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# HEALTH, SAFETY & ENVIRONMENTAL POLICY

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## DOCUMENT CONTROL

This document has been specifically produced for the purposes of use of **Milbury Contractors Limited**, as a Health, Safety and Environmental Policy Document and is only suitable for use in connection herewith.

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ISSUE	DATE	SECTION/S	COMMENTS
01	20/3/09	All	1 <sup>st</sup> Review/Revision by Meridian Safety Solutions.
02	12/3/10	-	Annual review and update
03	14/3/11	-	Annual review and update
04	20/8/12	3.10; 3.21; 3.34 (new section).	Annual review and update – Including various legislation reference updates
05	1/8/13	3.2 & General	Annual review and updates to referenced legislation
06	1/10/14	3.10; 3.14; 3.17; 3.29; 3.34. 3.39 – 3.46	Annual review and updates to referenced legislation. Added eight new sections (Section No. 3.39 – 3.46)
07	30/7/15	1; 3.11, 3.12, 3.14, 3.16, 3.20, 3.22, 3.26 & 3.38	Revisions required due to changes in legislation
08	3/11/17	All Sections Reviewed and revised where necessary	Annual review and update. Revised legislation references and links. New section on CDM. Added a Safety Policy Communication form
09	29/4/19	3.16; 3.20 & 3.38	Annual review and update to current codes of practice. Revised legislation references and links.
10	27/4/20	New Policy Statements & Revised Section 3.34	Annual review and update. Added Policy and Arrangements to deal with Coronavirus issues
11	22/11/21	3.19; 3.21; 3.26; 3.30; 3.42; & 3.43	Annual review and update.
12	22/11/21	New Section 3.48	Annual review and update. Added new arrangement for Behavioural Safety
13	24/11/2023	Sections 3.24 & 3.29	Annual review and update – Revised sections relating to Fire Safety & PPE, in line with updated legislation. Other minor amendments and updated hyperlinks.
14	21/03/2024	Section 5.5	Added a new Modern Slavery Policy Statement

**NB:** All references to legislation, such as Acts or Regulations, are hyperlinked to the National Archives website (<http://www.legislation.gov.uk>) so as to ensure that the most up-to-date legislation is referenced. If you are reading a hard copy of this document, you will need to manually look to this website yourself.

Any reference in this document to “safety” is also a reference to “health, welfare and environment”.

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## INTRODUCTION

This policy document has been prepared to define the way that Milbury Contractors Limited (MCL) intends to manage health and safety and meet the requirements of Section 2(3) of the [Health and Safety at Work etc. Act \(HSAWA\)](#). This act requires an employer to prepare a statement of general policy with respect to health and safety at work and the organisation and arrangements set up to carry out that policy.

MCL Health, Safety and Environmental Management Document System are contained within this Policy Document and its associated instructions, Procedures Manual, assessments and guidance documents. The Document System formally communicates the instructions and procedures covering operation and work activities from the Company Directors to their supporting Managers, Supervisors and all other personnel employed or involved in the Company's activities.

The Document System has been developed to meet statutory requirements for a Safety Management System to ensure the health and safety of all personnel associated with work activities of the Company including contractors, visitors and the general public.

The Policy and its associated documents apply as defined to all personnel employed or contracted to the Company as appropriate to the work being undertaken. It is the duty of personnel so involved to apply the requirements of these documents to their work.

## Policy Statements

The Policy Statement of Intent summarises the Company's commitment to health and safety, details general responsibilities and gives information relating to arrangements for implementing the policy and ensuring that it is kept current.

This Statement of Intent will be signed by the Director with particular responsibility for Health and Safety and displayed prominently.

## Organisation Structure and Responsibilities

This section describes the structure of the business in terms of health and safety responsibilities. There will be a section relevant to everyone in the Company. This section will summarise how external health and safety assistance will fit into the business structure.

All employees need information from this section in so far as it relates to them.

## Arrangements

This section details and provides guidance on the specific day-to-day arrangements and responsibilities for controlling or eliminating the types of hazards to health and safety that may arise as part of the business activity. Each employee will need the information set out in this section so far as it relates to them.

## HEALTH AND SAFETY POLICY STATEMENT

Milbury Contractors Limited (MCL) is fully committed to undertake its business in such a way as to minimise the risk of injury or ill health to people, damage to property or the environment.

MCL has a moral and legal obligation to safeguard, so far as is reasonably practicable, the health, safety and welfare of their employees and anyone who may be affected by the actions of the Company, its employees, or as a result of MCL activities, fully accepts their obligations and responsibilities, which will be achieved by:

Meeting its responsibilities as an employer to do all that is reasonably practicable to prevent accidents, injuries and damage to health.

Providing and maintaining safe working environments that are without risks to health, safety and welfare. Limiting adverse effects on and adjacent to the area in which those activities are carried out.

Ensuring all employees play an active part in the health and safety of the Company by consulting with them and providing them with adequate information, instruction, training and supervision for them to understand their role within the Company.

Ensuring that hazardous areas are kept secure from the public, employees or tenants, or contractors not required to enter them.

Ensuring that when new substances, plant, machinery, equipment, processes or premises are introduced, adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.

Ensuring that all plant and equipment is maintained in a safe condition and is subject to routine and statutory inspections and examinations.

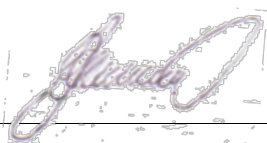
The Company will communicate the Health and Safety Policy to all employees, and it will be freely available to customers, shareholders and the general public. This policy will be reviewed annually and updated as required to conform to current legislation.

This Policy, supported by Instructions, Procedures and Organisational Arrangements, is to be applied to all activities carried out by the Company.

The Managing Director is personally responsible for the health and safety performance of the company and signs this policy statement in acknowledgement of this.

Whilst all personnel within the company have a responsibility for Health and Safety, the person within the organisation with the overall responsibility is Andy Kennard. The person with day-to-day responsibility for the administration of the Safety Management System is Sveta Smith.

*Signed:*



*Date:*

March 21, 2024

**Andy Kennard**

For and on behalf of MCL

## ENVIRONMENTAL POLICY STATEMENT

Milbury Contractors Limited (MCL) recognises that protection of the environment is of prime importance. The achievement of a high standard of environmental awareness throughout the Company is not only essential to assist in sustaining and keeping in balance the environment and environmental resource, but also results in healthier and more acceptable conditions for work and social activity. Environmental awareness assists in the enhancement of the Company's reputation as not only a caring employer, but also a Company that is aware of the prospective impact of its activities on the environment. Such awareness creates improvements from which the general public, of this and successive generations, will benefit.

It is the responsibility of everyone to work together to achieve this environmental goal. With this in mind, MCL will ensure that the Company complies with the [Environmental Protection Act \(EPA\)](#) and all other domestic legislation concerned with the protection of natural resources and the external environment. The Company will prepare and enforce policies which, as far as is reasonably practicable and having taken into account project and client requirements, provide for:

- Protection of the environment at/or affected by work sites.
- Reduce waste and consumption of natural resources wherever possible.
- Conservation of natural resource materials, energy and use of recyclable materials.

To achieve this it will: -

- Introduce systems and monitoring procedures which meet the requirements of the policy.
- Guide and assist in the formulation of those systems and procedures and conduct regular internal audits of the monitoring procedures in relation to the stated environmental management objectives.
- Train the workforce in current methods, practice and awareness of the need for environmental protection.
- Provide advisory, communication and training facilities as required.

Appropriate training and financial company resources will be made available to ensure that all staff members have the knowledge and skills to implement the above policy.

Whilst all personnel within the company have a responsibility to care for the environment whilst carrying out their work, the person within the organisation with the overall responsibility is Andy Kennard. The person with day-to-day responsibility for environmental management is Sveta Smith.

This Environmental Policy will be reviewed annually.

Signed: \_\_\_\_\_



**Andy Kennard**

For and on behalf of MCL

Date: \_\_\_\_\_

March 21, 2024

## HEALTH AND WELLBEING POLICY STATEMENT

Milbury Contractors Limited (MCL) recognises that its team of workers are the most valuable resource within its business. We are therefore committed to providing an environment that delivers and maintains wellbeing and good health, because we believe that a healthy workforce is an effective workforce.

The aim of this policy is to:

- Ensure that workers are fit to carry out their designated job roles through the provision of medicals.
- Encourage its workforce to visit their GP's to ensure their health is regularly monitored and acting on any advice given.
- Encourage its work force to take responsibility for their own health within their control. These include taking reasonable steps to minimise their own stress levels and seeking assistance as early as possible if symptoms persist.
- Ensure that the team do not work when severely fatigued and what to do when they feel too tired to work safely. Set out the expected maximum daily and weekly hours, and arrangement for checking these are being followed.
- Ensure the Company's management team consider fatigue aspects of work-related travel times to and from the workplace.

### Personal Health and Infectious Diseases

If an employee has an infectious or communicable disease such as Coronavirus (COVID-19), AIDS/HIV, Hepatitis, Tuberculosis (TB) etc, or other health issues such as cancer, epilepsy, asthma, diabetes, cognitive disorders or other health problem that may constitute a risk to themselves whilst at work, or may constitute a risk to the health and safety of others employed by the company, that person **MUST** bring this to the attention of the Director Responsible for Health and Safety.

Any employee who becomes aware that a fellow worker has or may be sickening from the effects of an infectious or communicable disease, that they have not already disclosed, should bring that information to the attention of the Director Responsible for Health and Safety. Thereafter, they will treat that information as confidential and not divulge it to anyone else within or outside the organisation without the person's consent.

Any breach of this rule will be regarded as a serious disciplinary offence and may result in summary dismissal. If, however, the employee is concerned about the health and safety implications of non-disclosure, he or she should seek advice from the Company Directors only, who will then deal with the matter as necessary.

Where there is a conflict between the demands of work operations and health and safety, health and safety will take priority.

The Policy will be kept up to date, particularly if the business of the Company changes in nature and size. To ensure this, the Policy, and the way in which it has operated, will be reviewed as appropriate and at least once every year.

Signed:



**Andy Kennard**

For and on behalf of MCL

Date:

March 21, 2024

## RETURN TO WORK POLICY STATEMENT

Someone's ability to do their job can be affected by personal injury and health conditions, whether or not they are caused at or by their work. This may result in worsening health conditions, poor quality work and spread of infection in the workplace. Therefore, this Return to Work Policy has been produced by Milbury Contractors Limited (MCL). Its purpose is to return workers to employment at the earliest date following any injury, illness, or infectious disease. It is our desire to speed recovery and enable employees to return in good health.

Several laws are relevant when managing sick leave and return to work. These include the [Equality Act 2010](#), the [Employment Rights Act](#) and the [Health and Safety at Work etc. Act \(HSAWA\)](#). From the viewpoint of safety at work, and in fulfilment of these laws, the policy of the Company is to safeguard, so far as is reasonably practicable, the health, safety and welfare of all employees. This applies in particular to the provision and maintenance of safe systems of work and covers all workplaces managed by the Company, including construction sites.

The Company regards the legal health and safety requirements as a **minimum standard** and expects targets to be achieved without compromising health and safety criteria. In order to achieve this, the Company will ensure that the following arrangements are fully implemented:

- Record and monitor sick leave to identify trends and manage risk.
- Train managers how to manage sick leave and following return to work.
- Keep in contact with workers who are off sick, ensuring the conversation remains focused on their health, safety and wellbeing and their return to work.
- Consider making workplace adjustments to help workers return to work. This may include shorter hours, flexible or part-time working, or adapting work equipment.
- Review health and safety risk assessment where a worker's health condition makes them or others more vulnerable to workplace risks, or the impact of the workplace adjustments could affect the work and health of others.
- Get professional advice on issues such as fitness to work or workplace adjustments, such as from an occupational health provider when necessary.
- Develop an infectious disease preparedness and response plan when necessary.
- Develop policies and procedures for prompt identification and isolation of sick people.

