stress: The company acknowledges that stress in the workplace can affect staff at all levels and can be caused by:

- Job content
- Working environment
- Relationship with others at work
- Excessive workload or working hours
- Inadequate training
- Personal problems outside the workplace

We will provide mechanisms designed to discover and manage instances of stress and promote a return to full health as soon as possible.

3.1.14. Protective Clothing & Equipment Policy

All employees must wear/use protective clothing and equipment where and when required, e.g. safety footwear, gloves, goggles, waterproofs, earmuffs/plugs, high visibility clothing and masks, must be worn where relevant. Safety harnesses, lifelines, gas detectors, emergency breathing apparatus, underground service detectors, should always be used where and when required.

Personal Protective Clothing and Equipment: All site personnel are required to wear all appropriate clothing and equipment when and where required.

- Safety Helmets are to be worn whenever there is a likelihood of head injury from either falling/flying objects or head strikes against fixed objects
- Safety Footwear - appropriate footwear will be worn for respective trades. Trainers and lightweight shoes are not permitted
- Gloves - appropriate gloves will be worn for respective trades particularly when demolition works are concerned so that hands are protected from cuts and abrasions so that it prevents the likelihood of catching Leptospirosis from rats urine
- Overalls - appropriate overalls are to be worn for respective trades when and where required. Overalls are to be cleaned when necessary if they are not of the disposable type
- Eye Protection will be worn whenever there is a likelihood of eye injury
- Masks of the appropriate type will be worn when and where required. Face fit tests will be completed for employees required to wear tight fitting RPE
- Ear Protection will be worn when noise levels are above 85 dB(A)

Further guidelines with regards to the wearing of protective clothing and equipment will be read before using substances and materials of a hazardous nature. This information will be contained in the COSHH Safety Data Sheets. COSHH Assessment Sheets will be supplied to the site before the materials are used.

It is our policy that on all sites, employees, sub-contractors, visitors and purchasers must wear safety helmets. The wearing of safety helmets is mandatory throughout the site, with only the following exception: Inside site offices and huts as long as no works are being conducted in those areas or within the immediate confines of these areas.

The Personal Protective Equipment at Work (Amendment) Regulations 2022 details additional duties for employers of both employees and limb (b) workers for the issue and upkeep of personal protective equipment (PPE)

Employers with both employees and limb (b) workers

- We will ensure there is no difference in the way PPE is provided to our workers, as defined by PPER 2022. This means we will assess the risk and ensure suitable PPE is provided, when needed, to all people that fall under the definition of worker.
- Our PPE will be compatible, maintained and correctly stored. All workers must use the PPE properly following training and instruction in its use from their employer. If the PPE provided is lost or becomes defective, the fact must be reported. PPE will be provided free of charge to both types of worker classification.
- The provision of PPE to our self employed workers will be at our discretion, however where such PPE is required to undertake a task and not provided by us, we will ensure that the worker is wearing the appropriate PPE for the task in hand. Managers and Supervisors will not permit work to commence unless the identified PPE is worn by all operatives involved.

3.2. Office Arrangements

3.2.1. Health & Safety in the Company's Offices

In considering the Workplace health Safety and Welfare Regulations, we will ensure that:

Maintenance: The workplace and associated equipment and systems must be maintained in a clean and efficient state, in efficient working order and in good repair. Statutory records of maintenance and testing for the following shall be kept for:

- Gas appliances
- Fire Alarm Systems
- Fire Equipment
- Intruder/Security Systems
- Pressure Systems
- Local Exhaust Ventilation Systems
- Air Conditioning Systems
- Air Handling Systems
- Water Storage Systems
- Asbestos Management Systems

Ventilation: Where windows or other openings will not provide suitable ventilation, mechanical ventilation systems should be provided and properly maintained.

Temperature: The temperature in workrooms must be "reasonable" and where practicable, this should normally be at least 16°C. Where work involves significant physical effort, the temperature should be at least 13°C. If, despite measures to heat or cool a workroom, workers are exposed to temperatures, which do not give reasonable comfort, suitable protective clothing and rest facilities should be provided. Sufficient suitable thermometers must be readily available to allow workers to check the temperature in the workplace.

Lighting: Natural lighting should be provided, where reasonably practicable; windows and skylights must therefore be kept clean. Lighting should be sufficient to enable people to work and move safely without visual fatigue. Local lighting should be provided where necessary. Where appropriate, emergency lighting must be provided and maintained

Cleanliness and tidiness: Floors, walls and ceilings, together with furnishings must be kept sufficiently clean, the standard of cleanliness depending on the use of the workplace. Absorbent floor surfaces, such as untreated concrete or timber, which are likely to be contaminated by oil, grease, etc, should be sealed or coated, e.g., with suitable non-slip floor paint.

Waste, dirt and refuse should be cleared regularly. Furniture, materials and tools should be placed so that they do not cause people to trip or fall and do not obstruct access or fire escape routes.

Space: Workrooms should have enough space to allow people to move with ease.

Workstations & Seating: Workstations should be arranged so that each task can be carried out safely and comfortably. Seating should, where possible, provide adequate support for the lower back; a footrest should be provided where the foot cannot comfortably be placed flat on the floor.

Floors and Traffic Routes: Floors of workplaces and surfaces of passages, staircases, access roads, etc., must be suitable for their intended use and properly maintained. Measures must be taken to reduce the risk of persons slipping, tripping and falling, or of vehicles becoming unstable. Any open side of a staircase should be securely fenced by an upper rail at 1100 mm, or higher and a lower rail. A secure and substantial handrail should be fixed on at least one side of every staircase.

