



joinery ltd

Health, Safety and Welfare Policy and Procedures

GENERAL STATEMENT

At **Woodcraft Joinery Limited**, it is our policy to provide and maintain safe and healthy working conditions, equipment and systems of work for all our Employees, Contractors and Other Parties involved in our work, and to provide sufficient information, training and supervision required for this purpose.

We will take all necessary measures to ensure that the Health, Safety and Welfare of our Employees and others affected by our work meet with the requirements and spirit of the Health and Safety at Work Act 1974, together with all other statutory requirements and considering Approved Codes of Practice (ACOPs).

All Employees, Sub-Contractors and Agents acting on our behalf, will be made aware of the Company's arrangements regarding Health and Safety, including being given a copy of this Policy. Clients, Principal Contractors and their Agents may also be given a copy to ensure that all are very clear about how seriously we take our responsibilities towards everyone we have contact with during our work.

Additional guidance will be given to all persons working for this Company which outlines our rules and other information relating to working for our Organisation.

The active participation of all people working for this Company regarding the safe execution of their duties is paramount, without which our Policy cannot be delivered effectively.


WORKSAFE POLICY

Everyone has the "right to refuse to work" if doing so would endanger anyone at the time or in future.

In such circumstances, this must be reported to the relevant Manager immediately, who will investigate and take improvement actions until a suitable resolution is agreed.

Should the need arise, then the "right to refuse" report can be escalated to other senior Managers or Directors, for example: if the person making the report believes that the matter is not being treated with sufficient importance. People who make such reports are to be thanked for their efforts in making our workplaces safer for all without risk of disciplinary action.

This Health, Safety and Welfare Policy will be updated to reflect changes in the business and working conditions, or if any changes in legislation affect our work.

Signed: 

Ian Walker (Managing Director) Date: 25th October 2023

Scheduled date of next review of this Policy: end of October 2024 unless required earlier.

OTHER DOCUMENTS AND PROCEDURES IN PLACE:

In order to effectively manage our work, we utilise the following in addition to this Policy:

- Anti-Bribery and Corruption Policy
- Environmental, Sustainability and Waste Management Policy
- Equal Opportunity, Harassment and Bullying Policy - Including Modern Slavery Statement
- Quality Policy and Procedures
- Work at Height Standards and Procedures
- Site Rules - Our Own and Clients
- Construction Phase Plans, Risk Assessments and Method Statements
- Third Party Accreditations - CHAS, Constructionline and SMAS Worksafe
- Drugs and Alcohol Policy

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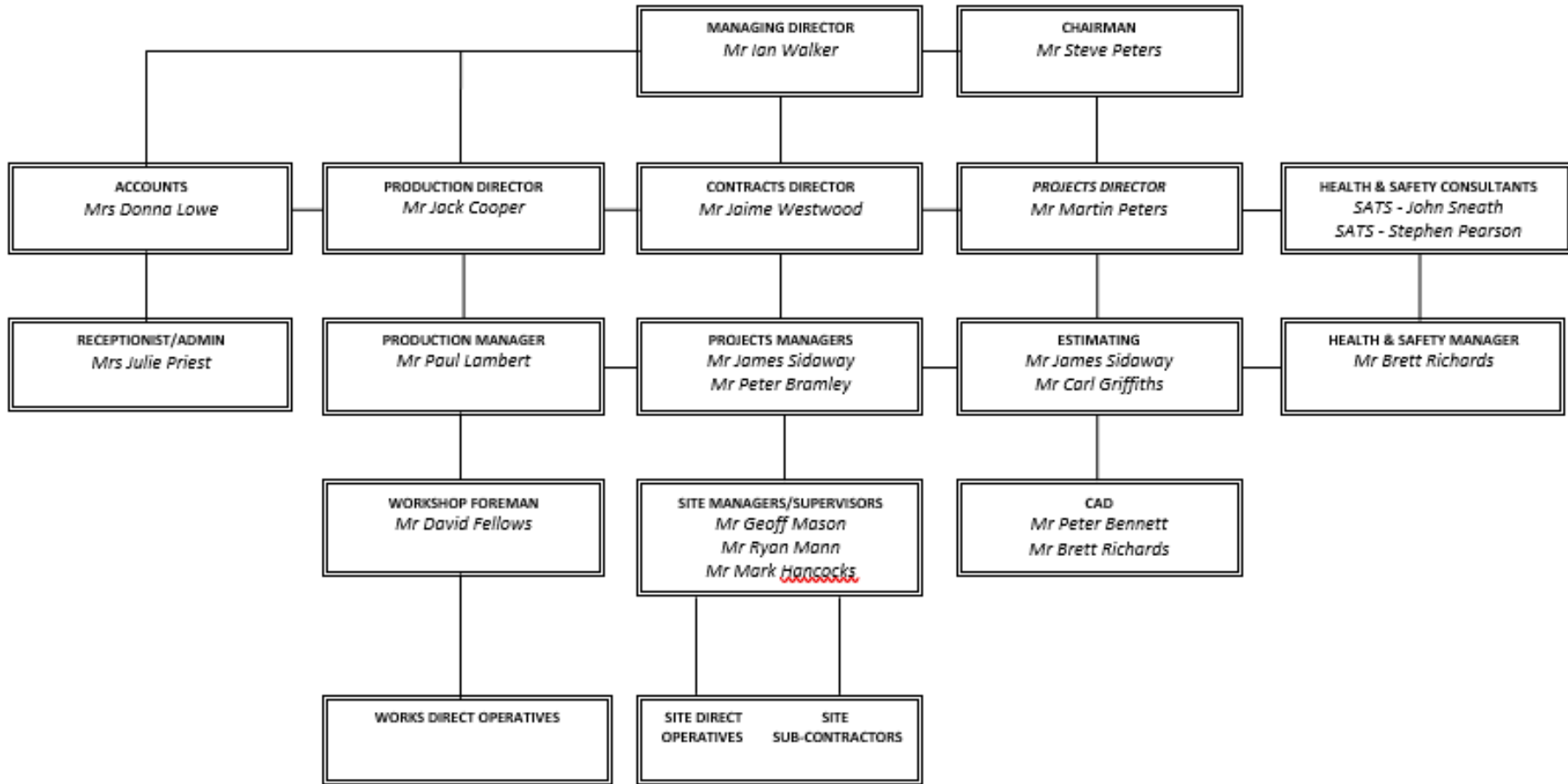
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ORGANISATION & RESPONSIBILITIES

1. SAFETY ORGANISATIONAL STRUCTURE



RESPONSIBILITIES

2. KEY RESPONSIBILITIES:

Ian Walker, Managing Director, on behalf of the company:

- Will have overall corporate responsibility for Health, Safety & Welfare, supported by our Designated Competent Person: Staff at **Site Assessment & Training Services (SATS)**.
- All Directors will have read INDG417, guidance on 'Leading Health & Safety at Work' and this will inform our approach.

It is the responsibility of ALL of the management Team to:

- Ensure that suitable & sufficient strategy, resources & expertise are utilised to comply with relevant legislative requirements & to carry out all of the activities contained within this policy.
- Effectively delegate key responsibilities to others throughout the Company to carry out company business activities on their behalf, providing sufficient time, information, training & ongoing support to do so.
- Monitor arrangements, procedures, performance & compliance regularly to ensure that everyone is working safely.
- Ensure that everyone working on behalf of the Company is Competent to do so, providing suitable Development & Certification where required.
- Ensure that, on starting with our Company, all employees must receive a Company Induction covering items including: their role and responsibilities; structure of the company and key roles relevant to their position; and Emergency Procedures.
- Everyone must receive an effective Site Induction covering: Workplace Risks, Rules, Safe Working Methods, Emergency Procedures & their own responsibilities.
- Ensure that corrective or improvement actions are taken as & when required in order to promote good practices throughout the business activities.
- Act as a "Role Model" to others, demonstrating positive safe actions, knowledge & behaviour.
- Ensure the production & issue of proportionate Construction Phase Plans, Risk Assessments (with resultant control measures), Method Statements & the provision of work instructions. This will cover all aspects of our work where Significant Risks may exist. It will include: Manual Handling; Hazardous Substances; Tools, Equipment & Machinery; Driving at work; Fire and Office Premises; and Work at Height. Where such information is provided by others, we will check that the information is valid & meets our needs prior to their works commencing. All such relevant information will be issued to all as part of daily & ongoing work controls.
- Ensure that all works are carried out following safe systems of work.
- Utilise the "principles of prevention" at all times as in **Appendix 1 of L153**. In summary, they are to:
 - (a) avoid risks where possible;
 - (b) evaluate those risks that cannot be avoided; and
 - (c) put in place proportionate measures that control them at source.
- Have in place suitable Emergency arrangements for each workplace with regular reviews of their effectiveness. These must be recorded and communicated to all who work at or visit the relevant workplace.
- Ensure that adequate and suitable welfare facilities are provided throughout the duration of each project.
- Effectively manage, monitor & review the performance of all at work to ensure compliance & to seek continuous improvement throughout. As a minimum, an annual review of self-employed & sub-contractors must be carried out to prove effective monitoring of performance.
- When applicable, carry out due diligence to enable initial & ongoing approval of Contractors for each contract, considering previous knowledge, experience, qualifications & work done.

- Keep up to date with instructions, legislative requirements & procedures, then cascading key information to others under their control.
- Ensure the recording of accidents, incidents & near misses.
- Coordinate, cooperate & consult with all others involved in our work, from planning at pre-start to post completion (this includes consulting with workers on developing safe working practices for the works they are involved in).
- Ensure that everyone shall have equal access to employment & to development opportunities with this company - discrimination of any sort is not permitted and must be challenged if suspected.
- Do all that we can to prevent slavery and human trafficking from taking place within our directly employed workforce & our supply chain. This is done via monitoring of the workforce.
- Regularly check on the Health & Well Being of all employees to monitor the welfare of our team.
- For any Site Works, a member of the Management Team will have an oversight role – either as Site Manager or as a visiting Manager – to review Health & Safety periodically during a project and to be a point of support and escalation for any issues arising from the works.