The Company considers it essential for this policy to operate satisfactorily and to fulfil this aim it is especially important to have the full co-operation of all employees of the Company. Therefore, the Company gives every encouragement to its employees to make suggestions and have discussions on any aspect of health and safety with the Director Responsible for Safety.

The allocation of duties for health and safety matters and arrangements, which are made to implement this Policy, are detailed in the Health, Safety and Environmental Policy Document.

Where there is a conflict between the demands of work operations and health and safety, health and safety will take priority.

The Policy will be kept up to date, particularly if the business of the Company changes in nature and size. To ensure this, the Policy, and the way in which it has operated, will be reviewed as appropriate and at least every year.

Signed:



Date:

March 21, 2024

**Andy Kennard**

For and on behalf of MCL

## MODERN SLAVERY POLICY STATEMENT

MCL (Milbury Contractors Limited) recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the [Modern Slavery Act](#) (the "Act"). The Company therefore takes a zero tolerance approach to non-compliance with this Policy and will not tolerate any slavery or human trafficking in any part of its business or in any part of its supply chain.

This Policy applies to all of MCL, their officers, directors and employees, whether permanent or temporary. It also applies to the MCL supply chain, which must ensure that both its business and that of its supply chain worldwide comply with this Policy.

The Company will take steps to ensure that modern slavery and human trafficking are not taking place in its own business or within any of its supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy and must have submitted a pre-qualification document, which also covers the Act;
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards;
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms;
- Suppliers will be expected to comply with the [Immigration, Asylum and Nationality Act](#);
- The Company will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates;
- The Company will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every MCL employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to ACAS Advisory, Conciliation and Arbitration Service, using the confidential telephone helpline number 0300 123 1110 provided as part of the Company's Whistleblowing Policy.

The Company considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, our Clients have the right to notify the relevant authorities of an individual or a suppliers contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation, regulations and good practise.

Signed:



Date: March 21, 2024

**Andy Kennard**

For and on behalf of MCL

## Section 1: Organisation

### General Organisation

Arrangements for health, safety, welfare and the environment will be organised by Milbury Contractors Limited (MCL).

The Managing Director has overall responsibility for health, safety and the environment.

The Managing Director has appointed Meridian Safety Solutions Limited as an external Consultant who will assist the company and carry out Health, Safety and Environmental monitoring for the company.

Constructive suggestions to improve health, safety, welfare and environmental awareness in the Company are welcomed from any employee.

### General Responsibilities

Directors and management are responsible for the implementation of the Company's Health, Safety and Environmental Policy and determining the Company's policies on health, safety, welfare and environmental matters, including revision of this Policy.

All employees are expected to set a personal example and take reasonable care for the health, safety and welfare of themselves and of others who may be affected by their acts or omissions, as well as protection of the environment from their work activities.

Employees who are responsible for supervision are expected to promote and encourage health, safety and environmental awareness in employees under their control. These Supervisors, supported by an appointed Safety Advisor, will monitor compliance with the requirements and provide advice on health, safety, welfare and environmental matters.

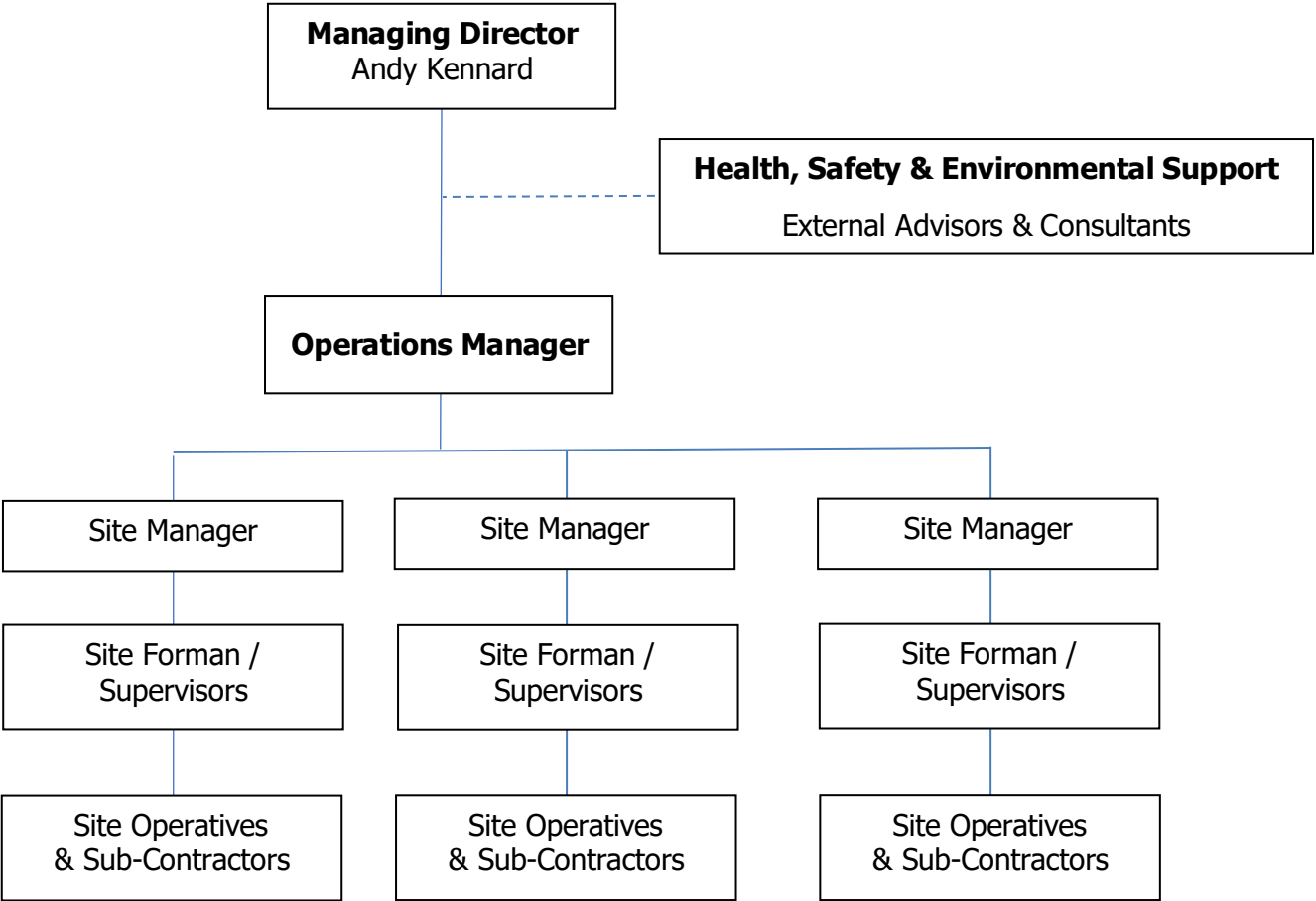
### Consultation

Employees will be consulted in accordance with the [Health and Safety \(Consultation with Employees\) Regulations \(HSCER\)](#) whenever there are changes in the Company's work procedures and arrangements for health, safety and welfare of the employees and consultation with the Health and Safety Executive (HSE).

Consultation will be either directly with the employees or with a group of employees elected as their 'representative of employee safety'.

Information will be provided initially to allow sufficient time for employee comments and feedback to be considered and any necessary changes made to the proposals.

**Organisational Structure Chart**



**Note:** Duties are listed in following Responsibilities section.

## **SECTION 2: RESPONSIBILITIES**

The following responsibilities are the main duties of management and are in addition to the duties outlined in general responsibilities.

### **2.1 Responsibilities of the Managing Director**

- To have overall responsibility for health, safety and the environment within the Company.
- To have full knowledge of all parts of this policy and how it relates to the safety management system.
- To appoint competent persons to manage health, safety and the environment within the Company.
- To provide adequate resources to enable the company to comply with this policy.
- To fully support the senior staff in carrying out their responsibilities.
- To set a personal example in safety matters and acknowledge all suggestions for improvement.
- To implement required training for staff at all levels.
- To initiate disciplinary action against staff who do not comply with their duties under the policy or statutory requirements.
- To ensure that all employees have knowledge of this policy and that they are updated when any changes are made.
- To seek the advice of Health, Safety and Environmental Advisors/Consultants whenever needed and heed the advice given.
- To inform the consultants in good time of work that they are required to do.
- To consult with the workforce over any changes that may affect health or safety.
- To ensure that any contractor appointed or self-employed person working on our behalf is competent to do the work.
- To ensure that all plant and machinery used by the company is to a suitable standard.
- To keep records as required by current legislation and retain documents for the appropriate time periods.
- To liaise with the Client, Principal Designer, Designers, Principal Contractor and other Contractors as required for effective project management and under the requirements of the [Construction \(Design and Management\) Regulations \(CDM\)](#).

### **2.2 Responsibilities of the Operations Manager**

- To have full knowledge of all parts of this policy and how it relates to the safety management system.
- To seek the advice of the safety consultants over any queries that may arise.
- To ensure that all of the workforce have received a copy of the policy and have signed to indicate that they have read and understood it.
- To ensure the training matrix remains up to date and accurate.
- To organise training that is required before expiry and to give attendees sufficient notice to attend.
- To ensure that effective safety meetings are held regularly, that minutes are taken and points raised are actioned by the appropriate personnel within an agreed timescale.
- To ensure that toolbox talks, or other in-house training is carried out as required and that records are kept.
- To ensure that records are kept of competency checks on subcontractors and self-employed persons who work for Milbury Contractors Ltd

- To ensure that documentation related to safe working practices is produced and distributed to the appropriate personnel.
- To ensure that workplace safety inspections are carried out regularly by competent persons.
- To ensure that health questionnaires are completed by employees as required.
- To ensure that regular inspections of tools and equipment are carried out including Portable Appliance Testing.
- To report serious accidents immediately to the safety consultants and to heed advice given in investigation reports produced.
- To comply with the same requirements as all other managers (see below)

### 3.2 Responsibilities of other Managers

- Ensure that all operatives have signed into the Principal Contractor's office and received site induction.
- Take note of and enforce any site rules, including ensuring that all operatives are wearing the appropriate PPE, following security procedures and using access routes as designed.
- Liaise with operatives, senior management and the Principal Contractor when erecting scaffold.
- Be familiar with the host's health and safety policy, especially procedures for fire, first aid facilities and accident reporting.
- Report any defects in health and safety systems to the Site Manager or Project Manager as appropriate.
- Ensure that operatives are familiar with method statements and risk assessments, carrying out toolbox talks to ensure full understanding if necessary.
- Be aware of responsibilities under section 7 of the Health & Safety at Work etc. Act 1974 to take reasonable care of themselves and those who may be affected by their acts and omissions.
- Ensure that operatives tidy away any equipment etc. that could cause a slipping or tripping hazard to themselves or other trades.
- Ensure that tools are checked before use and ensure that they are used only by those trained to do so.
- Take note of any comments on Health and Safety matters raised by site operatives and pass these on to Andy Kennard as appropriate.
- To report all accidents or near misses whether persons are injured, or property is damaged, to Sveta Smith.
- To set a good personal example to all other employees of the company.

### 2.3 Responsibilities of First Aiders

- To provide first aid to employees, as trained.
- To ensure that the first aid kits and accident book are maintained.
- To report serious accidents to management and assist with RIDDOR reporting and where required, assist in any accident investigation.

### 2.4 Responsibilities of All Employees

- To read and understand the Company's health, safety and environmental policy and comply with the prescribed arrangements.
- Not to intentionally or recklessly interfere with, or misuse anything provided in the

interests of health, safety or welfare.