Precautions against persons or objects falling (fencing and covers): Secure and suitable fencing, guard-rails or covers should normally be provided where persons are liable to fall. Guard-rails should consist of a top rail and at least one intermediate rail should be fixed to prevent persons from falling under the top rail. Where necessary, adequate upstands or toe boards should be fixed to prevent objects falling.

Ladders: Fixed ladders, which include steep stairways should extend at least 1.10m above any landing place that is served. Fixed ladders installed after 31 December 1992, with a vertical height of more than 6m, should have a suitable resting place every 6m. Floor openings for ladders should be as small as possible, with fencing and a gate provided where necessary to prevent falls. Fixed ladders at an angle of less than 15° to the vertical, which are more than 2.5m high, should, where possible, be fitted with safety hoops or permanently fixed fall arrest systems.

Roof Work: Where frequent access is needed to roofs, suitable fixed, safe means of access should be provided. Compliance with the requirements of the Work at Height Regulations 2005 must be achieved in all instances.

Stacking and Racking: Materials should be stacked and stored in such a way that they are not likely to fall and cause injury. Racking should be of adequate strength and stability.

Loading and Unloading Vehicles: The need to climb on top of vehicles or their loads should be avoided as far as possible. Where this is unavoidable, measures such as fixing fencing on top of a tanker should be taken to prevent falls.

Danger Areas: Where it is not reasonably practicable to take measures such as the provision of fencing, guard-rails, etc., to prevent falls, entry to such "danger areas" should be restricted to authorised persons who have received adequate information, instruction and training on any appropriate safe system of work. A Permit-to-Work system may be appropriate.

Glazing: Glazing of doors and walls, which could be broken, accidentally by persons or materials and cause injury, must be made of suitable safety material, or be adequately protected against breakage by suitable screens or barriers.

Windows: Windows, skylights etc., must be capable of being opened and closed without any risk. Windows should be designed, or provisions should be made, to ensure that cleaning could be carried out safely. Window cleaning is subject to the requirements of the Work at Height Regulations 2005.

Doors and Gates: Doors and gates which swing in both directions should have a transparent panel. On main traffic routes, all doors should be fitted with such panels. Power operated doors and gates must have appropriate safety features to prevent injury to persons where it is possible to be struck by them.

Traffic Routes: Traffic routes must allow the safe movement of persons and vehicles within the workplace and when entering or leaving it. Appropriate measures may include: clearly marked separate routes for pedestrians and vehicles; fitting reversing alarms to vehicles; appointment of a banksman to supervise safe movement of vehicles; display warning signs to alert drivers to restrictions in force; setting speed limits for vehicles and installing road humps; warning indication of height limitations or obstructions; use of one-way systems for vehicles; wearing of high visibility clothing.

Sanitary Conveniences and Washing Facilities: Suitable and sufficient facilities must be provided for the maximum number of persons likely to be at work in a workplace at any one time. Warm water, must always be provided but, in some cases, the provision of showers and/or baths may be appropriate.

Drinking Water: An adequate supply of drinking water must be provided, together with suitable cups, etc., unless the supply is from a drinking fountain. There should also be facilities for washing cups, or alternatively, disposable cups should be provided.

Accommodation for clothing and changing: Suitable and sufficient accommodation must be provided for any special work clothing and for personal clothing, which is not worn at work. Clothing should be able to be hung in a clean, warm, dry and well-ventilated place, with at least a separate hook, peg or hanger for each worker. Where workers are required to wear special work clothing, adequate room for changing should be provided and measures should be taken to ensure security, for example by providing lockers.

Facilities for rest and meals: Other than in offices, or similar clean workplaces, separate rest areas or, in new workplaces, separate rest rooms, should be provided. Suitable and sufficient facilities for eating meals should be provided where workers regularly eat meals at work. Minimum facilities should include a means of preparing or obtaining a hot drink and, where necessary, means of heating food.

3.2.2. Health & Safety (Display Screen Equipment) Regs 1992

We recognise that this legislation requires us to manage the risks posed by the use of Display Screen Equipment, to this end, we will identify the groups of persons directly and indirectly affected.

A 'user' means an employee who habitually uses display screen equipment as a significant part of normal work, whether at his/her own employer's workstation, at another employer's workstation, or at a workstation at home.

An 'operator' means an employee that has access to the same equipment as a 'user' but its use does not use it habitually.

Risk Assessment: We will undertake a DSE Risk Assessment for all 'users' and 'operators' This assessment may take the form of a self-assessment or be undertaken by a line manager. They will draw on the experience of 'users' and be recorded against an ergonomic checklist based on the schedule to the Regulations. Assessments will be reviewed periodically.

Information and Training: Employees shall receive the appropriate level of training in relation to DSE, including suitability of equipment, workstation layout, signs and symptoms of fatigue and pain resulting from DSE and early intervention measures to solve potential problems.

Eyesight tests: We will provide eyesight test to employees who are 'users' if they request the. This means a "sight test" as defined in the Opticians Act and includes a test of vision and an examination of the eye completed by a registered ophthalmic optician (optometrist) or a registered medical practitioner.

If the sight tests indicate that a 'user' needs 'special corrective appliances' (spectacles), as distinct from their normal spectacles, to overcome vision defects at the specific viewing distances they will be provided free of charge. However, we are only obliged to provide basic spectacles, which are adequate for the purpose. If users choose more expensive spectacles, they must pay the difference in cost between the basic ones and those of their choice. If a user's normal corrective spectacles are adequate for safe use at their DSE, the employer is not responsible for the provision of additional spectacles.