Supervision

- Each workplace shall have a Designated Person* / Supervisor* with day to day safety responsibilities on behalf of the Company. This includes checking that work conditions are safe, resulting in NO additional risks to any persons carrying out the works. All persons carrying out this role shall be aware of their overall responsibilities. This is done via regular support & guidance from the Management team with additional information, support & training when identified to meet the legislative criteria.

[NB* For any Site Work, should we be in charge of a particular Project, this person will assume the role of Site Manager unless a member of our Management Team is undertaking that role].

Each Supervisor must:

- Ensure that Risk Assessments, Method Statements & work instructions provided are effective to cover the work & that all risks are effectively controlled.
- Check & maintain sufficient First Aid provision, Fire & Emergency procedures in each workplace, reporting & taking immediate action to correct any deficiencies found.
- Maintain a record of regular weekly checks on the issue, use & condition of Tools, Equipment & Personal Protective Equipment (PPE) in accordance with the PUWER Regulations 1998.
- Ensure the effective delivery of Inductions, Briefings & Toolbox Talks - these must be recorded & kept in the workplace records.
- Assist the management in monitoring the performance of all involved, investigating any deficiencies or non-conformities & ensuring that corrective action is taken when required.
- Liaise with the Company and Client Management & Co-contractors regarding all workplace progress, Health, Safety & Training matters.
- Special supervisory arrangements will be required to allow for young or vulnerable persons who may be in the work location.

Employee & Contractor responsibilities (To include all Site, Office & Workshop Staff):

- Everyone must co-operate fully with any arrangements made both by our Organisation & those made by our Clients on their sites or in their premises.

- All persons working on our behalf have a duty to report any breaches of this Health, Safety & Welfare Policy or any unsafe work circumstances promptly to their respective Supervisor or the Management Team. Work affected should cease until remedial action has been taken. **NOTE:** Anyone reporting such events will be thanked, with their concerns recognised as a positive action to benefit all.
- All persons working for the company must promote a safe working environment to take reasonable care of themselves and all others that could be affected – in this they must ensure they do not put themselves or others at risk either by their acts or omissions, and must comply with any requests or provisions put in place in the interests of Health & Safety.
- All working for the Company are expected to contribute to the safe working practices we use, by reporting any dangerous situations; & by providing input into the development of future practices.
- We all have a responsibility to carry out our work taking into account that our workplace may be occupied premises, thus at all times work must be done with utmost consideration for occupants & visitors who may not be aware of the risks in the area and in particular any vulnerable persons.
- Every workplace shall have in place suitable Emergency Procedures to ensure the Safety of all in the event of an incident - everyone has a responsibility to know what arrangements are in place & to follow them in an emergency.
- Our work must not in any way harm the environment - use and disposal of materials will follow manufacturer's/supplier's instructions or as indicated in the CoSHH documents.
- Workers should follow any reasonable instructions given (noting our Worksafe Policy), such as Risk Assessments and Method Statements, CoSHH Assessments and Site Rules, (including correct use of Respiratory/Personal Protective Equipment).
- Failure by anyone to act according to the company policies, rules or safe systems of work will lead to disciplinary action, including possible dismissal.

Subcontractors

- **Approved Subcontractors** (both Subcontractor companies and Labour Only Subcontractors) must agree to & comply with all of the arrangements herein & have completed a "Pre-Qualification Questionnaire" document requiring them to supply proof of Competence. This forms an integral part of their contract to work with us & to ensure compliance with the duties of all under the current Construction (Design & Management) Regulations. This process must be fully completed prior to starting work & then reviewed annually in order to retain the "Approved Contractor Status".
- NOTE: Scaffolding Contractors must supply additional information relating to their ability to comply with the Industry expected standards of the current TG20 & SG4 (currently TG20:21 and SG4:22).

ARRANGEMENTS

3. ADVICE & ASSISTANCE (Management of Health & Safety at Work Regulations 1999 Regulation 7)

It is the company's policy to have competent persons in charge of Health & Safety Matters as required by the Management of Health & Safety at Work Regulations 1999, & act upon advice from suitably qualified persons as and when required.

The following Company lead may be contacted in this respect, **Ian Walker** on either the main office number: **01384 265888** or call mobile: **07801 529537**.

Or alternatively our external Competent Health & Safety Advisors – Site Assessment & Training Services (SATS): John Sneath on 07824 514584 or Stephen Pearson on 07913 607252

NB for the latest information on Health and safety Law and its application can be viewed on the Health & Safety Executive's (HSE's) website: www.hse.gov.uk

The HSE Local office can be contacted on - 0121 6076200.

4. RISK ASSESSMENTS, METHOD STATEMENTS (RAMS) & PERMITS TO WORK - (Management of Health & Safety at Work Regulations 1999)

The company shall ensure that Risk Assessments are carried out to identify, reduce & control significant hazards & risks.

Method Statements & Work Instructions will show how to complete tasks in the safest manner. We will convey information of any such matters to all staff & others who may be affected, as part of the Workplace Documentation & during workplace Inductions as appropriate. **NOTE: For minor works a combined Minor Works Plan & Method Statement. For very simple, short duration works, a Job Sheet will be used for this.**

All risk control & safe system of work documents will be approved for use by both our Management (including those provided by sub-contractor companies we may use) & Principal Contractors (if we are not in control of the works); they will also be checked on site to account for changed circumstances & fully explained to our team on site during inductions, briefings & toolbox talks.

Permits to Work

A Permit to Work will be required for the following:

- Hot works - using blowlamps or heat guns, soldering & welding
- Entry to unsupported excavations or confined spaces (**See Confined Spaces Section**)
- Work on live electrical systems or where part or circuits remain live
- Permits to dig where services may be nearby or when the client requires this
- Gas, water or underground sewer systems
- **Work at height where deemed to be “High Risk” or where “collective fall prevention is NOT suitable” e.g.: use of harnesses, fall restraints, air bags or crash decks.**

The Permit to Work procedures must be followed in full without exception by our own managers & the operatives carrying out the works, including agreed sign off at completion.

Records of permits must be retained within the project files & returned to the office upon project completion.

The purpose of the above strategies is to minimise the risk of injury, ensure that safe systems of work are adopted and prevent unsafe acts.

Our working methods will use all available relevant information to guide us, including Approved Codes of Practice (ACOPs) as issued by the HSE.

All systems in place must be briefed to those involved in the work by the person in charge.

5. CONTRACTORS, CUSTOMERS AND VISITORS (The Occupier's Liability Act 1957 & 1984)

Everyone working on our behalf shall be made aware of the content of this policy and will be required to follow the rules contained herein in order to maintain safe working practices.

All contractors shall be pre-vetted to ensure that they are Competent & able to comply with all working requirements, including those covered here.

We will cooperate & communicate with all other parties involved, including occupiers & neighbours via regular discussions with all in the workplace & monitoring of the daily activities to allow for changing circumstances & work progress. Participation of key stakeholder representatives in site meetings are a key part of these arrangements.

Customers & others in our workplaces shall be informed of any dangers associated with our work; in particular we will ensure that young or other vulnerable persons are afforded additional consideration.

Visitors must be warned of any dangers associated with the workplace upon arrival, advised on where and where not they are entitled to access & when on construction sites in particular, escorted throughout when in high-risk/working areas. The Supervisor must be aware of who is on site at all times either via a sign in process or knowledge of attendance for very small numbers or people.

Through signage and premises/site security arrangements, we will take steps to warn against and prevent unlawful access by trespassers and visitors accessing unauthorised areas.

6. TRAINING & TRAINEES - (Health & Safety at Work Act 1974 & CDM Regulations 2015)

Training & development shall be carried out as and when required to meet the Company's business needs and to ensure that all individuals have the necessary Skills, Knowledge, Experience and Training to safely and proficiently undertake their role.

New Employees & Trainees shall receive a full induction on company rules & procedures. This will include any restrictions upon use of equipment or work areas. Also as part of induction, we will undertake a full training needs analysis to identify an individual's needs against their role and arrange for any necessary training and development activities to be put in place. Inductions will cover all aspects of working for our company (e.g. employment policies and procedures, our business ethics, approach to ensuring quality, and environmental aspects).

Existing employees will, as a minimum, have an annual review of their training needs and in all cases where a change in work duties is proposed to identify any gaps that need addressing or items that need to be refreshed (e.g. for training that has an expiry or review date). To help record and manage this process, we will maintain a Training Matrix covering all direct employees and any regular Labour Only Subcontractors that we use. We will retain copies of relevant cards/certifications as evidence of competence within the constraint of the General Data Protection Regulation and Data Protection Act 2018.

As well as periodic reviews of training needs, additional support will be given as part of day to day operation:

- Workplace Inductions will provide information & cover the specific rules for each workplace.
- Refreshers/Toolbox talks will provide periodic updates & reminders on key subjects relevant to the work being undertaken or any emerging issues.

- Structured Training courses will be offered to enhance peoples' capabilities, knowledge & understanding (NB we would expect that everyone has a minimum of one-half day's training per year).
- Coaching & mentoring will be utilised to share existing skills & knowledge amongst our team.

7. CONSTRUCTION DESIGN & MANAGEMENT REGULATIONS–CDM 2015

Every construction project must comply with the whole of the CDM Regulations no matter how minor or the duration.