- To only use work equipment, as instructed and trained. No unauthorised use of equipment is permitted; neither is repair or modification permitted unless express authority is given. Damage to equipment should be notified to the Manager.
- Sign in and out of site, as required by the Client and/or Principal Contractor.
- Receive the Client and/or Principal Contractor's safety induction.
- Be familiar with the Principal Contractor's procedures for fire, first aid facilities, welfare and accident reporting.
- Comply with all site rules, including the wearing of PPE (Personal Protective Equipment), security arrangements and prescribed access routes.
- Read and follow the relevant risk assessment for the task.
- Report any defects in the health and safety systems to the site supervisor.
- Not interfere with or operate any equipment unless competent to do so.
- Be aware of responsibilities under section 7 of the Health & Safety at Work etc Act 1974 to take reasonable care of themselves and those who may be affected by their acts and omissions.
- Keep work area tidy and free from trip hazards. Clear up any materials and store properly in order to minimise trip hazards.
- Check tools before use and ensure that they are used only by those trained to do so.
- To report all accidents or near misses whether persons are injured, or property is damaged, to their immediate supervisor.
- To report all accidents to a Manager, including those where no injury occurred.

### 2.5 Responsibilities of the Health and Safety Advisor

- Advise MCL on the preparation, promulgation and review of a company Health, Safety and Environmental Policy.
- To provide advice on the following:
  - Legal requirements affecting health, safety, welfare and the environment.
  - Personal protective clothing and equipment.
  - Working methods, equipment or materials, which could reduce risks.
  - Potential hazards on new sites, health and safety factors affecting the selection of plant and equipment etc.
  - Specialist services including substances hazardous to health, noise, asbestos removal, development of health and safety plans for site work.
- Carry out inspections of sites and workplaces as notified by MCL.
- Carry out investigations of serious accidents.
- Assist MCL in notifying and dealing with the Health and Safety Executive/Environment Agency, with regard to new sites, dangerous occurrences etc.

## **SECTION 3: ARRANGEMENTS**

### **3.1 Introduction**

The general details of Milbury Contractors Limited (MCL) arrangements for the management of health, safety and the environment are provided within this section. In addition to and supporting these arrangements, detailed health and safety procedures for specific workplaces and activities are set out in the Procedures Manual.

### **3.2 Communication and Consultation**

Consultation and Communication between workers at all levels is an essential part of effective health and safety management. All workers must be given the opportunity to have their comments or concerns channelled through their respective line foreman and passed on to either the Clients representative or the Director responsible for Safety who must take the appropriate action as deemed necessary so far as is practicable.

Feedback from employees and subcontractors is welcomed as it displays good interest and awareness of health and safety. Regular safety meetings with supervisors and administration staff will be held, during which any points raised by employees and subcontractors will be discussed. Site Supervisors will be responsible for gathering points that persons wish to make, although by arrangement, any person may attend the safety meetings in order to promote an open and healthy safety culture.

A guide of discussion will be:

- Accident records including near misses, ill health and sickness absence.
- Results of any accident investigations and subsequent action.
- Results of inspections of the workplace.
- Matters of interest raised by HS&E Advisors and Consultants.
- Risk assessments and method statements – feedback.
- Health and safety training requirements.
- Issues arising from working for different Principal Contractors.
- Any changes affecting the health, safety and welfare of employees and subcontractors.

Minutes of meetings will be produced and maintained for future reference and reviews.

All relevant safety information will be provided at all workplaces where employees are located. This will include:

- Health and Safety Policy.
- Environmental Policy
- HSE Law poster (*What You Should Know*).
- Employer's Liability Insurance Certificate.
- Fire safety instructions.
- Names of Fire Wardens and First Aiders.
- Other safety instructions relevant to that workplace.

### **Non-English-Speaking Employees**

It is the policy of the company, that Non-English speaking persons will only be employed if there is a competent interpreter capable of briefing safety and environmental related

information in their native language, and who is able to be present at all times during their work activities. When numerous Non-English-Speaking employees are to work together there shall be a ratio of no more than one competent English-speaking interpreter to five Non-English Speaking employees.

In all cases every attempt will be made to ensure essential information is passed on to Non-English-speaking workers in an easily understood form and in line with HSE's Guidelines.

When working on or in close proximity to rail contracts, no person shall be engaged unless they meet Network Rail "Requirements for establishing the ability of PTS candidates to speak English". (*Document published by Network Rail Contracts Procurement - dated 12/02/2008*).

MCL expects contractors and sub-contractors employed by the company to observe this policy.

### 3.3 Health and Safety Policy

The health and safety policy will be reviewed annually to ensure that it is effective. The policy will be amended where required and all employees informed of any amendment.

Each workplace with site staff will hold a copy of the policy. A copy of the health and safety policy will be available to all employees.

The Health and Safety and Environmental Policy Statement will be displayed on a health and safety notice board.

### 3.4 Training

Incompetent and poorly trained personnel, who undertake work activities, increase the likelihood of accidents and injury. Many accidents at work occur as a result of an individual's capability and training not meeting the requirements and skills of a specified task.

Management and supervisory staff must ensure that all employees under their control have appropriate training and experience to undertake their allocated tasks.

Where necessary, management and supervisory staff should identify and arrange training and instruction of employees.

Health, safety and environmental records of training provided will be maintained. All such training will be planned in advance (annually) and detailed on a training matrix.

### 3.5 Risk Assessment

Management and supervisory staff are required to carry out risk assessments of work activities, which pose a significant risk to health, safety and the environment, to ensure hazards are eliminated or reduced by implementing appropriate control measures and safe systems of work.

Risk assessments will identify the range of hazards associated with the work activities, together with any necessary remedial action.

The findings of risk assessments will be recorded and where necessary, will be used to develop method statements to ensure safe systems of work.

A copy of the risk assessment report will be available at the workplace, and the findings will be brought to the attention of all employees.

All risk assessments will be monitored and reviewed at regular intervals, normally annually, or when working practices or equipment change, to confirm that all risk assessments are adequately controlled and are in compliance with legislation.

### **3.6 Development of Method Statement**

In developing a method statement, a competent person should be appointed to ensure that all the relevant risk assessments, identified control measures and standards for health and safety are incorporated into the method statement.

When developed, the Principal Contractor shall review the method statement, and copies of the method statement should be given to all organisations involved and a copy filed in the site Health and Safety Plan.

All organisations involved in the work have a duty to ensure that all employees are aware of and comply with the requirements of the method statement.

The Principal Contractor will ensure that site requirements are met and that all planning procedures and control measures are implemented with particular reference to hazardous features on site.

Organisation(s) undertaking the work shall provide all necessary equipment specified in the method statement and maintain a necessary level of supervision to ensure compliance with the requirements.

### **3.7 Safe Systems of Work**

A Safe System of Work will be instigated where a risk assessment identifies a hazard that cannot, so far as is reasonably practicable, be eliminated.

Where a task(s) requires access to hazardous areas, (e.g. a confined space) a Permit to Work system will be established and implemented. Where a hazard cannot be eliminated, a hazard warning sign will be displayed.

Personal protective equipment will be issued, free of charge, to all employees, where necessary.

### **3.8 Safe Place of Work**

MCL will make adequate arrangements to ensure that all workplaces are maintained in a clean, orderly and safe condition.

A safe means of access and egress from all workplaces, where practicable, will be provided and maintained.

All workplaces must have appropriate arrangements for the storage and use of hazardous substances, without risk to health.

### **3.9 Environmental Control**

MCL is committed to effectively managing all their activities' environmental aspects through compliance with legislation and Company policy.

Appropriate arrangements to protect the environment, will be put in place at all workplaces, including:

- Approved storage and use of raw materials and substances.
- Waste minimisation (promoting reuse, recover, and recycling).
- Identified waste disposal routes under Duty of Care.
- Monitoring and review of environmental performance.

### **3.10 Site Plant, Machinery and Equipment**

The company acknowledges that work involving the use of plant and machinery can be very hazardous. It is therefore the Company's intention to reduce these risks as far as is possible. Therefore, all reasonable steps will be taken to secure the health and safety of employees who use, operate or maintain plant and machinery.

All plant and machinery provided for use in the workplace will be subject to a system of inspection, service and maintenance, as recommended by the manufacturer or competent engineer.

Records of the inspections, service and maintenance, including statutory inspections will be maintained in accordance with the [Provision and Use of Work Equipment Regulations \(PUWER\)](#) and/or the [Lifting Operations and Lifting Equipment Regulations \(LOLER\)](#).

All plant and machine operators will first be approved and authorised by the Director Responsible for Health and Safety. Only appropriately trained and competent machine/plant operators will be authorised. The minimum training standard required for all such operators will be CPCS (Construction plant Certification Scheme) or equivalent. All authorised machine operators shall hold appropriate certification for each machine type they are authorised to use.

Where the company are appointed as the Principal Contractor, carefully selected operatives may receive on-the-job training by another trained and competent machine operator. In all such cases the training operations will take place under close supervision and will take place in areas of sites that do not put others at risk. This controlled process will enable lesser experience employees to developed skills that can be further trained to CPCS standards.

All machine/plant keys will be removed from ignitions and the machine/plant will be immobilized when unattended. All machine/plant keys will be kept secure (locked in a secure key box) at the end of each working day. This process will ensure the prevention of unauthorised use.

Dumper operators will be required to dismount and stand clear of dumpers during excavator loading.

Excavator operators must refuse to load dumpers until the dumper operator is standing clear of the machine.

All machine operators are required to wear seat/lap belts at all times, when the machine/plant is in operation.

Any machine fitted with Roll Over Protection Systems (ROPS) shall only be operated with the ROPS in the correct position. The only exception will be when travelling below limited overhead clearances.

Passengers will not be permitted to ride on plant unless a secondary seat is provided.

### Site Transport

All transport on site, including dumpers, tipper lorries, tractors, tankers etc., will be provided, maintained, operated and used in accordance with The [Construction Design and Management Regulations \(CDM\)](#) Part 4 and the [PUWER](#).

**The Road Traffic Acts** and associated legislation will also apply when transport is required to be used on public roads. Reference should also be made to Health and Safety Executive (HSE) publications, which give information on the precautions and procedures required to prevent accidents.

- **HSG144** The Safe use of Vehicles on Construction Sites
- **HSG136** Workplace Transport Safety
- **INDG148L** Reversing Vehicles
- **L64** Safety Signs and Signals

Mobile work equipment is covered by the requirements of [PUWER](#) – Please refer to work equipment.

The Contracts Manager will arrange for transport to be provided, taking into account the work to be done and the above standards. He will endeavour to segregate vehicles from pedestrian traffic where possible.

Where necessary, discussions will take place with the Local Highway Authority, Police etc. on road crossing, traffic management etc. Temporary access roads, fuel storage, maintenance facilities for transport on site, will be planned.

The Site Manager will ensure that all site transport, when delivered to site, is in good order and fitted with all necessary safety devices, notices and guards. Any defect must be reported to the supplying sub-contractor or hire company, and the machine must not be used until the defect is rectified.

The Site Manager will ensure that only authorised licensed drivers are permitted to operate any site transport.

No person under 18 years old is permitted to operate any transport and there is a minimum age of 21 years for certain types of transport. Where any doubt of competency of any operator exists, the Site Manager will refer this to the Contracts Manager or sub-contractor as appropriate.

The Site Manager will ensure that any necessary preparatory work required to ensure transport is used safely on site, e.g. access roads, traffic control measures etc., is carried out as planned.

The Site Manager must ensure that any defect notified to him by drivers during operations on site is reported immediately for repair and that, where the defect could affect safety on site, the items of transport taken out of use until repairs are carried out.

Hazards associated with the use of transport on site are:

- Incorrect use
- Speeding
- Poor maintenance (i.e. lack of checking - water, oil, fuel, lights, tyres and brakes daily)
- Unsupervised reversing
- Carrying of passengers where no proper seat is provided
- Undue care when refuelling
- Overloading or insecure loads
- Incorrect or improper towing
- Transport in close proximity to pedestrian traffic

All operatives required to enter specific high-risk areas as designated by the Contracts Manager will be provided with high visibility waistcoats or belts.