3.3. Workplace Arrangements

3.3.1. Asbestos Containing Materials

3.3.1.1. We do not work with ACMS

We will not knowingly work with asbestos containing materials (ACMs). To ensure / minimise such a situation arising, when tendering for any works on building constructed before 1999, we will insist on a R&D asbestos survey report undertaken by an accredited asbestos survey Company. If the survey indicates there is asbestos containing materials in or close to any areas to be worked, we will arrange with client for asbestos removal and the necessary asbestos clearance certification being issued prior to works being started.

This is in accordance with the requirements and guidance under Control of Asbestos Regulations 2012. Where operatives undertake works that may involve ACMs, operatives shall be trained to minimum of asbestos awareness standards. This will provide operatives with the foundation knowledge about ACMs and facilitate the full implementation of our policy for ceasing works where asbestos is suspected to be present. This training shall be refresher trained every 12 months by the completion of a detailed toolbox talk confirming policy, identifying any new procedures or industry practices etc.

In the event of an asbestos incident where asbestos is suspected to be present in a location where it has not been identified, or asbestos exposure may have occurred, or non-compliance with asbestos controls etc. need to be reported, the Site Manager must be informed immediately for further advice and to ensure full compliance with any Client's emergency procedures. The following process must be followed:

- Immediately stop the work
- All workers are to leave the work area, and where possible the work area should be locked or made secure in some other way
- Where clothing has been contaminated, if practical remove the clothing carefully so as to reduce the dispersion of fibres/dust and leave the clothing in the work area. If not practical to remove clothing, obtain assistance to lightly wet down the clothing (i.e. with wet wipes or a damp rag) to prevent the fibres being dispersed. Remove the contaminated clothing as soon as possible and seal in a bin liner. Store in a secure location pending safe disposal as contaminated waste
- DO NOT make any attempt to sweep up any suspect dust
- Report the findings/suspicion to the duty holder
- Do not re-enter the work area until the duty holder has confirmed in writing (if necessary, with the inclusion of Clean Air Certificates) that it is safe to do so.

3.3.2. Control of Noise

We have a duty to protect our employees and others from the effects of noise exposure. We have been provided with action levels to assist in meeting this duty of care.

An action level is a noise exposure level at which we are required to take certain steps to reduce the harmful effects of noise on hearing. There are two main action levels for continuous noise, 80dB(A) and 85dB(A):

The lower exposure action value: is a daily or weekly average noise exposure level of 80 decibels (dB(A)), at which the we have to provide information and training and make hearing protection available. As a guide, an employee may have to shout to be heard at a distance of 2m away from the person they are talking to.

The upper exposure action value: is set at a daily or weekly average noise exposure of 85dB(A), above which the employer is required to take reasonably practicable measures to reduce noise exposure, such as engineering controls or other technical measures. The use of hearing protection is also mandatory if the noise cannot be controlled by these measures, or while these measures are being planned or carried out. As a guide, an employee may have to shout to be heard at a distance of 1m away from the person they are talking to.

The exposure limit value of 87dB(A): above which no worker can be exposed (taking hearing protection into account).

Exposure to noise levels without protection at these levels, in the long and occasionally in the short term can lead to hearing damage referred to as Noise Induced Hearing Loss:

Symptoms of Noise Induced Hearing Loss: Mild form of noise induced hearing loss. There is sometimes difficulty in conversing with people, wrong answers may be given, and there is also, difficulty in hearing normal environmental sounds, such as a clock ticking. Severe form of noise induced hearing loss. There is difficulty in conversing, even when face to face with people. People will seem to be speaking indistinctly on radio and television and there is an inability to hear the normal environmental sounds of home and street. It is often impossible to tell the direction from which a sound is coming, and to assess the distance from the sound. (This last mentioned feature is a contributory factor in accidents). In the most severe cases, there is a sensation of whistling or ringing in the ear, (tinnitus).

In compliance with the regulations we will conduct suitable and sufficient assessments of the workplace where noise is produced.

The assessment may be structured as follows:

- Identify and note down all the work tasks that incorporate excessive noise
- Identify all the noise hazards associated with the activity i.e. those aspects (for example equipment, work processes, or work environment) which have the potential to cause harm. When determining noise hazards remember that actual practice may differ from your prescribed practices / procedures; (this is frequently a route whereby risks creep in unnoticed). Always consider the non-routine operations affiliated with the task, e.g. maintenance operations, loading and unloading
- Who Might Be Harmed: Identify All Workers Likely To Be Exposed To the Hazard. Consider others who might be affected. Do not forget maintenance or repair staff, security staff, delivery drivers, subcontractors, visitors, and the general public
- Measuring the Risk: The Level of Noise In dB(A). Arrange for a competent person to carry out a noise assessment, and obtain reliable information about work patterns and the noise sources. In planning, it is important that you consult the affected employees and their safety or employee representatives; this will help ensure co-operation with any control measures that might be needed
- Considering & Implementing Control Measures, consider whether all the existing control measures you have in place are adequate to prevent and protect people from injury. Take into account all of your existing preventative or precautionary control measures. Use the following as a guide to developing an effective and realistic action plan using your noise assessment findings

Elimination: involves removing the hazard completely. This is the most effective method of dealing with a noise hazard. Examples are:

- Purchasing finished components rather than having to grind or polish them on site;
- Replace noisy plant or processors by less noisy alternatives

It is often possible to reduce the risk at source, or to use a safer alternative. The following are examples:

- Ask potential suppliers for information on the noise emission of machines and whether they are likely to cause exposure at or above the first or peak action level.
- Changes in technology can alter the machine or process resulting in a lower noise exposure to the workforce. Sometimes a different way of working might avoid the need for a noisy operation.