We shall take the following actions relevant to the precise nature of each project based on the requirements of the **HSE guidance document L153** & other available guidance:-

- Ensure that the Client & Designer are aware of their duties as required by the CDM 2015 Regulations, this may involve us asking our engaged consultants to advise them.
- NOTE: Should we undertake work for Domestic Clients, although they are duty holders, they are excused from responsibility other than to appoint a Principal Designer & Principal Contractor (if more than one Contractor is involved) or Contractor. We are expected to take on the Domestic Client duties &, in the absence of an appointed Principal Designer, take of their duties* to Plan, Manage & Coordinate works. *This would only apply for minor maintenance, repairs or like for like replacement works, otherwise a Principal Designer must be appointed. **We have no intention of taking on Design duties as we are not Designers or Specifiers. We may offer our expert advice as constructors only.**
- Work with the Client & their appointed Principal Designer to establish the required details for Health & Safety Plans for both the Pre-Construction & the Construction Phase.
- Ensure that form F10 has been submitted & is displayed on site when appropriate (although notification should be done by the Client or Principal Designer as they should have been involved in the project before we are). NB When the construction phase of a project is likely to exceed 30 working days with more than 20 on site simultaneously at any stage the project, or 500 person days total time on site, then it is "Notifiable" to the HSE via an online form (F10).
- Inform the Client & their Appointed Principal Designer of any variations to the planned works at any stage.
- Ensure that we comply with Organisational Competency & Safe Working procedures throughout.
- Provide suitable resources to plan, manage, supervise & carry out the work, using people with the right Skills, Knowledge, Experience & Training to do so.
- Ensure that a proportionate* Construction Phase Plan (sometimes referred to as a Construction Phase Health & Safety Plan) is in place before works commence on site and then work in accordance with the work plan throughout. NOTE: Construction Phase Plans may be put in place by others - if so, we will be aware of & contribute to them. [* For smaller jobs rather than our Construction Phase Plan may be in the form of a Minor Works Plan or Job Sheet.]
- Cooperate & coordinate with all other parties involved throughout via regular communication, both formal & informal, with consideration given to the planning & organisation of works.
- Upon completion of the works, provide information to be included within the Project Health & Safety File (O & M Manual) to be prepared by the Principal Designer to be passed to the Property Owner/Client.

8. ACCIDENTS, INCIDENTS & NEAR MISSES - (Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR) Regs 2013)

All accidents must be recorded in an Accident Report Book. These are kept in the Company premises & on construction sites

All accidents, incidents or near misses* - including those thought of as being "minor" or dangerous in any way, are to be reported & recorded with an investigation carried out using our "Accident, Incident & Near Miss Form". Our team will be advised of the need to take photos & report what they have seen immediately after any such event. All will be required to assist with any enquiry by Company Management or other agent involved. An initial investigation must be instigated by line managers within 24 hours, collating information from/regarding: injured persons, witnesses, photos of the location, injuries & equipment involved. This will result in a formal report, to be produced or approved by our Health & Safety Advisor within 5 working days of the event. NB some accidents/incidents may be reportable – see Section 9.

*Incidents and near misses happen far more frequently than accidents, and although many if they happened again may have no serious consequence, others have the potential for serious injury – thus investigating them and putting in place preventative measures can help prevent the worst-case scenario occurring.

9. REPORTABLE ACCIDENTS & DANGEROUS INCIDENTS - A Statutory requirement

Overall responsibility resides with: **Ian Walker**.

For most types of incident, including:

- accidents resulting in the death of any person
- accidents resulting in specified injuries to workers
- accidents resulting in the worker being away from their work (or unable to perform their normal duties) for more than 7 days as a result of their injury
- non-fatal accidents requiring hospital treatment to non-workers and
- dangerous occurrences

the responsible person must notify the enforcing authority without delay. This is most easily done using the reporting online using the following link: <https://www.hse.gov.uk/riddor/report.htm#online>

Alternatively, **for fatal accidents or accidents resulting in specified injuries to workers only**, you can phone 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

NB: A report must be received within 10 days of the incident.

For accidents resulting in the over-seven-day incapacitation of a worker, you must notify the enforcing authority within 15 days of the incident, using the appropriate online form.

Cases of occupational disease, including those associated with exposure to carcinogens, mutagens or biological agents, as soon as the responsible person receives a diagnosis, using the appropriate online form.

Reporting to the HSE if out of office hours

The type of circumstances where HSE may need to respond out of hours are:

- following a work-related death.

- following a serious incident where there have been multiple casualties.
- following an incident which has caused major disruption such as evacuation of people, closure of roads, large numbers of people going to hospital etc.

If your incident fits these descriptions ring the duty officer on 0151 922 9235.

Others to inform

Outside of the HSE, others to be notified of any such accidents and incidents are: Our Health & Safety Advisor; & our Company Insurers.

10. FIRST AID- (First Aid Regulations 1981)

Each workplace shall have at least one trained Emergency First Aider whose name & location shall be known to all. For work on large sites there will be an agreed number of designated qualified persons.

First Aid Kits are located on site as indicated during the site induction upon arrival. For works of short duration or on very small sites (e.g. domestic properties), they may be kept in the Company vehicles for works of a short duration as long as these are in close proximity to the works, and if not they should be offloaded & located within the respective workplace.

Individuals have a responsibility to inform of their stock becoming low & arrangements made to replenish required items as soon as possible. Periodic checks should be undertaken to ensure that items that have an expiry date are replaced where appropriate.

Supervisors have overall responsibility for the contents being correct & of useable quality, and to consider provisions in case of lone working.

11. EMERGENCY PROCEDURES-(Management of Health & Safety at Work Regulations 1999)

Each workplace shall have effective emergency procedures to enable safe access, escape & clear instruction for all in the event of an emergency, including ensuring unhindered access for the Emergency Services. The specific actions & procedures will be detailed within the notices placed on notice boards, documentation for each project & during Inductions.

The office base arrangements are as indicated on the emergency action notices & as detailed within office risk assessments. All occupants must be aware of this information.

Where the premises are shared with other contractors or customers, we shall agree mutually suitable emergency procedures with them & communicate this to all concerned.

The Management Team & Site Supervisors are responsible for ensuring that periodic emergency evacuations take place to check the effectiveness of these arrangements, they must keep records of the event taking place with remedial action taken if required.

12. FIRE SAFETY- The Regulatory Reform (Fire Safety) Order 2005 & The Fire Safety (Employees Capabilities) England Regulations 2010

- All staff will receive instruction in fire prevention, emergencies & safety, including the importance of keeping a clean and tidy workplace. We will consider everyone's capabilities with regards to fire related matters whether in our workplaces as an employee, sub-contractor, co-worker, occupier or visitor.
- Each workplace shall have at least one nominated "Fire Marshal/Warden" who shall monitor the fire arrangements & take the lead if an emergency arises.
- When working in workplaces controlled by our own organisation, including our commercial business office premises, we shall carry out our own Fire Risk Assessment as required by The Regulatory Reform (Fire Safety) Order 2005. This will be reviewed annually or whenever changes to the environment or processes are to be undertaken.
- Each premises or site must have a means of raising the alarm.
- Fire alarm systems must be tested regularly.
- For our permanent premises or for sites of long duration, we will undertake at least one fire drill and record the results every 12 months.
- When working in Commercial Customers premises we shall ask them for details of their Fire Risk Assessment which they are required to have by Law – the information they provide should inform us of their Emergency arrangements in the event of a Fire & all precautions that they take to prevent & control Fire Risks, we will then use this to confirm our site arrangements, agreeing any temporary amendments required (e.g. if an escape route or muster point will be impacted by our works).
- Everyone must ensure that escape routes are kept clear and are known to all that may require their use (unless this forms part of the works and suitable alternative arrangements have been agreed and communicated).
- Fire extinguishers should be placed where there is a fire risk, and, must be periodically checked by a qualified person for suitability & be fit for purpose.
- "Hot Working" involving heat generation and the like shall be carried out in accordance with Approved Codes of Practice (ACoPs). *No work involving this shall be done within 1 hour prior to leaving the work location to reduce the risk of fire.
- Transportation & storage of gas containers & allied equipment shall be in accordance with manufacturer's instructions.
- Burning of rubbish materials shall not be permitted on sites.

13. PERSONAL PROTECTIVE EQUIPMENT- (PPE at Work Regulations 1992, PPER 2022 & UK Conformity Assessed (UKCA) Construction Products Regulation (305/2011/EU))

PPE is defined as 'all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects the person against one or more risks to that person's health or safety, and any addition or accessory designed to meet that objective'. Our approach to selection and issue of Respiratory Protective Equipment/Personal Protective Equipment (R/PPE) are as detailed within our "PPE Equipment Log & Standards" document.

Items shall be provided for use to all our workers as and when necessary as identified by Risk Assessments, COSHH Assessments & Work Instructions as a minimum – the selection will take into account any combination

of factors workers may be exposed to when they are doing their works (e.g. products being used by others in the same workspace). Everyone is to use any equipment provided to prevent exposure to dangers.

Where applicable*, the equipment we use is UK Conformity Assessed (UKCA) (formerly CE**) marked as required by the [Construction Products \(Amendment etc.\) \(EU Exit\) Regulations 2020](#) ***NB not all products can have a marking as for some there is no harmonised standard to be tested against.** ** The CE mark will currently continue to be recognised until 31/12/24.

Face fit tested P3 filtered Respiratory masks shall be used for all operations when silica or metal particles will be produced E.G.: when using disc cutters or when other hazardous dusts such as hardwoods & MDF are likely to be produced. We shall do all that we can to ensure that workers who will be wearing tight fitting (negative pressure) RPE masks are Face Fit Tested and clean shaven (ideally having shaved within 8 hours preceding the start of a shift) to achieve effective protection.

PPE shall be used, treated with care, maintained & replaced according to the manufacturer's guidance & above all be fit for the purpose. A register of issue will be kept & updated by Management.

Users of all such R/PPE equipment shall be given instruction on proper use, storage, lifespan & limitations for each item of protective equipment upon issue & during daily monitoring of work if recommended procedures aren't being followed. If the R/PPE provided is lost or becomes defective, the relevant worker should report that to their line manager for replacement. Workers are also required to ensure the PPE they are provided with is used in accordance with the training and instructions they are given and take reasonable steps to ensure the PPE is returned to the designated storage after use.

Where blanket Site Rules on R/PPE are in force, we will identify any instances where Task Specific Method Statements, Risk Assessments or CoSHH Assessments (which should take priority over blanket rules) are contradictory, and we will negotiate with Site Management regarding such matters using our expertise regarding our work.