### 3.11 Vibration

Health risks from Hand-Arm Vibration (HAV) and Whole-Body Vibration (WBV) can cause circulatory disorders, numbness and severe pain.

The company acknowledges and accepts their duties, as stated in the [Control of Vibration at Work Regulations \(CVAWR\)](#). It is therefore the policy of the company that all tools and equipment that may cause vibration related illness (Vibration White-Finger, Hand Arm Vibration Syndrome etc.) will be subjected to a full and thorough Vibration Risk Assessment before they are used, the results of the assessments will be recorded and available for inspection as required.

All employees that are likely to use this equipment will be informed of the results of the assessment and where necessary an action plan will be introduced by the Site Supervisor to ensure that exposure limits set out in the Regulations are not exceeded.

Where reasonably practicable, vibrating tool will be avoided or else selected on a basis whereby the tools with the lowest vibration emission will be chosen over high vibration emission tools, e.g. anti-vibration dampers and devices.

It is recognised by MCL that personal protective equipment has little or no use in preventing the risk of vibration white finger or HAV. However, gloves will be worn by operatives using vibrating tools. This may only slightly reduce the risk of exposure but will nevertheless be adopted.

Where the risks from vibration cannot be avoided, regular assessment of the exposure times and levels for those operatives regularly involved in these tasks will be made. This will involve keeping records of exposure levels and ensuring adequate numbers of operatives are trained in the use of the equipment. The register will be used to record individual employee's exposure times, and will provide details of the vibrating equipment, the magnitude of vibration and the recommended maximum exposure times.

The effects of vibration will also be managed by means of regular tool assessment to ensure tools with the lowest vibration are used and purchased. Older tools will eventually be replaced, with the worst offending tools replaced as a priority.

### 3.12 Scaffolding

All reasonable steps will be taken by MCL to provide a safe working environment for employees required to use scaffolding during their working day.

The Company will ensure the provision of the necessary preventative and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity.

Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of all equipment.

### 3.13 Ladders and Step Ladders

All reasonable actions will be taken by MCL to ensure the safety of employees who work with ladders, stepladders, trestles and stagings.

Any work activity using ladders, stepladders, and staging will be risk assessed and as a result of that assessment suitable equipment will be provided.

Control measures will be introduced to reduce the risks to a minimum.

Ensure all equipment used is clearly identified and regularly inspected and maintained.

### 3.14 Work at Height

The Company acknowledges its duty with respect to the [Work at Height \(Amendment\) Regulations \(WAHR\)](#) and aims to achieve a high standard of compliance. Where work at height is involved a risk assessment will be carried out to identify the risks involved and the processes to eliminate or control the risks.

All work at height will be carried out as planned and in accordance with the relevant standards and risk assessments.

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

The Company will also arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so.

All safety equipment, staging's, restraint equipment, harnesses, anchorages, etc. will be inspected not less frequently than weekly and any defects noted during inspections or reported by operatives shall be attended to immediately. Employees must inspect their equipment immediately prior to use and ensure that any defective equipment is exchanged or repaired before further use.

The hierarchy of control measures listed in the Working at Height Regulations are:

1. Avoid work at height
2. Prevent any person from falling
3. Use an existing place of work which complies with Schedule 1 of the Regulations
4. Use work Equipment
5. Mitigate falls by using work equipment to minimize the fall distance and the consequences of a fall
6. Where work equipment does none of the above, provide additional training and instruction or other suitable measures

The above hierarchy will be considered during the preparation of risk assessments and method statements to ensure that safe systems of work which comply with the WAHR are established and implemented. Other factors such as the location and duration of the work; the weather conditions; the task to be carried out and the experience and competence of the individual should also be taken into consideration.

This policy and its arrangements cover the use of all types of ladder, for example those used for gaining access to positions above or below ground. In this policy a ladder or stepladder should be referred to as a temporary measure which may be used as a working platform for no more than 30 minutes.

Where work at height is unavoidable, the selection of methods for controlling work at height related risks will take place in the following order, as a hierarchy of control:

1. Working platforms (scaffolding, lightweight staging or mobile towers etc) with double handrails, toe-boards and a minimum working platform no less than 600mm wide.
2. Mobile Elevated Work Platforms (cherry pickers and scissor lifts etc)
3. Work restraint or work positioning equipment (harnesses with restraint lanyards etc)
4. Fall arrest equipment (harnesses with shock absorbing lanyards)

The main rules to follow when working at height are as follows:

1. First, as a part of the planning of the work, carry out a Risk Assessment
2. Plan to do as much of the work as possible at low level.
3. Do not work at height unless it is unavoidable.
4. Provide a secure platform which will:
  - a. be securely footed on stable ground
  - b. support the weight of the personnel and equipment to be used
  - c. provide a stable access and will not overturn
  - d. be secured to an existing structure, where necessary and wherever possible
  - e. Take account of the gradient of the ground, especially where mobile platforms are used
  - f. Provide guard rails to any platform
  - g. Provide barriers on open edges, holes and openings in the platform floor, the edges of roofs and working areas

In order to help prevent falls the following must be considered:

1. Plan all instances of working at height
2. Think about where and how the work is to be done
3. Where possible use an existing structure, which will allow safe access and provide a safe working platform. Where this is not possible, a safe working platform will need to be provided.
4. Consider any lifting and handling requirements needed to carry out the work
5. Be aware and prevent possible electric shock dangers that may initiate accidents
6. Remember to allow adequate clearance when equipment is used, particularly near overhead power lines and around nearby structures when mobile equipment is used.
7. Ensure that only properly CE marked Category III approved Personal Protection Equipment is used for working at height.

### 3.15 Lifting Operations and Lifting Equipment

Carry out assessments of risks for use and maintenance of lifting equipment.

Ensure all control measures identified by risk assessment(s) are implemented to minimise risk.

Any lifting appliance and lifting gear provided or delivered for use on site has been tested, thoroughly examined and inspected in accordance with the relevant standards and that copies of certificates, register entries etc. are available on site. Obtain adequate information from the installer on the safe and proper use of the equipment.

Ensure lifting equipment is suitable for the task (including consideration of environmental conditions).

Arrange for adequate maintenance, checks, examinations and tests of lifting equipment to be carried out weekly or at regular or prescribed intervals by a competent person and ensure that records are kept.

Do not exceed the safe working load of any lifting equipment or use it in a way or for a purpose for which it is not intended.

### **3.16 Work In Confined Spaces**

A confined space is any area where access is restricted, has little or no ventilation, or it is possible that an operative will have difficulty due to a lack of oxygen, e.g. bathrooms without ventilation, storage containers, manholes and sewers etc.

Any work carried out in a confined space must not be started until a full Risk Assessment has been carried out and a Confined Space Entry Permit arrangement is in place.

It is the responsibility of the Site Manager / Supervisor to ensure that the necessary precautions are in place and that only suitably skilled/trained operative or specialist contractors are used.

The [Confined Spaces Regulations \(CSR\)](#) are applicable for entry into confined spaces. Reference should also be made to the Health and Safety Executive (HSE) publication; L101 - Safe Work in Confined Spaces, which provides information on the hazards involved, precautions and procedures required.

Information and advice on the legal requirements, recommendations of the Approved Code of Practice and any other aspect of work in confined spaces is available from the external Health and Safety Advisor / Consultant.

All work will be planned to take the above standards into account.

The main hazards associated with confined spaces are:

- Asphyxiation due to oxygen depletion
- Poisoning by toxic substance or fumes
- Explosions due to gases, fumes, dusts
- Fire due to flammable liquids, oxygen enrichment etc.
- Electrocution from unsuitable equipment
- Difficulties of rescuing injured personnel
- Drowning
- Fumes from plant or processes entering confined spaces

Before work commences, the Contracts Manager must establish if work in confined spaces is to be carried out and, if so, must arrange for any necessary equipment, working procedures, training etc. to have been provided, taking into account the hazards likely to be encountered.

All personnel required to carry out testing and monitoring of atmospheres must have been suitably trained as well as operatives required to use breathing apparatus, reviving apparatus, rescue and permit procedures etc.

Method statements must be prepared before any work in confined spaces can commence.

The Site Manager will ensure that all operatives have the necessary equipment available on site, in accordance with the planned procedures, before entering a confined space.

The Site Manager will ensure that the contractor follows the planned procedures, including any permit to work system, and that only authorised persons are permitted to enter the confined space.

Any changes in working methods or conditions, which were not included in the planning procedure, must be referred to the Contracts Manager before work recommences.

All safety equipment must be regularly checked and maintained. Any defects in equipment must be attended to immediately.

When conditions make it necessary, the external Health and Safety Advisor / Consultant. may provide safe systems of work, permit to work systems etc., as requested and provide information on ventilation equipment, breathing apparatus, rescue apparatus, ropes, harnesses, monitoring equipment etc. as requested.

The Contracts Manager will identify situations and working operations which would involve entry into a confined space. These areas will be highlighted to all site operatives via induction training and site briefing prior to work commencing.

The Contracts Manager and the site engineer will then prepare risk assessments for the activities to be carried out in confined spaces. The risk assessments will confirm all necessary control measures to be taken to ensure operative safety.

### 3.17 Safety in Excavations

All excavation work will be carried out in accordance with the [Construction \(Design and Management\) Regulations \(CDM\)](#) Part 4.

Reference should also be made to the Health and Safety Executive (HSE) publication: HSG185 (Health and Safety in Excavations; Be Safe and Shore), which provides guidance on good practice and requirements when undertaking excavation work.

All work will be planned to take the above standards into account.

The main hazards associated with excavations are:

- Collapse of the sides.
- Persons falling into excavations.
- Striking underground services (see separate section).
- Persons in excavations being struck by falling materials.
- Building of structures collapsing due to excavations flooding.
- Asphyxiation or poisoning due to ground conditions or fumes from plant.
- Plant running into excavations.

Details of the ground conditions to be encountered in excavation work or the buildings or structures affected will be obtained from the pre-construction information by the Contracts Manager to enable work to be planned safely. This information will be passed to the Site Manager before excavation commences.

Training shall be provided to Site Managers required to carry out inspections of excavations.

Operatives involved in erecting support for excavations shall also require training. Where applicable, training will also be provided in the use of monitoring equipment and rescue procedures.

Site Managers will not permit excavation work to begin on site until all plant, materials and equipment necessary to carry out the excavation work safely, is available on site.

No person is permitted to enter any unsupported excavation unless the sides are properly supported or battered back to a safe angle for the ground conditions which apply or that there is no risk to any person from a fall or dislodgement of any material.

Where possible, the excavation support should be installed from ground level, otherwise precautions must be provided for safety of operatives installing support.

A competent and authorised person shall inspect daily, before any person carries out work, all excavations required to be supported, as noted above at the commencement of each shift, after any event likely to have affected the strength and stability of any part of the excavation or after any accidental fall of rock, earth or other material. At least one inspection report must be recorded in the site Excavation Report of Inspection in any seven days.

Access and plant must be routed away from the edge of excavations. Where necessary to prevent danger to any person, suitable precautions must be taken to prevent any person, plant, equipment or material from falling into any excavation.

Ladders, securely fixed, must be provided for access into excavation.

Where necessary, excavation supports, underpinning or shoring must be designed by specialists.

All personnel required to enter excavations must wear a safety helmet.

The safety of the public, particularly children, must be considered when excavations are left open outside working hours.

Where health hazards may be encountered, e.g. land fill sites, industrial sites, sewers, methane gas, carbon dioxide from limestone etc. The external Health and Safety Consultant may be asked for advice on precautions required, air sampling, monitoring etc.

If excavation is flooded or likely to flood, care must be taken to ensure that any water pumped out is disposed of in foul drainage or via soakaway and is not allowed to pollute any watercourses.