Control of exposure: These provide you with alternative options for reducing the exposure from a noisy machine or activity, and include:

- Distance - Increasing the distance between noisy equipment / activities and the receiver is often the most effective method of controlling noise
- Enclosure involves placing a soundproof cover over the noise source. Noisy machines can be fully or partially enclosed or an acoustic cover can be placed around a noisy part of a machine
- Screens and barriers - This involves placing a physical obstacle between the noise source and the employees. The path between the points at which noise is generated and the workplace/receiver point can sometimes be modified by using screens or barriers
- Noise refuges - The employee workstation itself can be 'enclosed' by providing a cabin or 'noise refuge', which is an acoustically designed enclosure (with proper regard for its ventilation and seating arrangement). If controls are brought into the cabin it will be possible to reduce the need to enter noisy areas

Protective devices: can often be provided to minimise the amount of noise produced by the equipment. Examples are:

Avoiding impacts: Try to avoid impacts, or make arrangements to cushion them, for example; ensure that the cutting edge is always sharp on abrasive wheels to reduce the impact noise.

Damping involves adding material to reduce induced vibrations and the tendency of machine parts to 'ring', for example; bolt together, instead of welding, the individual steel plates joined to produce large structures. Proprietary magnetic damping material can be obtained.

Isolation: involves separating the machine from its surroundings. Flexible isolators made of rubber or springs can be used to reduce the spread of structure borne sound through a machine frame, for example purchase or hire equipment fitted with anti-vibration mountings to reduce the transmission of sound from hydraulic power supply pipes to the cab floor on an earth-moving machine.

Silencers: are attachments fitted to the inlet or exhaust (or both) of a moving air or gas stream emitted from machines. Mufflers or silencers can reduce noise transmitted along pipes and ducts, for example; exhaust and intake silencers on internal combustion engines; mufflers fitted to pneumatic breakers.

3.3.3. Damage to Services

Electrical Cables: Should any electrical cables be damaged, then everyone in the vicinity must evacuate the area immediately and position themselves so that no-one can approach the damaged cable. Management should then be notified so that they can inform the Local Electricity Company to deal with the matter.

Gas Mains: In the event of the presence of gas being detected during operations, either as a result of damage to gas mains or for any other reason, the following emergency action must be taken immediately:

- The person in charge must order immediate cessation of work and clear all employees and personnel from the area of possible danger
- Employees should be stationed at a safe distance to prevent the general public from entering the affected area and to warn against smoking and the presence of naked lights. Barriers and signs should be erected whenever possible
- All machines, excavators, compressors, dumpers, pumps, etc., in the area, must be switched off immediately and left standing. Naked lights and fires must be extinguished
- Notification of an escape of gas and precise details of the location must be conveyed immediately to the Management who will arrange for the local Distribution Superintendent of the Gas Company to be informed
- The Site Manager/Contract Supervisor should remain on the scene in order to ensure that the area is kept clear until the arrival of the Gas Company employees and officials
- The Gas Company will make arrangements if Police assistance is required but this should not deter Site Management from requesting Police assistance at the outset if the situation is considered sufficiently serious

Other Services: Should any other services be damaged, i.e. British Telecommunications cables, sewers etc., then Management must be notified immediately.

3.3.4. Electrical Safety

We will comply with Statutory Regulations, issued by the Institution of Electrical Engineers and designed to provide for the safety of electrical installations in and about buildings generally. Compliance with the IEE Regulations will, in general, satisfy the requirements of the Electricity At Work Regulations, the Electricity Supply Regulations and the Building Standards (Scotland) Regulations. These Regulations apply to all electrical equipment and systems and require that such installations must not give rise to danger; should be suitably insulated and protected and provide for the installation to be isolated, or cut off, or the current reduced in the event of a fault. The Regulations also require equipment and installations to be properly identified and labelled.

The Regulations create duties for employers, the self-employed and employees and cover all aspects of electrical work, requiring that persons who work with electricity are competent. To be considered competent, a person must have:

- Adequate knowledge of electricity
- Good experience of electrical work
- An understanding of the system being worked on
- Practical experience of that type of system
- Knowledge of the hazards that might arise and the precautions that need to be taken
- The ability to immediately recognise unsafe situations

General electricity demands for sites:

- Plant; 415v 3 Phase
- Portable Tools; 110v Single and 3 Phase
- General Site Lighting; 110v Single Phase
- Site Huts; 240v Single Phase

Procedures where working with Electricity:

- Before work starts on site contact the local Electricity Company and the Client to obtain all appropriate Service Drawings and advice regarding existing services
- Existing services should be made dead where dangers could arise from the electric due to building operations. It is now illegal to work on live electrical systems unless there is no other way in which work can be done
- All appropriate warning notices/signs should be displayed on live equipment/cables.c)
- Electrical equipment/cables should not be sited where it could be a hazard or be damaged
- Electrical equipment/cables should be checked regularly to ensure that it is maintained in good order. All electrical equipment found not in good order, must be taken out of service immediately
- Where a high voltage is taken, the user must provide adequate substation facilities and appoint trained duty holders to operate the equipment and supervise it's maintenance, alteration, repair or extension as may be necessary. Safe systems of work must be adopted and these will usually include the use of permit to work procedures

Damage to electricity supply services:

Should any electrical cables be damaged, everyone in the vicinity must evacuate the area immediately and position himself or herself so that no-one can approach the damaged cable. Management should then be notified so they can inform the Local Electricity Company to deal with the matter.