Self Employed - NB unless the person who is self-employed is solely working with us on a full-time basis, then they have to provide their own R/PPE that meets the required standard of that workplace.

14. GENERAL WORK EQUIPMENT - (PUWER Regulations 1998; LOLER Regulations 1998 & Construction Products Regulation (305/2011/EU))

All equipment must be used for the purpose for which it was designed and used and as per the manufacturer's instructions.

Users of any equipment must ensure that they are competent to do so safely & that their Skills, Knowledge, Experience & Training mean that they meet the criteria to be covered by Insurers.

Only authorised & competent staff may use any tools, equipment, machinery or act as "Banksman". **Equipment must only be used for the purpose and in the way for which it was designed and as detailed in the Manufacturer's instructions.**

Where applicable*, the equipment we use is UKCA (formerly CE marked) as required by the [Construction Products \(Amendment etc.\) \(EU Exit\) Regulations 2020](#) ***NB not all products can have a marking as for some there is no harmonised standard to be tested against.** ** The CE mark will currently continue to be recognised until 31/12/24.

All equipment must be checked before use by the user for its overall condition, and suitability for intended purpose. ANY DEFECTS FOUND MUST BE REPORTED IMMEDIATELY with effective action taken prior to its use. All equipment shall be maintained in accordance with ACoPs, manufacturers/supplier's instructions & normal industry practice; in particular, the following shall apply:

- **Managers & Supervisors** are responsible to ensure that daily checks are carried out by users & regular checks by supervisors (site supervisor's checks should be recorded). They will also arrange PAT Testing, & LOLER testing, with records kept of all inspections carried out.

NOTE: Equipment used & supplied by Hirers or other Contractors must also comply with the same Testing requirements. This is conveyed to them via their contract terms with reminders during inductions & workplace checks.

15. MACHINERY & PLANT - (PUWER Regulations 1998, & LOLER Regulations 1998)

RULES FOR USE: Adequate supervision and training will be provided to operators of machinery & shall be compliant with the PUWER Regulations 1998. Specific requirements are as follows: -

- We will require proof of Training & Certification to meet legislative guidance as given by the HSE, Site Rules & Insurers in order to use the following: Fixed Machinery, Operating Plant, & mounting Abrasive Wheels.
- Use, refuelling & maintenance of machinery to be in accordance with manufacturer's instructions & carried out by persons competent to do so in a safe designated area with appropriate bunding/spill clean-up provisions in place.
- All guards must be checked & in position before starting & using machines. * Guards must not be removed during the operation of any machinery and the machine must not be used if the guard is faulty or incomplete. Guards must be correctly positioned to suit the task.
- When dusts will be created by use of machinery, any on machine extraction or suppressants must be used as per the Manufacturer's guidance.
- Hired in plant & machinery must be fit for purpose, checked, maintained & used in accordance with hire agreements. Our staff must not accept hire items unless they have had a pre-hire check with use & retesting to be in accordance with the hire agreement.
- Driven Plant/Forklifts must be operated correctly, keeping reversing to a minimum (unless this is the safest way to move a load and is sufficiently marshalled), and only in designated areas, with beacons & warnings in use. Wherever practicable, plant and pedestrians should be kept apart, with a vehicle marshal used where segregation is not possible.
- All Lifting Equipment must have a current "Thorough Examination Certification" available at all times to prove that it is fit for use with chains & shackles similarly certificated.
- When machinery is classed as "Woodworking machinery", users must comply with the requirements of the HSE document "Training Woodworking Machinists"; Trainees may use these machines ONLY under direct supervision following sufficient Training & Familiarisation & with written permission stating which machines can be used. This includes: - Bench mounted machinery, portable or chop circular saws, planers, routers & sanders.

16. ELECTRICAL EQUIPMENT- (Electricity at Work Regs 1989 & PUWER Regs 1998)

The fixed electrical supply within our premises must be inspected by a competent person at a minimum frequency of every 3 years with improvements made as & when required.

Routine visual inspection is required by all operatives prior to use, followed by checks on all connections, plugs and extension cables. Use of Battery operated or 110-Volt equipment is preferred.

Where 240 Volt supply is used for portable items a residual current device (RCD) must be used at source. NOTE: For site work, 240-volt equipment can only be used in dry areas with Management permission.

The Management Team are responsible for ensuring that all portable electrical equipment is regularly PAT tested at between 3-12 months based on the risk as stated within Table 1 on page 17 of HSG 107 by suitably qualified persons; any hired equipment must have been tested prior to accepting the hire agreement. Office based items will be tested every 2 years.

All plugs and/or machines should clearly have on display a label showing the date of testing with a tracking/serial number used to determine which item it is.

David Fellows will ensure that company records are maintained for this and that re-resting is arranged as per HSG 107 (or earlier if items may have been damaged or misused).

*Equipment used & supplied by other Contractors or hirers must also comply with this Testing requirement. Our Management & Supervision are required to check that this is done.

17. HOUSEKEEPING, WORK AREAS and SAFETY SIGNS & SIGNALS - (Workplace-Health, Safety and Welfare-Regulations 1992, current CDM Regulations & The Health and Safety (Safety Signs and Signals) Regulations 1996)

Cleanliness is everyone's responsibility. This will ensure that we operate safe systems of work; all work areas are to be regularly cleaned in order to reduce trip hazards and other accidents. RAMS will cover such arrangements, but in particular we shall always aim to minimise any dusts being disturbed into the air by removal and suppression at source as much as possible.

Waste must be disposed of in a manner which befits the materials; E.G.: chemical or petroleum products must be clearly marked and treated appropriately.

When waste materials are being brought down from height, this will be done in a planned and managed way – 'bombing' is strictly prohibited.

Storage and stacking of materials must be carried out safely, considering any manufacturers guidance notes, and training received.

Rest areas, canteen facilities & eating places must be cleaned daily as a minimum to ensure good levels of hygiene, with all other areas at least weekly to prevent the build-up of dust, & germs with a potential for health hazards.

We will display safety signs and signals where, despite putting in place all other relevant measures, a significant risk to the health and safety of employees and others remains. Signs must be clear and legible, and should be used to identify actions that are prohibited (e.g. no access), safeguards that must be followed (e.g. ear protection must be worn), warning of a hazard (e.g. corrosive material) and to direct towards fire exits/equipment or first-aid equipment.

18. CONSULTATION & COMMUNICATION- (Consultation with Employees Regs 1996, Health and Safety Information for Employees Regulations 1989 & CDM 2015)

We will display the health and safety law poster* in all our sites where our workers can easily read it or provide each worker with a copy of the approved leaflet or equivalent pocket card. *The poster outlines British health and safety laws and includes a straightforward list that tells workers what they and their employers need to do. We will consult, engage with & involve all persons working with us on all matters relating to Health, Safety & Welfare. This is done via daily informal contact, during inductions (Company and site), meetings, briefings (including RAMS), Toolbox Talks & training sessions.

Everyone is encouraged to discuss & have responsibility towards maintaining a happy safe workplace.

Through effective consultation & feedback we must ensure that our team fully understand all matters relating to the Health, Safety & Welfare of all. We will record key details when exchanging information between parties to ensure that we are able to prove that effective consultation takes place.

Should anyone lack the ability to understand any instructions given due to lack of ability or language skills (including those whose first language is not English), we will take positive action to correct this and ensure key information is understood on an individual basis – such actions may include one or more of the following:

- Ensure adequate time to consult with employees where language and/or literacy may be issues so they can absorb the information and respond to you.
- Encourage employees to express their views in their preferred language by using interpreters.
- Ask a work colleague to interpret, although these employees may need training if they are asked to undertake this role.
- Get information translated and check that this has been done clearly and accurately by testing it with native speakers. Tip: make sure it is clear in English first.
- Use pictorial information and internationally understood pictorial signs where appropriate.
- Where information has to be in English, use clear and simple materials, and allow more time.
- Committees and representatives should reflect the workforce they represent.
- Consider ESOL courses (English for Speakers of Other Languages) as an improved grasp of English will help communication in the workplace and on health and safety.

In all cases, we will be aware of cultural differences and take these into account when consulting employees (e.g. there may be some employees who do not feel able to speak up about health and safety matters).

It is everyone's duty to inform their respective manager or supervisor if they do not understand any instructions.

Managers and Supervisors must check to confirm that people do understand key information.

19. HAZARDOUS/DANGEROUS SUBSTANCES - COSHH (Control of Substances Hazardous to Health Regs 2002 & as amended 2004)

The COSHH Regulations State that "Any substance that could be harmful to health", shall be treated with care & exposure or use will follow guidance within risk assessments.

Material Safety Data Sheets (MSDS) supplied by manufacturers are kept on file either in the Company Offices or site files & are provided to relevant persons for information purposes. Where the MSDS indicates that any substance that may pose a “significant risk” to people during & after use, a formal COSHH Assessment must be completed to identify, minimise & control risks which also takes into account the way we use or encounter the product. The CoSHH Assessment will also identify if Health Surveillance is required. A copy of the COSHH assessments relevant to any project must be available for workers to refer to.

We will review CoSHH Assessments annually to ensure they continue to reflect the current MSDS.

Everyone potentially affected must be informed of the dangers & control measures before use via briefing, instruction or toolbox talk.

We insist that all staff & others potentially affected read & understand guidance given on items purchased with labels attached prior to use.

Everyone should take advantage of such information & arrangements, in order to promote safe working.

PPE & RPE requirements for each task will be determined by the COSHH assessments (and any relevant Method Statements/Risk Assessments) & the work circumstances (E.G. other activities taking place in the work area). Fit testing is required for the users of RPE to ensure effective protection.

The person in charge of each workplace is responsible for ensuring that COSHH information is up to date & readily available for use. NOTE: This information may be issued to us by Principal Contractors who supply such substances to us.

