

Health & Safety Policy and Procedures



Document Owner: SMD Building Services Ltd

Haigh Moor Farm, Haigh Moor Road

West Ardsley, WF3 1EF Herein referred to as SMD

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PREFACE – HEALTH, SAFETY & ENVIRONMENTAL POLICY AND PROCEDURES

PLEASE READ THE FOLLOWING:

The following documentation comprises the Health and Safety Policy and Procedures applicable to **SMD.** The documentation comprises:-

- Health and Safety Policy Statement
- Health and Safety Procedures Organisation and Management
- Health and Safety Procedures General Arrangements
- Environmental management Procedures

The above documents should be read in conjunction with the Appendices, which will provide guidance and information on a variety of topics. These will include:-

- (a) Specific work arrangements
- **(b)** Safe Systems of Work to be adopted by company employees.
- (c) Other specific aspects of health and safety management relevant to the Company.

The Health and Safety Policy and Procedures applicable to SMD will be distributed as follows:-

- Copies are held by Company Managers
- One set of Policy and Procedures will be held at the Company Offices.
- One set of Policy and Procedures will be available to all employees.

The responsible person for all documentation comprising the Health and Safety Policy and Procedures, as applicable to **SMD** is: **The Appointed Person.**



HEALTH & SAFETY AT WORK ACT 1974

SMD Building Services - Health and Safety Policy Statement

- 1. It is the policy of SMD to achieve and maintain the highest standards of safety and health for employees. Additionally, as suppliers of skilled labour at client premises (i.e. other than that of the Company) SMD acknowledges its special responsibility to ensure the safety of company employees off-site and others who may be affected by its' undertakings.
- Successful health & safety performance is a Management responsibility, based on a common understanding of the risks identified, with the control of the risks through good management. This will require a commitment from all employees to the highest standards with regard to health and safety.
- 2. The promotion of health and safety issues is a mutual objective for management and employees. The Company will seek the active involvement of all employees in maintaining a continuing interest in health and safety. Effective control of health & safety is achieved with a co-operative effort at all levels in the Company. The Company will ensure that a process of consultation with all employees is entered into in respect of health, safety and welfare and the procedures adopted.
- 3. The Company will do all that is practicable to prevent personal injury and damage to property and to protect everyone from foreseeable health and safety hazards, including the public where they may come into contact with the Company and its activities. Company will implement the established principles of prevention where it is reasonable to do so the. In particular the company accepts its responsibilities to:
- i. Provide and maintain safe, healthy working conditions, taking account of statutory duties.
- **ii.** Provide adequate Information, Instruction, Training and Supervision to enable all employees to perform their work safely and responsibly.
- iii. Make available all necessary safety devices and protective equipment and supervise their use.
- **iv.** Undertake hazard identification on an on-going basis, with the aim of reducing risks at the workplace to the lowest practicable level.
- v. Ensuring the provision of adequate first aid, medical and welfare facilities.
- **4.** To achieve a safe working environment, all employees have a duty to co-operate in the operation of this Health and Safety Policy and Company Procedures. *In particular all must:*
- i. Use any and all protective equipment provided and strive to meet all statutory obligations.
- ii. Work safely and efficiently at all times, following procedures adopted by the Company.
- iii. Adhere to Company rules and procedures as defined from time to time.
- iv. Report incidents and hazards that have led, or may lead to injury or damage.
- v. Assist in the investigation of accidents, aimed at introducing measures to prevent a recurrence.
- **5.** This health and safety policy is applicable to **SMD**. The duties and responsibilities for health and safety and the arrangements by which this policy is to be implemented are set out in the Health and Safety Procedures. The Policy and Procedures will be subject to review, to take account of changes in working practices and changes in legislation with regard to health and safety issues. Company Management will hold copies.

Mark Duffield (Director Responsible for Safety)



ORGANISATION - Management & Employee Responsibilities

Company Responsibility

The named Director with overall responsibility and accountability for health, safety and environmental performance for SMD at Haigh Moor Farm, Haigh Moor Road, West Ardsley and off-site where employees work in the commission of the businesses undertakings is: Mr. Mark Duffield (the Managing Director of SMD Building Services).

Senior Managers, Site-Based Managers and Supervisors:

Senior Manager of SMD Ltd. is accountable to the Director Responsible for Safety for the implementation and monitoring of our Health, Safety and Environmental Policy and Procedures. They are assisted in this role by the Company Health & Safety Advisor.

Site-Based Managers and Supervisors are responsible for the day-to-day management of health, safety and environmental functions and for ensuring that, where appropriate, the rules and safe working practices developed are implemented and adhered to. Our Site Managers will identify and ensure that those with supervisory responsibilities for workplace health & safety have adequate support to meet their duties. They are assisted in this role by the Company Health & Safety Advisor.

The Appointed Person

In accordance with the Management of Health and Safety at Work Regulations 1999, regulation 7(1) the Company will appoint a Competent Person on health and safety at work. The name of the person appointed will be made known to all employees. The Appointed Person will be responsible to Company Managers for:

- 1. Advising on all aspects to Health & Safety, relevant to the activities of the Company.
- 2. Seeking, where necessary additional expert advice in Health and Safety at Work.
- 3. Consultation, where appropriate, with Clients in respect of Health and Safety at Work.
- Keeping abreast of Health and Safety Legislation relevant to the undertakings of the business.
- 5. Developing and Maintaining appropriate Records, Inspection Reports and Schedules.
- 6. Monitoring, Review and Revision of the Safety Policy and Procedures.

Manager (West Ardsley) and Site Managers

Where the business undertakings of SMD take its' employees off site a *Site Manager* will be designated for the task, operation or project. The Site Manager is responsible, via his Supervisors for ensuring that safety and safe working practices are maintained. Our Site Managers are assisted in this role by the Company Health & Safety Advisor.

The Company Director and/or Site Manager will consult fully with Clients *prior* to work commencing off-site to:

- 1. Establish Health and Safety requirements,
- 2. Assess hazards, evaluate risks and ensure adequate Control Measures are in place.



- 3. Identify special requirements,
- **4.** Confirm Fire & Emergency Procedures, Assembly Points and the Welfare and First Aid facilities available at the site.
- 5. Inform the Client of Sub-contractors likely to be on-site during the task, operation or project.
- **6.** Determine possible risks to SMD employees due to the activities of the Client whilst at the premises or the site.
- **7.** Establish possible risks to the employees of the Client arising out of the activities undertaken by SMD.

Accident Reporting and Investigation: The Designated Manager or Site Manager is responsible for ensuring the follow-up investigation of accidents and incidents and the completion of any statutory forms relating to those accidents. Additionally, the Site Manager will monitor and report (as appropriate) on safety performance at the premises of Clients. Internal Accident Reporting Procedures will be implemented by completing the Injury / Incident / Near Miss Report at the Records Section to this Manual.

Fire Precautions and Procedures: The Designated Manager or Site Manager is responsible for the administration of company Fire Evacuation Procedures and the implementation of the procedures as required. The Designated Manager or Site Manager also will ensure that all periodic fire apparatus checks are carried out, monitoring work carried out by the fire apparatus contractors.

Personal Protective Equipment: The Designated Manager or Site Manager is responsible for the arrangements concerning use and for the supply of Personal Protective Equipment.

Health, Safety and Welfare: The Designated Manager for the West Ardsley premises will be responsible for employee health and welfare services, including; the administration of First Aid trained personnel, First Aid supplies and consumables and for the provision and maintenance of all signs and displays associated with health, safety and welfare. At site level this will be a delegated responsibility of the Site Manager under the advice of the Company Health & Safety Manager.

Plant and Equipment: The Designated Manager or Site Manager is responsible for ensuring that all new and existing plant and equipment is safe for use, and complies with all current regulations and legislation. Machine usage and operational documents such as Process Instructions, for which the Designated Manager or Site Manager is responsible, will include safety advice consistent with any hazards(s) that may be present.

The Designated Manager or Site Manager is responsible for ensuring that the building infrastructure, plant, machinery, equipment and services are serviced and maintained to a satisfactory standard, in compliance with all statutory requirements. Associated with this duty the Designated Manager or Site Manager will ensure that all logs, records and registers relating to workshop maintenance **and** equipment used off-site are compiled, maintained and retained as required.

Contract Management: The Designated Manager or Site Manager will be also responsible for ensuring that the contractual arrangements in force between the Company and the supplier(s) of services are conducted in line with the requirements of Company Policy & Procedures. The Site Manager will be responsible for health and safety issues arising from the presence of subcontractors retained on-site in connection with engineering matters.

From time to time, additional expertise may be required and the Company will co-opt that expertise.



Site Supervisors:

Site Supervisors are accountable to the Designated Manager or Site Manager for the day to day implementation of the Company's Health and Safety Policy and Procedures, established rules and safe working practices. They will consult with the managers responsible for the introduction of remedial measures to reduce or eliminate unsafe acts or conditions. Their responsibilities also include the informing, training and supervising of employees in safer methods of work, investigating accidents and occurrences that arise within their area of influence, in particular, where an employee who reports to them is involved. This responsibility includes completion of the initial Accident and Incident Report.

All Employees:

All Employees have a *duty* under the Health & Safety at Work etc. Act '74 to take *reasonable care of themselves and others*, and to co-operate in the implementation of the Company Health & Safety Policy and Procedures, together with established rules and safe working practices. *Additionally*, under the Management of Health & Safety at Work Regulations 1999 there is a duty for any employee to report to Company managers any *serious or immediate danger* to Health & Safety or any *possible shortcoming* in the employers Health & Safety Arrangements. Breaches of safety rules will be dealt with by means of the published disciplinary procedure.

Resolution of Safety Issues and Problems

Any employee with a health and safety problem must inform their supervisor. If, after investigation, the problem is not corrected in a reasonable time, or if the supervisor decides that no action is required and the employee is not satisfied with the explanation, the employee may then refer the matter to Company Managers or the Appointed Person for Health and Safety. The advice of the external expertise may be sought if required.

Consultation with Employees and Health & Safety

SMD recognises that consultation with employees in Health and Safety issues is an important aspect of successful safety management. To this end the Company will enter into a consultation process with employees. Senior Management will consult *directly* with *ALL* employees in regard to the following:

- 1. Any change which may substantially affect their Health and Safety at Work, for example; in procedures, equipment used or ways of working.
- 2. Employer's arrangements for getting *competent* people to help him satisfy Health & Safety laws.
- 3. The Information that employees *must* be given on:
 - i. likely risks and dangers arising from their work
 - ii. measures to reduce or eliminate these risks
 - iii. what employees should do if they have to deal with a risk or danger
- 4. The planning of Health and Safety training.
- 5. The Health and Safety consequences of introducing new technology.

Liaison with External Officials / Bodies

Except where noted to the contrary above, the Company Health & Safety Manager will be the principal contact with external bodies such as the Health and Safety Executive, the Company insurers and other bodies, statutory or otherwise.



Responsibilities under the CDM Regulations 2007

The Construction (Design and Management) Regulations 2007 – Introduction

The Regulations came into force in April 2007. They apply to construction work in Great Britain and its territorial sea. The construction industry covers a wide range of activities, hazards, materials, techniques, employment patterns and contractual arrangements. Operating in such a diverse industry requires good management of construction projects (from conceptual design through to the eventual demolition of structures) if health and safety standards are to improve.

CDM is intended to protect the health and safety of people working in construction, and others who may be affected by their activities. The Regulations require the systematic management of projects from design to completion. Hazards must be identified and eliminated where possible, and the remaining risks reduced and controlled. This approach reduces risks during construction work and throughout the life cycle of a structure (including eventual demolition of structures)

The revised Approved Code of Practice (ACoP) and guidance for CDM came into effect in April 2007 and is intended to clarify important issues such as the roles of the various duty-holders, how to assess competence and resources, how to prepare health and safety plans, and what should be in the health and safety file. The Health and Safety Executive publication *HSG224 Managing Health and Safety in Construction* should be referred to as authoritative guidance in implementing the requirements established under the Regulations.

CDM is intended to encourage the integration of health and safety into project management. Any paperwork should contribute to the management of health and safety. Work carried out under the Regulations needs to be targeted to where it will bring health and safety benefits. If you are asked to do something under CDM that will not produce a health and safety benefit there is probably a misunderstanding of what the Regulations require.

In summary, the Construction (Design & Management) Regulations Requires:

- A realistic project programme with adequate time allowed for planning, preparation and the work itself.
- Early appointment of key people.
- Competent duty holders with sufficient resources to meet their legal duties.
- Early identification and reduction of risks.
- Provision of health and safety information from the start of the design phase, through construction and maintenance to eventual demolition, so that everyone can discharge their duties effectively.
- Co-operation between duty holders.
- Effort and resources proportionate to the risk and complexity of the project to be applied to managing health and safety issues.



Responsibilities under the Regulations

- 1. The Client must appoint a CDM Coordinator to ensure health & safety is taken into account at the design & planning stage of the project together with a competent Principal Contractor to manage and co-ordinate the contractors on site.
- 2. The Client must make available to the Designer, the CDM Coordinator and Contractors such construction information as may be appropriate prior to the construction phase.
- 3. The Client must ensure the CDM Coordinator, Principal Contractor and sub-contractors are competent. Providing the company has sufficient competence, the company could be appointed as both CDM Coordinator and Principal Contractor.
- 4. The Client must appoint a Principal Contractor to manage health & safety activities on site.
- **5.** The Principal Contractor must develop an adequate Construction Phase Safety Plan as required, and prepare and submit information for inclusion in the Health & Safety File that is assembled by the CDM Coordinator and handed to the Client at the end of the construction phase.
- **6.** Contractors who sub-contract work must similarly ensure the sub-contractors are competent.

Application of the Regulations

With regards to construction work, the regulations will apply to work that is expected to involve more than 30 days of construction activities, or more than 500 person days of construction work, and there will be 5 or more workers on site.

If this size/timescale criterion is exceeded, the Regulations will apply in full. If this size/timescale criterion is not exceeded, the only requirements of Part 2 and 4 of the Regulations that will apply.

Company Acting as Principal Contractor

If the company is acting as Principal Contractor the duties and responsibilities are:-

- a) To take the outline health & safety plan from the CDM Coordinator and develop it into a management document to control health & safety throughout the project.
- b) To take reasonable steps to ensure co-operation between all contractors sharing the site
- **c)** Ensure, so far as is reasonably practicable, that all contractors (and persons) follow the rules contained in the health & safety plan.
- d) Take reasonable steps to ensure only authorised persons are allowed on site
- e) Ensure the project notification details are displayed
- f) Liaise and co-operate with the CDM Coordinator
- g) To give reasonable direction to any contractor, with regards to health & safety
- h) To develop such written rules as may be required in the Construction Health & Safety Plan.



- i) Disseminate information to contractors on the risks associated with the work
- j) So far as is reasonably practicable, ensure contractors' employees are aware of any site rules contained in the health & safety plan, and have been trained in the site's emergency procedures.
- **k)** Make arrangements, taking into account the nature and size of the project, for employees and contractors to advise, discuss and comment on issues that will affect their health & safety.
- I) Maintain health & safety file and present this to the CDM Coordinator at the end of the project.

Company Acting as a Contractor

When the company is acting as a contractor, its duties are:-

- a) To inform our employees and sub-contractors of the sites emergency procedures and any relevant aspects of the project health & safety plan.
- b) To co-operate with the Principal Contractor on health & safety issues, advising him of any new hazards or shortcomings in existing procedures.
- c) Advise him of any injury or dangerous occurrence.

The Construction Health and Safety Plan

The plan should set out the arrangements for the management of health & safety issues of the project and the monitoring of contractors' compliance with statutory provisions. It should also identify significant risks that contractors should take into consideration when planning and tendering for the work. In addition it would state what welfare arrangements have been made for the project.

If there are significant fire risks associated with the project a specific fire safety plan will be produced with details of the precautions and procedures to be followed to control this risk. If there are no significant fire risks, then normal company procedures relating to the control of fire risks will apply.

When the Principal Contractor is appointed, they should develop the plan into a full management control document for the health & safety aspects of the project. This detailed plan must be agreed with the client before on site work commences.



Health and Safety File

The Health & Safety File is developed on behalf of the Client. It is intended to provide other persons (who may undertake future maintenance, refurbishment or repair to the building or structure; or to undertake the eventual demolition of the building or structure with essential health and safety information.

The CDM Coordinator is responsible for the assembly of the Health & Safety File. Other CDM duty-holders will have an input with regard to the contents to the completed Health & Safety File. At the completion of the project, the CDM Coordinator must review the file and, before handing it to the Client, ensure the file contains the following information:-

- a) Drawings, plans and the design criteria (i.e. 'as built to' drawings)
- b) General details of the construction methods and materials used
- d) Details of any equipment and maintenance facilities
- c) Maintenance requirements and procedures for the structure
- e) Any procedural or suppliers or maintenance manuals or similar documents relevant to the maintenance of the structure or installed equipment
- d) Details of utilities, services provided to the structure
- f) Such information as would be appropriate for the health, safety and welfare of persons undertaking maintenance, refurbishment or repair to the building or structure

Information for Employees

Under the CDM Regulations employees are:-

- Entitled to information about health and safety (especially information about the significant risks) during the construction phase.
- They must be given an opportunity (by the Principal Contractor) to comment on the health and safety aspects of the project; i.e. Principal Contractor to consult with the employees on site.



HEALTH & SAFETY ARRANGEMENTS

1. COMMUNICATING ESSENTIAL INFORMATION TO EMPLOYEES

SMD Ltd. recognises its duty to provide all employees with suitable and sufficient information, instruction, training and supervision on health and safety matters. This includes the duty to communicate essential health and safety information to employees. Part of this requirement is fulfilled by displaying certain information.

The changing nature of the UK based workforce; in particular the employment of site operatives whose first language is not English is recognised by SMD as an issue that needs to be sufficiently addressed. SMD will provide **essential health and safety information** in the language understood by the non-English speaking employees where reasonably practicable. English speaking interpreters will be employed to assist Site Agents and essential safety information will be translated.

Health and Safety law requires SMD Ltd. as an employer to provide employees with certain information. For example the Company must display:

- 1. The poster "Health and Safety Law What You Should Know" (or issue individual leaflets)
- 2. A copy of the current Employers Liability Insurance Certificate
- 3. The current Fire and Emergency instructions for employees and company visitors.
- **4.** The names of trained First Aid personnel and location of the First Aid point.
- 5. Some hazard-specific posters, e.g. use of abrasive wheels, electricity and electric shock

1. The Health and Safety Law - What You Should Know

The poster provides employees with information on the following:

Employers Duties: Statutory duties are placed on SMD Ltd. under section 2(1) of the Health and Safety at Work Act 1974 (HSWA). This covers the general duty of care owed to employees by the employer to ensure, so far as is reasonably practicable the health, safety and welfare at work of employees.

Section 2(2) (a) to (e) specifies five further workplace-specific requirements covering a duty to:

- (a) Ensure a safe place of work,
- (b) Ensuring the use of plant and machinery and systems of work that are safe,
- (d) Provide you with information, instruction, training and supervision to protect your health and safety whilst at work.
- (c) Ensure articles and substances are moved, stored and used safely; and
- (e) Provide adequate welfare facilities.



The poster also lists particular issues that must be addressed; for example: risk assessments, health and safety arrangements (policies and procedures), workplace requirements, and avoidance of the need to undertake hazardous manual handling operations, the need to prevent exposure to hazardous substances and the provision of free PPE.

Employee Duties: The poster summarises the legal duties placed on all employees of SMD Ltd. under the HSWA as defined at sections 7(a) and (b) and 8 of the Act. They include a legally enforceable duty on all employees to:

- Take reasonable care for their own health and safety and that of others who may be affected by what they do or do not do; i.e. their acts or omissions in respect of health and safety.
- Co-operate with the Company to enable the SMD Ltd. to comply with health and safety law (for example the duty to wear PPE where a risk assessment has identified a need to protect employees from specific hazards).
- The HSWA also imposes a duty on employees not to interfere with or misuse anything
 provided in the interest of employee health and safety (e.g. not to remove machinery guards
 during use).