3.3.5. General Work Equipment

Managers will provide the right kind of tools and equipment for the job and to see that they are properly used. Information concerning the safe use of tools should always be requested from the manufacturers/suppliers who by law are required to provide such information. Tools should be regularly checked on issue from and on return to the store.

Employees must only operate equipment for which they have been thoroughly trained and use the correct tools and equipment for the job. Ensure that equipment issued is accompanied with the operators instructions and check that the equipment is safe and fully efficient. Equipment should be guarded and equipped with safety devices where required and tested in accordance with all the current Regulations. Defects in equipment and tools should be reported immediately to your Superior.

Do not use unsafe defective equipment until it has been put back in good safe condition. Do not attempt to repair or maintain equipment unless you have been properly trained to do so, particularly when it may involve the removal of safety guards or live electrics. Ensure that guard protection is always in place where required. Ensure the working environment meets the safety requirements for operating the type of equipment and tools you require to use, i.e., adequate space and lighting etc.

Pneumatic Tools: Compressed air is delivered at high pressure. If it enters the body it can rupture internal organs and cause death. Any form of horseplay or misuse should be expressly forbidden.

Compressors: Should always be under the supervision of a competent person who should be responsible for ensuring that the machine is kept in good order, i.e., making sure that feed belt and pulley drives are guarded, that hoses and couplings are maintained in good order and that regular checks are made to ensure that oil feed to the airline is properly topped up. Air receivers must be marked with a safe working pressure and distinguishing number. They must also be fitted with safety valves, pressure gauge, drain cock and manhole. Hose connections must be properly clamped - it can be dangerous to have loose or over-tightened connections. Air receivers must be cleaned and thoroughly examined.

Cartridge Operated Tools: Should only be used by properly trained and certificated persons over the age of 18 years. Supervised test runs are always advisable before the method of using the cartridge operated tools are put into general practice on site. When operating cartridge tools, operators should wear head, ear and eye protection. Major hazards in using cartridge tools apart from malevolent firing are as follows:

- Where material is of a soft nature, the fastener can puncture and emerge from the other side like a bullet
- Where the material is brittle or of uneven constituency, the fixing device may turn back on itself and injure the operator
- The material may splinter at the point of impact
- Recoil, which can throw the operator off balance
- Excessive noise levels in certain circumstances, for example, confined spaces.

3.3.6. Hand/Arm Vibration

Employees who are regularly exposed to high vibration can have conditions such as 'dead finger' or 'dead hand', which is caused by damage to the blood vessels or blood supply. Damage to nerves of the finger causing permanent loss of feeling and other damage to muscles and bone may also contribute to pain and stiffness in the hands and wrists.

Whole body vibration can also cause damage to the spine or vertebrae after long exposure. Symptoms of vibration white finger are usually set off by the cold, with early indications of the fingertips rapidly becoming pale and loss of feeling. These attacks can produce numbness and 'pins and needles'. This phase is followed by an intense red flush (sometimes preceded by a dusky bluish phase) signalling the return of blood circulation to the fingers and is usually accompanied by an uncomfortable throbbing. Continued work will see the affected area becoming larger.

Control Measures for reducing the risk of vibration exposure

The control measures to be implemented to ensure compliance with the above regulations is achieved will include:

- assessing the vibration risk to our employees
- deciding if they are likely to be exposed above the daily exposure action value (EAV) and if they are introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable, and provide health surveillance (regular health checks) to those employees who continue to be regularly exposed above the action value or otherwise continue to be at risk
- deciding if they are likely to be exposed above the daily exposure limit value (ELV) and if they are, take immediate action to reduce their exposure below the limit value
- providing information and training to employees on health risks and the actions you are taking to control those risks
- consulting the safety representative or employee representative on your proposals to control risk and to provide health surveillance
- keeping a record of your risk assessment and control actions
- keeping health records for employees under health surveillance
- reviewing and update your risk assessment regularly

Our strategy for reducing vibration

We will risk assess all work tasks, during which the following issues should be addressed:

- can the job be done without using high vibration tools? If this is not possible, is it feasible to reduce the vibration levels of the tools to be used?
- ensuring that any new tools have vibration controls built in. All tools, whether supplied new or secondhand, should be safe to use and handle in compliance with the requirements of the Provision and Use of Work Equipment Regulations 1998 and relevant British Standards
- arranging for operatives to stay warm by providing heating for the workplace and, where possible, suitable clothing and gloves employers will reduce the effect of cold on the operatives' hands and other parts of the body and help them to identify the symptoms of vibration-induced diseases more quickly

We will provide training to employees involving the correct use of vibrating tools. They will be helped to recognise the vibration symptoms and the need to report them to the supervisor.

The company requires employees 'at risk' to complete a Medical Questionnaire specifically relating to the use of Hand Held Tools. This will be used annually as medical surveillance to assess any possibility of hand/arm vibration syndrome.

Preventive measures:

Action taken by the employees to minimise the risk of injury or ill health should include:

- the use of working practices which are designed to minimise vibration being directed to the hands, thereby maintaining a good blood circulation to the affected areas;
- making sure tools are properly maintained and promptly reporting defects and problems with the equipment to their supervisors and obtaining replacements where necessary.

Keeping the hands and body warm is essential to help maintain good blood flow to the fingers and reduce the risk of injury. Specific measures might include:

- wearing anti-vibration gloves
- using proprietary heating pads for the hands
- using tools with heated handles
- avoiding pneumatic exhausts which discharge towards the hands
- allowing operatives to warm up before starting work, and helping them to stay warm
- wearing warm, weatherproof clothing for cold wet areas
- avoiding or cutting down smoking (smoking reduces blood circulation), and massaging and exercising fingers during work breaks

An important factor in preventing hand-arm vibration syndrome is by reducing the time which operatives are actually exposed to vibration. In a team of employees, if the use of a vibrating tool is shared between them, as opposed to it only being used by one person all day, then the tool can be kept in use for the full day.