Risks from Drug Use Equipment:

We must be aware of the health risk arising from illegal use of drugs using “needles & sharps”, users leave their needles in lots of places that we could accidentally come into contact with them.

The potential consequences can lead to serious illness or even death resulting from infections.

20. ASBESTOS-(Control of Asbestos Regulations 2012)

All of our team who may come into contact with Asbestos Containing Materials (ACMs) will receive Awareness Training on an annual basis to meet the Regulations & HSE Training document em2.

Where Asbestos may be Present in our Own Commercial Premises

For our own premises, under Reg 4 of the Control of Asbestos Regulations, we shall ensure that a management survey has been carried out and an Asbestos Management plan has been put in place. Any construction or refurbishment carried out on the building will require a Refurbishment & Demolition survey is to be carried out, prior to works commencing. We will make all such information available to anyone who is due to undertake such works. Regular checks are to be carried out on all Known ACM’s by an appointed person (minimum annually) and the Asbestos Register kept updated with all occurrences involving ACM checks and removal.

We have inspected our own premises for ACMs (Asbestos Containing Materials) with the results showing that none are present that may affect us.

Potential Asbestos on Site

Should we suspect that ACMs may be present on site, and as a matter of course for any building constructed prior to 2000, we will ask Commercial clients to provide us with confirmation that they have carried out an

appropriate survey (normally a Refurbishment Survey) by a competent person* and to provide us with details of the findings; we will use this to guide us in our work.

* Selection of an Asbestos Surveyor will require the surveyor to be UKAS accredited under testing and inspection with due diligence checks on the person's/company's' example qualifications (BOHS P402) and references to carry out the task.

None of our workers will be permitted to undertake any works ACMs unless we have confirmed that the works are Non-Licensed, the operatives concerned have received the relevant training to undertake non-Licensed works and all necessary controls are in place. When planning our works, we will factor in the 14 day minimum lead in for the notification of any Licensed removal works to the HSE.

Emergency Procedures - The following will apply in ALL circumstances:

Should we suspect or find Asbestos based products in existence in any workplace, we must treat the material as if it is Asbestos until a Licensed Expert has assessed the material & a safe method of work is established to deal with it. In such situations we will follow Asbestos Essentials EM1, THE MATERIAL MUST BE LEFT UNDISTURBED; access to the area MUST be prevented to all except Appointed Personnel (Non-Licensed trained people (for Lower Risk Asbestos works)) or Accredited Licensed Contractors (for other Higher Risk works). A Project Briefing will be given to inform everyone of the dangers posed and the arrangements put in place to deal with it, and we will advise the Client, Principal Contractor and others who may be impacted as soon as possible.

Actions on The Accidental Release of Asbestos Fibres

Emergency arrangements will be invoked for the site:

Stop work, prevent access to affected area and further spread of Dust, if safe to do so, by sealing all possible means of dust transfer including shutting off Aircon systems and paying particular attention to ceiling voids; Set up decontamination area; Segregate those exposed and carry out full decontamination, removing all items of clothing and placing in asbestos waste bags; Issue individuals in asbestos cat 2 overalls; Unless advised it is unsafe for them to remain on site, do not allow them to leave site until Investigators/Regulatory bodies Have Completed their investigations; Carry out investigation of dangerous occurrence and be prepared to complete RIDDOR Report as a Dangerous Occurrence. A Survey is to be carried out on the area to identify the materials exposed. Duty holders should be prepared for the possible requirement for a Licensed Asbestos contractor to carry out removal works (NB in normal circumstances there is a minimum 14 Day notification requirement for Licensed works). A record should be kept of anyone who is likely to have been exposed to fibres and this information should be passed on to the Company's insurers.

NB If Emergency services are called to a site incident involving contamination of asbestos they are to be informed at the time of call if possible or at the latest on arrival, to enable them to protect their own staff in carrying out their duties.

21. WORKING WITH LEAD CONTAINING MATERIALS - (Control of Lead at Work Regulations 2002)

Lead can be a hazardous substance if absorbed, handled or if fumes are breathed in. When the planned work may produce lead dust, fume or vapour we are most at risk.

This can include:

- Removing, cutting, dressing & welding of lead sheeting.

- Blast removal and burning of old lead paint finishes*.

Should our work involve such work we shall take the following steps:

- Assess the risks to health to see if it is likely to be significant, if so the resultant control measures will be used to determine safe work practices.
- Use the HSE document - "Lead & You INDG305" & the "ELSLA - Leadworker Safety" document to guide us in formulating a safe system of work to prevent any exposure to our staff or other who may be affected.
- Share all relevant information with people who may be affected by explaining the specific work arrangements prior to starting the work.
- Monitor compliance & check if there are any ill health effects (NB lead is a high hazard substance which requires statutory medical surveillance).
- Remind our employees of the need to wear the appropriate PPE/RPE and ensure they wash all exposed skin after any potential contact with Lead Containing Materials.

*NOTE: This type of work is a very rare occurrence as we normally refinish such surfaces without removing or disturbing the integrity of the old paint.

22. USE OF FUELS, LPG, GASES, FLAMMABLE LIQUIDS & COMPRESSED AIR - (Dangerous Substances & Explosive Atmospheres Regs 2002)

LPG, Gases & Flammable Liquids

- Transportation and storage of Gas Containers and Flammable Liquids will be in accordance with Manufacturer's instructions, away from heat and sources of ignition.
- Use shall be controlled by Method Statements, site rules and Permits to Work.
- Stored Containers must be kept upright, with adequate ventilation and in limited quantities.
- Storage must be secure to prevent misuse or unauthorised access, with gas bottles stored outside within a locked cage when not in use.
- All joints, pipes and installations will be inspected regularly for defects, with pressure tests carried out & purging of pipes to remove fuels before any parts are removed or for storage.
- Qualified engineers must carry out inspection and maintenance works as required by Regulations and Manufacturer's instructions.

Work near to gas installations

- During pre-start surveys by management, we shall identify pipework & appliances that are near our work with the intention of preventing any contact or disturbance which could damage items or release gas.
- Should we accidentally damage pipework or appliances, it must be reported immediately with urgent action taken to take corrective measures by a registered Gas Safe Engineer and taking advice from the local Gas Supplier Network.

NOTE: Such incidents must always be recorded with advice sought from SATS who will advise if the event must be reported to the HSE & assist with an investigation into the circumstances to put in place preventative actions.

Compressed Air Use

- The same storage, inspection & maintenance arrangements apply as above.
- Users must also be aware of the dangers of the release of pressure and the risk of personal injuries in case of misuse.

NOTE: Compressed air should not be used for cleaning up of wood and construction dust.

23. MANUAL HANDLING- (Manual Handling Regulations 1992)

Wherever possible all shall use mechanical means to lift loads. When Manual Handling is required, then Safe (Kinetic) Lifting techniques are to be utilised at all times as instructed.

Individuals **must not** risk injury by lifting weights exceeding their own capability.

When handling items with a potential to cause cuts & abrasions, suitable gloves must be worn - correct gloves will also aid grip & reduce stress to the hands from repetitive actions.

Training will be provided within Toolbox Talks to cover all aspects of Manual Handling with regular reminders given during briefings.

All Site staff will receive a formal training session delivered by our Health & Safety Advisor or other competent expert - this shall include reference to the control measures within our Manual Handling Risk Assessment (which will be reviewed for each Project).

24. WORKING AT HEIGHT - (Work At Height Regulations 2005)

Defined as: “work in any place, including a place at or below ground level, or obtaining access to or egress from such a place, while at work, except by a staircase where, if suitable measures were not taken, a person could fall a distance likely to cause personal injury”.

All Work at Height **MUST** follow the hierarchy of control within the Work at Height Regulations - the first key point is to “avoid work at height wherever possible”.

In order for work at height to be controlled effectively, all of our Construction site team must be aware of, understand & follow risk assessments, method statements and our “**Work at Height Standards & Procedures**” document.

Permits to Work may also apply when the work is likely to affect others in the workplace.

These documents inform all of our safe working arrangements, use of equipment & competency in order to minimise the risk of falls.

In addition to the above we will specifically:

- Properly plan & proactively manage all work where a fall from height is possible.
- Use work equipment & other measures to prevent falls.
- Ensure that persons do not reach out or over-stretch whilst at height.
- Limit items being carried to keep one hand free at all times when climbing ladders or inclines.
- Observe site rules regarding the choice & use of equipment.
- Mitigate distances & consequences of falls by using equipment or other measures to limit potential harm should a fall occur.
- Collective fall prevention systems shall be used in preference to individual measures.
- When scaffolding is required, we shall take all reasonable steps to ensure that it is correctly ordered (e.g. by specifying the anticipated use), erected & dismantled in accordance with the current versions of TG20 (Design

& Compliance Standards) & SG4 (Preventing Falls in Scaffolding Operations). NOTE: All Scaffolders must declare compliance with TG20 & SG4 within their work plans & RAMS.

- Ladders are a means of gaining access or for work of a short duration of time only.
- Ladders must be used correctly, at the correct angle, on a suitable surface & checked regularly for defects - any defective equipment must not be used in any circumstances.
- All Work at Height equipment shall be used only for the purpose and in the way for which it was designed and inspected by the user prior to use, with regular weekly inspections carried out and recorded by a "Competent person" in accordance with regulatory or industry standards as a minimum. Supervisors must do likewise at the start & end of each shift, also checking that unauthorised use is prevented at all times.
- As part of site closure each day, we will ensure that access points to height (e.g. ladder access to scaffolds) are secured to prevent unauthorised access.

25. WORKING IN CONFINED SPACES- (Confined Spaces Regulations 1997)

Work in confined spaces is infrequent during our routine activities.

However, where this is identified as a significant risk, work shall be planned in order to ensure that a safe system of work is in place & known to all who may be at risk.