Management of Health and Safety: The poster identifies who within the organisation has been appointed to advise the SMD Ltd. on health and safety at work (the Appointed Person). This is a specific requirement of the Management of Health and Safety at Work Regulations 1999. The named person on the poster must be a Competent Person. In this organisation the Appointed Person is SafetyWise Solutions Limited. They can be contacted via Company Head Office.

Employee Consultation Process: SMD Ltd is required to consult with its employees or Representatives of Employee Safety (RoES) on certain health and safety issues. The names of RoES should be listed on the Health and Safety Law poster.

At site level the health and safety consultation process is implemented by the Site Agent / Manager, who will consult directly with all employees on health and safety matters.

The consultation process is further fulfilled with the establishment of Functional Safety Meetings at the Head Office of SMD. Meetings are convened from time to time and Representatives of Employee Safety attend. The meeting is chaired by a senior member of SMD Building Services management and the Appointed Person (see above) attends the meetings in an ex-officio role. Representatives of Employee Safety can bring to the Functional Safety Meeting health and safety concerns, ideas and suggestions etc. and speak on behalf of the employees they represent.

Reporting Health and Safety Problems: The poster sets down how employees should address any health and safety problems they may have. In the first instance employees should speak to Line Supervisors or Managers who should be able to resolve employee concerns (perhaps in consultation with the Appointed Person).

If an employee is not satisfied with the response of the Company and (in the opinion of the individual concerned) health or safety remains at risk of harm the individual can contact the Enforcing Authority (HSE). Details of the Enforcing Authority local to the site must be recorded in the relevant box on the poster. Details as to how to contact the HSE's Employment Medical Advisory Service (EMAS) must also be recorded on the poster. EMAS can provide employees with advice on workplace health issues.

Further Information: The poster lists further sources of Health and Safety information available to employees including suggested HSE publications and useful web site addresses.



2. Employer Liability Insurance

The organisation must display a copy of its current Employer Liability Insurance in an easily accessible location. (The Site Health & Safety Notice Board suits this requirement). It demonstrates that the Employer has in place current and adequate levels of insurance cover to protect employment rights were an employer to initiate action against the Employer under Civil Law.

3. Fire and Emergency Arrangements

The organisation is required to display information on what should be done in a fire or other emergency situation. The Site Health & Safety Notice Board suits this requirement. It should cover the location of Fire Assembly Points, names of fire marshals, a Fire Plan for the building / site, the names of persons trained to use firefighting equipment and what individual employees should do if the alarm is raised.

4. First Aid Arrangements

The names of trained First Aid personnel and location of the First Aid point must be displayed. The Site Health & Safety Notice Board suits this requirement. It should identify who is the nominated first aid trained person and where the nearest first aid resource is located. All accidents resulting in injury must be reported in the site accident book.

5 Hazard-specific Information

Some hazard-specific posters (e.g. use of abrasive wheels, or electricity and electric shock) need to be displayed in the workplace. This could be at the Site Health and Safety Notice Board or displayed at the point of risk, i.e. adjacent to the bench grinder or next to the electrical Mains Control Box.

Dignity & Respect at Work for Our Employees

SMD Building Services welcomes the full participation of the UK's multi-racial and multi-cultural society, particularly in our work environment. As a company we have long recognised the benefits brought to our industry with the employment of migrant workers, acknowledging the skills that they can bring to the industry and the skills shortage that we as a company have experienced.

We will strive to provide a well-resourced and tolerable working environment; recognising the various cultural needs of our employees. To meet this aim SMD requires the full co-operation of all of employees to ensure that we operate a work environment that is amenable to all needs.



Employee Entitlement Statement

As an employee you have the right to:-

- be treated fairly with dignity and respect
- work without fear of being discriminated against, bullied, harassed or suffer any other form of detriment
- Work without being distracted by inappropriate behaviour. Such behaviour might include:-
 - the use of aggressive, threatening or offensive language
 - persistent bad behaviour that interrupts your work
 - o Failure to respect your property.

What SMD Expects from Our Employees & Contractors Employees

We expect our employees and those of our subcontractors to act responsibly at all times by adhering to our policies and procedures. This includes and is not limited to:-

- Respecting our buildings, furniture, equipment, plant and our work environment.
- being courteous and respecting the rights of others
- not participating in emotional or physical bullying
- not discriminating on the grounds of gender, race, sexual orientation, religion, disability or age
- not causing offence or disturbance to other employees; for example, by making excessive noise.
- using bad / abusive language, or any other discourteous behaviour
- not making sexual remarks, ogling / leering, wolf-whistling or cat calls
- not telling jokes based on gender, race, sexual orientation, religion, disability or age
- making unwelcome physical contact

Complaints of Unfair and/or Discriminatory Treatment

If any employee of SMD feels they have been subjected to unfair and/or discriminatory treatment, they may raise a grievance either formally or informally. We will deal with the complaint fully and sensitively. In some cases this may involve initiating disciplinary action against those who do not comply with these guidelines.

Our Site Managers will be expected to respond to any complaint of unfair or discriminatory treatment effectively. Senior Managers will be informed of any such complaint as soon as is practicable and the Senior Manager (to whom the reported complaint is made) will be charged with the responsibility of resolving the issue through to a conclusion that is satisfactory to all concerned.



2. PERSONAL SAFETY & OCCUPATIONAL HYGIENE AT WORK

SMD is committed to taking all reasonable precautions necessary to secure the health and safety of those carrying out work activities. This commitment extends to the protection of those employees who work away from company premises. The person responsible for the implementation of this policy is: the **Site Manager.**

Arrangements for the Personal Safety of Workers

Safe working procedures have been devised for all work activities where a significant risk to health and safety might exist. These must be complied with at all times. Failure to work in accordance with agreed procedures reduces the safety of people at work, is a contravention of company safety policy and may constitute a criminal offence.

Working alone

SMD will ensure that the need for employees to work alone will be avoided wherever reasonably practicable. Where employees do work alone a Risk Assessment will be undertaken and personal safety will be made a high priority at all times. This includes ensuring that there is regular communication with a responsible person before, during and upon completion of the work. Lone workers must take the necessary steps to ensure that they do not put themselves at significant risk during the work activity, when using work equipment or as a consequence of the work environment.

Management & Supervisors Responsibility

Managers and Supervisors are responsible for the adequate supervision of employees to ensure that they do not endanger themselves or others by work activities, practical jokes or horseplay. Employees must be prevented from using equipment or undertaking tasks which could be detrimental to their health and safety. Additional considerations are required by the manager of employees whose duties take them away from the normal workplace, or where employees are required to work alone. Any special arrangements will depend upon the nature of the risk. Advice on, or assistance with, personal safety will be obtained where required. Managers must ensure that employees have received sufficient information and training regarding their personal safety to enable them to work without risk, so far as is reasonably practicable.

Employee Responsibility

Employees must ensure that they do not compromise their own health and safety whilst at work. If there is a perceived shortcoming in the arrangements for the work activity, affecting the personal safety of any individual, *this must be reported to a responsible person*. Employees must work in accordance with safe working procedures at all times, and comply with company policy and procedures. Where work is undertaken away from SMD company premises, thought and attention must be given to any hazards that are present in and around the working area. Employees must also familiarise themselves with safe working procedures, including emergency arrangements, applicable to all premises which they enter. They should report any situations presenting a risk to personal safety immediately



SAFE SYSTEM OF WORK

The following actions should be followed to ensure personal safety.

- 1. Always work in accordance with designated safe systems of work.
- 2. Promptly report to a manager or another responsible person any condition or activity which appears to be of significant risk.
- 3. Never deliberately misuse plant or equipment.
- 4. Do not tamper with anything that has been provided in the interests of health and safety.
- 5. Ensure that safety alarms and warnings can be heard at all times.
- **6.** Actively participate in evacuation drills and with other arrangements.
- **7.** If working alone, maintain regular communication with a responsible person.
- **8.** Inform a responsible person of any health condition which may be affected by the work activity.
- 9. Do not undertake tasks without having received authorisation and training.
- **10.** Only bring personal equipment to work where this is expressly permitted.
- **11.** Never indulge in horseplay.

Young Persons at Work

The Company will implement appropriate measures to fulfil the requirements of regulation 19 to the Management of Health & Safety at Work Regulations 1999 to protect the health and safety of young persons in the employ of the Company and record those measures provided. *Definition:* A Young Person is defined as an individual *who has not yet attained the age of 18*.

The Health and Safety at Work Act 1974 requires employers to ensure, so far as is reasonably practicable, the health, safety and welfare of *all* employees, taking into account the prior knowledge, experience and maturity of the individual. The information, instruction, training, supervision and safe systems of work for *young persons* may differ to those applied to experienced adults. Young persons will be given the raised level of information, instruction, training and supervision to enable them to work safely. Concerns regarding the employment of young persons in the workplace should be addressed to the Designated Manager, responsible for the implementation of this policy.

The Company will carry out risk assessments specific to the employment of young persons in the Company before they start work. They will apply to all young people including long-term employees, temporary staff, those on government-funded schemes and those on work experience programmes. The extent of the risk to which young persons might be exposed will be a deciding factor as to whether the work of young persons should be restricted.

In addition to the normal health and safety records kept relating to particular work activities, the following record should be kept with regard to young persons.



- 1. Risk Assessment records for the specific risks relating to young people.
- **2.** Training and information given to young persons, with a record of competence.

SAFE SYSTEM of WORK for YOUNG PERSONS

Additional to the specific training they will need to carry out their work, young persons need to be aware of the following general rules for safeguarding their safety and the safety of others.

- 1. Games and practical jokes are not appropriate in the workplace.
- 2. Work areas and gangways need to be kept tidy.
- 3. Good personal hygiene is essential. Use of barrier creams where appropriate.
- 4. If PPE and clothing is issued, this needs to be used and kept in a good condition.
- **5.** Running in the workplace can be dangerous. Safe routes must always be used. Pay particular attention to the fact that Forklift Truck operations are constantly in progress be careful.
- **6.** Lifting and carrying should be carried out in the correct manner and supervisors should arrange instruction and training, and monitor the necessary techniques are used.
- Electricity can very dangerous. Electrical equipment should only be used as instructed.
- 8. Machines *must not* be used unless training and authorisation has been given.
- **9.** Machines *must not* be used unless a safe means to do so are available as per the training given, including guards, covers, circuit breakers, etc.
- **10.** Hazard warning signs for harmful substances need to be recognised and instructions followed.
- **11.** Care must be taken when handling flammable substances and smoking prohibitions must be observed. Carelessly discarding rubbish or smoking materials presents a serious fire hazard.
- **12.** Any injury must be reported to managers / supervisors
- **13.** Be fully aware of fire, emergency and first aid arrangements and actions.

Temporary Employees and Safety Whilst at Work with SMD

Where the Company takes on the services of temporary employees it will ensure that measures are in place to protect their health and safety. The Company recognises that it carries a duty to conduct its business in such a way so as not to compromise the health and safety of both temporary staff and contractors who may be on site. In the areas of the Company where temporary employees are occasionally employed, hazards will be identified and the risk to temporary employees will be suitably and sufficiently assessed.

All temporary employees will be provided with comprehensible and relevant information by the Company on the following:



- (a) The risks identified in the Risk Assessment process.
- (b) Measures taken by the Company to control the risks and protect their health and safety.
- (c) Action to be taken by all employees in the event of an emergency situation.
- (d) The identity of the competent person(s) who might initiate the Emergency / Fire Procedures.
- **(e)** The risks notified to the Company by the employer of other employees on the site. (i.e. contractors)

SAFE SYSTEM OF WORK FOR TEMPORARY EMPLOYEES

- 1. The Company will provide temporary employees and those on fixed term contract with comprehensible information on the qualifications and skills required to carry out their work.
- **2.** Employees from other employers (e.g. Contractors) carrying out temporary work at the Company premises will be provided with information on the risks they might be exposed to (whilst on the site) and the Control Measures in place.
- **3.** The Company will provide details of the arrangements in place for Emergency situations.
- **4.** Where any health surveillance measures are in place (because of the nature of the work), details of such will be provided for temporary employees.
- **5.** The Company (as the Host Employer) will provide employers of temporary staff (e.g. Employment Agencies) with relevant information, to inform temporary staff of Company requirements.

Arrangements for Occupational Hygiene at Work

Good personal hygiene practice is important in ensuring a safe and healthy place of work. It is particularly important that high standards are maintained where employees are exposed to substances or conditions that may be hazardous to health. This policy highlights the standards that are required in relation to personal hygiene. The person responsible for the implementation of this policy is: **the Designated Manager or the Site Manager** and the co-operation of all personnel within the organisation is essential.

Management responsibility

Managers should ensure that the following requirements are met.

- **1.** Applicants for employment should be screened for pre-existing health conditions which may have been caused or exacerbated by poor personal hygiene.
- **2.** Employees should receive sufficient information and instruction in the standards of personal hygiene that are required and the facilities that are available at the workplace.
- **3.** Personal protective equipment should be stocked, issued and maintained in accordance with company policy, and replaced or disposed of at the appropriate time.
- 4. Suitable laundry arrangements should be made for cleaning of overalls and uniforms.
- 5. Suitable facilities should be arranged for employees and those on temporary or mobile sites.



- **6.** Work conditions and facilities, including washing and sanitary conveniences, should be adequate to enable workers to maintain good standards of personal hygiene.
- **7.** Routine site inspections carried out by Managers (or the Appointed Person) should include examination of the facilities provided for occupational hygiene.
- **8.** Employees should comply with company rules on eating, drinking and smoking at the workplace.
- **9.** Potential hygiene problems should be dealt with quickly and effectively, taking into consideration the need for medical confidentiality where this applies.

Employee Responsibility

Employees are responsible for ensuring that they maintain good standards of personal hygiene whilst at the workplace and for ensuring compliance with the company's working arrangements for achieving this requirement. Where problems are identified in working arrangements or facilities or with the health and safety of the individual, these must be reported to a responsible person immediately.

Employees must make full and proper use of facilities provided to assist in achieving good standards of personal hygiene.

SAFE SYSTEM OF WORK FOR OCUPATIONAL HYGIENE

The following guidelines on personal hygiene will minimise health and safety problems.

- 1. Before starting work, check that there are no signs of skin irritation or open wounds.
- 2. Cover open wounds with suitable waterproof dressings and ensure that existing dressings are clean before starting work.
- 3. Avoid direct contact with hazardous substances at work.
- 4. Ensure protective clothing is clean, changed when necessary and regularly washed.
- **5.** Ensure that protective clothing is repaired or replaced when necessary.
- 6. Observe the rules regarding eating, drinking and smoking in the working area.
- **7.** Where there is a possibility of contamination, wash hands and face before eating, drinking or smoking and thoroughly wash or shower at the end of each shift.
- 8. Wash hands before and after using toilet facilities.
- 9. Do not keep contaminated rags or materials in pockets.
- 10. Make full use of barrier creams, cleansers and other skin creams.
- 11. Refrain from spitting at the workplace.
- **12.** Report any problems to a responsible person without delay.



3. OUTDOOR & PERIPATETIC WORKERS

Where employees are required to work outdoors or at locations away from their normal base, SMD will ensure that, so far as is reasonably practicable, all steps are taken to ensure their safety and health. It will be the duty of all employees to carry out work activities in the way which the risk assessment has shown to be best, to control the risk and to comply with any safe systems of work and Standard Operating Procedures (SOP). Where the employee's ability to work to these agreed methods is in doubt, owing to the nature of the particular location or the activity, work should not commence until the situation has been reported to and reviewed by the Site Manager and a system of work has been prepared.

Arrangements for the Health and Safety of Outdoor / Peripatetic Workers

Planning

Prior to commencement of any outdoor activity, the site will be visited and inspected by the nominated **Site Manager** to identify any particular hazards to which the employee(s) may be exposed and any conditions which may necessitate modification to any SOP's or specific risk assessments. Where the site is under the control of another party, this party's relevant risk assessments will be reviewed and an agreed method statement will be prepared.

Assessment

All hazards associated with the work will be identified, the likelihood and severity of harm will be assessed, appropriate control measures will be developed and safe systems of work will be prepared.

Training

Any employee required to work outdoors, or at the premises of a third party will be instructed in the appropriate safe systems of work and hazards associated with the activity. They will also be informed of any specific requirements for procedures and precautions relevant to the conditions in which the work will be carried out, e.g. hazards in a third party's workplace, site conditions, site accessibility, etc.

Control

On arrival at any site under the control of a third party, the employee *must report to a responsible person*, e.g. safety advisor, to *ensure* familiarisation with safety precautions relating to that site and the activities being carried on there. Should there be no person in a position to provide such a briefing the employee should contact his or her supervisor for further instructions. *Work should not commence* until a briefing has taken place. If, during the period of the work, the conditions change or any aspect of the task alters in such a way as to affect the degree of risk, work should stop, unless doing so presents a greater risk, and the supervisor should be contacted to agree any additional control measures.

Personal protective equipment (PPE)

Where the need for PPE has been identified by the risk assessment for the activities being carried out or can be reasonably foreseen prior to arrival at site, this will be provided. Where there is a requirement for specialised equipment related to a third party's activities, this should be identified at the planning stage and be supplied by the party in control of the site.



First aid

Where employees regularly work away from their base, SMD will provide portable first aid kits. Where work is being carried out at the premises of a third party, employees should *ensure* that they are made familiar with the first aid arrangements applicable there and should follow these.

Accidents

Any accidents to employees working away from their base *must be reported* directly to their manager or supervisor. In addition, accidents occurring on a third party's site should be reported in accordance with the local arrangements applying at that site.

Transport

Outdoor and peripatetic workers driving either a company vehicle or their own vehicle on company business must have a valid driving licence. Any changes which may affect the employee's ability to drive, e.g. certain health conditions or conviction *must* be reported to a responsible person.

Reporting Procedures

Where an employee experiences problems in relation to outdoor and peripatetic work, he or she should inform a responsible person *immediately*.

SAFE SYSTEM OF WORK

Risks to outdoor workers and others can be eliminated or reduced by careful preparation and planning of the activity. In particular, the following precautions should be taken:

- 1. Devote time at the planning stage to ensure that all problems have been anticipated.
- **2.** Ensure that all parties with control over the activities and the place of work are involved in the planning. Outside, expert advice may be required in certain instances.
- 3. If a risk assessment has not already been carried out, ensure that this is completed.
- 4. Provide the employee(s) with appropriate training.
- 5. Take all necessary precautions to prevent injury.
- 6. Employees must report to the responsible person when the site is under another party's control.
- **7.** When working alone ensure that the employee's whereabouts are known and arrange for contact to be made at intervals.
- **8.** When others may be present, ensure that they are informed of the activities.
- 9. Ensure that first aid facilities are available.
- 10. Children and other unauthorised persons must not be allowed on site.



4. ELECTRICITY at WORK & ELECTRICAL EQUIPMENT

All reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain electrical equipment. The Company acknowledges that work on electrical equipment can be hazardous and it is therefore the intention of the Company to reduce the risks as far as is possible.

The implementation of this policy requires the total co-operation of all members of management and staff, as well as any contractors contracted to carry out work involving electrical equipment.

Where a problem arises related to electricity at work, employees must inform a responsible person immediately. The Operations Director will then take the necessary measures to investigate and remedy the situation. The person responsible for implementing this policy is the Designated Manager.

Work On Electrical Equipment, Machinery or Installations

Work on electrical equipment, machinery or installations should be:

- · Thoroughly planned;
- Carried by people who can demonstrate competence;
- Applying suitable equipment and work standards.

Electrical Installation to the Building:

The Designated Manager is responsible for ensuring that the electrical infrastructure to the building is inspected, maintained and tested annually or in accordance with the guidance provided by an electrically competent person.