An emergency egress plan will be developed on a site-by-site basis taking into account the equipment available in site. Full details of how an injured person is to be removed from the excavation will be included in the general method statement which shall be briefed to all operatives prior to entry into the excavation.

The method statement shall include full details of all specific equipment and accessories that are required on site. The site manager will ensure that all such equipment is clearly identified and kept on site all times whilst work in the excavation continues.

In all excavatory works, operative safety is always the highest priority. The following work practice applies to all excavations carried out by the company's employees or contractors.

- The Site Manager will examine all underground service drawings to identify the presence of buried services, tanks or vessels.
- The type and voltage of all services will be confirmed through contact with the service providers.
- The Site Manager will inspect the site to ensure all underground services have been located and clearly marked. Cable detection tools will be used to identify as far as is reasonably practicable the approximate location of the services.
- Trial holes will then be hand dug to confirm the location.
- Dependent on the required depth of excavation, the Site Manager will assess the need for excavation support and will not allow work to continue until this support is installed and has been inspected.
- Should the excavation present the risk of asphyxiation through natural gases or contamination, then a further risk assessment will be carried out to identify the requirements for reducing the risk to an acceptable level, by means of alternative work methods, mechanical ventilation or personal protective equipment and atmospheric monitoring.
- All supported excavations will be inspected by the Site Manager before each shift. In addition, inspections will be made after any event likely to have affected the strength or stability of the excavation.
- No underpinning work will be carried out unless a full structural risk assessment has been carried out and a safe system of work prepared.

### **3.18 Demolition**

Carry out and produce risk assessments and detailed written method statement of how the proposed works will be carried out in a safe manner.

The method statement should include the sequence and method of demolition or dismantling of the building or structure, details of personnel access, working platforms and machinery requirements and any pre-weakening of structures which are to be pulled down or demolished by any other means.

Before work commences, ensure that existing services into the site have been located and disconnected; the existence of any hazardous substances, e.g. asbestos, lead painted steelwork, etc., must be determined; and advice must be obtained from an appropriately qualified structural engineer if the building or structure to be demolished contains unusual or possibly hazardous design features.

Protection is to be provided to adjacent building's basement, vaults and walls, together with details of protective scaffolding and gantries.

Ensure procedures are in place for dealing with dust, vibration and noise problems that may emanate from site operations and appropriate arrangements are provided for the storage, loading and disposal of demolition material from site.

### 3.19 Underground Services

Regulation 34 of the [Construction Design and Management Regulations \(CDM\) - Part 4](#) requires precautions to be taken to prevent danger from electricity cables. Other services, if damaged by excavation work, could also be a hazard, e.g. water flooding trench, gas-causing asphyxia. Explosion risks caused by gas leaks, health risks from raw sewage and, in all cases, the costs involved in repair, must be taken into account.

Reference should also be made to Health and Safety Executive (HSE) publication:

- **HSG47** Avoiding Danger from Underground Services

All work will be planned to take the above standards into account. The Contracts Manager will obtain full details of all underground services from the service authorities, e.g.:

- Electricity Board
- Local Authority - street lighting cables
- Gas Board
- Water Authority - mains water, sewers
- British Telecom
- Television Relay Companies
- Adjacent Private Owners and any other local special circumstances

Where there are a large number of existing services, e.g. in a town centre, then a permit to work system for excavation work will be prepared.

A detailed Method Statement is to be prepared, for works near underground services, by the relevant contractor or utility company.

Before any excavation work commences, the Site Manager will ensure that all information on existing underground services has been obtained and that either all services are physically located and marked by means of location equipment and/or carefully hand dug trial holes, or that trial holes are carefully excavated along the line of the proposed trench, or area of excavation.

Full consultation must be carried out at all stages with representatives of the various service authorities, to agree precautions required.

All Site Managers, machine operators and banksmen will be instructed in the procedures to be followed. Any sub-contractors involved in excavation work will be issued with full information obtained from service authorities and will also be involved in any consultation procedures.

All persons on site will be instructed in the operation of a Permit to Work system, if applicable.

Any service installed as temporary supplies, or as part of the permanent works, will be accurately plotted on a site plan by the Engineer/Site Manager and will be physically marked along its route by means of timber stakes and notices.

No machine digging will take place within 500mm of live services. Hand digging will proceed with care in close proximity to live services. Additionally, the company will ensure that the safest methods and equipment are used, taking into consideration the latest technology and systems of work, such as the use of air picks and safety shovels and pick with solid fibreglass non-conductive handles to help reduce damage to utilities and the associated risks of coming into contact with live services.

The sub-contractors involved must provide service location equipment, for use on site, in

accordance with the above standards, training must be provided, to supervisory and key operatives, in the use of the equipment.

Only trained operatives will physically locate and mark all services by means of locating equipment and hand dug trial holes.

Operatives should not assume that the plans are accurate or to scale, but use them as an indicator for position, layout and numbers of services. In addition, reliance is not placed upon the locating equipment alone, i.e., physical indicators such as previous excavations, junction boxes, manholes etc. will also be used.

### **HV & LV Cables**

Before commencing any work involving the cutting into any electric cable, the cable must be positively identified either by an authorised competent person. This is to be carried out in the presence of the Competent Person who is to undertake the work.

The cable is to be identified at the point of work, either by visually tracing it along its length to a point of secure isolation, where it is earthed by a Circuit Main Earth (in the case of a HV cable) or to the end connected to electrical equipment. A rope loop may be used for those parts of the route that are not visible. Alternative means of identification may be adopted, but only with the agreement of a designated Authorising Engineer.

All High Voltage (HV) cables that cannot be readily identified must be spiked by a specialist external contractor. In the case of Low Voltage (LV) cables where it is impractical due to its size or construction to spike the cable, it must either be remotely cut or cut using approved insulated tools, under a safe system of work.

Special care must be taken when spiking LV cables to ensure that all conductors and earth have been effectively spiked. The spiking gun must be an approved type and must only be used by a Competent Person.

All other cables in the vicinity of the point of work must be assumed to be live and marked with danger signs.

## **3.20 Asbestos**

Asbestos is a generic term for a number of silicates of iron, magnesium, calcium, sodium and aluminium that appear naturally in fibrous form. In the 2006 Regulations, asbestos is defined as any of the following minerals, "Crocidolite, Amosite, Chrysotile, Anthophyllite, Actinolite, Tremolite or any mixture containing any of the said materials".

General obligations are covered by [The Health and Safety at Work etc. Act 1974](#). Specific legislation regarding asbestos is defined in the [Control of Asbestos Regulations \(CAR\) SI 2739](#)

Reference should also be made to the following HSE publications:

- **L127** The Management of Asbestos in Non-domestic Premises
- **L143** Work with Materials Containing Asbestos
- **HSG189/2** Working with Asbestos Cement
- **HSG210** Asbestos Essentials Task Manual
- **HSG213** Introduction to Asbestos Essentials
- **HSG 227** Managing Asbestos in Premises
- **INDG223** Managing Asbestos in Workplace Buildings

- **INDG188** Asbestos Alert for Building Maintenance, Repair and Refurbishment Workers
- **INDG255** Asbestos Dust Kills – Keep Your Mask On
- **INDG289** Working with Asbestos in Buildings

Duty holders have an explicit duty to assess and manage the risks from asbestos in premises in compliance with Regulation 4 of [CAR](#). Each premises assessment will be used to produce a Management Plan which details and records the actions to be undertaken to manage and reduce the risks from asbestos and have a requirement to pass on information about the location and condition of asbestos Containing Materials in non-domestic premises, to anyone likely to disturb them.

All work will be planned to take the above standards into account.

Under [CAR](#), duty holders have to undertake an assessment of their premises to establish the likely presence of Asbestos. Reference should be made to asbestos registers when planning work on existing premises.

The Contracts Manager will seek confirmation of the existence or otherwise of asbestos on site. Should asbestos be known to exist, the Contracts Manager will consult with and where appropriate employ, specialised asbestos contractors to arrange its safe removal. Qualitative tests will be carried out to determine the type of asbestos and to set the 'control limits' (equivalent to maximum exposure limits under COSHH).

A method statement and risk assessment must be prepared before removal starts.

The enforcing authority must be notified of any work involving asbestos at least 14 days prior to the commencement of work, (a lesser time may be agreed by mutual consent).

All operatives will be informed that asbestos exists on site and will be given specific instructions by the Site Manager as to how it affects them in their working practices. Recognised control procedures will be employed, and operatives will report defects or non-compliance in the procedures to the Site Manager immediately.

The Contracts Manager will instigate a monitoring programme throughout the removal process, closely liaising with the specialist sub-contractor.

All operatives will be given training, advice and guidance on the likely form that asbestos containing materials may take on the project, and how to recognise suspect material.

The employed specialist contractor will strictly carry out the supervision of the removal of asbestos only.

The contractor will keep the Site Manager informed at all times about the work and how it is progressing.

The Site Manager will supervise all other operatives as a consequence of the actions and advice of the specialist contractor.

Where operatives are likely to be exposed to asbestos at or above the control limits, and exposures cannot reliably be estimated, the company is obliged to keep monitoring records for a period of at least five years, and for at least 40 years if the Action Level is also likely to be exceeded.

Operatives exposed to asbestos at or above the Action Level must undergo medical surveillance.

No operative will be allowed to work in areas identified by the specialist contractors as being affected by asbestos. The Site Manager will designate "No Go Areas". Only employees of the specialist contractor, or persons authorised by that contractor will be allowed access to the designated areas.

If the presence of asbestos is unexpectedly "discovered" during normal working activity, the Site Manager must be informed immediately, and the procedures outlined in 'Planning' above will be put into effect. The Site Manager will stop work in all areas he feels may be affected until specialist help arrives. The Contracts Manager will also be immediately informed.

The spread of asbestos from one place to another must be prevented or reduced to the lowest levels possible.

Suitable and adequate washing and changing facilities will be provided on site for all persons exposed to asbestos. These facilities will include somewhere to store protective clothing and equipment. Disposal of contaminated clothing and equipment that cannot be decontaminated must also be arranged.

All plant, machinery and protective equipment exposed to asbestos dust will be taken out of service (if not removed as asbestos waste) until it has been thoroughly cleaned before it will be used again.

Raw asbestos and asbestos waste must always be stored and transported in sealed properly labelled containers.

No employee/contractor will resume work in the contaminated area until a clean air certificate / certificate of reoccupation has to be issued by the specialist licensed removal company.

### **Allowed activities**

Almost all work with asbestos containing materials will require work to be done by licensed contractors / specialists; there are some circumstances where this does not apply, this includes:

- Work where exposure is sporadic and of low intensity
- The risk assessment shows that the exposure of any employee to asbestos will not exceed the control limit (0.6 f/ml [10 mins] or 0.1 f/ml [4 hrs])
- The work involves:
  - Short, non-continuous maintenance activities
  - Removal of materials where the fibres are firmly held in a matrix
  - Encapsulation or sealing of asbestos-containing materials which are in good condition
  - Air monitoring and control, and collection and analysis of samples to ascertain whether a specific material contains asbestos.

A safe system of work must be planned and clearly explained to the employees involved.

Employees will be trained to such a level as to understand the typical locations in which asbestos materials are likely to be found and the detrimental health effects associated with inhalation of airborne fibre.

They will be made aware of the visual characteristics of asbestos containing materials and the actions to be taken in the event of suspect materials being discovered.

Should suspected asbestos containing materials be discovered during works then all works will be stopped and resumed following return of a negative result or on issue of a suitable hand-over certificate following specialist removal.

### 3.21 Noise

The Company acknowledges its duty to fully comply with the [Control of Noise at Work Regulations \(NAWR\)](#). However, detailed guidance on implementation will be used to supplement this arrangement. This has been obtained from the following Health and Safety Executive guidance notes;

Controlling Noise at Work: Guidance on [NAWR](#) - L108.