The following specific actions must take place:

- A supervisor must have agreed a plan of works based upon a Risk Assessment with operatives involved before work begins & issue a "Permit to work". The Permit will show that an effective emergency procedure/means of escape is in place & check that all are competent to do the work.
- The work area must be checked before & after each shift for any increased hazards & changes in site conditions, with work stopped if Risks are unacceptable.
- Work in sewers, drains, excavations or areas where animals (particularly Rats or Cattle) may have been, are a high risk due to the potential for disease. The safe system of work will include the prevention of bodily contact with any material in the vicinity & regular washing/disinfecting of hands.

26. WELFARE- (Workplace-Health, Safety and Welfare-Regulations 1992 & CDM 2015)

The wellbeing of all is vital; our workplaces will have suitable facilities to ensure the Health, Safety & Welfare of all at work. Specifically, all should have access to: Clean toilets, washing facilities, hot & cold running water, drinking water, rest places, a dry place to shelter, and, where workers have to wear special clothing for the purposes of their work and cannot be expected to change elsewhere, a changing room will be provided.

Suitable arrangements must be made to accommodate any disabled employees; this will be addressed on an individual basis.

Delivery drivers must have access to welfare facilities in the premises they visit as part of their work. We will provide reasonable access to toilets and handwashing facilities.

27. YOUNG (INEXPERIENCED) PERSONS AT WORK - (Health & Safety at Work Act 1974)

Special care & consideration will be made to allow for young inexperienced people in the workplace, for those employed by us & those who are in the immediate vicinity. Specifically, we shall:

- Ensure that continuous supervision is given by responsible persons.
- Restrict access to certain areas, equipment & machinery until sufficient Training & familiarisation has been carried out.
- Carry out separate Risk assessments to cover the work to be done by young persons.
- During Training, we shall tell them about the risks to their health and safety identified by the assessment, and the measures put in place to control them.

28. CONSTRUCTION SITE SPECIFIC ARRANGEMENTS - CDM 2015 & Management Regs 1999)

All work must be properly surveyed, planned & carried out using all available knowledge & expertise. As such all levels of management & specialist advice will be used in order to control operations.

This requires allowing sufficient time to prepare, notice of start on site, research & sharing of information to enable works to be delivered safely.

The quality of detailed Pre-Construction Information (PCI) gathered during our initial enquiries will have a direct impact on the success of delivery, thus our management must be thorough in their attention to detail, requesting & collating key information.

Site Controls & Security: Every construction site or premises we work on will be “deemed to be within our Control” once we have taken possession by starting work. As such we will be responsible for the safety & security of everyone who is on site or within the vicinity during work times & when unoccupied. Our work plans will describe how we are to control these aspects, including: hoardings; fencing; management actions & inspections required.

Other arrangements: In addition to the other matters within this Policy, the following may be applicable:

- Occupied premises.
- Work over or near to power lines, overhead obstructions, over or near to water e.g.: Canals, rivers or streams or breaking ground with potential hidden services.
- Work in public areas, highways & affecting neighbouring facilities.
- Potential for disease caused by contaminated land, structures or waste products.
- Historic buildings or protected land - permissions & licences to be sought.
- Areas subject to subsidence or omitting gases E.G: mine workings or near waste tips leaking methane etc.
- Vulnerable people or children in the workplace – Disclosure and Barring Service (DBS) (formerly CRB) checks are likely to be required.
- High security premises requiring government security clearances.
- Protected species of plant or animals.
- Preventing spread of plants & environmental hazards such as Japanese Knotweed.

Should any such issues be prevalent, then we must include them within our written work plans to be shared & where appropriate gain permission from any authorities prior to starting the work. Any permits obtained must be displayed for all involved to see.

29 Welding Fume (Control of Substances Hazardous to Health Regs 2002 & as amended 2004)

Welding fume (which includes irritating gases such as oxides of nitrogen and ozone) may cause respiratory irritation and metal fume fever. It can also increase susceptibility to pneumonia. In the longer

term, it can lead to serious lung diseases including: chronic obstructive pulmonary disease (COPD), which used to be called chronic bronchitis, and emphysema, occupational asthma and cancer. If our works involve welding activities, we will take the following steps to control the risk:

- look to use alternative joining, cutting or surface preparation methods that produce less fume or dust where possible;
- where welding is unavoidable, use Local Exhaust Ventilation (LEV) for indoor working to help remove fume at its source; and
- where not all of the fume is removed by LEV alone, or if it is not reasonably practicable to provide LEV, or for outside welding, we will must provide our workers with suitable respiratory protective equipment.

30. Health and Safety (DISPLAY SCREEN EQUIPMENT) - (1992 Regs, amended 2002)

Use of such equipment must be in accordance with the regulations. This means that an assessment will be made of the work station area, seating, & lighting to ensure that users do not suffer any ill Health resulting from the use.

Regular users will also be required to have their eyesight tested on an annual basis. Continuous use shall also be restricted to a maximum of 2 hours; users must take regular breaks from “screen work” of 10 minutes per hour, for example by undertaking other work.

31. HEALTH SURVEILLANCE - (Management Regulations 1999)

Everyone has a duty to look after themselves whilst at work. To fulfil this objective, should any person suspect that they are suffering ill health in any way resulting from any work activity, it must be reported immediately to a Supervisor or Manager. This will then be investigated urgently with remedial action taken & recorded.

On joining, new employees will be asked to complete a document with questions relating to their previous & current state of Health. The results will be used to assess their suitability for the intended work & if they may suffer any ill health from tasks whilst in our employment.

On an Annual basis, a questionnaire will be sent to all staff to ascertain if any health-related issues are affecting them. This will cover what we consider to be “Safety Critical” to their role as well as stress & other “Well Being” topics.

Responses will be assessed with remedial action taken if required.

In order to reduce the risks to our people, all must follow the risk control measures within risk assessments & method statements. In addition to this we shall use low risk substances as much as possible.

For certain works involving regular heavy lifting, excessive noise, exposed to high-risk processes or chemicals, or of a repetitive nature, we may require employees to undertake an additional, more formal health check. [NB This may also apply for anyone returning to work after a long period of illness and/or still receiving medication that may have an impact on the safe undertaking of their normal duties - this shall be determined during a “Return to Work Interview” conducted by a manager.]

The highest level of surveillance - Statutory Medical Surveillance (involving a medical examination and possibly tests by a doctor with appropriate training and experience (The doctor must have been appointed by HSE)) is a legal requirement for those working with lead, for those who regularly undertake non-licensed work with asbestos, and those who work with ionising radiation.

32. MONITORING OF COMPLIANCE & SAFETY - (Management Regulations 1999 & CDM 2015)

In order to check that we are working safely & that our arrangements are effective we shall monitor our activities regularly. We do this via:

- Our recruitment procedures will include undertaking mandatory checks on eligibility to work in the UK under the Immigration, Asylum & Nationality Act 2006 and as a Company we condemn Human Trafficking and will report any suspected cases to the proper authorities. Those in our supply chain will be required to meet these requirements.
- Providing regular support to our team on safe working, including ongoing daily contact.
- Managers & Site Supervisors shall complete regular supervisory checks with any corrective or improvement actions taken urgently. Resultant actions will be reviewed by company management to ensure that improvements are put in place. [NB our checks will usually cover other aspects such as Quality of works and Environmental factors as well as Health and Safety].
- Sub-contractors & self-employed people will be subject to an annual review to monitor their performance over a range of compliance matters. Once done each contractor is to be issued with a copy of the review as well as the “Terms & Conditions” they must comply with.
- Obtaining feedback from our customers throughout projects.
- Health & Safety compliance & improvements will be an agenda item for all site meetings with any improvements put in place following consultation with our Health & Safety Advisor.
- Periodic safety audits to be carried out by our engaged NEBOSH Qualified Advisors **SATS**. Identified improvements shall be undertaken with the required level of urgency & our team briefed via toolbox talks on corrective actions put in place.

IN CASE OF VISITS FROM THE HSE

- During our works, it is possible that we may receive a visit from an Inspector from the HSE. In these cases, the Inspector should provide proof of identity, and then be signed into site. They should be offered a brief induction to the Site and then accompanied by our Site Manager/Site Supervisor. The relevant Company Manager overseeing the Project should be notified of the visit as soon as possible. We should do our best to co-operate with the Inspector’s requests but if we do not know the answer to a specific question be honest about this and offer to find out the answer at our earliest opportunity.

33. NOISE AT WORK - (Control of Noise at Work Regulations 2005)

We will take all reasonable steps to prevent excessive noise from affecting both our own staff & others nearby. At certain limit values specific action must be taken related to:

- the levels of exposure to noise of our employees averaged over a working day or week
- the maximum noise (peak sound pressure) to which employees are exposed in a working day.

Lower exposure action values:	<ul style="list-style-type: none">• daily or weekly exposure of 80 dB(A)• peak sound pressure of 135 dB
Upper exposure action values:	<ul style="list-style-type: none">• daily or weekly exposure of 85 dB(A)• peak sound pressure of 137 dB
Levels of noise exposure which must not be exceeded:	<ul style="list-style-type: none">• daily or weekly exposure of 87 dB(A)• peak sound pressure of 140 dB.

We will take the following steps:

- Know of the DbA - decibel rating for each tool or machine being used & ensure that we control any risk as in the points below:
- For noise, **up to 85 DbA** we will prevent unnecessary contact with the noise & suggest the wearing of Hearing protection for those in the work area- including non-users of equipment.
- For noise **over 85 DbA** we shall look for an alternative method of working if possible, if we cannot provide this then Hearing Protection **MUST BE WORN WITHOUT EXCEPTION** and this protection must be sufficient to reduce the noise level to below 85db.
- When purchasing machinery, we shall consider noise levels produced.
- We shall continuously monitor our team for any potential hearing damage caused by noise at work, taking preventative action if we believe that the risk is unacceptable. NOTE: We may provide periodic hearing tests for people who are regularly exposed to high levels of noise. Decisions regarding this will be taken based on advice received from our Health & Safety Advisor or Occupational Health experts.
- When operating in sites with other occupants or neighbours nearby, we will agree our working hours with restrictions for when noisy works can be undertaken (this includes deliveries with reversing alarms unless 'white noise' alarms are used to reduce the noise impact).