Planning to Undertake Electrical Work

All work should be thoroughly planned so that it can be done safely and so that the completed installation or equipment is safe. Particular care should be taken when repairing equipment that is safety related such as equipment which guards against contact with moving machinery. The Engineer undertaking electrical works must make sure that the repair will not prevent the correct operation of the equipment or adversely affect its safety in any way.

Competence to Undertake Electrical Works

People working on electrical equipment, machinery or installations must be competent to do so. The Designated Manager must decide if the expertise to carry out any electrical works is available inhouse. The level of competence required to do a task is dependent upon the complexity of that task and the amount of knowledge required. Assessing the suitability of an individual to do a task requires evidence of:

- Training to an appropriate level in the area of work
- Experience of achieving a suitable standard in similar work.
- Regular re-assessment.



People who cannot demonstrate competence to carry out the proposed electrical work should not be allowed to carry out the work unless they are supervised by someone who is. In many cases the Designated Manager (or; at site level, the Site Manager) will probably have to assign the work to an Electrical Contractor. In doing so it is essential that the relevant manager establishes that the Electrical Contractor is fully competent for the type of work to be undertaken. This may be achieved by asking for evidence of qualifications, certificates of training, membership to Trade Associations or membership to professional bodies.

Equipment and Work Standards to Electrical Installations

Equipment that is installed should be suitable for the task it will perform and the environment within which it will be expected to work. A wide range of electrical equipment and work is covered by recognised standards that offer guidance on good engineering practice. For example, BS7671:2001 Requirements for electrical installations and the IEE Wiring Regulations 16 Edition offers guidance on the requirements for the construction and testing of electrical installations.

The Low Voltage Directive (73/23/EC), places duties on the design, manufacture and supply of electrical equipment within the voltage ranges 50 - 1000 volts ac or 75 - 1500 volts dc. This Directive is implemented by the Electrical Equipment (Safety) Regulations 1994. These require electrical equipment to be safe and to conform to certain essential safety requirements.

Electrical Safety and the Health and Safety of Employees

The Company will, in consultation with employees:

- 1. Ensure that electrical installations and equipment are installed in accordance with the Institute of Electrical Engineers (IEE) Wiring Regulations.
- 2. Maintain the fixed installation in a safe condition by ensuring that routine safety inspections and tests are completed by a competent person.
- 3. Inspect and test portable and transportable equipment as frequently as required (the frequency will depend on the environment in which the equipment is used and the conditions of usage, i.e. how carefully it is handled.)
- **4.** Develop and implement a safe system of work for maintenance, inspection or testing of electrical circuits and or plant and equipment.
- **5.** Forbid live working unless absolutely necessary. On the very rare occasion when it is necessary for live working a Permit to Work will be issued.
- **6.** Ensure that employees who carry out electrical work are competent to do so.
- Forbid all work by staff on equipment or systems above 650 volts unless specifically authorised.
- 1. Such work will be carried out under contract by approved contractors who are required to be competent, trained and equipped for this work.
- **8.** Exchange safety information with contractors, ensuring that they are fully aware of (and prepared to abide by) the health and safety arrangements in place at all sites within the Company.
- 9. Provide suitable personal protective equipment if required, maintaining it in a good condition.
- **10.** Maintain detailed records as is appropriate.



Information and Training

The Company will provide information, instruction and training for all employees to enable them to carry out their duties without putting their health and safety at risk. Electrical work is only to be carried out by competent persons. If it is found necessary to use in-house technical staff to carry out such work, they will be adequately trained to the level required.

Electrical Safety and Safe System of Work

Most people are aware of the health and safety hazards associated with electricity. To avoid injury, or worse, it is essential to adopt the following precautions:

Faulty Plant, Equipment and/or Electrical Infrastructure

- 1. Report faults immediately. Do not use or continue to use faulty equipment.
- 2. Equipment is only to be used by authorised personnel.
- 3. Do not carry out repairs, etc, or even fit plugs, unless you are authorised to do so.

Portable and Transportable Electrical Equipment

- 1. The user should visually check all electrical appliances before each first use.
- 2. Electrical equipment used must have been subject to a combined Visual Inspection and Electrical Safety Test. A register of such tests will be maintained and kept by the Designated Manager and/or relevant Site Manager.
- 3. Equipment used outside must be 110 volt or be protected by a residual current device (RCD)
- 4. **Avoid** using long extension leads wherever possible. If their use is unavoidable, **ensure** that the connector is manufactured to BS EN 60309-2.
- 5. In accordance with the Guidance produced by the HSE for 110v hand-held electrical power tools and auxiliary equipment (used in the construction environment) is to be subject to a combined visual inspection and electrical safety test every 3 months, so far as is reasonably practicable.
- 6. In accordance with the Guidance produced by the HSE for 240v (where used) hand-held electrical power tools and auxiliary equipment (used in the construction environment) is to be subject to a combined visual inspection and electrical safety test every month, so far as is reasonably practicable.
- 7. In accordance with the Guidance produced by the HSE for 240v electrical appliances and auxiliary equipment used in the Site Office and Site Welfare accommodation is to be subject to a combined visual inspection and electrical safety test every 12 months, so far as is reasonably practicable.



Temporary Installations

Temporary wiring must be as safe as a permanent installation and must be replaced by a permanent installation as soon as practicable if it is likely to be needed for a period longer than three months.

Electrical Work — High Voltage

Do not carry out work on equipment or systems above 650 volts. Approved contractors **only** are authorised to carry out this work.

Electrical Work — Voltages up to 650

- 1. All work on electrical equipment or systems that involve the exposure of conductors must be carried out with *the supply switched off*, isolated and secured against re-energisation.
- 2. Any work carried out is to be completed by *Authorised* personnel only.
- **3.** A Proving test to **ensure** isolation must be completed **before** starting work and an approved test instrument **must** be used for this purpose.

Live Working

- 1. Live working *must be avoided wherever possible*. Work on or near live conductors is only permitted when essential for equipment fault diagnosis.
- 2. Only authorised (competent) persons to carry out live working.
- 3. A Permit to Work is required before working live.
- **4.** All practicable precautions must be taken when working live to ensure the safety of persons including:
 - The use of special tools, rubber mats and gloves.
 - The presence of another authorised person who understands the activity and who is able to handle an emergency (e.g. remove the victim from further danger, give first aid)
 - The erection of safety barriers to keep unauthorised persons out of harm's way.



5. MACHINE SAFETY & MAINTENANCE

SMD will take all reasonable steps to ensure the safety of all employees working on company owned machinery and ensure the protection of others who may be affected by the machinery. The Company will ensure, through liaison with suppliers of any new machinery that it is designed and supplied to work in a safe manner. SMD will seek to inform and train employees, as appropriate, to implement this policy.

Any employee who experiences any safety problems with machinery should immediately inform their Manager so that steps can be taken to remedy the situation. The implementation of this policy requires the co-operation of all management and staff. The person with responsibility for the successful implementation of this policy is: **the Site Manager**

Arrangements for the Health & Safety of Operators Using Plant and Machinery

SMD will, in consultation with machine operators

- Assess the operation of the machine, including an assessment of controls, visibility of any
 machine parts that *need* to be seen and the accessibility of parts that *need* to be adjusted or
 changed.
- **2.** Assess how to use the machine in its work environment, including its layout and any barriers that are *needed* to prevent visitors being exposed to danger zones.
- 3. Assess the suitability of all guards, isolation procedures and emergency procedures.
- **4.** In compliance with the COSHH Regulations, assess any chemicals involved with the machine and its use, maintenance and cleaning.
- **5.** Take all reasonable steps to minimise the risks found in the assessment procedures.

Information and Training

SMD will provide the information, instruction and training necessary to ensure the Health & Safety of all Operators and others who may be affected by the machinery. Managers responsible for the operation of the machines will be appropriately trained.

Safe System of Work for Machine Safety

The Company will ensure that the machinery is safely and securely positioned. The Provision and Use of Work Equipment Regulations 1998 provide for the following Safe Systems of Work:

1. Machinery will be maintained in an efficient state, in efficient working order and in good repair. This will include Planned Preventative Maintenance (PPM) and periodic maintenance as identified in Maintenance Schedules.



2. All persons who use, supervise or manage the use of machinery will have available to them adequate Health & Safety Information and written instructions (where appropriate) pertaining to the use of the machinery.

This information should include:

- i The methods and conditions in which the machine is to be used ii Any foreseeable abnormal situations and the action to be taken when they occur iii Any conclusions to be drawn from experience when using the machines
- **3.** All persons who use, supervise or manage work machinery should have had adequate training in its use for the purpose of Health & Safety.
- **4.** The Employer shall ensure that measures are taken to:
 - i Prevent access to any dangerous part of machinery
 - ii Stop the movement of any dangerous part of the machinery before allowing a person to enter a danger zone.

The alternative measures required to comply with this requirement are as follows:

- i the provision of fixed guards
- ii provision of other guards or barriers
- iii the provision of jigs, holders, push sticks or similar
- iv provision of adequate Information, Instruction and Training.
- 5. Any machinery or equipment at high or low temperatures must be suitably guarded.
- **6.** The Company will ensure that suitable Personal Protective Equipment (PPE) is used where necessary when using a machine.
- **7.** All machinery should have suitable controls including the method of starting and re-starting, the method of normally stopping and emergency stopping. These controls should be *clearly visible* and *easily identified*. All control systems should be safe.
- **8.** Isolation of all equipment or machinery from all sources of energy should be possible. Both the isolation and the reconnection should avoid any risks.

The use of any machinery can involve some risks. These are minimised by the following:

- Training in the correct method of using the machine
- Correct guarding of the machine and all dangerous parts and correct continual use of the guards.
- Satisfactory maintenance of the machines, including testing and a safe hand-over back to the Operators following any maintenance work.



6. SAFE USE of ABRASIVE WHEELS

All reasonable steps will be taken by the Company to ensure the health and safety of employees who work with grinding machines that incorporate abrasive wheels. Properly used, abrasive wheels serve an important purpose. The company recognises that health and safety hazards may arise from their use. It is the intention of the company to ensure that any risks are reduced to a minimum. This will need the co-operation of all employees. The **Site Manager** is responsible for policy implementation.

Arrangements for the Health and Safety of Workers and Abrasive Wheels

The company will, in consultation with employees:

- Carry out an assessment of the work activity.
- So far as is reasonably practicable, reduce the risks found as a result of the assessment.
- Ensure that all grinding equipment is maintained in good condition and is suitable for the task.
- Advise all who work with abrasive wheels of the risks to safety and the results of assessments.

Information, Training and Records

The company will give sufficient information, instruction and training to ensure the health and safety of workers who use abrasive wheels. This provision also applies to persons not in direct employment such as temporary staff and contractors. Training in the use of abrasive wheels will cover aspects of health and safety in general, the hazards associated with the use of Abrasive Wheels and the Provision and Use of Work Equipment Regulations 1998 in particular. The Company will appoint competent persons to mount abrasive wheels.

Safe System of Work for the Use of Abrasive Wheels

The main types of injury concerning the use of abrasive wheels are those that result from:

- Flying particles
- Those occurring when abrasive wheels burst
- Those caused by contact between the wheel and the operator's hand.

The risk of accidents and injuries can be reduced with the following precautions

- 1. All users of abrasive wheels are to be adequately trained. Unauthorised use is prohibited.
- 2. Maintaining all grinding machines / cutting machines / abrasive wheels in good working order.
- 3. Selection of the right abrasive wheel for the job. Advice can be obtained from the manufacturer.
- **4.** Make sure that grinding wheels are not operated at excessive speed. Both spindles and wheels must be marked with their maximum operational speed. (Over-speeding can cause wheels to burst or disintegrate.)
- **5.** Faulty mounting can also cause wheels to burst. Ensure that trained, competent persons mount all abrasive wheels.
- **6.** Damaged wheels should be rejected.
- **7.** Guards should be securely attached to the body of the grinding machine and be strong enough to withstand the impact of flying fragments should a wheel burst.



7. LIFTING EQUIPMENT & LIFTING ACCESSORIES

A small element of the work completed by SMD Ltd. requires that lifting operations be undertaken. It is vital that all lifting operations are completed safely, supervised by competent persons, using lifting plant, equipment and accessories suitable for the proposed lift. The Site Manager is responsible for ensuring that site requirements and the Principal Contractors instructions regarding all lifting operations are complied with

Lifting Equipment and Lifting Accessories – Thorough Examination & Use

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER'98 encompass any equipment used to mechanically raise or lower a load, and the definition of a load includes people. The term lifting accessory means the attaching or suspending a load to lifting equipment (i.e. lifting tackle).

Purchasing Lifting Equipment

With all new lifting equipment, there is a requirement for the owner to hold a 'declaration of conformity' issued by the manufacturer or the supplier confirming the equipment satisfies the requirements of the European Union. This declaration must be kept throughout the entire life of the lifting equipment. If no such declaration is available or if the declaration is more than 12 months old, a thorough examination certificate must be issued by a competent person before using the equipment.

This declaration of conformity together with copies of the latest thorough examination reports must be kept as long as the company owns the lifting equipment. If the company sells the lifting equipment the declaration of conformity and the latest thorough examination report, must be passed to the new owners.

If lifting equipment is purchased 'second hand', the seller should provide a copy of the original declaration of conformity and relevant thorough examination reports. If no such documentation is available the purchaser must beware and ensure a competent person carries out a thorough examination before the lifting equipment is put into use.

Lifting Equipment for Carrying People

If the *lifting equipment is used to move people*, additional requirements apply. The thorough examination reports must be undertaken every 6 months (or as specified by the competent person on the thorough examination report or in the written assessment). The report is kept by the owner until replaced by a new report.

Lifting Accessories

With regards to *lifting accessories*, (i.e. slings, shackles and web slings etc.) the company shall obtain a declaration of conformity which clearly states the safe working load and, if relevant, other information essential for its safe use. Lifting accessories shall be Thoroughly Examined at least once in every 6 months or as specified by the competent person on the last Thorough Examination report or in the written scheme. Reports of the Thorough Examination of lifting accessories must be kept for 2 years after the report was made.



Inspections of Lifting Equipment & Lifting Accessories

With regards to the inspection of lifting equipment, the regulations require an appropriate inspection by a competent person at suitable intervals. A weekly inspection of lifting equipment (by a competent person such as the operator or other suitable experienced person) is to be undertaken, with records of such inspections maintained by the person completing the inspection. If the inspection shows there are faults with the equipment, these faults must be brought to the attention of the Site Manager and owner (if applicable) of the equipment without delay.

With regards to the inspection of lifting accessories, the Slinger and Signaller should undertake a visual inspection of all lifting accessories before each first use and after any lift where it is reasonable to conclude that damage to any lifting accessory may have occurred.

Scrapping of Lifting Equipment

If lifting equipment is taken out of service and scrapped, the original declaration of conformity and the last thorough examination certificate should be kept for a period of 2 years after the equipment has been scrapped.

In accordance with the health and safety policy statement SMD will take all reasonable steps to secure the safety of employees and others who use lifts and hoists and ancillary equipment at the workplace.

Arrangements for the Safety of Workers during Site Lifting Operations

The company will, in consultation with its employees:

- 1. Carry out assessment of risk to users, maintenance staff and others, during the use of lifting equipment and hoists.
- 2. Ensure that all lifting operations are adequately planned, supervised and completed by competent persons, with an Appointed Person (as required under LOLER'98) a Lift Supervisor and trained Slingers and Signallers.
- 3. Implement any control measures necessary to minimise the risks identified by these assessments
- 4. Obtain adequate information from the Supplier / Installer on the safe and proper use of lifting equipment and lifting accessories
- 5. Ensure that lifting equipment and lifting accessories are suitable for the task (and for the environmental conditions) and are properly installed.
- 6. Arrange for adequate maintenance, checks, examinations and tests of lifting equipment and lifting accessories to be carried out at regular or prescribed intervals by a competent person and ensure that records are kept
- 7. Before maintenance work starts on lifting equipment and lifting accessories, ensure that a safe system of work has been agreed and clearly understood by all personnel involved in testing or examination
- 8. Make employees aware of the company arrangements for reporting defects to a responsible person.



Information and Training

The company will provide users of lifting equipment and lifting accessories with suitable information, instruction and training to ensure that there is no risk to their own or others' safety whilst at work with the equipment and associated accessories. Other persons not in direct employment, visitors or temporary staff will also be provided with adequate information to ensure their safety during lifting operations. Those responsible for the management and supervision of the workplace will be given appropriate training to ensure the proper use and maintenance of the lifting equipment and lifting accessories. Employees will be provided with such additional information that is deemed necessary, where equipment or job specification changes significantly.

Safe System of Work for Lifting Operations

Inadequately maintained equipment, use of equipment for unauthorised purposes, a poor working environment and untrained employees can create unsafe situations resulting in injury and/or damage to persons and property or equipment during lifting operations. Following the precautions should avoid these unsafe situations.

- 1. Do not exceed the SWL of lifting equipment and lifting accessories, or use it in a way or purpose for which it is not intended.
- **2.** Never attempt to repair or undertake work on lifting equipment and lifting accessories for which you are not trained or authorised always leave this to a competent person.
- **3.** Observe the safe system of work when carrying out regular checks, maintenance, inspection and examinations.
- **4.** With regard to lifting equipment and lifting accessories consider the rapid deterioration of certain components, in certain circumstances (i.e. the harsh working environment of a construction site). The competent person must assess the age of the lifting equipment, its operating environment, weather conditions and method of work.
- **5.** Report any defects to a responsible person immediately.

Safety Critical Appointments for Lifting Operations

Appointed Person: Contract sites operating with a tower crane must appoint a competent person (the Appointed Person) to plan site lifting operations.

The duties of the Appointed Person shall include the following:

- Assessment of lifting operations to provide such planning, selection of cranes, lifting gear and equipment, instruction and supervision as is necessary for the tasks to be undertaken safely.
- Overall responsibility for the organisation and control of the lifting operations.
- Ensuring that appropriate and suitable Lifting Plans are completed.
- Ensuring that Work Method Statements for general lifts are drawn up, as well as task-specific Method Statements for complex lifting operations.
- Liaison to ensure an adequate foundation is provided for all cranes.
- Selecting the method of signalling, (radios, hand, etc) and ensuring that a tower crane operator cannot follow the instructions intended for another Crane Operator (i.e. on multicrane sites).



- Liaising with local authorities, highways authorities, railway operators, local airfields, statutory undertakers etc. if tower cranes operations put such at risk of damage.
- Liaison with the owners of neighbouring properties for over-sailing rights, if required.
- Responsibility for the selection and use of hired in tower cranes
- Responsibility for appraisals of any operations that may affect the assembly, alteration or dismantling of tower cranes
- Monitoring, reassessing and revising the lift plan, method statements and risk assessments.

The Appointed Person should consult all parties involved in the selection and hire of the crane, especially the experienced persons in the crane team. Delegation of duties to competent persons will generally occur, but the Appointed Person will maintain overall responsibility for these duties.

Slingers & Signallers: All cranes used on contract sites operated by SMD must have at least one Slinger & Signaller allocated to it. They must be appropriately trained and competent to sling site loads safely and direct lifting operations with appropriate signals. The Slinger & Signaller is responsible for the correct selection of lifting accessories in accordance with the Site Lifting Plan and attaching and detaching the load to and from the crane.

SMD Building Services and Hired Cranes

All cranes used by the Company on contract sites must have, as a minimum, a twelve-monthly Thorough Examination Report and a four yearly test certificate completed by a Competent Person*.

Where man-riding baskets are in use, or the use of a man-riding basket for an emergency situation is planned then a six-monthly Thorough Examination Report is required.

A suitable clause for inclusion in orders for all cranes and all relevant sub contracts involving craneage is: "Any crane supplied under this Purchase Order must be accompanied by a Report of Thorough Examination made within the previous twelve months and a certificate of tests made within the previous four years (or after major repair or alteration) or as may otherwise be required under the Lifting Operations and Lifting Equipment Regulations 1998."

* The competent person carrying out any of the above activities should be from a UKAS accredited inservice inspection body.