The Section of [NAWR](#) for which this document provides summary guidance includes:

- Assessment of Exposure.
- Assessment records.
- Reduction of risk of hearing damage.
- Reduction of noise exposure.
- Hearing protection.
- Hearing protection zones.
- Maintenance and use of equipment.
- Provision of information to employees.
- Health Surveillance

The NAWR 05 include the assessment of noise at work and protection from damage to hearing. However, there are other requirements laid down in the [Management of Health and Safety at Work \(Amendment\) Regulations \(MHSWR\)](#) concerning the exposure of Young Persons (<18years) to noise.

The Company acknowledges this and will therefore include noise within any risk assessments produced specifically for young persons.

Action Required:

- Identify those activities and areas where noise levels are significant e.g. difficulties with normal conversation.
- Identify those persons or groups who may be exposed to this noise.
- Where noise exposure varies markedly from day to day then weekly exposure figures will be used in place of daily exposures
- Arrange for a competent noise assessor to carry out, an assessment of the activity/area.
- Provide assessor with such information as he requires to carry out assessment.
- Arrange review of assessments in the event of any significant changes in the work to which the assessment relates.
- Arrange for health surveillance (audiometry testing) through Occupational Health, for those staff members at risk of hearing damage.

Records of all noise assessments and subsequent reviews shall be made by a competent person and stored in a retrievable format. Any such record will be kept, until a subsequent assessment has been undertaken, and archived in a retrievable format.

The risk of damage to the hearing of employees from noise exposure will be kept as low as is reasonably practicable. Employees will be advised when a hearing protection zone is in operation.

Where practicable, noise levels will be maintained below the first action level of 80dB(a) (decibels). At this noise level, all persons likely to be affected will be provided with suitable hearing protection and advised to wear it. When noise levels reach or exceed 85dB(a), all

reasonably practicable means of reducing the noise will be employed. Until the noise levels become acceptable (i.e. 80dB(a) or below), a Noise Protection Zone will be identified, and suitable signage will be displayed (e.g. a blue mandatory sign stating: Warning – Ear Protection Required). All persons working in this zone, who are likely to be affected by the excessive noise, will be provided with suitable hearing protection and requested to wear it. Additionally, compliance with this requirement will be monitored. Any non-compliance may result in disciplinary action.

All employees, contractors and visitors will obey any instructions and warning notices with regard to wearing of hearing protection in designated areas.

The company will carefully select all required plant and equipment and ensure that is appropriately maintained so as to minimise noise levels as much as is reasonably practicable.

The company will also ensure that suitable ear protection is supplied for the conditions of exposure. And ensure adequate means of communication in noisy environments, especially if relevant alarm sounds may need to be heard.

All PPE provided by the Company for the benefit of employees in compliance with the regulations shall be fully and properly used.

Workplace management and supervisors will also ensure compliance with any noise levels and periods of permitted noise activities laid down by local authorities, in order to prevent noise pollution.

### **3.22 Hazardous Substances and COSHH**

Whilst a substantial portion of materials used in construction work are not classed as being hazardous to health, many products that contain acids, alkaline, solvents or toxic ingredients, do represent a health hazard.

Therefore, in order to identify substances that are subject to these regulations, the criteria adopted will be two-fold, firstly, if a material is required to carry the statutory hazardous substances packaging label. And secondly, if a health hazard is created during a work operation such as dust from machinery hardwoods, or cutting stone, brick and concrete etc. or vapours produced by mixing different products, then the COSHH assessment procedures will apply.

Regulations that cover the control and the safe use of all materials, chemicals and substances, are covered by the [Control of Substances Hazardous to Health \(Amendment\) Regulations \(COSHH\)](#). It is the policy of the Company to fully comply with the Law as set out in these Regulations.

General guidelines to be applied are covered in the Health and Safety Executive (HSE) Guidance Notes of which there are a great variety published. Those more specific to the construction industry, include:

- **L5** Control of [COSHH](#): ACOP & Guidance
- **EH44** Dust: general principles of protection
- **EH54** Assessment of exposure to fumes from welding and allied processes
- **L101** Safe work in confined spaces
- **GS46** In-situ timber treatment using timber preservatives
- **IND(G) 297** Safety in gas welding cutting and similar processes
- **IND(G) 233** Preventing Dermatitis at Work: advice for Employers and Employees

No assessment should be carried out without reference to:

- **EH40** Occupational Exposure Limits

Additional information is contained in Construction Summary/Information Sheets produced and issued by the Health and Safety Executive (HSE).

All work will be planned to take the above regulations and standards into account.

Managing hazardous substances, and complying with COSHH, requires the Company to take the following steps to comply with the regulations:

- Identify the problem.
- Assess it, measure it, get some idea of the scale.
- Consider:
  - The hazardous properties of the substance
  - Health affects as identified by the supplier
  - The level, type and duration of the exposure
  - The circumstances of the work and amount of substance involved
  - Limits on exposure from statutory guidance
- Decide on the method of solving the problem, preferably by minimising exposure but considering:
  - The effect of preventative and control measures
  - The results of any health surveillance
  - The results of monitoring the exposure
  - Any other information relevant
- Implement the chosen method of solving the problem
- Check that the method is being implemented properly and monitor the outcome
- If necessary, develop procedures, provide information and establish warning systems to deal with emergencies involving hazardous substances

Products and substances that fall under the jurisdiction of COSHH will NOT be used unless:

1. An assessment of the substances had been made, after taking into account the locations and purpose for which it is to be used;
2. The relevant material safety data sheet (MSDS) has been obtained from the product or substance manufacturers or supplier;
3. The safety precautions necessary have been determined.
4. Any protective equipment required has been obtained;
5. The operatives have been informed of the potential hazards, precautions needed, and the safe system of work to be adopted;
6. Training has been given. This is over and above that which is required for normal trade skills, and is that which may be necessary, enable the operatives to use the substance without risk to the health of either themselves or others;

All workers who will be exposed to hazardous substances will receive comprehensive and adequate training and information on the health and safety issues relating to that type of work.

Where protective clothing or equipment is needed for the safe use of a particular material, it must be ensured that it is suited for both the risk and task to be carried out. A record will be kept of the use, inspections or checks, and any maintenance that is carried out on that equipment (as required by the regulations).

Before work starts, the Contracts Manager will ensure that any special protective clothing, or equipment, required is available for use on site.

The Site Manager will ensure that, before operatives are set to work, they are instructed in the safe use of any product they are using in accordance with the written assessment. He will take into account the circumstances and conditions in which the substance is being used when instructing the workforce. He will ensure that any necessary protective clothing or equipment is provided and used.

### **COSHH Assessment**

The Company will provide written assessments for all those products that have been assessed as hazardous to health. Where necessary the Company will request the external Health and Safety Advisor / Consultant to assist them in making the necessary assessments.

Assessments will be conducted of all work involving exposure to hazardous products and/or substances. The assessments will be based on the relevant manufacturers' and suppliers' Material Safety Data Sheets (MSDS), as well as health and safety guidance and our own knowledge of the work process.

The Company will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases. Where an assessment highlights a reasonably practicable less hazardous substitute substance, these must be used.

Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

### **Marking of Containers**

In addition, any containers or pipes for substances hazardous to health used at work should be clearly marked with the nature of the contents and any associated hazards.

Staff will be made aware of the hazards associated with any materials they will be asked to use. Hazard data sheets will be issued for each product and control methods will be devised.

### **Keeping of Records**

The Company will keep records of all assessments, data sheets and medical surveillance as required in the Regulations. These assessments will be reviewed at regular intervals to ensure that they are up to date and still relevant.

The Company will review the situation at regular intervals to ensure that the systems are working and that they are adequate.

## **3.23 Electricity**

All electrical equipment should be inspected, tested and maintained as required by the [Electricity at Work Regulations \(EAWR\)](#). The company will also ensure that all electrical installations and equipment are installed in accordance with the Institution of Engineering and Technology (IET) Wiring Regulations, as amended (BS 7671: incorporating Amendment 2) and are safe for use and free from defect.

Only 110V equipment (or less) will be used on site.

Maintain all electrical fixed installations in a safe condition by carrying out routine safety testing.

Inspect and test portable and transportable equipment as frequently as required (the frequency will depend on the environment in which the equipment is used and the conditions of usage, i.e., how carefully it is handled).

When 240V must be used a suitable risk assessment must be prepared in order to assess and minimise any associated risks of using the 240V supply.

### 3.24 Fire Prevention and Evacuation Procedures

This Fire Safety Arrangement has been produced in accordance with article 11(1) of the [Regulatory Reform \(Fire Safety\) Order \(RRFSO\)](#), and [Fire Precautions \(Workplace\) Regulations \(FPWR\)](#).

Fire risk assessments will be undertaken at the company's own work premises, as required. All such assessments will be reviewed regularly (at least once a year) and their findings will be brought to the attention of all employees of the company.

A Fire Action Notice will be clearly displayed for all to see at each place of work. It will outline the basic fire action and evacuation procedures necessary. The following is a sample of what it may say:

#### **FIRE ACTION NOTICE**

Any person discovering a fire:

1. Sound the alarm (a description and location of the alarm will be noted).
2. Call 999 to call the fire brigade (or other number if displayed)
3. Attack the fire if possible using the appropriate appliance/extinguisher provided

On hearing the alarm:

1. Leave the building immediately by the nearest safe exit
2. Close all doors behind you
3. Report to the assembly point

**DO NOT** take unnecessary risks

**DO NOT** return to the building for any reason until authorised to do so.

**DO NOT** use the elevator (if applicable)

All employees must bring to the attention of their Line Manager, the Health and Safety Advisor or Fire Officer any potential fire risks that they may become aware of.

The Company will ensure suitable and sufficient Fire and Emergency procedures are prepared on each site. Procedures including the Project Fire Safety Plan, which every worker should be made fully aware of by the site management team, will be made available in the site office.

Adequate fire-fighting equipment and alarm-call points shall be provided by the Company for each workplace, if not already provided by the client or principal contractor.

A fire/emergency evacuation procedure may be in force in the premises you are working at. It is the duty of ALL personnel to familiarise themselves with the procedure.

At no time should a fire be tackled unless you have received training in extinguishing a fire and it is only to be done when there is no risk to that particular operative.

If an employee's work creates an increased risk of fire, they are required to have a portable fire-fighting appliance appropriate to the potential type of fire in the close vicinity of their work.

Hot Works Permits must be issued and approved by the site management team before any hot works are permitted on any site or workplace under the management of Neulive Limited.

ALL fires, no matter how small, MUST be reported to your Line manager at the earliest opportunity.

### **Fire & Emergency Evacuation**

Fire and Emergency Evacuation drills will be carried out at least twice every year at the company's main work premises. All personnel within these premises will be required to cooperate with the drill and follow the direction of the Fire Marshal or Fire Warden as necessary.

On hearing the alarm each individual should immediately make their way to the fire assembly point using the nearest safe exit. Do not take any personal items, such as coats and bags, with you. Leave them where they are and do not attempt to return to them until authorised to do so by the Fire marshal.

The fire alarms will be tested weekly to ensure that they function properly and are clearly audible in all places of work within the company's premises. Please notify the Fire Marshal/Warden if the alarm sounder in your area of work is faulty or not loud enough to be heard.

A Fire Log will be maintained to record all findings/results from the drills and fire alarm tests.

### **Fire Fighting Equipment**

Appropriate fire-fighting equipment will be located throughout the company's premises and maintained as appropriate. All fire extinguishers will be tested at least once a year by an authorised competent person (an external company/contractor).

Ensure that you are familiar with each appliance and what it is suitable for. E.g. Water Filled  
– Combustible materials such as wood and paper, etc.