34. VIBRATION - (Control of Vibration at Work Regulations 2005)

The Company shall assess the risks to employees from vibration at work, based upon our knowledge, risk assessments & "Vibration Safety Guides". The following action will be taken:

- Introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as reasonably practicable.
- Carry out health surveillance to those employees who continue to be regularly exposed above the action values or otherwise continue to be at risk.
- Provide employees with information, instruction and training on health risks and the actions to be taken to control these risks.
- Consult with employees & experts on ways to control risk & provide health surveillance.
- Utilise a system of regular rotation of use of tools & equipment with agreed time limits on continuous use or use in one working shift (Note – agreed time limits may be reduced if working in cold or damp conditions).

High risk employees are those who regularly operate:

- Hammer action tools in excess of one hour per day.
- Rotary and other action tools in excess of two hours per day.

Medium risk employees are those who regularly operate:

- Hammer action tools in excess of 15 minutes per day.
- Rotary and other action tools in excess of one hour per day.

35. MENTAL HEALTH & STRESS AT WORK - (Management Regulations 1999)

We are committed to ensuring that we operate in a way that helps those who work for us to come to work and leave at the end of the day in a state of well-being in which the individual realizes his or her own abilities, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to his or her community.

One of the main risks we therefore have to manage is stress - the Health and Safety Executive defines stress as 'the adverse reaction people have to excessive pressure or other types of demand placed on them'. This makes an important distinction between pressure, which can be a positive state if managed correctly, and stress which can be detrimental to health.

The effects of long-term stress can be seen in physical, intellectual, emotional and behavioural signs.

In order to reduce the possibility of stress causes & their effects Managers shall be aware of & carry out the following:

- Conduct and implement recommendations of risk assessments within their control.
- Ensure good communication between management and staff, particularly where there are organisational and procedural changes.
- Ensure that Employees & sub-contractors are fully trained to carry out their duties.
- Ensure staff are provided with purposeful developmental opportunities.
- Monitor workloads to ensure that people are not overloaded.
- Monitor working hours and overtime to ensure staff are not overworking.
- Monitor holidays to ensure staff are taking their full entitlement.
- Attend training as requested in good management practice and health and safety, including Mental Health Awareness.
- Ensure that bullying and harassment are not tolerated within their jurisdiction.
- Be vigilant and offer additional support to a member of staff who is experiencing stress outside of work e.g.: bereavement or separation.

Staff may notice signs of possible mental health problems in a colleague and are encouraged to approach the colleague concerned and offer to talk and to help them speak to their line manager as early as possible. Line managers will arrange a time to talk privately and listen non-judgmentally to the employee's current concerns and situation, whether this arises from problems inside or outside of work. They will assess the impact on their work and if the person is well enough to be at work; whether work stressors are contributing to the current condition and, with the employee, agree what next steps will be most appropriate in the short term and in the medium term. They will confirm who else needs to know and make arrangements for how best to support the employee and how often.

36. PANDEMICS – E.G. CORONAVIRUS (COVID-19)

When the UK is affected by a Pandemic such as that for Coronavirus (COVID-19), we are committed to ensuring that practical and effective measures are in place to minimise the risk of infection for our staff, customers and the communities within which we operate as a result of our business activities.

We will put in place appropriate resource to engage and train staff, promote our safety measures, take account of changing advice and regularly assess and review our risks and control measures accordingly.

As part of this commitment, we will:

- Identify and implement all relevant governmental & regulatory advice and industry guidance (such as Site Operating Procedures).
- Identify work areas and processes that can be undertaken remotely through home working and have the necessary arrangements in place.

- Identify any of our workforce who are at higher risk and follow guidance on managing that risk.

37. COMPANY VEHICLES - (Road Traffic Act)

We aim to manage Occupational Road Risk in our Company by: providing safe and reliable vehicles; and effectively planning the journeys they take to minimise the risk to our workforce, in terms of hours being driven and driver tiredness. Only authorised people are to drive or be in charge of company vehicles and the vehicles should only be used for agreed purposes. Everyone authorised must ensure that they have a current valid driving licence meeting the conditions of our Insurers.

Each person is responsible for informing the management if for any reason a change in circumstances means that they may not meet this criterion. Regular checks will be made by the Company to ensure that key information regarding this is up to date.

*Immediate compliance with such requests is an absolute must to maintain Insurance cover.

Drivers have a duty to make sure that vehicles are checked, cleaned & maintained regularly to ensure that the vehicles are roadworthy & serviceable. Drivers must also inspect loads for safety & to prevent their movement during transit to avoid overloading or slippage.

We have breakdown cover in place and details will be kept in each vehicle, and drivers are to call our providers rather than attempting to undertake any repairs themselves.

The following are prohibited:

- the use of Mobile handsets whilst driving;
- smoking in Company Vehicles;
- driving whilst under the influence of drugs and/or alcohol.

All drivers and occupants must comply with all relevant road traffic regulations.

38. LONE WORKING & PERSONAL SAFETY Management Regulations 1999) and SHIFT/LATE WORKING (Working Time Regulations 1998 (as amended)

Some of our projects may be undertaken by small teams or individuals working alone, and as such we take very seriously the risks associated with working remotely & without assistance from a colleague if needed. We shall take the following actions to control risks:

- Only competent people may work alone with an agreed emergency action plan in place.
- All are to be made aware of the risks, working practices & safe systems of work involved through instruction & giving of information. This will include: Lone working risk assessment (including access to First Aid), job specific work instructions & daily management support.
- An agreed method of maintaining regular contact must be in place between operatives & supervision, usually via mobile phones. This is not always possible as some areas have no signal, in such cases we shall visit where possible & use landlines if available.
- No “High Risk” work shall be undertaken by lone workers or for work at height whereby help may be required in an emergency.
- Consult with our team regularly to ensure that no one feels at risk.

In order to manage our works, some projects may require working outside the standard daytime hours (the standard hours being a work schedule involving an activity during the day, commonly for a period of eight hours between 7.00 am and 7.00 pm. There are usually two periods of work, one in the morning, the other in the afternoon, separated by a lunch-time break). Research has shown that there can be undesirable consequences for those working shifts outside standard daytime hours, particularly those covering the night or with early morning starts. For example, shift work may result in:

- disruption of the internal body clock;
- fatigue;
- sleeping difficulties; disturbed appetite and digestion;
- reliance on sedatives and/or stimulants;
- social and domestic problems

These in turn can affect performance, increase the likelihood of errors and accidents at work and might have a negative effect on health.

To help manage the risks, we will assess the risks involved based on the type of shifts required and the duration they are required for and discuss the best ways to manage the risk with the individuals concerned taking into account the advice in the HSE document HSG256.

39. NON-CONSTRUCTION WORKPLACES - (Workplace (Health, Safety and Welfare) Regulations 1992)

All aspects of the workplace shall be carefully managed to ensure that everyone who works for us as an employee, sub-contractor or as a visitor shall be safe from injury or ill health. This covers; design, management, monitoring & maintenance via positive management & supervision with continuous vigilance by everyone. The following aspects are to be considered:

- Premises including: buildings, car parking, access & egress routes, stairways, furniture, temporary & permanent fixtures & fittings.
- All equipment, machinery & services provided by our organisation or by others.
- Any steps, inclines or other potential hazards will be identified with actions taken to draw attention to inform people of them, considering any special arrangements for people with mobility, sight, hearing or other sensory issues.
- Provision for heating to maintain a suitable temperature for the type of work & sufficient lighting.
- Provision of welfare facilities to include; washing drinking water, heating & eating of food, changing & secure place to store personal items during work time.

40. ELECTROMAGNETIC FIELDS – (Control of Electromagnetic Fields at Work (CEMFAW) Regulations 2016)

Electromagnetic Fields (EMFs) at different frequencies affect the human body in different ways, causing sensory and health effects. As required by the CEMFAW Regulations, we will:

- assess the levels of EMFs to which your employees may be exposed;
- ensure that exposure is below a set of Exposure limit values (ELVs);
- when appropriate, devise and implement an action plan to ensure compliance with the exposure limits;

- when appropriate, assess the risks of employees' exposure and eliminate or minimise those risks, giving particular attention to those most at risk, such as expectant mothers and workers with active or passive implanted or body-worn medical devices;
- provide information and training on the particular risks (if any) posed to employees by EMFs in the workplace and details of any action we are taking to remove or control them.
- take action if employees are exposed to EMFs in excess of the ELVs; and
- provide health surveillance or medical examination, as appropriate.

41. TEMPORARY WORKS (Code of Practice BS5975: 2008 "Code of practice for temporary works procedures and the permissible stress design of falsework" and CDM 2015)

"Temporary works" is a widely used expression in the construction industry for an "engineered solution" used to support or protect an existing structure or the permanent works during construction, or to support an item of plant or equipment, or the vertical sides or side-slopes of an excavation, or to provide access. The construction of most types of permanent works will require the use of some form of temporary works.

Examples of temporary works include, but are not limited to:

- Earthworks - trenches, excavations, temporary slopes and stockpiles. Structures - formwork, falsework, propping, façade retention, needling, shoring, edge protection, scaffolding, temporary bridges, site hoarding and signage, site fencing, cofferdams.
- Equipment/plant foundations - tower crane bases, supports, anchors and ties for construction hoists and mast climbing work platforms (MCWPs), groundworks to provide suitable locations for plant erection, e.g. mobile cranes and piling rigs.