Planning of Lifting Operations

The Lifting Operations and Lifting Equipment Regulations (LOLER'98) require that all lifting operations be properly planned by a competent person, be appropriately supervised and carried out in a safe manner.

In planning for lifting operations there may need to consult with designers and other parties to ensure that adequate allowance for lifting operations is made. This will include planning both for sufficient general craneage, and for significant individual lifts.

All lifting operations must be planned to ensure it is carried out safely and that all foreseeable risks have been taken into account. In cases of repetitive or routine operations, periodic review may be required to ensure no factors have changed.



8. COMPRESSED GAS CYLINDERS

All reasonable steps will be taken by SMD to secure the health and safety of employees who work with compressed gas cylinders (transportable gas containers) and associated plant and equipment. The company acknowledges that health and safety hazards may arise from the reception, transport, distribution, storage, use and/or disposal of any compressed gas cylinder or gas contained within it.

The company will ensure that risks are reduced to a minimum. Adequate training will be given and the correct information on safe working procedures will be supplied to each employee handling compressed gases. The implementation of this policy requires the complete co-operation of all employees. The employee consultation process will be utilised for dealing with such problems that may arise. The Site Manager is responsible for implementing this policy.

Arrangements for the Health and Safety of Workers and Compressed Gas Cylinders

The company will, in consultation with employees:

- (a) Carry out an assessment of each workstation or operation to note any risks with substances, plant or equipment that may affect the worker or the environment
- (b) Take all necessary measures to control any risks highlighted as a result of the assessment.
- (c) Introduce changes in work procedures wherever possible to reduce the risk to the worker.
- (d) Introduce safety devices into the plant and equipment or supply all necessary PPE in order to minimise the risk of injury or damage to persons, plant or the environment
- **(e)** Provide employees with accurate information on the safe use of compressed gas cylinders (transportable gas containers) and gases and the plant and equipment used in conjunction with them.

Dealing with Health and Safety Issues

When a matter related to health and safety is raised by an employee regarding the use of working with compressed gas cylinders and gases contained within them, the company will:

- (a) Investigate the circumstances of the enquiry or complaint
- (b) Take the necessary corrective measures where appropriate
- (c) Advise the employee of the action taken.

Where a problem arises regarding the use of compressed gas cylinders (transportable gas containers), gases contained within them or plant and equipment used with them, employees must adopt the following procedures:

- Inform a responsible person immediately
- In the case of a health condition, advise the company doctor or their own general practitioner.



Information and Training

The company will provide sufficient information, training and instruction as is necessary to ensure the health and safety of workers involved in the use or handling of compressed gas cylinders (transportable gas containers), gases and plant or equipment used with them. This provision also applies to others not in direct contact with gases or equipment (such as purchasing staff) as well as temporary staff and contractors.

Any persons likely to suffer ill health from working with compressed gases due to a known health condition should not be employed in a location where they are likely to experience further problems. Where the results of an examination reveal the possibility of a health risk, alternative employment or provision of adequate PPE will be considered.

Employees who transfer to a job involving the use of compressed gas cylinders (transportable gas containers) or gases will be provided with training to enable them to carry out the work in a safe manner. Employees are entitled to the supply of all PPE, its periodic replacement due to fair wear and tear and its inspection by a competent person at intervals recommended by the equipment supplier or statutory requirement.

SAFE SYSTEM OF WORK FOR COMPRESSED GAS CYLINDERS

Badly located equipment or incorrect positioning of plant and equipment can result in discomfort and in some cases permanent disability. Poor planning of the working procedure can also add to these conditions. These situations can be avoided by adopting some simple precautions.

- 1. Make sure that all equipment is operating correctly and that the working position is comfortable.
- 2. Follow any safe system of work or other procedure which has been devised for the task.
- 3. Ensure that breaks are taken during long periods of a working procedure.
- 4. be aware of safety devices installed in the plant or equipment.
- **5.** Use any PPE provided and ensure that it is properly maintained.
- 6. Do not allow modification / tampering with gas cylinders or plant or equipment used with them.
- 7. If any faults in the equipment are apparent, cease work and report to the immediate supervisor.



9. CUTTING BURNING & WELDING OPERATIONS (HOT WORKS)

SMD will comply with all the mandatory requirements and, so far as is reasonably practicable, ensure the health and safety of all who may be affected by oxy-fuel and electric arc cutting and welding processes. This will be achieved by setting up safe systems of work, based on risk assessments by competent persons that will either eliminate or reduce hazards to acceptable levels, in accordance with the approved guidelines or codes of practice. The safety systems will be supported by the provision and maintenance of the requisite safety and personal protective equipment, information and training where needed and the development of safety awareness throughout all levels of the company. The advisor concerned with all cutting, welding and related processes is: *the Designated Manager or Site Manager*.

Arrangements for Cutting, Burning and Welding Operations:

The following procedures will deal with any potential risks to health and safety:

- (a) Safety procedures will be devised (see Safe System of Work below for example)
- (b) All operators will be trained and competent in those procedures
- (c) Necessary safety equipment will be available and fit for its purpose
- (d) The safety systems will be audited and appropriate records kept and reviewed.

Health Surveillance

Every new employee will be required to declare any pre-existing physical health condition that may affect, or be affected by, his or her employment with the company. Existing employees who may be affected by the operations they are required to carry out will also be assessed under the health surveillance programme. Thereafter, the company will monitor the health of the employees where appropriate, to ensure that susceptible employees are not being injured at work.

Safe System of Work for Cutting, Burning & Welding Operations:

- **1.** All equipment must be in good condition, properly installed and routinely inspected by a competent person, and records must be kept where required by regulations.
- **2.** Flexible hoses, cables and connections must be free from damage or risk of damage in service. Cables and hoses shall have adequate carrying capacity.
- 3. Operators shall wear eye, ear, face, head and body personal protective equipment provided.
- **4.** The atmosphere in the vicinity of work must be known to be safe to breathe and free from gases.
- **5.** Adequate ventilation and fume extraction must be provided and used as required by the COSHH assessment and especially in enclosed areas and pits.
- **6.** Surfaces to be heated by the process must be cleaned of contaminants that may be degraded by heat or give off noxious fumes (e.g. paints, plastics, zinc coating).
- 7. Naked flames/high temperature surfaces must not be allowed in the vicinity of volatile solvents.
- **8.** All moveable flammable materials must be removed from the vicinity of work and fireproof covers placed over all flammable materials that cannot be removed.



- 9. The workpiece and any access equipment must be safely secured.
- **10.** A Hot Permit to Work procedure must be operated where cutting, burning and welding operations are planned in confined spaces and hazardous environments.

Oxy-fuel Gas Processes

- **1.** Handle cylinders carefully, keep outside enclosed areas and tether upright safely. Keep oxygen cylinders away from fuel gas cylinders where possible.
- **2.** Ensure screwed fittings and hoses are correct and keep screwed and sealed surfaces free of contaminants, oil and grease.
- 3. Close cylinder valves when flame is extinguished.
- **4.** Ensure any vessel, drum or tank that has contained flammable or toxic substances has been properly cleaned and inspected before subjecting it to hot work.
- **5.** Remove all torches from enclosed areas when not in use.
- **6.** Use fire-watchers if there is a possibility of ignition unobserved by the operator (e.g. on the other side of bulkheads).

Arc Cutting, Gouging and Welding Processes

- 1. Connect the welding current return cable to the workpiece close to the arc point or to a well electrically conductive support structure in good contact with the workpiece. Also, connect the workpiece or the support structure to a separate earth terminal.
- **2.** Beware of increased fume hazards when welding with chrome containing fluxed consumables or high current metal inert gas (MIG) or tungsten inert gas (TIG) processes.
- 3. Avoid contact with water or wet floors when welding. Use duckboards or rubber protection.
- **4.** Provide screens to limit exposure of others to glare from arcs.
- **5.** Use the correct eye and face protection with the correct filter glass.
- 6. Use a low voltage open circuit relay device with alternating current in constricted or damp places.

SAFE SYSTEM OF WORK

The use of PPE is an important means of controlling the risks involved in various work activities. To ensure that it is effective, it is necessary to follow the manufacturer's and employer's instructions on its correct use. The following procedures should be observed when using PPE.

- 1. Ensure that protective clothing fits properly and adjust PPE so that it is comfortable when working.
- 2. Make sure that the PPE is functioning correctly: if not, report the defect.
- **3.** When using two (or more) types of PPE together, ensure that items are compatible and that combined use does not reduce their effectiveness.
- 4. Report symptoms of discomfort or ill health immediately.
- 5. Inform your Supervisor of any training needs.



10. HEALTH & SAFETY AND THE USE OF HAND TOOLS

SMD will make a suitable and sufficient Risk Assessment of the risks to the health and safety of employees whilst working with hand tools. These risks will be controlled so far as is reasonably practicable, so that employees and others, (who could also be at risk) are protected. Responsibility for the implementation of this policy is with **the Designated Manager.**

Use of Hand Tools and the Health and Safety of Employees

SMD will, in consultation with employees:

- (a) Inform users of their responsibility to maintain tools and report defects.
- (b) Ensure that defective tools are taken out of use.
- (c) Implement a system for replacing defective tools that will be made known to all employees
- (d) Arrange for tools to be repaired by trained personnel only
- **(e)** Arrange for regular inspection of electrically powered tools in accordance with EAWR; all such tools will be tagged showing the date of the last test
- (f) Ensure that the correct tool for the job is provided
- **(g)** Supervise employees to ensure there is no misuse of tools, which can lead to damage of materials and equipment as well as possibly leading to injury
- (h) Implement a system for reporting defective tools at all workplaces
- (i) Provide personal protective equipment if necessary
- (j) Ensure that work areas are kept clear, so as not to impede the safe and efficient use of tools
- (k) Provide suitable storage facilities for tools.

Training and Information

All employees using tools will be trained in their use and the use of any associated equipment. Any employee who is not conversant with a tool must make it known to his or her supervisor.

SAFE SYSTEM OF WORK FOR HAND-HELD TOOLS

To ensure the safe use of hand tools the following procedures should be followed.

- 1. All portable appliances should be used in accordance with the safe system of work.
- **2.** Low voltage portable appliances (110v) are to be used wherever practicable. This requirement is especially important where the work is in a potentially harsh or hazardous environment.
- **3.** All portable electrical appliances should be subject to a visual inspection (before use) by the user. **DO NOT** operate equipment in a damaged and potentially unsafe condition.



- **4.** Where electrically powered tools are used from a trailing lead:
- (a) The length of the lead should be kept to a minimum.
- (b) The cable should be heavy duty and capable of serving the equipment that it is to supply
- (c) The cable should be fully paid out from any winding drum and protected from damage.
- (d) The cable should be laid with care to ensure that it does not present a tripping hazard.
- 5. When using power tools fitted with guards, they guards must be fitted correctly prior to use.
- 6. Power tools must be isolated from the power source before routine adjustments are carried out
- **7.** The correct fuse rating must be used for all electric tools.
- **8.** All electrical portable appliances will be subject to periodic electrical safety checks. The frequency of tests is defined at the Guidance Table in the Records section of the Company Policy and procedures. Management holds the register of electrical safety tests completed on the equipment used by the Company. Users should confirm that the appliance test is 'in date.'

9. Supervisors should:

- (i) Ensure that equipment and tools are properly maintained and repaired.
- (ii) Ensure that correct working methods are followed and unsafe practices are not tolerated.

10. Employees should

- (i) Use the right tool for the job in hand
- (ii) Use the tool in a correct manner
- (iii) Use the safety devices and equipment provided
- (iv) Report conditions they may consider to be dangerous.

11. When using Compressed Air tools:

- (i) Couplings should be securely attached before allowing air to flow
- (ii) Where practicable, air compressors should be located outside the building in which the work is being conducted or isolated to reduce noise at the place of work.
- (iii) Hoses & couplings should be checked before use (by the user) and supervisors
- (iv) Hoses should be routed so that they do not obstruct access and are unlikely to become damaged whilst in use, whilst allowing free movement of the tool.
- (v) Report any problems with compressed air supplies or the tools used with the supply.
- (vi) Do NOT indulge in horseplay with compressed air supplies or ancillary tools.



11. PERSONAL PROTECTIVE EQUIPMENT (PPE)

SMD will provide personal protective equipment (PPE) when the risk presented by a work activity cannot be adequately controlled by other means.

All reasonable steps will be taken by the company to secure the health and safety of employees who work with PPE. The company acknowledges that health and safety hazards will have been identified if this equipment is to be used. The company will ensure, through the proper use of this equipment, that any risks are reduced to a minimum. Whilst it is generally recognised that the use of PPE can be undertaken without undue risks to health, it is appreciated that some employees may have some concerns. The company will seek to give information and training to enable a fuller understanding of these issues.

Implementation of this policy requires the co-operation of all employees. There will be full consultation with employees. The person responsible for implementing this policy is the **Site Manager.**

Arrangements for the Health and Safety of Workers and PPE

The company will, in consultation with workers and their representatives:

- (a) carry out an assessment of proposed PPE to determine whether it is suitable
- (b) take any necessary measures to remedy any risks found as a result of the assessment
- (c) ensure that where two (or more) items of PPE are used simultaneously, these are compatible and are as effective used together as they are separately
- (d) arrange for adequate accommodation for correct storage of the PPE
- (e) implement steps for the maintenance, cleaning and repair of PPE
- (f) train staff in the safe use of PPE for all risks within the organisation
- (g) replace PPE provided to meet a statutory obligation, as necessary and at no cost to the employee
- (h) inform every employee of the risks which exist
- (i) re-assess as necessary if substances used or work processes change.

Procedures for Dealing with Health and Safety Issues

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

- (a) take all necessary steps to investigate the circumstances
- **(b)** take corrective measures where appropriate
- (c) advise the employee of action taken.



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

- (a) Inform a responsible person immediately
- (b) In the case of an adverse health condition advise the company and his / her general practitioner.

Information and Training

The company will give sufficient information, instruction and training to ensure the health and safety of workers using PPE, which includes temporary staff, persons gaining work experience with the company and contractors, as well as those in direct employment. Managers and supervisors who are responsible for users of PPE will also receive appropriate training.

Record Keeping

Records should be kept of the following.

- 1. Inventory of PPE equipment authorised and issue / replacement of such equipment
- 2. Record of the provision of training and information given to employees.
- 3. Records of Maintenance and Testing of PPE equipment.
- 4. Record of PPE given as a personal issue. (I.e. gloves, goggles, ear defenders etc.)



12. SAFE WORKING AT HEIGHT

SMD Ltd. fully recognises the duties imposed on the Company in legislation regarding the provision of a safe place of work; especially when working at height. In particular the Company recognises the duties under the Working at Height (WAH) Regulations 2005 which it has taken into account in developing the safety policy for working at height.

Company policy is to adopt a risk-based approach, so that measures taken to comply with the WAH Regulations are:

- Proportionate to the risks involved
- Build upon existing good practice in the construction industry
- Comply with the current Health and Safety legislation.

The policy is based on a hierarchy of controls whereby work at height should be avoided as far as reasonably practicable; if work at height is necessary, safe systems of work should be established, proper planning and organisation should take place, and appropriate equipment should be chosen and used correctly.

The policy aims to ensure ladders, wherever reasonably practicable are used as a means of access and egress and not for work. It also seeks to ensure that where work at height is undertaken, full working platforms are provided wherever reasonably practicable.

All reasonable steps shall be taken by SMD to provide a safe working environment for employees working at height. The company shall provide the necessary preventative and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity. All employees and any other person involved in the work activity shall co-operate in the implementation of this policy. The responsibility for the implementation of this policy, at the work site, is with the: *On-Site Supervisor*

Hierarchy of Control for Working at Height

The following hierarchy of Control Measures are to be implemented (where No. 1 is the foremost consideration) on all sites to which SMD employees are deployed.

- No. 1 Working at height should be eliminated where possible.
- **No.2** Where elimination is not possible, fall prevention measures are to be put into place such as guard-rails, scaffolding and safe working platforms.

No.3 Where fixed measures are not possible, fall arrest systems are to be in place, such as safety harnesses, as well as other personal protective equipment (PPE).

Priority is given to the deployment of collective protection measures (i.e. safety nets or inflatable air bags) before the use of personal fall protection equipment (i.e. personal fall arrest or fall restraint systems). Any equipment selected for working at height must be well maintained, regularly inspected and properly used. Workers must be properly trained in the use of equipment provided and the work activity must be appropriately supervised.



Working at Height and Competence to Manage Work at Height

The WAH Regulations require those who work at height to be competent. The following definition of competence enables an individual to be assessed relatively easily:

"A competent person is a person who can demonstrate that they have sufficient professional or technical training, knowledge, actual experience, and authority to enable them to:

- (a) Carry out their assigned duties at the level of responsibility allocated to them
- (b) Understand any potential hazards related to the work (or equipment) under consideration
- (c) Detect any technical defects or omissions in that work (or equipment)
- (d) Recognise any implications for health and safety caused by those defects or omissions
- (e) Specify a remedial action to mitigate those implications."

The level of responsibility will dictate the degree of competence required, e.g. more will be expected of Managers and Site Supervisors / Foremen than a Site Worker. To actually work at height the above definition implies that competent persons ought to be able to demonstrate:

- Knowledge (at least) of what the Regulations require of you as an individual
- Understanding of the equipment used and using it as it is actually designed to be used.
- Knowledge of how the equipment should be used and checked before use (and personally used, i.e. looked after, stored, maintained and formally inspected).
- Ability to recognise safe and unsafe situations associated with the work undertaken and the equipment used (preferably before they occur!)

Arrangements for Working at Height

Site Agents and Site Supervisors in control of working at height are to be competent to manage site operations carried out at height. They are required to ensure that such work is carried out as detailed in the Safety Management System, including documentation such as:

- Risk Assessments
- · Written Safe Systems of Work,
- Method Statements
- Other policies & procedures relevant to the work activity within the Safety Management System
- Agreed site-specific requirements (in consultation with the Principal Contractor)
- Manufacturers' instructions supplied on the safe use of proprietary fall protection systems.

The company will, in consultation with employees:



- **1.** Avoid the need to carry out any work at height where a risk of a fall by persons and/or objects exists and an alternative method of work is reasonably practicable.
- 2. Assess the risks involved in working at height and take steps to eliminate or control them
- 3. Provide all the necessary equipment to allow safe access to and egress from the place of work
- **4.** Provide suitable plant to enable the materials used in the course of the work to be safely lifted to, and stored if necessary at, the workplace
- **5.** When working in an open environment, assess the effect of weather conditions on the type of work being undertaken and, if necessary, halt work temporarily (once the work, plant and equipment have been left in a safe condition) until such time as it is safe to continue
- **6.** When working at dusk, night or dawn, provide sufficient local lighting, so that work can be carried out safely and access and egress are easily visible
- **7.** Arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so
- **8.** Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of equipment used in work at height.

Working at Height and Dealing with Health & Safety Issues

The company will prepare a method statement (a written safe system of work incorporating the results of any risk assessments made) for work at height, to be followed by all involved in such work. Where it is not possible to follow the method statement:

- 1. No further work should be undertaken
- 2. The responsible person (competent person) should be informed
- **3.** Alternative procedures will be outlined and employees advised of these following appropriate consultation.

Information and Training

The company shall provide any information, instruction and training that an employee may require to carry out his or her trade or skill in a safe manner when working at height.

The company shall ensure that supervisors responsible for ancillary plant and equipment used for the work are suitably and adequately trained and capable of providing the correct information on its use.

Ladder Safety

Only work of short duration should be undertaken from ladders, such as visual inspections etc.

Both hands are required for ascending and descending ladders. Users of ladders should always be able to maintain three points of contact with the ladder during ascent / descent. Proprietary systems must be used for carrying any materials or tools.

Ladders are suitable for light work only, no heavy work (i.e. drilling or any work requiring application of force such as pulling or pushing).



If ladders are to be used, ensure the following: -

- The work only requires one hand to be used.
- The work can be reached without stretching
- The ladder can be fixed to prevent slipping or footed at platform.
- A good handhold is available.
- Proprietary systems are used to prevent the ladder slipping e.g. foot plates or stand-off brackets for gutters etc.