### **Reducing Fire Risks**

Prevention is better than cure when it comes to fire safety and one of the most important areas of fire prevention is to minimise and/or isolate combustible materials as follows:

- Highly inflammable liquids, such as oils, fuels and paints or other inflammable material, must be removed from the business premises if not normally required for business operations. If flammable liquids/materials are used for business operations such liquids/materials must be kept to a minimum and securely stored in appropriate closed, locked metal containers within a properly designed storage facility well away from sources of ignition.
- Gas leaks are another possible source of fire or explosion and the detection of such a gas leak must be reported to the Manager immediately. All equipment with gas taps including gas bottles not in use should be constantly checked to ascertain that the gas taps are turned off and not leaking.
- Any waste such as paper waste and other waste such as oily rags must not be allowed to accumulate and must be disposed of in appropriate containers.

- Smoking is not permitted on the company's premises. Smokers must only smoke in designated areas and discarded cigarette ends must be properly extinguished in ashtrays. Smokers must not extinguish or throw cigarette ends into wastepaper bins.
- Faulty electrical equipment is a common source of a fire, therefore, electrical equipment not in use must be switched off and any observable defect of electrical equipment must be reported to the Health and Safety Officer or Fire Safety Officer.

Attention to 'good housekeeping' practices can reduce the likelihood of fire. Some of the particular practices that must be observed are:

- Avoidance of the use of highly flammable materials and liquids wherever practicable;
- Orderly methods of stacking in stores where linen, paper or plastic packaging are used, to reduce the risk of fire spread, and to assist fire-fighting;
- Storage of equipment and packages in designated areas only - not in plant rooms, service voids and shafts, corridors or lobbies;
- Regular checks to ensure that storage is never permitted in an escape route, near a fire exit or fire-fighting equipment;
- Positively discouraging the drying of items over heaters having radiant heat sources which can lead to dangerously high temperatures and possible ignition;
- Regular checks for the accumulation of rubbish in 'out-of-sight' spaces such as basements, behind radiators, dead-end corridors etc. Waste and unauthorized storage must be dealt with promptly;
- Regular cleaning of workplaces, machinery and equipment spaces, and checks for the accumulation of fluff and grease deposits in laundries. Correct storage of cleaning rags and materials in non-combustible containers after use;
- When leaving places of work, checking for possible causes of fire, for example electrical equipment left on or plugged in (over 20% of fires start in electrical equipment), and gas appliances and other heating sources left on. Vulnerable doors and windows should be secured against intruders;
- When television viewing or radio listening is concluded for the day, checking by staff that all TV or radio equipment is switched off at the socket outlets;
- Remove all non-fused multiple point adapters found in socket outlets.
- Prohibition of unauthorized adjustment or repair to electrical equipment, and no use of official, unofficial, or private electrical equipment until it has been checked and approved by the appropriate technical staff. If in doubt contact the Administration Manager; and
- Regular checking of electrical cables and cords for signs of wear, and the immediate withdrawal from service of any suspect electrical equipment, which must be reported to the Administration Manager.

### General Fire Procedures

All personnel associated with the Company must familiarise themselves with this fire and emergency arrangement.

If there is any doubt that a fire cannot be extinguished immediately without risk of injury to individuals, all employees must immediately report any fire to the local fire service (dial 999).

Employees must conduct their operations in such a way as to minimise the risk of fire, and in particular, employees must not smoke near combustible materials and only smoke in areas (if any) designated by the Company as smoking areas. All combustible materials must be separated from sources of ignition.

### Discovery of Explosives, Bombs, Suspicious Packets

- DO NOT touch anything suspicious
- Warn the manager of the company immediately.

- Before leaving, take all necessary measures so that nobody, even mistakenly, comes into contact with dangerous object before the arrival of the police.
- Follow the same emergency evacuation procedure as that for fires.

### 3.25 Emergency Procedures

Written emergency procedures for reasonably foreseeable incidents will be assessed at all workplaces.

All employees will be informed, instructed and where necessary, trained in the emergency procedures. These procedures will be practised regularly, and records will be maintained.

Appointed persons will be identified to take control in the event of an emergency incident.

### 3.26 First Aid and Accident Reporting

Most safe practices are simply common sense. This, together with proper training, should avoid the majority of workplace accidents and injuries. It is your duty as a member of staff to act responsibly and to think of the consequences of your actions. If you are unsure of something, ask. If you see a potential hazard, report it.

It is the policy of the company to fully comply with the [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations \(RIDDOR\)](#). These regulations require employers to investigate and report all:

- Work-related deaths;
- Certain specified Injuries (serious injuries as specified within the regulations);
- Cases of diagnosed industrial illness/disease;
- Injuries that result in over seven consecutive days incapacitation (not counting the day of the accident but including weekends and rest days).
  - Incapacitation means that the employee is absent or is unable to do work that they would reasonably be expected to do as part of their normal work.
  - All injuries causing over-seven-day incapacitation must be reported to the HSE within fifteen days from the day of the accident.
- Specified 'Dangerous Occurrences' (serious near-miss incidents specified within the regulations).

All the above must be reported to the Site Manager and to the respective principal contractor, where applicable, and an entry made in the accident book (bi510). The Director Responsible for Safety and the Health and Safety Advisor will determine whether any further action is necessary.

See the Accident Reporting Flow-Chart (*Appendix A*) for further information and guidance.

Records of all incidents will be kept by the company for three years. Additional records will be made in the case of injuries causing over-three-day incapacitation. The company will maintain all such records within an accident book (bi510), as required under [The Social Security \(Claims and Payments\) Amendment Regulations \(SSCPR\)](#). This record can also be treated as a record for the purposes of [RIDDOR](#).

In order to comply with the [Data Protection Act \(DPA\)](#), personal details entered in the accident book will be kept confidential.

The Director Responsible for Health and Safety will be responsible for making such reports to the HSE. Where necessary, the companies Health and Safety Advisor/Consultant will assist in this process.

To report an accident, incident, disease or dangerous occurrence to the HSE contact:

Incident Contact Centre  
Caerphilly Business Park  
Caerphilly, CF83 3GG

By Telephone: 0845 300 9923 (8.30 am – 5.00 pm)  
By Fax: 0845 300 9924  
By internet: [riddor@natbrit.com](mailto:riddor@natbrit.com)

The company will use Accident and Incident Investigation as a valuable tool in the prevention of future accidents/incidents. This is an essential part of health and safety practice to ensure the organisation complies with legislation and learns and improves from any lapses in good practice.

All accidents or dangerous occurrences classed as reportable under [RIDDOR](#) will be investigated by the Director Responsible for Safety, the respective Site Manager / Foreman presiding at the site or place of work where the incident occurred, with the assistance of the appointed Health and Safety Advisor, where necessary. A report will be produced, based on the findings of the incident investigation and the recommendations therein will be adopted. Every employee will be expected to fully cooperate with any such investigation.

Where accidents and incidents are of a serious nature, or where there are legal implications and/or a possibility of civil claims against the company, the Health and Safety Advisor/Consultant will carry out a full and thorough investigation. Every employee will be expected to fully cooperate with any such investigation.

- See the Accident Reporting Flow-Chart (*Appendix A*) for further information.

### First Aid

The Company has a policy of at least one first aider on site where practicable who is suitably trained and holds a current First Aid at work certificate issued by an organisation whose training and qualifications are approved by the Health and Safety Executive, i.e. St. Johns, British Red Cross etc.

If the Company has no trained first aider on site, where a Principal Contractor is responsible for Health and Safety, then the Principal Contractor is to ensure that the appropriate trained personnel is on the development.

The Company will continue to provide the appropriate training as and when necessary.

Adequate First Aid equipment is normally located in the site office on each site/project, as well as at the company's head office. Principle Contractors should give all of their appointed first aider's access to a suitably stocked first aid box/kit. The box should be clearly marked with a white cross on a green background and be stored in a readily accessible location. A sign will normally indicate where First Aid is located and who the appointed first aiders are at that particular place of work.

When working on small projects, such as domestic premises, First Aid equipment will be provided to the appointed trained First Aider.

All first aid type injuries should be recorded in the Accident Book (bi510) that is located in the Accounts Manager's office. See the Accident Reporting Flow-Chart (*Appendix A*).

### **3.27 Welfare Facilities**

Suitable and sufficient welfare facilities will be available at all workplaces to all employees, contractors and visitors, including:

- Toilet facilities, including special facilities for the disabled.
- Washing facilities.
- Accommodation for clothing.
- Facilities for rest and to eat meals.
- Drinking water.

All facilities will be maintained to a satisfactory standard, with regard to:

- Accessibility.
- Ventilation.
- Lighting.
- Cleanliness/hygiene.

The Welfare Facilities for a site will be detailed in the Health and Safety Plan.

Before work commences on site, arrangements must be made for the use by operatives of convenient sanitary facilities throughout the duration of the works.

Where welfare facilities are to be shared on site between different contractors, arrangements and procedures for the proper use and maintenance of those facilities must be developed and communicated to all parties and recorded in the site Health and Safety Plan.

### **3.28 Manual Handling**

It is the policy of the Company to comply with the [Manual Handling Operations Regulations \(MHOR\)](#). As such, manual handling shall be avoided or mechanized as far as reasonably practicable where there is risk of injury.

The company will, so far as reasonably practicable, ensure arrangements are made to reduce the risk to employees' health. Where it is not possible to avoid manual handling a Risk Assessment of the operation will be made, taking into account the task, the load, the working environment and capability of the personnel concerned. Such assessments will be reviewed regularly.

All possible steps will be taken to reduce the risk of injury to the lowest level possible. However, where regular manual handling is unavoidable adequate training will be provided and operatives who have received such training will be selected to carry out these operations.

Mechanical means will be used so far as is reasonably practicable. These may include:

- Provision of mechanical aids, (trolleys, etc.).
- Provision of sufficient persons to undertake lift.
- Provision of proper handles, handholds.
- Provision of a carrying device.
- Secure items, to prevent load shifting.
- Reduce the size of load to be lifted.
- Provision of PPE.
- Provision of manual handling training.
- Provision of manual handling information. (Posters, etc.)

Site Managers will ensure that materials are handled by machine as far as possible. When the use of a machine is available to handle heavy or awkward loads, instructions must be issued to site on the handling of such.

Posters giving guidance in lifting technique should be displayed in the workplace where such work is required.

### 3.29 Personal Protective Equipment

It is the policy of the Company to comply with the Law as set out in the [Personal Protective Equipment at Work Regulations \(PPEW\)](#). Therefore, all workers who may be exposed to a risk to their health and safety while at work will, where necessary be provided with suitable, properly fitting and effective PPE.

Personal Protective Equipment should be regarded as the last resort to protect against risks to health and safety. Wherever possible, safe systems of work and engineering controls should be used to control risks first. Where required, all employees will wear Personal Protective Equipment, while they are undertaking their assigned tasks.

All Personal Protective Equipment provided by the Company will be properly assessed prior to its provision and shall be maintained in good working order. The Company will endeavour to ensure that all personal protective equipment provided is stored correctly and used properly by its workers.

All workers provided with personal protective equipment by the Company will receive training and information on the use, maintenance and purpose of the equipment.

Where required, all employees will wear hard hats, Hi-Visibility vest/clothing and suitable safety footwear (e.g. steel toe-capped), and suitable hand protection (gloves) while they are undertaking their assigned tasks.

### Fall Protection Equipment

The Company recognises that work at height presents a serious risk of falls and that such work must be carefully managed and controlled. When work is carried out at height it will occasionally necessitate the use of individual fall protection equipment (harnesses and lanyards), the Company will ensure that appropriate measures are in place for the issue and control of FPE with regard to their issue, use, inspection and maintenance. This is so that all employees are provided with a means of fall protection that is safe and remains fit for its intended purpose. The Company will ensure that it meets all of the requirements of [PPEAWR](#) in fulfilling the requirements of this policy.

Site Managers and Forman are responsible for the implementation of the company's health and safety policies and management at site level. They are to ensure the issue of safety harnesses to individuals is documented in the PPE Register, including the unique manufacturers' serial / ID number for the harness / lanyard or plant number as appropriate.