By splitting up the work in this way and by rotating such personnel not operating the tools at that time to other areas of work will considerably lessen the effects of vibration on the actual user and assist the maintenance of blood circulation, thus lessening the chances of injury or ill health effects being caused by the use of the vibrating tool.

3.3.7. Manual Handling Activities

In carrying out a manual handling risk assessment, consideration will be given to the requirements of the Manual Handling Operation Regulations 1992. Under these Regulations we have a duty to prevent employees from handling loads that are likely to cause injury. This injury may be due to the weight of the load, but it is not sufficient just to think of manual handling hazards only as a function of weight. Other factors should be considered such as:

- The physical size of the load
- The provision of carrying handles or lifting straps
- The position of the centre of gravity within the load
- Is the load rigid or will the load move? i.e. partially filled fluid containers
- Is the load inert or is it a person?
- Where is it being moved from, and to where?
- If the load is being moved outside, consider weather conditions
- Consider the ground conditions over which the load has to be moved

In addition to the physical aspects of the load and the area in which it has to be moved, we must also consider the physical attributes of the person actually doing the lifting and carrying. Every employee is an individual and employers must also consider this when assessing manual handling tasks.

The first step in carrying out the assessment is to eliminate the need to manually handle loads if this is possible. This means introducing mechanical ways of lifting and moving loads whenever practicable.

A generic assessment may be undertaken, and the assessment applied across different premises or sites. However, in a construction the working environment of the workplace is continually changing and so the site managers and every employee must continuously be looking for, and assessing site operations that involve manual handling operations, and produce a site-specific assessment for moving heavy or awkward loads.

Employees are to be encouraged to highlight activities which involve manual handling operations which are likely to cause injury. In planning, managers will try to minimise the requirements for manual handling and ongoing training will be provided to employees to enable them to carry out their own assessments of the load before undertaking manual handling tasks and to enable them to lift using kinetic handling techniques.

In construction operations, there are a lot of manual handling issues, but items that must be considered at planning stage (with a view to eliminating the need for manual handling) are:

- The maximum weight to be lifted by one person should be 25 kg
- If the lifting is of a repetitive nature, this should be reduced to 20 kg

Heavy blocks must be assessed to see if there are alternatives. If not then smaller unit sizes must be considered so there is a corresponding reduction in weight.

Heavy kerbs typically weigh 67 kg and are too heavy even for 2 people. Therefore they should be only handled by mechanical means.

Masonry features such as plinths, lintels, arched lintels etc will likely require a mechanical lift to get them into position.

Difficult or cumbersome items such as plasterboard should be assessed and selected according to practical needs and health & safety. Boards 900mm wide are readily available and these are obviously easier and safer to handle than boards of 1200mm wide, especially if being fixed to ceiling joists, when the full weight of the board has to be sustained until fixed.

Heavy kerb stones should be questioned. Development work is progressing to try and design kerbs which are lighter, but when in position have the same properties as traditional kerbs. Until these items are available, traditional kerbs must be handled by mechanical means.

For new construction work mechanical means of lifting must be used. For short duration repair work, 2 man lifting frames can be considered but the kerbs should still be positioned as close to the working place as possible using mechanical means with the manual lift frame being used only for the final positioning.

Other items requiring special consideration include:

- Gas boilers and gas fires
- Large timber units such as stairs or kitchen units and worktops
- Large items such as double-glazed units, patio doors, security doors, garage doors etc.

These items should have been identified at the design stage and have been dealt with by the Designer and / or Principal Designer. However, as the Contractor or Principal Contractor it is equally important that we check and ensure we have the necessary assessments in place to ensure excessive weights or repetitive handling likely to cause injury does not occur.

3.3.8. Mobile Work Equipment

We will ensure that authorised persons are only carried by mobile work equipment suitable for that purpose, with features to reduce safety risks (as far as reasonably practicable) such as seats, restraints and rollover protection. Where there is a risk of rollover, this should be minimised by stabilising the work equipment, with a structure provided - such as a ROPS (rollover protective structure) - with sufficient clearance for anyone being carried. Where there is a risk of crushing, a suitable restraint system should always be provided for anyone being carried, unless such a system would:

- increase the overall risk to safety
- make the equipment significantly more difficult to operate (and thus not be reasonably practicable)
- not be reasonably practicable to put in place (e.g. for very old equipment, in use at work before 5/12/1998)
- fork lift trucks with either a mast or ROPS should, if not already fitted, be provided with restraint systems (e.g. a seat belt) where appropriate, if such systems can be fitted to the equipment, to prevent workers carried from being crushed between any part of the truck and the ground, should it overturn.

We will ensure our mobile work equipment has:

- facilities to prevent the equipment being started by unauthorised people
- facilities to minimise the consequences of collision, where there is more than one rail-mounted item in motion at the same time
- a device for braking and stopping
- (where required) emergency facilities for braking and stopping, operated by readily accessible controls or automatic systems - in the event of failure of the main facility
- adequate devices for improving driver vision, so far as reasonably practicable, where the driver's direct field of vision is inadequate to ensure safety - modern CCTV systems can be very effective where mirrors are found to be inadequate
- appropriate lighting, where used at night or in dark places, so the work activity can be carried out safely
- carries (or have located close by) appropriate fire-fighting equipment, when carrying or towing anything which could present a fire hazard and endanger employees

Those who provide remote-controlled, self-propelled work equipment must:

- ensure there is a means to stop it safely and automatically when it leaves its control range, if it presents a risk to safety while in motion
- provide features to safeguard against crushing or impact with other machinery, obstacles or people

Where the seizure of a drive shaft, between mobile work equipment and its accessories or anything being towed, is likely to involve a risk to safety, it must have means either to prevent seizure or the adverse effects of seizure. Means should also be provided to safeguard the shaft from soiling or damage from contact with the ground while uncoupled.