Ladder accidents are mainly due to the following causes.

- 1. Using a ladder for the wrong purpose, e.g. as a working platform instead of scaffolding.
- 2. Using the wrong type of ladder, e.g. a metal ladder near overhead electricity lines.
- 3. Dropping tools or materials from a ladder due to lack of adequate means of carrying them.
- 4. Inadequate securing of ladders, resulting in falls.
- **5.** Ladders not extending far enough above their landing place, leading to falls.
- 6. Using defective or poorly maintained ladders.

Many of these accidents can be avoided by adopting the following precautions:

- **1.** Take necessary measures to reduce risks found as a result of risk assessments carried out. These will include:
 - selection of suitable ladders
 - inspection before use
 - keeping records of ladder identification, inspection and maintenance
 - correct storage between use
 - use of ladder at correct angle (75°, i.e. 1m out at the base for every 4m in height)
 - secure fixing or footing during use
 - · ensuring only one person is on the ladder at a time
 - ensuring suitable footwear is worn
 - use of tool-carrying bags to leave both hands free to hold ladder



- reporting of defects and removal of ladders from service if necessary
- 2. Obtain the necessary instruction, information and training concerning ladder safety
- **3.** Ensure that all ladders are from reputable manufacturers and suppliers and that they conform to the relevant British and European standards.

Safe Access and Egress

Risk of a Person Falling

A safe means of access and safe place of work is essential in any construction or maintenance activity. Every year, 50% of all fatal or serious accidents occur because a person falls from a height. Therefore, whenever work has to be done at height, from which a person and/or objects could fall specific precautions must be taken.

The company will assess this at tender stage and planning stage and incorporate the means of access and safe place of work in their site-specific Method Statement. Means of access could be in the form of ladder, mobile towers, scaffolds or hydraulic platforms. Some simple precautions are outlined in the following sections.

Access - Ladders

Ladders must not be used as a means of access unless it is reasonable to do so taking into account:

- The nature of the work being carried out and its duration.
- The risks to the safety of any person arising from the use of the ladder.
- Ladder should be placed on firm level stable ground and secured to prevent slipping or falling.
- Ladders should comply to schedule 6 of the Working at Height Regulations 2005, as set out in the Appendices to this Policy and Procedures Manual.

Access - General Scaffolds

Scaffolds should only be erected, altered and dismantled by trained and competent persons.

Scaffolds must be inspected before use and every 7 days thereafter, or if the structure has been exposed to severe weather conditions, especially high winds. Trained and competent persons should undertake these inspections. Working Platforms, including scaffolds must meet the statutory requirements in accordance with Schedule 3 (Part 1) and (Part 2) of the Working at Height Regulations 2005 as set out in the Appendices to this Policy and Procedures Manual and HSE guidance contained in the publication CIS49.

Access - Mobile Access Towers (MATs')

The use of Mobile Access Towers (commonly called mobile scaffold towers) is common on the sites operated by SMD. A MAT is proprietary access system that will provide the user with a safe working platform only if it is assembled and used in accordance with the manufacturers' safe assembly and



use instructions. The incorrect assembly and use of a MAT is a dangerous practice and must be prevented. The prevention of such is a responsibility of the Site Manager and Site Supervisors.

Persons involved in the assembly and use of MATs' must be competent. The HSE and PASMA have developed a Code of Practice that; when used will enable the safe installation of the MAT. This Code of Practice recognises two approved methods for the assembly of a MAT.

- 1. The use of proprietary Advanced Guardrail Systems
- 2. Adopting the Through the Trap method of assembly (the 3 T's)

Only those persons who have been trained in the above methods of work are to assemble any MAT.

Before Use of Tower:

After a tower has been erected it is to be inspected by a competent person, as required by the

Working at Height Regulations 2005 before being put into first use, the following checks should be made before it is used:

- Check that it is vertical and square and that the horizontal braces and platforms are level.
- Check outriggers or stabilisers are correctly positioned and secured.
- Check that all baseplates or castor wheels are fully in contact with the ground, including those on stabilisers or outriggers. All castors should be properly locked.
- Check that all the spigot and socket joint locks holding the frames together are secured.
- Check that all the bracing members have been located exactly in accordance with the instructions in the supplier's manual.
- Check that all guardrails and toe boards are in position as required.
- Check that all access stairways and ladders are in position and are firmly located.
- Check that the base to height of platform ratio does not exceed the manufacturer's instructions.

During Use of Tower

During use, the tower should be kept in good order. A competent person should inspect the tower regularly to see that the structure has not been altered in any way. Should parts become damaged they should be replaced before the tower is used again.

MAT's should not be lifted around the site by the site crane (or any other lifting equipment) as they are not designed for this type of loading. If it needs to be re-located and this cannot be done by manually pushing it on the castors it should be stripped down and re-assembled at its new location.

Access - Mobile Elevating Work Platforms (MEWP's)

There are many types of access platform available and for some jobs they may provide a more suitable alternative to ladders, scaffolding, staging, suspended cradles or platforms. Employees should follow some basic rules, as set out below:



- People must not operate a MEWP unless they have been trained and authorised as competent (CPCS card holder) or are undergoing formal training under close supervision.
- The maximum number of people that may be carried on the platform and the safe working load should be clearly marked on the platform.
- Anyone using the MEWP's platform must wear a full body harness in good condition. They
 must wear a fall restraint lanyard which is as short as possible and does not allow climbing
 out of the basket. A fall arrest harness should only be used where a suitable assessment
 requires it.
- Operating instructions must be available for use and reference whenever the MEWP is in use.
- The maximum permissible wind speed in which the MEWP may operate or remain raised or extended should be clearly specified on the machine.
- The maximum gradient on which a MEWP may operate should be clearly marked on the platform, and inclinometers should be provided to enable an operator to establish the slope of the ground.
- Stabilisers/outriggers should be provided with suitable soleplates for use on soft ground.
- Identify any localised ground hazards such as ducts, manhole covers, holes or voids.
- Ensure no parts of the MEWP can protrude into any areas where site plant or vehicles may strike the MEWP.
- The user of the MEWP should make use of information supplied by the manufacturer relating to the minimum supporting capacity of the ground needed by the MEWP.

General Requirements for MEWP's

Never attempt to operate an access platform unless you have been properly trained and authorised to do so.

Guard-rails at least 950mm high, with mid-rails or mesh infilling, and toeboards at a suitable height should be provided at the edges of working platforms. Alternatively, solid enclosures at least 950mm high should be provided. Access gates should not open outwards and should return automatically to the closed and fastened position, a vertically sliding section of mid-rail can also be an acceptable means of access.

The upper surface of the platform should be made slip-resistant and adequate means of attachment for safety harnesses should be provided. Properly secured guard-rails may provide a suitable attachment point.

Before being used for the first time, MEWP's should be thoroughly examined by a competent person and a copy of that examination report should be made available to the user.

Access - Use of Harnesses

For some operations, even though all practical steps have been taken, there may still be a risk of persons falling. In such cases safety harnesses should be used and secured to a solid anchor point.



Users should inspect the harness & lanyard before each use. Site supervisors should more formally inspect them on a three monthly basis or as recommended by the manufacturer. Formal Inspections must be recorded in the Site Register of Harness Inspections.

The use of safety harnesses and associated equipment is sometimes the most appropriate means of protecting workers who are at a risk from a fall from height. Managers must have a good working understanding of the fall protection systems employed on their site. The following definitions will assist the Site Agent in ensuring that the **most appropriate system** is used.

Personal Fall Protection System

An assembly of components for protection against falls from a height at work when the risk of a fall exists, generally but not always including at least a body-holding device connected to a reliable anchor.

Fall Prevention System

A personal fall protection system in which the onset of a fall is physically prevented from occurring. An example would be a valley walker frame used for accessing the valley gutters of a fragile roof.

Work Restraint System

A specific form of personal fall prevention system by which a person is prevented from reaching zones where the risk of a fall exists. An example would be a harness and lanyard/rope system adjusted so that it prevents the user from getting to the edge of a roof.

Fall Arrest System

A personal fall protection system by which a fall is arrested to prevent the collision of the user with the ground or structure. Examples would be the traditional harness plus lanyard incorporating energy absorbance, or, alternatively, lead climbing using dynamic rope.

Rescue System

Personal fall protection system by which a person can carry out a rescue, rescue himself/herself, or be rescued from a height or a depth by pulling, lifting or lowering

SAFE SYSTEM OF WORK FOR WORKING AT HEIGHT

The following measures should be taken.

- **1.** If practical, arrange for work to be done at ground level or provide adequate work platforms with suitable measures to prevent fall from height.
- **2.** All work undertaken at height (from which persons are at a risk of falls from height or of being struck by falling objects and materials) is to be: (a.) properly planned by a competent person and (b.) suitably supervised and (c.) carried out by a competent workforce.
- **3.** Ensure all site operatives fully understand the safety measures in place on the site to prevent falls from height. Only authorised persons should be permitted to work at height.
- **4.** Work carried out at height is be undertaken by competent persons. A competent person is to plan work in advance to anticipate potential problems and implement safe procedures.



- **5.** Scaffolding and/or Mobile Access Towers should be erected by trained and experienced workmen making use of all the necessary plant and equipment including site / task-specific lighting where required.
- **6.** Ensure that adequate edge protection is provided.
- **7.** Ensure that the surfaces of working platforms, gangways and runs are free of protrusions and obstructions and are large and strong enough to hold workers along with their tools and materials.
- 8. Erect barriers or use secured covers to prevent falls through openings in the floor.
- 9. Make use of safety harnesses and belts, or safety nets, where these are required.
- **10.** Site Managers are to ensure that there is a suitable Emergency Rescue Plan in place where a need to effect a timely recovery of any person is envisaged within the Risk Assessment for work at height.
- **11.** The Site Manager is to ensure that an appropriate means of rescue (or self-rescue) is immediately available on the site should an employee fall into a collective fall protection system (i.e. a safety net) or require recovery from a suspended position (i.e. a fall arrested by a harness and lanyard).
- **12.** Persons needing to use self-rescue equipment or persons expected to affect a rescue plan must be trained in the rescue techniques applicable.
- **13.** Follow the method statement laid down by the company; if this is not possible, inform a responsible person immediately.
- **14.** Inspect all working platforms or places of work where a fall from height would result in injury (a.) before first use and (b.) at intervals of 7 days or less and (c.) after any event likely to affect the strength of stability of the structure and/or temporary work platform.
- **15.** Inspect equipment before use; a competent person should inspect working platforms (including scaffolding and fall protection systems)
- **16.** Site Managers are to maintain records of all inspections undertaken to comply with the Working at Height Regulations 2005 until the end of the construction phase of the contract.
- 17. Report any defects found to a responsible person immediately.



13. ISSUE & CONTROL OF SAFETY HARNESSES AND LANYARDS

SMD Ltd recognises that work at height presents a serious risk of falls and that such work must be carefully managed and controlled at site level. During work carried out at height it will at some time be necessary for individual fall protection to be worn (harnesses and lanyards). SMD will ensure that appropriate measures are in place for the issue and control of safety harnesses with regard to their:

- Issue
- Use
- Maintenance
- Inspection

This is so that all employees are provided with a means of fall protection that is safe and remains fit for its intended purpose. The Company will ensure it meets all the requirements of the Personal Protective Equipment Regulations in fulfilling the requirements of this policy.

Issue of Harnesses and Lanyards

Site Agents and Supervisors are responsible for the implementation of the Safety Management System at site level. They are to ensure the issue of safety harnesses to individuals is documented in the PPE register, including the unique manufacturers' serial / ID number for the harness / lanyard.

Use of Harnesses and Lanyards

Only those who have been trained in the correct use and the inspection requirements and the rescue procedures will be entitled to use the harnesses and lanyards.

Only lanyards identified in the risk assessment may be used with safety harnesses and in any case they must all incorporate shock absorbing facilities for the purpose of this policy, except where specifically identified such as in MEWPS.

Maintenance of Fall Protection Systems

Managers are to ensure any maintenance requirements specified in the manufacturer's instructions are included within the inspection framework.

Inspections of Harnesses and Lanyards

There are 3 types of inspection to be used. These are:

• **Pre-Use Inspection** – Carried out daily by all users of harnesses. The importance of this daily 'user inspection' must not be overlooked. On a day-to-day basis it is often the user who will first notice if the harness or lanyard is deteriorating through wear and tear due to the harsh nature of the construction site environment. Pre-use checks should be tactile and visual. The whole lanyard should be subject to the check, by passing it slowly through the hands (e.g. to detect softening or hardening of fibres, ingress of contaminants). A visual check should be undertaken in good light and will normally take a few minutes.

The Site Agent will emphasise the need for the daily pre-use check at the point of issue to the user and re-affirm the need for daily inspections via a Tool Box Talk on the Use of Harnesses and Lanyards.



• Interim Inspections – a more formal inspection carried out and recorded by Site Agents on issue to site individuals and at monthly intervals after that. The function of the interim inspection is to enable the Company to demonstrate that managers regularly check on the condition of the harnesses and lanyards in use on the site that they manage.

Interim inspections are to be completed monthly; Site Agents will record the inspections carried out on the Safety Harness Inspection Register.

• **Detailed Inspection** – Formal process carried out by a member of staff who is competent to do so; may also be carried out by competent person appointed by the insurance company

These are more in-depth inspections. The inspection regime should be drawn up by a competent person. Detailed inspections should be recorded. Detailed Inspections are to be carried out at least every 6 months. For frequently-used lanyards this may be increased to at least every 3 months, particularly when used in arduous environments if deemed appropriate by the Site Agent, (e.g. demolition, steel erection, scaffolding, steel skeletal masts/towers with edges and protrusions).

Examples of Defects and Damage

The following defects and damage have the potential to result in the degradation and/or weakening of the lanyard and Users and Site Managers should be aware of them when carrying out User and/or Interim Inspections.

- A knot in the lanyard, other than those intended by the manufacturer.
- Surface abrasion across the face of the webbing and at the webbing loops, particularly if localised.
- · Abrasion at the edges, particularly if localised
- Cuts to the webbing, rope or stitching, particularly at the edges (e.g. where the lanyard may have been choke-hitched around steel work)
- Chemical attack which can result in local weakening and softening often indicated by flaking of the surface. There may also be a change to the colour of the fibres.
- Heat or friction damage indicated by fibres with a glazed appearance which may feel harder than surrounding fibres.
- Damaged or deformed fittings (e.g. karabiners, screwlink connectors, scaffold hooks).
- UV-degradation which is difficult to identify, particularly visually, but there may be some loss of colour (if dyed) and a powdery surface.
- Partially deployed energy absorber (e.g. short pull-out of tear webbing).
- Contamination (e.g. with dirt, grit, sand etc) resulting in internal or external abrasion.

Other Factors to Consider

Any lanyard that has been used to arrest a fall should never be reused. It should be withdrawn from service immediately and destroyed.



All lanyards should be indelibly and permanently marked (BS EN 365:1993). They should be uniquely identifiable so that they can be easily associated with their respective inspection documentation.

Training in the Use of Harnesses and Lanyards

Managers and Site Supervisors are to ensure that all personnel who use safety harnesses and lanyards receive training on the following:

- Fitting and adjusting of the harness/lanyard
- Method of use
- Inspection requirements
- Competence

Managers are to ensure that those who carry out the detailed inspection of harnesses as the designated competent people are to have received formal training. In appointing the competent person Managers must ensure the person carrying out the function is given the necessary authority in order to carry out the function effectively e.g. whereby items are removed on the grounds of safety there should be no pressure on the competent person when making their decisions. In deciding competence, training previously mentioned must be considered, as must experience and knowledge of safety harnesses and lanyards.

Safe System of Work for the Issue & Control of Safety Harnesses and Lanyards

- **1.** The use of fall protection systems should only be considered where it is not reasonably practicable to introduce measures to prevent a fall from height utilising suitable barriers.
- **2.** Collective fall protection control measures (e.g. safety nets) should be considered over the use of harnesses and lanyards (individual fall protection measures) where suitable barriers cannot be incorporated into the works.
- **3.** Harnesses and lanyards must be subject to regular inspection; Pre-Use Checks, Interim Inspection and Detailed Inspection, as set out above. Inspection must be carried out by competent persons.
- **4.** Individuals must be competent and sign for and take responsibility for the harness issued to them. Issues are to be recorded in a Site Harness Register, with unique identifier numbers included in the register.
- **5.** A means of rescue and/or self-rescue will be available on the site when individual fall protection equipment is in use. Those persons who may be called upon to use rescue equipment are to be competent in the use of the rescue equipment.



14. CONFINED OR RESTRICTED SPACES

Working in Confined Spaces

Entry into a Confined Space by employees will be prohibited where it is reasonably practicable for the work to be completed **outside** the designated Confined Space.

Where it is necessary for the work to be completed inside a Confined Space, SMD will take all reasonable steps to secure the health and safety of those persons making entry into confined spaces. This will include personnel who may be required to carry out rescue operations. The company acknowledges that health and safety hazards may arise when entry into confined spaces is required. It is the intention of the company to ensure that any risks are reduced to a minimum. To assist in meeting this goal Site Managers or Supervisors will complete a Confined Space Entry Procedure Checklist to establish that it is safe to enter prior to entry.

The implementation of this policy requires the total co-operation of all members of management and staff. There will be full consultation with employees and the Client where the work requires entry onto a confined space. The person responsible for implementing this policy is: *The Site Manager and Supervisors onsite*

Confined Spaces and the Health and Safety of Employees

The company will, in consultation with employees and their representatives:

- **1.** Provide such information, instruction and training as is necessary to enable the appointment of "Competent persons" capable of carrying out risk assessments when entry into confined spaces is planned.
- **2.** Maintain a documented permit to work system that must be used whenever entry into "confined Spaces" is required (an example of the PTW is at the Appendix to the Health and Safety Procedures) or implement the Principal Contractors requirements for confined space entry.
- **3.** When entry into confined spaces is required for employees:
 - (i) Have available to employees, sufficient serviceable sets of appropriate breathing apparatus
 - (And, if applicable, safety belts and ropes) to ensure safe entry where there is danger from gases, fumes, vapours, etc. or where there is liable to be a deficiency of oxygen
 - (ii) Provide training in the use of breathing apparatus (and safety ropes where necessary) for those employees who may be required to use such equipment when working in confined spaces or, when entry into confined spaces by contractors and sub-contractors (including the self-employed) is required:
- **4.** Ensure that only serviceable sets of approved breathing apparatus (and safety ropes) are used so as to allow safe entry into confined spaces where there is danger from gases, fumes, vapours, etc or where there is a deficiency of oxygen.
- **5.** Ensure that users of breathing apparatus and safety ropes have received training in its use.
- **6.** Provide equipment and resources as are necessary to safely carry out entry into confined spaces.



Dealing with Health and Safety Issues in the Confined Space Environment

Where an employee raises a matter related to health and safety associated with work in confined spaces, the company will:

- 1. Take all necessary steps to investigate the circumstances.
- 2. Take corrective measures where appropriate.
- 3. Advise the employee of actions taken.
- **4.** Where a problem arises associated with work in confined spaces, the employee must adopt the following procedures:
 - (i) Inform a responsible person immediately
 - (ii) In the case of an adverse health condition, advise the company doctor and his or her own general practitioner.

Information and Training

The company will provide sufficient information, instruction and training as is necessary to ensure the health and safety of workers who are required to enter into confined spaces. Managers and supervisors who are responsible for workers required to enter confined spaces will also be given appropriate training.

SAFE SYSTEM OF WORK IN THE CONFINED SPACE ENVIRONMENT

When the proper precautions are adhered to, there is no reason why employees should not safely enter confined spaces during the course of their work. Following the three steps below will help to ensure that work is without significant risk:

- **1.** Find out as much information about the confined space as possible, including details of any previous contents and their associated hazards
- 2. Never enter a confined space without the knowledge of others
- 3. Always prepare thoroughly for work and adhere strictly to the rules of any permit to work system.