For any such works under our Control, we will:

- a) Put in place effective arrangements for controlling risks arising from the use of temporary works, which will contain most or all of the following elements:
 - Appointment of a Temporary Works Co-ordinator (TWC)
 - Preparation of an adequate design brief.
 - Completion and maintenance of a temporary works register
 - Production of a temporary works design (including a design risk assessment and a designer's method statement where appropriate).
 - Independent checking of the temporary works design.
 - Issue of a design/design check certificate, if appropriate.
 - Pre-erection inspection of the temporary works materials and components.
- b) Put in place control and supervision of the erection, safe use, maintenance and dismantling of the temporary works – i.e. procedures to:
 - Check that the temporary works have been erected in accordance with the design, and issue a formal "permit to load" where necessary.
 - Confirm when the permanent works have attained adequate strength to allow dismantling of the temporary works, and issue a formal "permit to dismantle" where necessary.
 - The procedure should include measures to ensure that the design function, the role of TWC, and Temporary Works Supervisor(s) where appropriate, are carried out by competent individuals.

- Smaller contractors may not have the experience to operate their own temporary works procedure and may need to obtain external expertise. It is also common for large and medium contractors to outsource aspects of temporary works design and management.

42. SAFETY IN STREET WORKS - New Roads and Street Works Act 1991 (NRSWA) and Section 174 of the Highways Act 1980

To safely carry out signing, lighting and guarding of street works and road works on all highways and roads, we will follow the “Safety at Street Works and Road Works - A Code of Practice”. In particular we will:

- ensure that the correct procedures have been followed for works that involve the need for prior consultation, consent or agreement (e.g. highway closures, working in the vicinity of railways and/or tramways, etc);
- ensure that before we start that a site-specific risk assessment has been carried out, paying particular attention to the requirements of highway users, including pedestrians and vulnerable users such as disabled people. If circumstances change, we will consider whether the risk assessment needs revising;
- ensure that before we start that the works site layout has been planned, necessary equipment has been identified and that you know how you will set the site out;
- understand and implement pre-planned site safety requirements before starting the works;
- sign, light, guard and maintain your works safely at all times;
- ensure that our works remain compliant and safe as works progress or following any alteration;
- ensure that the safety of yourself and others who pass near or through the works;
- encourage our workers to consult our supervisor, manager or other competent person immediately if they are unsure about any requirements contained in their work instruction; and
- ensure that the work team understands all key safety issues and the local site risk assessment related to the activity.

43. PROHIBITED ACTIONS

- **Anyone ignoring or not following correct working methods, safe working documents or work instructions.**
- **Not adhering to this policy & other company rules.**
- **Anyone putting themselves & others at risk.**
- **Using tools, equipment or machinery without proper safeguards.**
- **Leaving tools, equipment or machinery in an unsafe condition or able to be used by unauthorised persons.**
- **Failing to use R/PPE when required by Site Rules, Method Statements, Risk or COSHH Assessments.**
- **Not being clean shaven if required to wear RPE that relies on a tight fit to the face to work effectively.**
- **Misappropriation of, or deliberate damage to Company Property (including R/PPE).**
- **Altering scaffolds if untrained and unauthorised to do so.**
- **Failure to report incidents, accidents or near misses to us immediately.**
- **Failing to maintain workplace security thus allowing unauthorised access.**
- **Personnel being transported without proper seating or wearing safety belts.**
- **Drinking alcohol or being under the influence of alcohol whilst at work, including being in charge of vehicles/machinery during the course of work that could increase risks to anyone.**

- Taking any drugs or substances that are illegal or may affect the ability of persons to work safely. Where medications are prescribed by a Doctor, the individual must check whether any potential side effects may affect their ability to work and notify their Supervisor before starting work. NOTE: Random Drug & Alcohol tests may be carried out by some of our clients. Everyone must comply with this upon request.
- Using personal audio & personal mobile phones that may cause distractions or a lack of awareness in the workplace.
- Wearing of loose, ill-fitting clothing or inappropriate jewellery items that could pose a risk to safety or offence to others.
- Driving any company vehicle if any recent event may lead to the loss of insurance cover or no longer being legally entitled to drive.
- Failure to inform the company management of any matter that may compromise the good name & reputation of the company.
- Use of equipment for any purpose for which it was not designed.
- Acting or behaving in a manner that is non-compliant with legislation E.G.: Horseplay or causing offence to others in the workplace.
- ‘Bombing’ – the uncontrolled throwing or tipping of materials from height.
- Smoking in an enclosed area of any workplace - smoking must be in defined areas only.

NOTE: Disciplinary action may be taken for any failure to follow company policy, procedures, rules or for failing Drug & Alcohol tests. For serious non-compliance or if found to be involved in prohibited actions, immediate suspension or summary dismissal may result. If a staff member should fail an initial drugs or alcohol test, they will be asked to leave site & be suspended pending the outcome of a follow up test. Once the results of a second test are available, should the follow up test be positive showing drugs and/or alcohol present (thus failing the test), as a minimum, the person may receive a written warning & guidance based on the results. However, the more likely scenario is that the staff member will be immediately dismissed from our employment for a “serious breach of your employment contract”.

44. Log of review & amendments to the Company Policy

Filename, incl. version	Sections amended (<i>note minor wording changes are not detailed</i>)	Issue date	Issued by
Health, Safety & Welfare Policy 02 12	Amended various sections with minor changes.	03/02/12	SATS Ltd
Health, Safety & Welfare Policy 01 13	Amended sections on RIDDOR, asbestos with other minor changes.	17/01/13	SATS Ltd
Health, Safety & Welfare Policy 04 14	Amended sections for Permits, RIDDOR 13 and Consultation with other minor amendments. New sections added to cover: Lead based Materials, Construction Site Specific, Stress at Work, Log of Review section.	03/06/14	SATS Ltd
Health, Safety & Welfare Policy 12 14	Amended sections: RIDDOR, Asbestos, Work at height, & number of other headings linked to regulations with other minor changes to various other sections	02/12/14	SATS Ltd
Health, Safety & Welfare Policy 06 15	Amended sections for CDM 2015 as well as other minor changes to various sections	02/06/15	SATS Ltd
Health, Safety & Welfare Policy 05 16	Annual review of contractors within sections 2 & 30 added, additional scaffolder controls added within sections 2 & 24. Timescales for incident reporting added in sections 8 & 9. Reference to need to be clean shaven in section 13. PAT testing frequencies as defined by HSE guidance. Insertion of new Section 22 – Use of LPG, Gases, Flammable Liquids & Compressed Air. Specific reference to the Manual Handling RA within section 23. Additional bullet added to section 31 regarding checks on eligibility to work in the UK and Human Trafficking.	18/05/16	SATS Ltd

	Additional details added to section 32 regarding monitoring of noise affects. Change of order for sections 38 and 39.		
Health, Safety & Welfare Policy 09 16	Update to reflect revised organisational structure and key responsibility holders	23/09/16	SATS Ltd
Health, Safety & Welfare Policy 09 17	Reference to the company Equal Opportunity, Harassment & Bullying Policy - including Modern Slavery Statement on page one. Reference to Slavery & Human Trafficking in section 2 Section 12-added: The Fire Safety (Employees Capabilities) England Regulations 2010 with additional arrangements in para one. New Section 37 to cover non-construction workplaces.	25/09/17	SATS Ltd
Health, Safety & Welfare Policy 10 18	Section 8 – additional text re incidents and near misses. Addition to Section 13 PPE to give approach where blanket rules are imposed on site. Section 19 – additional content re risks from drug use equipment. Section 22 – additional content re working close to gas installations. Section 35 – additional reference to Occupational Road Risk. Insertion of new section 38 to cover Electromagnetic Fields.	01/10/18	SATS Ltd
Health, Safety & Welfare Policy 10 19	Section 2 – additional text stating that Directors will have read INDG417 Section 6 – Additional text to provide more detail on our approach to the management of training & development needs. Section 20 – Update to Asbestos section to include additional content for Premises reporting under RIDDOR in case of accidental release of asbestos fibres. Section 31 – additional bullet regarding what to do in case of an HSE visit.	03/10/19	SATS Ltd
Health, Safety & Welfare Policy 10 20	Section 9 – Update to RIDDOR reporting timeframes. Sections 13 & 14 – additional statement regarding the Construction Products Regulation (305/2011/EU) Section 18 – Additional content for people who may have difficulty understanding English instructions. Section 32 – Additional bullet regarding restricting noisy works at certain periods. Section 35 – additional content re prohibited actions. Section 39 – New section on Temporary Works.	07/10/20	SATS Ltd
Health, Safety & Welfare Policy 07 21	Updated organisational chart	12/07/21	SATS Ltd
Health, Safety & Welfare Policy 10 21	Section 13 - Update of references to CE marking to the new UKCA. Additional content re being clean shaven for wearing tight fitting RPE. Section 21 – Inclusion of reference to Statutory Medical Surveillance for work with lead. Inclusion of new section 29 re Welding fume. Section 31 - Inclusion of reference to Statutory Medical Surveillance. Section 35 - additional content re Mental Health. Inclusion of new section 36 regarding pandemics. Section 38 – Additional content regarding shift working.	15/10/21	SATS Ltd
Health, Safety & Welfare Policy 10 22	Section 5 – Addition of reference to Occupier's Liability Acts 1957 & 1984 and content regarding unlawful visitors. Section 13 – Addition of reference to PPER 2022 and addition of the term of workers and their responsibilities and note about the Self Employed. Section 17 – Addition of content relating to the Health and Safety (Signs and Signals) Regulations 1996 (in addition to existing related content in the Site Conditions-Set Up Risk Assessment). Section 18 – Inclusion of specific reference to the Health and Safety Information for Employees Regulations 1989 and the Health & Safety Law poster (in addition to existing related content in the Site Conditions-Set Up Risk Assessment). New Section 42 re SAFETY IN STREET WORKS Section 43 – Inclusion of Altering of scaffold in the list of Prohibited actions (in addition to its existing reference in the Work at Height Standards & Procedures document).	12/10/22	SATS Ltd
Health, Safety & Welfare Policy 10 23	Sections 13 & 14 UKCA references updated to reflect that the CE marking can now be used up to 31/12/2024 (the deadline has been extended). Extra content re actions in case of a positive drugs test on Prohibited Actions section. Update to Scaffolding SG4 reference to SG4:22	25/10/23	SATS