We will ensure that vehicles designed to travel on the highway, are fit for purpose, taxed where applicable and provide the legally required lighting to enable safe transit.

Our mobile plant and equipment is subject to PUWER thorough examinations and testing. This will be completed annually unless specified by the manufacturers instructions.

Operators should visually check their equipment/plant daily and report any fault no matter how trivial. Weekly confirmation of inspection registers will be provided on site and must be completed by the nominated person.

3.3.9. Portable Appliance Testing (PAT)

In view of the risks from damaged or faulty electrical equipment, an appropriate maintenance system should be set up. It is also important that equipment is regularly serviced in accordance with Manufacturer's instructions.

Users should carry visual checks out daily and competent persons should carry out formal inspections at regular intervals. These checks and inspections should ensure that:

- Bare wires are not visible and the cable covering is not damaged
- The plug is in good condition
- There are no taped or other non-standard joints in the cable
- The cable covering is gripped where it enters the plug or equipment
- The outer casing of the equipment is not damaged or loose
- There are no signs of overheating on the plug, cable or equipment
- Residual Current Devices (RCDs) are working correctly (the test button should be pressed daily).

Testing by a competent person can detect faults such as loss of earth continuity, deterioration of the insulation and internal or external contamination by dust, water, etc.

Outlined below is guidance on the intervals between inspections and testing as advised by the HSE:

Battery operated power tools and torches (Less the 25V):

- User Check: No
- Formal Visual Check: No
- PAT Test: No

25v Portable hand lamps (confined or damp situations) (25V Secondary winding from transformer):

- User Check: No
- Formal Visual Check: No
- PAT Test: No

50v Portable hand lamps (Secondary winding centre tapped to earth (25V)):

- User Check: No
- Formal visual Check: No
- PAT Test: Annually

110v Portable and hand-held tools, extension leads, site lighting, moveable wiring systems and associated switchgear (Secondary winding centre tapped to earth (25v)):

- User Check: Weekly
- Formal Visual Check: Monthly
- PAT Test: before first use and then 3 monthly

230v Portable and hand-held tools, extension leads and portable floodlighting (230v mains supply through 30mA RCD):

- User Check: Daily/every shift
- Formal Visual Check: Weekly, Before first use then monthly

230v Equipment such as lifts, hoists and fixed floodlighting (230v Supply fuses or MCBs):

- User Check: Weekly
- Formal Visual Check: Monthly, Before first use then 3 monthly

RCDs User Check:

- Fixed** Daily/every shift
- Formal Visual Check: Weekly, Before first use then 3 monthly

Equipment in site offices: (230V site/office equipment)

- User Check: Monthly
- Formal Visual Check: 6 monthly, Before first use then annually

*Residual Current Devices (RCDs) need a different range of tests to other portable equipment and equipment designed to carry out appropriate tests on RCDs will need to be used.

**It is recommended that portable RCDs are tested monthly.

3.3.10. Protecting the Public

The general public is defined for the purpose of this Safety Policy as any person who is not employed by the Company:

- Employees of neighbouring businesses
- Visitors to us and neighbouring business premises
- Pedestrians and road users
- Any persons who could be affected by Company activities on site locations.

General public areas must be kept free from any unsafe obstructions and activities that could be a hazard e.g. re-texturing of granite paving slabs using oxy-acetylene torches. Where general public areas have to be guarded-off due to the nature of work, all necessary temporary safeguards must be provided and adequate control measures put in place. Areas of possible danger to the general public must be safely guarded-off and appropriate warning notices displayed. Those that could be affected by the works must be notified in advance wherever possible so that where necessary, their normal safety arrangements can accommodate additional safety provisions necessary for the safe use of temporary works.

Where pavements could be affected by the works all appropriate signs and guards must be displayed. Temporary walkways for pedestrians must be at a safe distance from the work. The walkways should be defined with red and white continuous rigid guard-rails and toe boards or hoarding. Where temporary pedestrian walkways have to be located in roads, red and white secured road timbers should be used instead of toe boards and all appropriate road signs/lights and cones must be displayed.

Where pavements are required for closure, our safety advisors and the Local Highways Department/Local Council must be informed so that all appropriate precautions and controls are taken. Note: Pavements are used by mothers pushing prams, children, blind and disabled persons as well as ordinary pedestrians and they must all be considered when diverting/closing pavements.

Trespassers safety must also be considered so they are protected from danger. There is a particularly strong liability towards children who may be 'attracted' onto our premises or site works after working hours. The precautions to exclude children depend on circumstances. If it is reasonably foreseeable that a child might gain access, the precautions, which have been taken, are not sufficient. Every reasonable precaution must be taken to keep trespassers out of Company premises and sites. Considerations must be given to safeguard trespassers should they gain entry, e.g., Guard dogs must be under control. Machinery, plant and equipment should be left immobilised (disconnected/locked off) and in a safe condition.

Third Parties and Visitors: We have a responsibility not to jeopardise any persons safety. This covers not only Employees, but also the Client's Employees, Sub-Contractor's Employees, Visitors and persons making deliveries, etc.

Where third parties or visitors are allowed onto our Premises or site locations, they should be made aware of safety standards and any special hazards. They should be accompanied by a responsible person and provided with protective clothing/equipment where appropriate.