A confined or restricted space is defined in the Confined Spaces Regulations 1997 and is used to describe a working place that has restricted means of access or may have little or no ventilation or there are other difficulties which could result in the atmosphere becoming toxic or dangerously low in oxygen content.

If work has to take place in such a workplace a thorough and competent assessment of the work area has to be made. As a result of this assessment, the company can decide on the procedures that must be taken to safeguard those working there. The person making the assessment must be familiar with working in hazardous confined spaces and be competent to thoroughly assess the situation, taking into consideration the work that has to be undertaken.

Any confined space work should have been identified at the planning stage and detailed in the site health and safety plan. However if this is not the case the Principal Contractor should be informed of the need to enter a confined or restricted space and a written system of work be produced and agreed. If a contractor is entering a known confined space on clients' premises, it may be that the



client will require the contractor to follow the client safe system of work. In which case the contractor must liaise with the client and action accordingly.

Some confined spaces are naturally dangerous such as :-

- Sewers and manholes where dangerous levels of gas could be encountered.
- Gas and toxic substances leaking or leaching into trenches and pits from contaminated land or nearby faulty plant or equipment.
- Inside steel vessels the rusting of the metals surface could use up the oxygen resulting in a dangerous atmosphere.
- By disturbing sludge/sediments in tanks and vessels and as a result dangerous fumes are released.
- By introducing substances or operations into an otherwise safe area and as a result the atmosphere becomes dangerous, i.e. welding operations or applying internal surface coatings.

In carrying out the assessment the following must be considered:-

- Identify what work must be done in the confined space and the hazards involved.
- Consider if operations can be modified to eliminate the need to work within the confined space.
- Ensure written procedures are produced and that everyone is aware of these procedures.
- Ensure the necessary people are adequately trained and have the necessary equipment.
- Ensure the appropriate emergency procedures and emergency equipment are in place.
- Ensure essential isolation procedures have been completed and the necessary permits obtained.
- Ensure there is a safe means of access into the confined space.
- Ensure the necessary pre-entry checks are carried out and if required the work space is mechanically ventilated.
- If the atmosphere is flammable the space must be ventilated to reduce the flammable levels to below the lower explosive levels.
- Whilst the work is taking place ensure there is adequate ongoing monitoring of the atmosphere and of the workers i.e. an outside man.
- Ensure there are proper means of communication with the people in the confined space.



15. CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Where work involving the use of substances hazardous to health is undertaken the systems employed must be safe, so far as is reasonably practicable, under the requirements of section.2 of the Health and Safety at Work Act 1974.

Under the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended 2005) SMD is required to make arrangements to control the exposure of their employees to all substances which may affect their health. Exposure must be prevented or, where this is not reasonably practicable, adequately controlled. The Regulations include measures relating to the control of harmful micro-organisms and arrangements for notifying the HSE when biological agents are first used in a workplace.

Where a substance has been assigned a Workplace Exposure Limit (WEL), there is a duty to reduce exposure, as far as is reasonably practicable and at least to below the WEL.

Personal Protective Equipment (PPE), when used to control exposure, must be considered as a last resort. If the use of PPE is necessary steps must be taken to ensure proper use by the employee. Protective equipment that is provided must conform to the requirements of the Personal Protective Equipment at Work Regulations 1992.

Measures introduced to control exposure to substances that are hazardous to health must be maintained, examined and tested to ensure their continued effectiveness (e.g. the use of Local Exhaust Ventilation systems.)

Where exposure cannot be prevented, monitoring of employee exposure to hazardous substances may be required, for example where there is exposure to substances that present a risk of occupational dermatitis then occupational health surveillance may be appropriate. Employee health surveillance, (including biological monitoring) is required for exposure to certain specified substances or agents hazardous to health.

Employers have a duty to give suitable and sufficient information, instruction and training to employees that are exposed to substances hazardous to health.

SMD Ltd. recognises that the use of substances hazardous to health must be properly managed and controlled and effectively supervised. The Company will ensure a review of Control Measures (other than the provision of plant and equipment), including systems of work and supervision, is carried out at suitable intervals. To meet these duties the Company will implement the principles of good practice for the control of substances hazardous to health, as set out below.

Principles of Good Practice for the Control of Exposure to Substances Hazardous to Health

- **1.** Design and operate processes and activities to minimise the use, emission, release and spread of substances hazardous to health.
- **2.** Take into account all relevant routes of exposure- inhalation, skin absorption and ingestion-when developing control measures.
- **3.** Control exposure by measures that are proportionate to the health risk.
- **4.** Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.



- **5.** Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment.
- 6. Check and review regularly all elements of control measures for their continuing effectiveness.
- **7.** Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks.
- **8.** Ensure that the introduction of control measures does not increase the overall risk to health and safety.

Identification and Assessment

The Control of Substances Hazardous to Health Regulations imposes a duty on every employer to identify all substances in use and to assess the risk to their employees (and others) from the substance, taking into account the manner in which it is being used and the quantities involved.

"Substance Hazardous to Health" means any substance which is:-

- Listed in the current Chemicals (Hazard Information and Packaging for Supply) Regulations.
- A substance with an occupational exposure limit (WEL); these are listed in HSE document EH40 entitled 'Workplace Exposure Limits'.
- A biological agent e.g. Leptospirosis
- Dust of any kind, when present in a substantial concentration.
- Any other substance that poses a comparable hazard to people's health.
- There are other hazardous substances, but because they have legislation specifically covering their use they are not covered by COSHH e.g. asbestos, lead and substances that are hazardous because they are radioactive, asphyxiants, at high pressure, at extremes of temperature, or are flammable or explosive.

Instructions and Training

The employer is responsible for ensuring employees are trained and properly instructed in the use of any hazardous substance and about the importance of using the washing facilities before consuming food or drink. Smoking should not be permitted when working with hazardous substances. Site Agent / Managers should ensure employees are properly instructed before using hazardous substances.

SMD acknowledges that few substances can be considered completely safe. All reasonable steps will be taken to ensure the exposure of employees to substances hazardous to health is prevented or at least controlled within statutory limits. SMD undertake to control exposure by engineering means where reasonably practicable. Where exposure cannot be adequately controlled by engineering means, appropriate PPE will be provided. All employees will be provided with information, instruction and training on the nature and likelihood of their exposure to hazardous substances and advice on their control. Implementation of this policy requires the co-operation of all members of Management and Staff. The person responsible for the implementation of this policy is **the Site Manager**:



Arrangements for Securing the Health & Safety of Employees

SMD, in consultation with employees will:

- 1. Maintain an Inventory of All hazardous substances on site with appropriate hazard information
- **2.** Appoint a Competent Person to carry out Risk Assessments of the exposure to Hazardous Substances and advise on Control Measures.
- **3.** Operations that involve exposure to Hazardous Substances will be assessed and appropriate Control Measures implemented where the elimination from the process of the substance or substitution of less hazardous substances is not possible.
- **4.** Engineering Controls will be properly maintained and the effectiveness monitored. This will be achieved through Planned Preventative Maintenance and performance monitoring.
- 5. All employees will be informed of the purpose and safe operation of Engineering Controls
- 6. PPE will be used as a Control Measure as a last resort or as a back-up measure.
- **7.** Assessments will be reviewed as is appropriate and work activities involving the use of Hazardous Substances will be re-assessed.
- **8.** Health Surveillance, where identified under the Risk Assessment procedures will be carried out by qualified professionals.
- **9.** Individual Employee Records of exposure to Hazardous Substances, where required, will be kept for the period prescribed by the current legislation.
- **10.** Employees will receive comprehensible Information, and Training on the Hazardous Substances and Control Measures pertaining to the substances to which they are exposed. Further, employees will be informed about Health Surveillance results.
- **11.** New substances will **NOT** be introduced without first carrying out Risk Assessment and **ALL** changes to Control Measures and PPE will be properly assessed.

Information and Training

SMD will provide *sufficient* Information and Training to ensure a full understanding of the hazards to health posed by the substances used at the workplace and the importance of the Control Measures in place. Such information will also be provided for others who may be affected, such as Contractors, Temporary employees and Visitors. Managers and Supervisors will be given training to ensure the proper management of the risks.

Hazardous Substances Safe System of Work

Poorly maintained or poorly adjusted Engineering Control Measures can result in an exposure to substances hazardous to health. This can be avoided. Employees are encouraged to report defects and procedures must be in place for the prompt repair of such systems. Provision will be made (as appropriate) of temporary Control Measures (e.g. PPE)



The following steps will minimise the risk:

- Hazard information kept up to date. Assessments reviewed annually and re-assessed every 3 years or when material changes are made
- Ensuring employees are trained in the nature of the Hazards they are exposed to and the use
 of the Control measures implemented
- Ensuring that the Control measures in place are properly maintained
- Ensuring all documentation is comprehensive and comprehensible
- Encouraging all employees to report faults and problems.



16. SUB-CONTRACTORS and EMPLOYEE / PUBLIC SAFETY

SMD shares a duty of care with other contractors (as both are employers) to ensure that all reasonably practicable precautions are taken to safeguard their own employees, other persons on site and the public. Contractors who are self-employed carry the same responsibilities as an employer to make proper provision for health, safety and welfare during their activities on site.

A contractor can be anyone instructed by the Company to enter the premises to do work which might include free surveys, estimates, measurements, maintenance and servicing under warranty, etc.

Contractors have a duty to take all reasonably practicable steps to supply, erect and install plant and equipment and to use substances which will be safe and without risk to health when being set, used, cleaned and maintained by any person(s) at work.

As site occupiers, the company will plan, co-ordinate, control and monitor the activities of contract companies to effectively minimise the risks presented to employees, other persons on site and the public. Furthermore, the company is committed to ensuring that where any construction work is carried out at its premises, it is done so without risks to the health and safety of its employees or others and in accordance with the requirements of related statutes.

The Person responsible for the implementation of this policy is: **the Designated Manager and Site Manager**.

SAFE SYSTEM OF WORK SUB-CONTRACTORS & EMPLOYEE / PUBLIC SAFETY

- **1.** Accountabilities will be clearly defined so that relevant parties know, agree and understand what they are responsible for.
- **2.** Establishing and co-ordinating these accountabilities is one of the most important duties for the Company. Clear contractual arrangements and specifications for the work to be done will provide the essential foundations for effective management of contractors.
- **3.** The Company must actively and visibly demonstrate commitment to achieving high standards of health and safety that is consistent with quality and the agreed scope of work done.
- **4.** In certain cases, contractors' activities can be totally segregated from the rest of the undertaking, with control for part of the site formally handed over to a named organisation (provided it is physically segregated with effective barriers) and the arrangement can be contractually defined.
- **5.** Managers will monitor work carried out (in their areas of responsibility) by other employers (contractors) and report to Senior Management any concern in respect of Health and Safety at work (within their capability to recognise unsafe practices.)



Key Elements of Occupier Site Rules

The Company will ensure the following are planned and in place, at appropriate times, before work contracted out to another Employer is entered into:

- (a) A method statement identifying hazards, evaluating the risks and appropriate control measures.
- (b) Regular communication at the start of work, on a daily basis, with the Company nominee.
- (c) Determine hours of work for employees involved in the contracted out work.
- (d) Identify any access and vehicle restrictions.
- **(e)** Permit to work procedures and other codes of safe working practice for activities such as entry to confined spaces, overhead working, electrical safety, excavations, rotating machinery and fragile roof access precautions, etc.
- (f) Confirm emergency and fire procedures.
- (g) Confirm accident and near-miss reporting requirements.



17. INDUCTION (NEW EMPLOYEES) POLICY

SMD will provide Health & Safety Training as an integrated part of the general Induction Process for *all* new employees to the Company.

The training will commence on the first day of employment to ensure that new employees are familiar with the basic procedures once they are at their place of work. Where this is not possible, Induction Training will take place as soon as is possible after the new employee has started work.

The Induction Training will follow all sections of the Induction Training Checklist at the appendices to the Health and Safety Policy & Procedures. Where induction training is required at the Clients premises or site prior to work commencing, *the Site Manager* will liaise with the Client to arrange for the Induction Training to be completed.

The persons responsible for the successful implementation of this policy are **the Designated / Site manager**.

Safe System of Work for the Induction of New Employees

To ensure that the importance of the Company safety culture is fully understood by all employees effective induction training with regard to Health & Safety is essential. The following procedures will be followed.

- 1. Arrangements for Company Induction Training will be given as soon as is possible.
- 2. The Company will establish what written information is required for the new employee.
- 3. Records of Induction Training will be maintained by the Company
- **4.** Each employee will be issued with a copy of the Employee Handbook "Safe Work & Working Safely" immediately after they have completed their Safety Induction Training.
- **5.** The Company will ensure that all Information relevant to the new employee and His/Her position is covered in the Induction training process.
- **6.** Ensure the new employee understands the issues covered in the training and has the opportunity to clarify any points arising out of the training.
- **7.** A follow-up visit or meeting with the leader of the Induction Training will be arranged to answer any questions or correct any mis-understandings arising out of the training.



18. RISK ASSESSMENT POLICY & PROCEDURES

SMD accepts that some of the operations carried out at company premises *and* off-site, unless properly controlled, expose employees and others to some risks and they will take all reasonably practicable measures to reduce these identified risks to an acceptable level. SMD will take steps to ensure that Risk Assessments are carried out that will specify the hazards associated with the working processes together with any necessary remedial measures. Any employee who discovers a hazard during working operations should report the hazard to a Site Manager or the Site Supervisor. The persons with responsibility for implementation and operation of the Risk Assessment

Procedures are: the Designated Manager, the Site Manager

Planning & Organisation for Risk Assessment

In planning the Risk Assessment process the Company will follow the principles of prevention established at Regulation 4 to the Management of Health & Safety at Work Regulations 1999 and at Schedule 1 to the Regulations. These principles will be used to direct the approach adopted by the Company in identifying and implementing the necessary measures.

Management of Health & Safety at Work and the Principles of Prevention to be applied

- 1. If possible avoid the risk all together, e.g. do the work in a different way, taking care not to introduce new hazards
- 2. Evaluate risks that cannot be avoided by carrying out a Risk Assessment.
- **3.** Combat the risks at source rather than taking palliative measures, e.g. if the steps are slippery, treating or replacing them is better than displaying a warning sign.
- **4.** Adapt work to the requirements of the individual. Aim to alleviate monotonous work and paced working practices and increase the control employees have over work they are responsible for.
- 5. Take advantage of technological and technical progress.
- **6.** Implement risk prevention measures to form part of a coherent policy and approach. This will progressively reduce those risks that cannot be eliminated altogether, taking account of the work organisation, working conditions, the environment and relevant social factors.
- 7. Priority should be given to collective protective measures over individual measures.
- 8. Ensure that all employees understand what they must do
- **9.** Promote a positive culture of workplace health & safety within the organisation. Avoidance of risk at work should be the accepted approach within the Company. All levels of the organisation must recognise this principal and commit themselves to it.

These are general principles rather than individual prescriptive requirements. They should be applied wherever it is *reasonable* to do so.

The Company will address Risk Assessment with a formalised approach, rating the **HAZARDS** (Potential to cause harm) identified in the work process and the **RISK** (likelihood of occurrence). The Risk Assessment process will be implemented with a **3** *phase* plan.



- Phase 1. Carrying out of an Initial Hazard Assessment to identify possible hazards.
- **Phase 2.** Implementation of **Detailed Risk Assessments** where a need has been identified during the Initial Hazard Assessment. The Risk Assessment will apply a Risk Rating and prioritise actions.
- **Phase 3.** Development of a **Health and Safety Plan** identifying Hazards to be addressed, the Responsible Person, Priority, Due Date for completion and Actual date completed.

Risk Assessments will be undertaken in consultation with employees. The firm recognises that employee input is an important element of the process. The function of the Risk Assessment Process will be to formulate a system of Control Measures for the hazards identified associated with the daily working environment and actual working conditions.



19. COMPANY FIRE POLICY

It is of vital importance that no person is at risk from fire. The Company have a large capital investment in buildings, plant, equipment and stock, which must be protected against loss from fire. The Company will carry out a *Fire Risk Assessment* specifically aimed at identifying fire hazards at the place of work, and ensure that suitable arrangements are in place in the light of the Fire Risk Assessment. The Fire Risk Assessment will be subject to review and revision where there are significant changes to the work practice, building infrastructure or current fire safety arrangements.

The Company will:

- Provide suitable Fire Detection and Warning arrangements.
- Provide a safe means of escape and provide suitable firefighting equipment (FFE).
- Ensure arrangements are in place for: (a) immediate action in the event of a fire. (b) Raising the Fire Alarm and (c) Identifying the location of FFE and selection and use of FFE (training)
- Check and Maintain on-site fire safety equipment (FFE, means of escape, alarms etc.)
- Allocate special responsibilities.

Scope: The information contained in these procedures is applicable to the workshops and offices areas and brief requirements for work at the premises or sites of Clients. For the purpose of **off-site** work, full details will be ascertained by: **the Site Manger.**

Principal Responsibilities: The following persons will have particular responsibilities with regard to the Company Fire Procedures:-

Designated Manager: The Designated Manager will be responsible for all plant and equipment associated with protection against fire. This will include fire alarms and associated devices, fire extinguishers and ancillary equipment. He will be the principal contact with officers of the Fire Brigade and contractors who may provide services associated with fire prevention. The Designated Site Manager will hold Company associated documents and registers applicable to the fire procedures.

The Designated Manager will be responsible for ensuring that suitable fire procedures are maintained, at all times, and that procedures are communicated to all employees as appropriate. He will be responsible for ensuring that all fire signs and notices are maintained to the required standard.

Other Premises: The Site Manager will be responsible for liaison with other parties where work activities involve Company employees working on the premises of Clients. He will:

- 1. Establish if any special fire risks exist on the on the site.
- 2. Inform clients of any high risk of fire due to the on-site activities to be undertaken.
- 3. Ensure that all employees are fully aware of the fire precautions to be observed.
- 4. Inform all employees as to their own action in the event of a fire or emergency situation.
- 5. Identify any nominated Assembly Points and Reporting Procedures at the premises or site.



Managers and Supervisors: All Managers and Supervisors must ensure:

- 1. that they are familiar with the Company Fire Procedures
- 2. that they are conversant with correct practice
- 3. that they are able to put into operation the correct procedures.

They should additionally ensure that all employees, (for which they are responsible,) are fully advised of standing Company procedures in the event of fire. This is of particular importance in the case of new starters with the Company.

Fire Alarm System: In the event of a fire, the alarm will be raised. Upon activation of the alarm, all instructions from Managers and Supervisors will be followed.

Fire Assembly Points: Employees will, (when the alarm is heard) make their way, via the quickest safe route to a designated Assembly Point.

Evacuation Drill: A practice evacuation drill is carried out at least once annually, and the date of the drill noted.

Fire Exits: Managers and Supervisors must ensure that access to fire exits remains unrestricted at all times and that fire exits are not secured when employees are at work. If signs associated with fire exits need of attention, the Designated Manager should be informed. Any firefighting equipment faults or deficiencies must be immediately reported to the **Designated Manager**.

Housekeeping and Cleanliness: Experience has demonstrated that the single largest cause of fire at the workplace can be attributed to poor standards of Housekeeping. It is therefore imperative that good standards of housekeeping and site tidiness are maintained. Arrangements for the safe disposal of debris from sites away from the company premises will be organised by Supervisors.

Storage of Materials: Managers and Supervisors must ensure that any specific measures necessary to avoid fire are taken when storing materials that may be flammable or hazardous. This will include the separate storage of highly flammable liquids in appropriate storage facilities.

Smoking Policy: Certain areas will be designated as No Smoking Areas and Managers and Supervisors must ensure that observance of no smoking rules is complied with. Where a smoking policy at the site of the Client exists, the Site Manager will ensure compliance with that policy.



FIRE ACTION

If a fire is discovered, the following actions should be taken:

1. Immediately operate the nearest fire alarm call-point.

If the fire alarm is heard, the following actions should be taken:

- 2. Dial 999 from any available telephone to call the fire brigade.
- 3. Leave the building by the *safest route* and proceed to your Fire Assembly Point.
- 4. Close all doors behind you.
- 5. Report to the Fire Assembly Point.

The following general points should be observed:

- Do not take risks.
- Do not stop to collect personal belongings.
- Do not re-enter the building.

When calling the fire brigade, give the following information:

"Fire at [give precise location) i.e. SMD Building Services, Haigh Moor Farm, Haigh Moor Road, West Ardsley – You will be met at the entrance to the Drive way

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20. REPORTING OF INJURIES, INCIDENTS, NEAR MISSES & FIRST AID ARRANGEMENTS

SMD has in place procedures to be followed in the event of an Employee, Visitor or Contractor experiencing an Accident, Injury or involvement in a Near-miss or Dangerous Occurrence whilst on the premises.

This policy covers the procedures for reporting of Accidents, First Aid administration, Reportable Occurrences and Management actions. Suitable Information and Training will be given to all personnel regarding Reporting Procedures, the location of First Aid Facilities and the Accident Book.

The persons responsible for the successful implementation of this policy are **the Designated Manager and the Site Manager**

First Aid Arrangements

Arrangements are in place whereby First Aid can quickly be given to people injured at work. Company employees, as required, will have been trained with a recognised Training Provider, to an approved level of competence in First Aid at Work and will render assistance as required.

Signs will be displayed on the premises, identifying personnel trained to administer First Aid. Managers will be responsible for ensuring that there are adequate signs in place, identifying the location of First Aid facilities and the names of First Aid trained personnel.

All injuries, no matter how minor, must be treated and a record made in the Accident Book (BI 510) This is a requirement of the Social Security (Claims and Payments) Regulations 1979.

The decision to render first aid is at the discretion of the First Aider in attendance. First Aiders are limited in the degree of attention that they may provide to that defined in the training received.

In an emergency, if the First Aider cannot leave the patient, they will send some other person to tell a Manager or Supervisor. If the First Aider is of the opinion that more extensive attention than can be provided on-site is required, they may arrange to send the injured person to the nearest medical facility

The First Aider, in conjunction with the Manager / Supervisor, may need to arrange for an ambulance to be called, or on-site transport may be arranged. If an ambulance is summoned, a person should be sent to receive and direct the vehicle.

First Aid Administration

Managers will designate a First Aid Administrator who will carry out housekeeping of the First Aid Box, checking stocks and consumables. Shortages should be notified to the nominated person who will arrange for replenishment.



Accident Actions and Reporting

Any accident resulting in injury **MUST** be reported. For minor injuries a report in the Accident Book is required as a minimum. Where an accident results in the injured party having to leave the site (i.e. for further treatment, or is sent home to recuperate) the Accident Report Form **MUST** be completed.

After treatment, the First Aider will complete the ACCIDENT / INCIDENT REPORT FORM.

They will then pass the document to the appropriate manager who will complete the document after immediate investigation. After administering treatment, the employee (injured person) should also ensure that a record is made in the Accident Book

The nominated person will carry out all statutory reporting duties, as detailed below. He / She will also be responsible for ensuring that follow-up accident investigation is carried out. In the absence of the nominated person, the Supervisor will perform his duties on site.

In cases of serious injury, a Senior Manager or other responsible person will arrange to contact immediate relatives and, if necessary, will arrange transport to hospital. If appropriate, the senior Manager will make immediate contact with the Health and Safety Executive and Employee Insurers.

Accident / Incident Reporting and the Enforcing Authorities

Where an Accident or Incident occurs that results in the following:

- (a) Time lost from work. (Over 7 day Injury, not including the day of the accident)
- (b) An injury reportable under the RIDDOR Regulations 2013 and summarised at **SUMMARY OF MAJOR INJURY ACCIDENT CONDITIONS** in this section.
- **(c)** An injury (due to an accident out of, or in connection with work) to a person **NOT** at work, that necessitates in the injured party being removed to hospital for further treatment;

Records must be kept by the employer for all over 3 day injuries in if not exceeding 7 days.

It must be documented on the In-house Accident / Incident Report Form *and* HSE form 2508. Blank copies of this document are held at the Practice Office. Over 7 Day injuries must be reported to the HSE within 15 days from the day of the accident.

Near-miss Incidents and Dangerous Occurrences - Actions and Reporting

Any near-miss, incident or dangerous occurrence must be reported by anyone seeing it to the Manager/Supervisor of the area concerned. Certain such incidents are reportable to the Health and Safety Executive and accordingly, a nominated person will investigate the matter immediately and submit a report to the Health & Safety Executive. This will normally involve completion of the F2508



SUMMARY OF STATUTORY MANAGEMENT REPORTING REQUIREMENTS

| ACCIDENTS RESULTING IN | NOTIFICATION REQUIRED TO | RECORDS TO BE RETAINED |
|--|--|--|
| Death or Major Injury | Enforcing Authority by telephone immediately In writing on F 2508 within 15 days In writing to Insurers within 15 days | Company Accident Book Copy of form F 2508 Copy of Insurers form. |
| Incapacity for More than seven Days. (i.e. 'over 7 day injury') | Enforcing Authority on form F 2508 (01/96) within 15 days In writing to Insurers within ten days. | Company Accident Book Copy of F 2508 Copy of Insures form |
| Subsequent Death (within one year, if attributable to a previously reported accident) | Enforcing Authority in writing. Insurers in writing. | Copy of letter or F2508. Copy of Insures form |
| Dangerous Occurrences and Major Injury Accident / Conditions. (As listed at Schedule 1 & 2 of RIDDOR '95 Rev April 2012 | Enforcing Authority by telephone immediately In writing on F 2508 within 15 days In writing to Insurers within ten days. | Company Accident Book Copy of F 2508 Copy of Insurers form. |
| Injury to a person NOT AT WORK (i.e. a member of the Public) arising out of an accident at, or in connection with work and requiring movement of the injured person to hospital. | Enforcing Authority by telephone immediately In writing on F 2508 within 15 days. | Company Accident Book Copy of F2508 Copy of Insurers form. |
| Reportable Diseases (As listed at Schedule 3 of the RIDDOR '95 Rev April 2012 | Enforcing Authority on receipt of a written diagnosis from a doctor and where the ill employees current work activity is specified at <i>col 2</i> of Part 1 of Schedule 3 on Form F2508(A) | Copy of Doctors diagnosis. Copy of F 2508(A) |

The person normally responsible for ensuring that reporting requirements are met is **the Designated Site Manager.** In his absence, a Nominated Person will carry out these duties.



21. NOISE CONTROL POLICY

SMD will take all reasonable steps to ensure the risk of Hearing Damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum and will take steps to reduce noise levels as far as is possible. This policy will require the co-operation of all employees and management. The persons responsible for the successful implementation of this policy are: **the Site Manager**

Arrangements for Noise Control

- 1. Noise Assessments: The Company will undertake Noise Level Surveys and Noise Exposure Assessments on a regular basis. These will be used as a basis for formulating an action plan for remedial measures if necessary. Results will be recorded and updated regularly, particularly when there are significant changes to the working practice which have impacted on the noise levels.
- **2.** Reduction of Noise Level Exposure Levels: The Company will, as far as is reasonably practicable take steps to reduce noise levels by means other than the use of PPE and will include measures to ensure that the dose rate of 85dB(A) for 8 hours is not exceeded.
- **3. Provision of Ear Protectors:** The Company will provide suitable and effective ear protection for employees in areas with high noise levels. The Company recognises that the use of PPE is last resort and will strive to reduce noise levels by means of other means when reasonable practicable in the future, for example when replacing existing machinery. Training in the correct selection, fitting and use of PPE will be provided.
- **4. Ear Protection Zones:** The Company will designate identified areas or scenarios in which hearing protection is required to be worn and will supervise compliance with these requirements, be they on company sites or at the sites of clients.
- **5. Provision of Training:** The Company will provide adequate training on its hearing conservation and noise control policy. All employees subjected to high levels of noise will be provided with Information, Instruction, Training about the harmful effects of noise, the protection measures in place and the requirements of the Regulations and the Company Policy.

Managing Exposure to Excessive Noise Levels

The Safe System of Work for Noise applies to all employees of SMD associated with activities where noise could be excessive. Site Agents have responsibility for people who carry out activities where there is an **indication** that noise could be excessive; to ensure they are adequately protected from the damage that exposure to excessive levels of noise can cause.

(As a guide, an **indication** is where noise may be deemed as excessive is where, for example, in a conversation, two people standing two metres apart have to raise their voices excessively to be Heard).



Safe System of Work for Protection against Excessive Noise

- **1.** All Site Agents shall ensure that activities where there is an exposure to excessive noise are avoided so far as is reasonably practicable.
- **2.** Where there is an **indication** of exposure to excessive noise which cannot be avoided, the Site Agent shall ensure that the task is assessed and the appropriate steps taken so as to reduce the risk to the lowest level that is reasonably practicable.
- **3.** The Site Agent shall ensure that the assessment is reviewed if new information comes to light, if any changes in the operation are made, or if there is an incident as a result of exposure to excessive noise.
- 4. Where the Noise levels are above the Lower Exposure Action Level the Site Agent shall ensure:
 - Appropriate hearing protection is made available to all persons affected by exposure. This
 includes other contractors or temporary staff.
 - All relevant Site personnel shall receive appropriate training on
 - o Health hazards due to excessive noise
 - o PPE Issue, use, maintenance
 - o Controls in place.
 - Relevant Site personnel are provided with information.
- **5.** Where the Noise levels are above the Upper Exposure Action Level or exceed the peak action level the Site Agent shall ensure:
 - The same requirements as stated above except that
 - o Appropriate hearing protection is made available to all staff affected by exposure
 - Supervisory monitoring that it is worn. This includes other contractors or temporary staff.
 - Hearing protection zones are established and appropriate signage provided.
- **6.** Site Agents shall, from time to time deliver a Toolbox Talk to all employees deemed to be at risk of noise induced deafness from exposure to excessive noise levels.
- **7. All staff** shall take reasonable care for their own health and safety by making proper use of any equipment provided for them in respect of exposure to excessive noise.



22. Vibration Control

The Problem and the Effect

Exposure of the hands to excessive levels of vibration whilst at work can, for some Site Operatives (if left uncontrolled) cause discomfort or even pain, reduce productivity and in the long term may cause permanent disabling conditions (grouped to form the term HAVS).

There is some evidence that exposure over A(8) of 2.8m/s² (Where A(8) equals exposure over 8 hours and 2.8m/s² means root-mean-square)) can cause finger blanching in about 10% of the 'vibration exposed population' after 8 years. Where vibration is significantly in excess of 2.8m/s² the risk of harm is proportionately greater. Generally, suppliers of tools and equipment can supply the vibration levels assigned to equipment and this information should be ascertained by the Site Agent / Foreman.

Employees who develop symptoms of HAVS can suffer from various forms of ill health, which might include in the early stages painful finger blanching, numbness and loss of dexterity, loss of sensitivity, and painful throbbing. In the later stages this could lead to a loss of grip strength and an inability to complete simple, commonplace tasks. It could prevent a continued ability to work with hand-held power tools. Once the damage is done the symptoms are unlikely to improve, even if the exposure to vibration is halted. Continued exposure to harmful levels of vibration will lead to a worsening of the condition.

Controlling the Problem

The Company recognises the physical damage that the condition (HAVS) can cause and will therefore put into place effective controls to guard against the on-set of Hand-Arm Vibration Syndrome amongst company employees exposed to vibration to the health and safety. The Health & Safety at Work Act 1974 requires the Company to ensure the health and safety of employees at work.

More specifically the Management of Health and Safety at Work Regulations 1999 requires the Company to assess the risk (regulation 3) to health arising out of the use of vibrating equipment and to identify and implement control measures to reduce the risk so far as is reasonably practicable. In completing the Risk Assessment the Company will consider the population at risk to determine the likely scale of problem. The Management regulations also require the Company to address health surveillance of the workforce should this is identified as an appropriate control measure for exposure to vibration in the Risk Assessment process.

The Control of Vibration at Work Regulations requires that legal limits for levels of hand-arm vibration and whole body vibration be implemented.

For hand-arm vibration these figures are Daily Exposure Limit Value (DEL) 5 m.s-2 A(8) and Daily Exposure Action Value (DEA) is 2.5 m.s-2 A(8). These figures are root mean square averages whereas the previous guidance limit was given in the dominant axis. Managers will need to check which are being quoted by the manufacturer (rms figure is approximately 1½ times dominant axis figure for the same level of vibration).



Vibration protection techniques are as follows:

- Alternate working methods e.g. eliminate the need to use handheld power tools.
- Alternate work equipment e.g. make use of technological advances in tools
- Provision of vibration reducing auxiliary equipment
- Appropriate maintenance of equipment and control measures
- Information, instruction and training awareness to the hazard and the risks
- Limits on duration and magnitude of vibration
- Job rotation and rest periods
- Provision of warm, dry clothing

The Supply of Machinery Regulations 1992 requires suppliers of hand-held machinery to make available instructions regarding the control of vibration. Suppliers of equipment should also provide Employers with information as to the levels of vibration that operators could be exposed to.

The Provision and Use of Work Equipment Regulations 1998 requires that employers take into account the vibration emissions when selecting work equipment.

Preventing the Problem

Action can be taken to prevent the problem. In the first instance the work method should be addressed – i.e. can the work be completed without recourse to vibrating tools to eliminate the hazard? Where the use of vibrating hand-held tools is unavoidable Managers can take the following steps to help prevent problems arising:

- Providing the Right Tools for the Job in Hand
- Where possible choose low-vibration equipment. Provide tools designed to minimise vibration
 to the user for example some modern tools are vibration dampened or are fitted with special
 handles designed to reduce vibration. The expertise of Suppliers and/or manufacturers should
 be drawn upon for guidance.
- Ensure that routine inspection and maintenance is carried out on the tools in use.
- Implement an effective job rotation regime to reduce the likelihood of individual employees working for sustained, long periods with high-risk vibrating tools.
- Implement a health surveillance programme, to be delivered by Competent Persons (e.g. Occupational Health Practitioners), for employees deemed as being 'high-risk."
- Provide employees with adequate information, instruction and training on the causes, symptoms and effects of HAVS, the site-specific tasks that might put them at risk, the control measures to be implemented by the Company and actions they can take to prevent the condition developing.

The Provision and Use of Work Equipment Regulations 1998 requires that employers take into account the vibration emissions when selecting work equipment.



HAVS and Risk Evaluation

A number of factors contribute to the risk of contracting HAVS. The primary cause is working with vibrating tools; this vibration is most hazardous in the 5-20 Hz range (cycles per second.) Regular work with vibrating tools is the main factor to look for. Typical examples of equipment and work activities in the construction industry that may create a problem include: percussive hammers, vibratory compactors, concrete breakers, pokers, sanders and drills, hand-held portable grinders, disk cutters and hand-held circular saws.

These tools are typically used in road works, excavating trenches, shafts and manholes, structural demolition, placing and compacting concrete and may be used during tunnelling operations.

Other Contributing Factors

Other factors contributing to the risk of HAVS developing include:

- The grip and push used with vibrating tools a tight grip will transfer more vibration energy.
- Length and frequency of work with 'at risk' tools and the rest periods between to break up exposure time.
- How much of the hand is exposed to vibration.
- Physical factors affecting blood circulation, such as temperature and smoking.
- · Individual susceptibility.

Preventing the Problem

Site managers can take action to prevent the problem. In the first instance the work method should be addressed – i.e. can the work be completed without recourse to vibrating tools to eliminate the hazard? Can trenching machines complete excavations thereby reducing the need for vibrating, handheld, trenching tools? Is the use of concrete nibblers or remotely controlled hydraulic breakers a better option during structural demolitions? Can the tunnel be excavated mechanically?

Where the use of vibrating hand-held tools is unavoidable Site Managers can take the following steps to help prevent problems arising:

- Providing the right tools for the job in hand.
- Where possible choose low-vibration equipment. Provide tools designed to minimise vibration
 to the user for example some modern tools are vibration dampened or are fitted with special
 handles designed to reduce vibration. The expertise of Suppliers and/or manufacturers should
 be drawn upon for guidance.
- Ensure that routine inspection and maintenance is carried out on the tools in use.
- Instruct Site Supervisors to implement an effective job rotation regime to reduce the likelihood of individual operatives working for sustained, long periods with high-risk vibrating tools.
- Implement a health surveillance programme, to be delivered by Competent Persons (e.g. Occupational Health Practitioners), for Site Operatives deemed as being 'high-risk."
- Provide Site Operatives with adequate information, instruction and training on the causes, symptoms and effects of HAVS, the site-specific tasks that might put them at risk, the control measures to be implemented by the Company and actions they can take to prevent the condition developing.



23. MANUAL HANDLING OPERATIONS POLICY

Statistics show that manual handling is the most common cause of absence through injury in the workplace. More than one third of the lost time accidents are caused in this way. These injuries may often have long-term effects. It is the policy of SMD to reduce the risks associated with manual handling operations, thereby reducing the incidence of injury to all staff. The person with responsibility for the successful implementation of this policy will be: **the Site Manager**

This will be achieved through the following control measures:

- **1.** The elimination of hazardous material handling activities. The Company will ensure that operations that involve manual handling are eliminated, so far as is reasonably practicable.
- **2.** Where some manual handling operations cannot be eliminated the Company will provide all staff with guidance on the measures that should be taken to ensure that lifting and carrying in the workplace is done safely.
- **3.** Competent persons will carry out an assessment of manual handling activities. Risks that are identified will be reduced to the lowest reasonably practicable level.
- **4.** Suitable information and training will be provided to staff carrying out manual handling activities. Training needs will be identified and reviewed by a responsible person.

Safe System of Work for Manual Handling Operation in the Workplace.

Poor lifting and carrying techniques can result in discomfort and injury. In extreme circumstances these injuries can be permanent. Following these simple precautions can reduce these risks:

- 1. Ensure that safe systems of work devised for the work activity are complied with.
- 2. Make full and proper use of aids to lifting and carrying that are available.
- **3.** Store the heavier items between shoulder and hip height with the smaller, lighter items only stored above shoulder or below knee height.
- **4.** Use the legs and knees to bend and lift do not stoop or bend the back.
- **5.** Avoid twisting or stretching when lifting or carrying.
- **6.** Ensure that regular rest breaks are taken where manual handling activities are highly repetitive or to prevent the onset of fatigue.
- 7. Ensure there are no sharp, hot or cold edges which could cause injury.
- 8. Ensure, before lifting operations start, that the route from lifting point to final point is clear.
- 9. Make full and proper use of any protective clothing available.
- **10.** Importantly, do not over extend yourself in any lifting and carrying. Know your limitations and where necessary, seek assistance.
- 11. Report any problems or concerns about with manual handling operation to your Manager.



24. CLEAN SITE (HOUSEKEEPING) POLICY

Poor standards of housekeeping are a common cause of injury and damage at work and can create unnecessary fire hazards. Experience has demonstrated that the single largest cause of fire at the workplace can be attributed to poor standards of housekeeping.

Low standards of housekeeping often result from poor working practices and/or organisational deficiencies within the workplace. Poor housekeeping on the sites of our Clients on the part of

Company employees reflects badly on us all.

All employees of SMD must recognise the need to ensure that adequate standards of housekeeping are achieved and maintained. It is the Company's policy to ensure that the highest standards practicable are attained to meet its commitment to provide a safe place of work for all. Site Supervisors are responsible for the implementation of this policy.

Poor working practices that contribute to poor housekeeping may include:

- 1. Untidiness
- 2. Lack of thought and consideration by the individual.
- 3. Ignoring rules and procedures.
- **4.** Badly designed systems of work.
- 5. Insufficient space for normal working activities.
- 6. Inadequate storage facilities.
- **7.** A lack of training, information, instruction and supervision.