Site working areas must be suitably guarded/cordoned-off and appropriate safety signs displayed, particularly scaffold working platforms where the protection preventing persons from falling has been temporarily affected, at the base areas where hoists are being erected, areas where persons could be struck by hoist platforms and areas of potential fall of materials, etc.

3.3.11. Small Power Tools & Hand Tools

Small power tools and hand tools are much abused items in the workplace. In line with industry standards, power tools are limited to 110 volts or lower. The inspection procedures still need to be adequate to identify faults on a reasonably regular basis. Users of the equipment should inspect the tools before each use, and tools and equipment that are available for general use must be inspected in accordance with our procedures. When returned to the yard, store etc, the equipment should be 'IN' inspected to check it is still fit for use, before being made available again.

Hand tools can cause serious injury if not looked after. Once issued, the user is responsible for ensuring it remains fit for use, Do not use the tool for anything other than its designed purpose. Keep sharp edges clean and free from burrs, nicks etc, and replace loose handled tools and split/mushroom headed tools before they cause injury.

3.3.12. The Control of Substances Hazardous to Health

We have a duty of care to our employees and others when operations involve the use of substances that could be hazardous to health. Management have a responsibility to carry out a COSHH, Assessment for substances that could be hazardous to health and to have in place a management system for checking that the control measures required are in order. The Control of Substances Hazardous to Health Regulations 2002 defines in general and specific terms how we are expected to safely manage the use of potentially harmful substances. The Regulations are structured to describe a management strategy.

- Assess the hazards and risks to health
- Implement a control programme
- Ensure that controls are being used properly and maintained
- Where necessary, monitor the control measures
- Where necessary, measure workers exposure
- Where necessary, carry out medical surveillance
- Inform, instruct and train persons likely to be affected about the risks and precautions
- The keeping of records
- All suppliers and sub-contractors must provide full COSHH information on any hazards associated with equipment or materials supplied by us. This information must be passed to the relevant supervision for assessment before potentially hazardous equipment and materials are used. The COSHH Team Members (Managers) are responsible for vetting materials and substances to be used
- The Head Office library of safety information and the COSHH files are to be kept in order (up-to-date) by the COSHH Team Members (Managers)
- A stock of or individually issued protective clothing and safety equipment are to be provided when and where required
- Materials and equipment delivered to the Company premises or work areas are/is to be stacked and stored in a position/manner which does not create a hazard

Ventilation of the Workplace: Working environments must be kept free from toxic or explosive gases and it must be remembered that any gases which are heavier than air will tend to settle in excavations, basements and drains etc. The gases involved may be natural, like methane and sulphur dioxide or they may arise from nearby internal combustion engines (carbon monoxide), leakage from liquefied petroleum gas and acetylene equipment, fuel storage tanks and from welding operations, etc., or from substances used.

One of the most common methods of keeping the atmosphere healthy, is to use ventilation equipment to blow clean air into the working environment in sufficient quantities to dissipate the hazard, but careful consideration must be given to this method because this method may not efficiently remove particular hazards.

Where it is likely for gases to be present or generated that could be hazardous, tests must always be carried out in advance of work starting and continually monitored as work progresses with the use of Gas Detection Equipment.

No-one must enter into a working environment if toxic/inflammable gases or oxygen deficiency is detected and if a gas detector alarm goes off whilst persons are working in a confined space, then all persons must evacuate the working environment immediately.

3.3.13. Work at Height

A safe means of access and safe place of work is essential in any activity involving heights. Every year, 50% of all fatal or serious accidents occur because a person falls from a height. The Work at Height Regulations 2005 require employers (and self-employed persons) to plan all work at height, using a risk assessment approach, using the 'hierarchy of risk control' to assist in ensuring the correct safeguards and most suitable work equipment is selected for the task.

Hierarchy of risk control includes:

- Eliminating the risk wherever possible; can the work be carried out without the need to work at height?
- Provide a safe working place with secure protection – permanent protection or a temporarily protected place of work
- Provide 'collective protection' such as safety nets or safety landing systems - once correctly installed, they protect everyone working in that area
- Minimise the exposure by reducing the time and number of people required to work at height. During planning consider prefabrication therefore minimising the time spent working at height
- Only if none of the above is reasonably practicable should you consider personal fall prevention or fall arrest devices such as safety harnesses. If there is no alternative, the safety harness and restraint system must be carefully selected to minimise the risk of injury should a fall occur and that speedy and safe recovery of the person can be undertaken.

Work at height means any height from which a person can be injured should they fall. This means any work at height must be risk assessed and suitable safeguards taken.

3.3.13.1. Ladders

Ladders should only be used as a means of access and should be placed on firm, level and stable ground, and secured to prevent slipping or falling. Ladders must not be used as a working platform unless it is reasonable to do so taking into account:

- The low risk nature of the work being carried out
- The duration of work
- the ability to prove it was not reasonably practicable to use alternative, more suitable work equipment.

If ladders are used, their use must comply with Schedule 6 of the Work at Height Regulations 2005 and should:

- Be suitable and of sufficient strength for the purposes for which it is being used
- Be placed on firm level ground
- Be secured, or other means used, to prevent it slipping or sliding

If used as a means of access there must be a suitable handhold to provide a safe stepping off point.

If the ladder run is greater than 9 metres, there should be intermediate landing areas or rest platforms wherever practicable

It is our company policy that ladders should be regularly inspected for continued suitability. Our inspection routine is set out as follows:

- Visually inspected by the user every time they are used
- Thoroughly examined by a nominated person every 4 months supported by a written record.