Responsibilities

So that acceptable standards in housekeeping within the Company can be achieved all must accept their individual responsibility to the successful implementation of the Housekeeping policy.

Managers and Supervisors must ensure that their areas of responsibility maintain a satisfactory standard of housekeeping at all times.

All Staff are responsible for ensuring that they do not allow excessive waste materials to generate in their work area and for keeping work areas as clean and tidy as is practicable. This will mean acting in accordance with the safe system of work relating to housekeeping and reporting any problems with regard to storage or the removal of articles.



Safe System of Work for Housekeeping in the Workplace.

In order to ensure that satisfactory standards of housekeeping are achieved the following arrangements apply.

- **1.** Check that the workplace is free from potential hazards at the beginning of each day and report any problems to your Manager or Supervisor.
- 2. Always put articles away immediately after their use.
- 3. Clear up any spillages immediately where practicable, or report them to a responsible person.
- **4.** Do not allow articles to protrude into walkways.
- **5.** Ensure that waste materials are properly stored and removed on a regular basis. Report any such problems to your Manager or Supervisor.
- **6.** Special arrangements will be made for the removal of unusual or extra-large objects and substances. Consult your Manager or Supervisor.
- **7.** Do not store articles or substances anywhere other than designated places.
- 8. Leave the workplace tidy and put away documents, articles and substances.



25. MANAGING ASBESTOS AT WORK

The Risk to Health

It is now illegal to use asbestos in the construction or refurbishment of any premises. However many hundreds of thousands of tonnes of it were used in the past and much of it is still in place. There are three main types of asbestos still found in premises. These are commonly called 'blue asbestos' (crocidolite), 'brown asbestos' (amosite) and white asbestos' (chrysotile). All of them are dangerous, but blue and brown asbestos are more hazardous than white. Furthermore they cannot be identified just by their colour.

Breathing in air containing asbestos fibres can lead to asbestos related diseases, mainly cancers of the lungs and chest lining. Asbestos is only a risk to health if asbestos fibres are released into the air and breathed in. Asbestos-related diseases currently kill up to 3000 people a year in Great Britain. This number is expected to go on rising for the next ten years. There is no cure for asbestos-related diseases. There is usually a long delay between first exposure to asbestos and the onset of disease. This can vary from 15 to 60 years. It is *only by preventing or minimising these exposures now* that asbestos-related disease will eventually be wiped out.

Managing the Hazard

As long as any asbestos is in good condition and it is not being or going to be disturbed or damaged there is no risk. But if it is disturbed or damaged, it can become a danger to health because asbestos fibres are released into the air and people can breathe them in.

Employers have a legal duty to prevent the exposure of employees to asbestos, or if this is not possible to reduce it to the lowest possible level. In the future, a new duty to manage asbestos will be added to the Control of Asbestos at Work Regulations. This will require management of the risk to employee health from asbestos by:

- Finding out if there is asbestos in the premises, its amount and what condition it is in.
 Presuming materials contain asbestos, unless you have strong evidence that they do not.
 - Making and keeping up to date a record of the location and condition of the Asbestos Containing Materials (ACM's) or presumed ACM's in your premises.
 - Assessing the risk from the material.
 - Preparing a plan setting out how you are going to manage the risk from this material.
 - Taking the steps needed to put your plan into action;
 - Reviewing and monitoring your plan and the arrangements made to put it in place; and
 - Providing information on the location and condition of the material to anyone who is liable to work on or disturb it.

Anyone with any interest in the property will have a duty to co-operate with employers to enable them to manage the risk.



Asbestos Management Checklist

Finding ACM's: Check if materials containing asbestos are present.

Condition of ACM's: Check what condition the material is in.

Presumptions: Assume the material contains asbestos unless there is strong evidence that it

does not.

Identify: When planning to have maintenance or refurbishment of the building carried

out or the material is in poor condition arrange for the material to be sampled

and identified by an asbestos specialist.

Record: Record the location and condition of the material on a plan or drawing.

Assess: Decide if the condition or location means the material is likely to be disturbed.

Plan: Prepare and implement a plan to manage these risks.

Informing Operatives and/or Subcontractors

The new duty requires that information on the location and condition of the asbestos available to anyone liable to work on it or disturb it. Make sure that employees involved in building maintenance work and any contractors working on the premises know that the building contains or may contain asbestos. Tell them where it is and make sure they know there are potential risks to their health if they disturb it. If workers / contractors have to work on materials containing asbestos make sure that they know they are working with asbestos and what precautions they should take.

Make sure that they do:

- Keep everyone out of the work area who does not need to be there
- Take care not to create dust
- Keep the material wet, whenever possible
- Wear a suitable respirator and protective clothing
- Clean up with a 'Type H' vacuum cleaner that complies with BS 5415 (Your Supplier will be able to ensure any vacuum cleaner used in the cleaning up of ACM's complies with the required standard.)

Make sure they don't:

- · Break up large pieces of asbestos materials
- Use high-speed power tools they create high levels of dust.
- Expose other workers who are not protected.
- Take protective clothing home to wash.



26. WORKING ADJACENT TO STATUTORY UNDERTAKERS APPARATUS

Services - Underground and Overhead

The company would usually be informed at tender stage of any known Statutory Undertakers (S.U.) apparatus on or near the site. Even if the information available says there are no services the site supervisor should thoroughly check the area.

Statutory Undertakers Overhead Powerlines

Powerlines are obvious and easily located. If work will be within 15 metres of overhead lines on steel towers, or within 9 metres of wood, concrete or steel poles or if access to the work site passes beneath an overhead power line, then you must consult the operator of the line, (usually the local Regional Electricity Company or National Grid Co. - the owners name will often be posted on the support pole or tower - if in doubt call the local Regional Electricity Company office) All distances should be measured at ground level from a position estimated by eye to be vertically under the outer most conductor at a tower or pole position.

Where work is to take place close to overhead powerlines obtain accurate information on clearance distances and the precautions to be taken. A detailed work method statement should be produced. Further guidance can be found in HSE guidance note GS6 "Avoidance of danger from overhead power lines".

Remember - Electricity can kill! Never offer poles or other long objects up towards overhead lines as sighting or measuring aids - Never assume an overhead line is carrying telephone wires - some electricity lines look very similar to communication cables - some poles carry both electricity and telephone lines.

General Safety Precautions Whilst Working On Site In the Vicinity of Overhead Powerlines

- 1. Understand and follow instructions given on safe working areas and methods of work
- **2.** Machines passing under or needing to work under overhead lines should have any raising and lowering devices mechanically limited so that jibs, booms or tippers are physically restricted from encroaching upon the safety clearances to the overhead line.
- 3. Make sure barriers and warning notices are erected as required by the HSE guidance note GS6
- **4.** Do not tip soil or stack material underneath overhead lines as this may reduce the clearance from the line to an unsafe value.
- **5.** Make sure that when handling or using platforms, scaffold poles, piping, ladders, tools etc, they are kept at a safe distance from overhead lines.
- **6.** Do not steady a suspended load, skip, hoist wire, sling etc. unless satisfied that there is no danger from overhead lines.
- **7.** Remember that, when mobile plant such as a crane or excavator is operating near overhead lines, the raising or slewing of the jib may introduce danger.
- **8.** Never operate a machine unless carefully guided by an experienced Banksman/Slinger, always keeping overhead lines in view when manoeuvring mobile plant.
- **9.** Never approach or touch any broken or fallen conductors or any plant in contact with an overhead line before the Electricity Company confirms that conditions are safe.



10. If a machine in contact with an overhead line cannot be disentangled by backing off, remain seated in the cab and warn others to keep clear of the machine until the electricity Company confirms that conditions are safe.

11. If it is essential to leave the machine while it is in contact with the overhead line, (for example if it catches fire) jump clear - do not attempt to climb down in the normal way and do not touch any part of the machine when on the ground.

Statutory Undertakers Underground Services:

Statutory Undertakers apparatus and other underground services are much harder to locate; however, bear in mind items such as valve covers, manhole covers and marker posts which all indicate that there could be services in the ground.

Even after taking these precautions the area should be checked with a Cable Avoidance Tool (CAT) before commencing excavation work. All excavation work should use safe digging techniques detailed in HSE guidance HS(G)47 "Avoidance of danger from underground service." and under the site-specific requirements of a Company Permit To Dig issued by the Site Management Team.

Before starting work:

- Make sure you have plans of the underground services in the area. This may not always be possible for emergency or unforeseen works. Remember that service connection cables from the mains to a building or a street lamp may not be shown.
- Use a cable and pipe locator to trace electricity cables and metal pipes. You should have been trained how to do this. If in doubt or if you have any difficulty get help or advice from the Owner of the apparatus.
- Mark the positions of the cables and pipes using paint or other waterproof marking on the ground - or using short pegs and marker tape in soft ground.
- Look for signs of service connection cables or pipes, e.g. a gas or electricity meter box or a service connection entry into a house or street lamp
- Hand dig trial holes (as many as necessary) to confirm the position of services in close
 proximity to the area of your work. This is particularly important if there are plastic pipes that
 cannot always be found by locator.
- Always hand dig near to services, use spades & shovels rather than picks, pins or forks
- It is possible that cables or pipes may be embedded in concrete. Electricity cables embedded
 in concrete MUST either be made 'dead' before the concrete is broken out or another safe
 way of working agreed with the cable owner
- Services are sometimes protected by concrete polythene or earthenware tiles, or a marker tape may be laid above the service this is a useful indication of the presence of the service.
- Remember there are many services in existence that have no indication of their presence.



27. SMOKE FREE POLICY - HEALTH ACT 2006

Introduction - Smoking and the Increased Risks to Employee Health

This policy has been developed to protect all employees, service users, customers and visitors from exposure to second-hand smoke and to assist compliance with the Health Act 2006. Exposure to second-hand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

The Company also acknowledges that there are benefits to the safety of employees as well as to their health, most particularly to drivers of vehicles who may be distracted while lighting, smoking or disposing of cigarettes while in transit.

Policy

It is the policy of the Company that all our workplaces are smoke free, and all employees have a right to work in a smoke free environment. The law enforcing this policy came into effect on 1

July 2007. Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes company vehicles. This policy applies to all employees, consultants, contractors, customers or members and visitors.

Implementation

Overall responsibility for policy implementation and review rests with the Operations Director.

However, all staff are obliged to adhere to and support the implementation of the policy. The persons named above shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also inform all new personnel of the policy on recruitment/induction. Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all smoke free vehicles.

There is no legal obligation to provide sheltered locations for smokers although it shall remain at the discretion of Directors whether to provide such shelter or whether to ban smoking from the premises entirely. Any shelter erected may only be covered overhead and on two sides comprising no more than half of the wall space of the shelter.

Non-Compliance

Local disciplinary procedures will be followed if a member of staff does not comply with this policy.

Additionally, in public places those who do not comply with the smoke free law may also be liable to a fixed penalty fine and possible criminal prosecution.



28. COMPANY VISITORS POLICY

SMD accepts its responsibility to ensure the health and safety of all personnel who come directly or indirectly into contact with the organisation or the consequences of its activities. The person with responsibility for the successful implementation of the site visitor's policy is: **the Site Manager**

The Company has the following arrangements to enable its responsibilities to be effectively discharged.

Information and Communication between the Company and Visitor(s)

Any special arrangements required by the visitor(s) must be made known to the Company, where practicable, before arrival. This may include the bringing of vehicles, machinery or substances onto the site, or providing facilities for disabled visitors or those with language difficulties.

Upon arrival the visitor(s) must make themselves known to the Site Manager or Site Supervisor. If the visit to the Company will take the Visitor(s) into the installation area they will be informed of any special requirements of them. Visitor(s) will be informed as to any risks they may be exposed to during their visit and associated measures in place. Emergency measures (Including the location of Assembly Points) will be made known to visitors and actions to be taken. All accidents or near misses, which occur to visitor(s) to the Company, must be reported and followed up in accordance with the accident reporting policy.

Adequate supervision will be maintained throughout the time that visitor(s) are on the site and control of access to some areas, as is required, will be maintained. All visitor(s) leaving the Site must return any Company property made available to them, as may be applicable.

Any problems that are encountered by visitor(s) or by staff with regard to visitor(s) should be reported to a responsible person so that any action necessary can be taken.

Security arrangements and high-risk areas Emergency procedures

Full details of emergency procedures must be clearly indicated to visitors entering the premises or attending the site of any work activity. Where an emergency arises, measures must be taken by a responsible person to ensure that visitors are accompanied to a place of safety and that they comply with company procedures. Visitors must be accounted for during emergencies and evacuation drills.

Personal protective equipment

Visitors will be required to use any personal protective equipment that is necessary to safeguard their health and safety.

Duties of Managers.

Managers have overall responsibility for visitor(s) who enter their areas of authority. It is a management responsibility to ensure that this policy is complied with and they are charged the resolution of any problems at the earliest opportunity.

Duties of Employees

Staff must, in all cases seek approval from a responsible person, before arranging for a visitor to come on site. Employees must take responsibility for visitor(s) in their care and ensure that the requirements of the Company policy concerning visitor(s) are complied with at all times. Employees are responsible for ensuring that any machinery or equipment with which they have been working is left in a *safe* condition.



Safe System of Work for Visitors

The monitoring of visitor(s) at the Workplace (or Site) is vital to the Company in discharging its duties to maintain a work environment that is safe and without prejudice to health. By observing the following requirements careful control of the activities of visitors to the Company (or Site) should be possible.

- **1.** Ascertain any special arrangements required by visitor(s). This may include vehicles, equipment, substances or special needs.
- 2. Upon arrival ALL visitor(s) must report to the Site Manager or Site Supervisor.
- **3.** ALL visitor(s) must be advised as to any risks they may be exposed to during their visit and of the emergency procedures in place (Including the location of Assembly Points.)
- **4.** All security arrangements must be complied with when visitors enter.
- **5.** The responsible person must ascertain from the visitors as to any risks to themselves or others arising from their activities whilst on the site.
- **6.** Visitor(s) to the Company (or Site) will be expected to comply with the requirements of the measures and arrangements implemented for the health and safety of all whilst visiting.



29. ENVIRONMENTAL MANAGEMENT PROCEDURES

SMD BUILDING SERVICES - ENVIRONMENTAL POLICY STATEMENT

It is the Policy of SMD Building Services that the following principles are implemented at our Company Head Office and on all construction sites within the scope of our operations.

- The Company Directors shall take the responsibility for the implementation and further development of its Environmental Policy and the Environmental Management System implemented by the Company
- The Company will keep itself informed of relevant legislation and codes of practice on environmental matters related to its operations make best endeavours to ensure that its employees are aware of and are adequately informed of the relevant requirements of this legislation.
- The Company will assess and regularly re-assess the environmental impact of the Company's activities.
- Whilst construction is in progress, the Company will take all reasonable precautions that are
 consistent with our Clients' instructions to protect against environmental damage, disruption
 or nuisance on or adjoining the sites on which we operate. The Company will, at all times,
 endeavour to keep its sites clean and tidy and also any adjoining areas that may be affected
 by traffic to and from those sites and to prevent pollution of the air, ground or water by noise,
 fumes, dust or the disposal of construction materials.
- The Company will identify the activities within each project which could have an impact on the
 environment, and recommend to our Clients such products and materials that have derived
 from sustainable sources and/or that are reusable or recyclable.
- The Company will use the products and materials that have the least damaging effect on the
 environment and with the Clients approval shall make every effort to conserve the use of
 materials and energy and where feasible and financially practical, recycle all materials.
- Any environmental problems encountered in carrying out the works according to the Client's
 instructions will be brought to the attention of the Client and of any competent authority with a
 view to finding a satisfactory solution.
- The Company will commit itself to achieve a year on year improvement in the environmental performance of our work and will hold in the highest regard the local (and where appropriate the wider) environment
- The Company will promote and support environmental measures at all levels within our Company of "best practices" to encourage environmental improvement and to minimise, where necessary, the potential for any environmental damage that may be caused by our operations.
- Contract Managers within the Company will conduct environmental audits of all our
 operations and functions to ensure that the risk of environmental pollution is minimised and to
 monitor the impact of our works on the local (and where appropriate the wider) environment.



- The Company will ensure that it acts in a socially responsible manner in dealing with environmental issues. To this end we will (where appropriate) develop closer links with other organisations in order to improve the control and reduction of all forms of pollution generated by our site operations.
- We will actively encourage our suppliers to demonstrate a commitment to environmental improvement in its dealings with the Company
- We will maximise awareness and understanding of, and education about, environmental issues within our Company through the effective monitoring and maintenance of this policy.
- We will strive to achieve high standards of site cleanliness and we shall endeavour to minimise and reduce any environmental nuisance as a result of our site operations.
- We will reinstate sites and working areas to leave them no worse than they were found.
- We will continue to critically examine the Company's energy policy and introduce energy savings wherever possible, reducing costs and the use of fuel resources.

This policy is to be communicated to all Clients, Employees, Suppliers and Sub-contractors.

In order to achieve the objectives stated in the Environmental Policy, it is the policy of the Company to establish and maintain an effective and efficient Environmental Management System, planned and developed in conjunction with other management functions.

Determination of environmental performance within the business and compliance with statutory requirements will made on the basis of objective evidence of environmental reporting.

Mark Duffield (Managing Director, SMD Building Services)



30. DISCIPLINARY PROCEDURES

The company disciplinary procedures will be implemented on site when any operative:

- Does not adhere to the company policy and procedures.
- Fails to comply with the safe system of work, method statements and risk assessments provided to carry out the duties of their employment.
- Puts any other employee, visitor or member of the public at risk of injury.
- Uses abusive, offensive or threatening behaviour/language towards anyone while on site or company premises.
- Is found to be misusing any plant, equipment or provisions provided to ensure the work is carried out safely.

The company will adopt a yellow and red card system to be issued if an operative is found to be in breach of company policy and procedures.

- A yellow card will be issued if an operative is in breach of a minor offence.
- A second yellow card will be issued to an operative in breach of a second minor offence.
- If the same operative commits a third offence then a red card will be issued and the offending operative will be removed from site.
- If a more serious offence is committed at any time the site manager or director will issue an immediate red card and the operative will be removed from site.
- If a red card is issued then the operative will not be allowed back on site for a period of 3 months. After which point they will have to be re-inducted to be allowed back on site.

Evidence will be obtained from the operative that they recognise the infringements which resulted in the dismissal from site and agree to be re-inducted. The company will use its discretion when issuing a red or yellow card as to the seriousness of the offence.



31. AMENDMENTS TO POLICY AND PROCEDURES MANUAL

The person responsible for the maintenance of this record is: Mark Duffield

The company will review the policy and procedures and will strive to make improvements and amendments when required. The changes will be communicated to all employees when the amendments have been implemented.

| No | Detail of amendments | Date of change | Review Date |
|----|--|----------------|-------------|
| 1 | Organisational chart added | Aug 2013 | Feb 2014 |
| 2 | Reference to legislation & changes (RIDDOR 2013) | Oct 2013 | Feb 2014 |
| 3 | Disciplinary procedure included | Feb 2014 | Feb 2015 |
| 4 | Amendments and policy reviewed | Feb 2014 | Feb 2015 |
| 5 | | | |
| 6 | | | |

Reference to some important legislation and guidance

- Health & Safety at Works Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992
- The Provision and Use of Work Equipment Regulations 1998
- Personal Protective Equipment at Work Regulations 1992
- Manual Handling Operations Regulations 1992
- Health and Safety (First Aid) Regulations 1981
- The Health and Safety Information for Employees Regulations 1989
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Control of Noise at Work Regulations 2005
- Electricity at Work Regulations 1989
- Control of Substances Hazardous to Health Regulations 2002
- Construction (Design and Management) Regulations 2007
- Gas Safety (Installation and Use) Regulations 1998
- Control of Asbestos Regulations 2012
- Control of Vibration at Work Regulations 2005
- Lifting Operations and Lifting Equipment Regulations 1998
- Work at Height Regulations 2005
- Safety in the use of Abrasive wheels: HSG17
- Avoid danger from underground services: HSG47