Only those who have been appropriately trained in the correct use, inspection requirements and rescue procedures to be used in the event of a fall, will be allowed to use harnesses and lanyards.

Only the lanyards identified in the Method Statement may be used with safety harnesses, this may relate to the length or the incorporation of the appropriate energy absorbing facility.

Lanyards are to be anchored to sound effective and appropriate anchorages using any additional equipment necessary to operate effectively.

Advice is to be obtained in the event of any missing equipment before any work commences.

Site Managers and Forman are to ensure that any maintenance requirements specified in the manufacturer's instructions are included within the inspection report.

There are three types of inspection to be used, these are: -

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

The Site Manager / Supervisor will emphasise the need for the daily Pre-Use Inspection at the point of issue to the user and re-affirm the need for daily inspections via a Toolbox Talk on the Use of Harnesses and Lanyards.

- **Interim Inspections** – A more formal inspection carried out and recorded by Managers and Supervisors at the time of issue to site individuals and at monthly intervals after that. The function of the Interim Inspection is to enable the Company to demonstrate that Managers regularly check on the condition of the harnesses and lanyards on the site that they manage.

Interim inspections are to be completed monthly; Supervisors will record the results of the inspections in the Safety Harness Inspection Register.

- **Detailed Inspection** – This is a formal process carried out by a member of staff who is competent to do so, this may also be carried out by a competent person who is appointed by the insurance company.

These are more in-depth inspections; the inspection regime should be drawn up by a competent person. Detailed inspections should be carried out at least every six months and a record kept of the inspection. For frequently used equipment or equipment used in arduous conditions this may be increased to every three months, examples of arduous conditions include:

- Demolition
- steel erection
- scaffolding
- steel skeletal masts
- work with any materials with sharp edges.

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

- A knot in the lanyard, other than those intended by the manufacturer.
- Surface abrasion across the face of webbing and webbing loops, particularly if localised.
- Abrasion at the edges, particularly if localised.
- Cuts to the webbing, rope or stitching, particularly at the edges (e.g. where the lanyard may have been choke-hitched around steel work).

- Chemical attack, which can result in local weakening and softening – often indicated by flaking of the surface. There may also be a change to the colour of the fibres.
- Heat or friction damage indicated by fibres with a glazed appearance which may feel harder than surrounding fibres.
- Damaged or deformed fittings (e.g. karabiners, screw-link connectors, scaffold hooks).
- UV degradation, which is difficult to identify, particularly visually, but there may be some loss of colour (if the webbing is dyed) and a powdery surface.
- Partially deployed energy absorber (e.g. short pull-out of tear webbing).
- Contamination (e.g. with dirt, grit, sand etc) resulting in internal or external abrasion.

Any lanyard that has been used to arrest a fall should never be reused; it should be withdrawn from service immediately and returned to the office.

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

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

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

Managers are to ensure that those who carry out the detailed inspection of harnesses as the designated competent people are to receive formal training.

In appointing the competent person Managers must ensure the person carrying out the function is given the necessary authority in order to carry out the function effectively, e.g. whereby, when items are removed on the grounds of safety, there should be no pressure on the competent person with regard to that decision. In deciding competence, training previously mentioned must be considered, as must experience and knowledge of safety harnesses and lanyards.

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

Where an employee raises a matter related to health and safety concerning the safe use of harnesses and lanyards, he or she should inform a responsible person immediately, the

Company will take all necessary steps to investigate the circumstances, take corrective measures where appropriate, and advise employees of actions taken or to be taken.

### **Respiratory Protective Equipment (RPE)**

Where RPE is used as a control measure, it is vital that the selected RPE is adequate and suitable. It must be able to provide adequate protection for individual wearers. It cannot protect the wearer if it leaks. A major cause of inward leaking is poor fitting. Tight-fitting face-pieces need to fit the wearer's face to be effective.

To ensure that the selected RPE has the potential to provide adequate protection for individual wearers, the

Approved Code of Practice supporting the [Control of Substances Hazardous to Health Regulations \(COSHH\)](#), the [Control of Lead at Work Regulations \(CLAWR\)](#) and the [Control of Asbestos Regulations \(CAR\)](#) stipulate that tight-fitting RPE must be Fit Tested as part of the selection process. This will help to ensure that inadequately fitting face-pieces are not selected for use.

Note: A tight-fitting face-piece is a full-face mask, a half-mask, or a filtering face-piece (commonly referred to as a disposable mask or dust mask). The performance of these types of face-pieces, irrespective of whether they are used in negative pressure respirators, power assisted respirators or compressed air supplied breathing apparatus, relies heavily on the quality of fit of the face-piece to the wearer's face. An inadequate fit will significantly reduce the protection provided to the wearer. The presence of facial hair in the region of the face-seal will significantly reduce the protection provided. Therefore, beards are prohibited for RPE users.

General advice on the selection of RPE is covered in the [HSE guidance document HSG53](#). Additionally, the [HSE Operational Circular OC 282/28](#) provides supplementary information.

For RPE to be suitable it must be matched to the job, the environment, the anticipated airborne contaminant exposure level, and the wearer. As people come in all sorts of shapes and sizes it is unlikely that one particular type or size of RPE will fit everyone. Fit Testing will therefore help to ensure that the equipment selected is suitable for the wearer as well as the job.

RPE Fit Testing should be conducted by a competent person. Therefore, the company's external HS&E Advisors will ensure that this is carried out in compliance with the regulations.

Operatives will be trained in compliance with regulations and trained to use the required Face Fit RPE. This will be accomplished through in-house training and toolbox talks and will be maintained by observation and comment through our health and safety advisors.

Fit Test reports should be available for employees who wear RPE incorporating tight-fitting face-pieces. Therefore, Fit Test records will be made and retained by the Company. These records will be kept available for inspection on request.

### **3.30 Lone Working**

There is no general prohibition on a person working alone, although there are specific instances where legislation requires more than one person to be involved in the operations or activity.

In certain cases, lone working is not permissible, and the worker will be physically supervised, i.e., young person, person undergoing training.

The Company will ensure that the need for employees to work alone will be avoided wherever reasonably practicable. Where employees do work alone, personal safety must be a priority at all times. This includes ensuring that there is regular communication with a responsible person before, during and upon completion of the work.

Lone workers must take all the necessary steps to ensure that they do not put themselves at significant risk during the work activity, when using work equipment or as a consequence of the work environment.

Risk assessments must be carried out for lone working and control measures put in place prior to work commencing.

### **3.31 Protection of the Public**

Arrangements shall be made to ensure, so far as is reasonably practicable, that no member of the public will be exposed to risks to their health and safety as a result of MCL activities.

### **3.32 Young Persons**

In accordance with the Management of Health and Safety at Work Regulations 1999, MCL shall ensure that where young persons (under 18 years of age) are employed, they must be protected from any risks that exist in the workplace, are supervised by a competent person, and are informed of any restrictions and necessary precautions to be taken within areas where they will work.

Risk assessments will be reviewed for activities in which young persons may be employed before they commence work. This will ensure that appropriate assessment has been given with regard to a young persons' lack of awareness, inexperience and immaturity.

Copies of the risk assessments and control measures taken, for young persons under 16 years of age, will be sent to their parents or guardians.

### **3.33 Alcohol and Drug Abuse**

Alcohol or drug abuse by employees and contractors (including supervisors and management) can adversely affect the health and safety of themselves or others in the workplace. Therefore, it is the policy of the company that alcohol or drugs are prohibited in the workplace.

Any persons known to be, or strongly suspected of being, affected by alcohol or drugs must be referred to the appropriate Manager who will arrange for the person to be removed from the workplace.

### **3.34 Occupational Health**

A number of regulations impose requirements for the safe handling and use of substances which are known to be a risk to health, these include for example:

- The [Control of Asbestos Regulations \(CAR\)](#).
- The [Control of Lead at Work Regulations \(CLAWR\)](#).
- The [Construction \(Design & Management\) Regulations \(CDM\)](#) - Part 4
- The [Personal Protective Equipment at Work Regulations \(PPEAWR\)](#).

- The [Control of Substances Hazardous to Health \(Amendment\) Regulations \(COSHH\)](#).
- The [Workplace \(Health, Safety and Welfare\) Regulations \(WPHSWR\)](#).
- The [Health and Safety \(Display Screen Equipment\) Regulations \(HSDSER\)](#).

Reference should also be made to the Health and Safety Executive (HSE) publications:

- **EH40** Occupational Exposure Limits
- **EH43** Carbon Monoxide (*Revision*)
- **EH44** Dust: General Principles of Protection
- **EH46** Man Made Mineral Fibres (*Revision*)
- **HSG(88)** Hand-arm Vibration
- **HSG174** Anthrax: Safe working and the prevention of infection
- **HSG70** Prevention or Control of Legionellosis (including Legionnaires' Disease)
- **INDG84** Leptospirosis: Are you at risk?

Further information on the requirements of the Regulations, is also covered elsewhere in this Policy and is available from the external Health and Safety Consultant / Advisor.

All work will be planned to take the above standards into account.

The Contracts Manager will ensure that, before work starts on site, information is obtained on any material or substance to be used or likely to be encountered which could be a hazard to the health of operatives. If possible, arrangements should be made for an alternative, less hazardous material to be specified.

Any necessary protective clothing, equipment, enclosures, extraction equipment, hygiene facilities, medical examinations etc., must be planned before work commences.

Site Managers must ensure that all operatives engaged in any process involving the use of handling of any hazardous substance, will be given full instructions and any necessary training on the health hazards and precautions, use of protective clothing, equipment, hygiene measures etc., as required before they start using the product.

The Site Manager will ensure that:

- Protective clothing and equipment will be issued to operatives.
- The hygiene measures provided are maintained, and procedures planned to handle or use any hazardous substance are implemented.
- Measures necessary to protect other workers and the general public from such substances or procedures are provided and maintained.

Approved people, or organisations, will carry out any necessary air sampling, medical examinations, testing etc. as required, and records will be kept on site during the operations.

Health hazards from substances can be divided into the following categories:

- External contact - corrosive, skin absorption, dermatitis etc. (*e.g. cement, acids, epoxy resins*)
- Inhalation - gases, fumes, dusts, vapours.
- Ingestion - swallowing.

This section covers health hazards generally, other sections of the Policy deal with specific health hazards.

### Health Surveillance

The company will ensure that all employees are provided with health surveillance if deemed appropriate, due to hazards identified by detailed risk assessments.

The primary benefits of, and therefore the objective, of health surveillance will be to detect adverse health effects at an early stage, enabling further harm to be prevented.

Once it has been decided that health surveillance is appropriate, it will be maintained during the employee's employment unless the risk to which the worker is exposed and associated health effects are short term.

Health Surveillance will include:

- Inspections of readily detectable conditions by a competent person
- Enquires about symptoms, inspection and examination by a qualified person
- Medical surveillance, which may include clinical examinations
- Biological effect monitoring
- The frequency of the use of such methods will be determined either on the basis of suitable general guidance or on the advice of a qualified practitioner.

A record of all such Employee Health Surveillance will be maintained and kept secure in the interest of data protection. Personal records may be viewed following a request in writing.

### Personal Health and Infectious Diseases

If an employee has an infectious or communicable disease such as Coronavirus (COVID-19), AIDS/HIV, Hepatitis, Tuberculosis (TB) etc, or other health issues such as cancer, epilepsy, asthma, diabetes, cognitive disorders or other health problem that may constitute a risk to themselves whilst at work, or may constitute a risk to the health and safety of others employed by the company, that person MUST bring this to the attention of the Director Responsible for Health and Safety.

Any employee who becomes aware that a fellow worker has or may be sickening from the effects of an infectious or communicable disease, that they have not already disclosed, should bring that information to the attention of the Director Responsible for Health and Safety. Thereafter, they will treat that information as confidential and not divulge it to anyone else within or outside the organisation without the person's consent.

Any breach of this rule will be regarded as a serious disciplinary offence and may result in summary dismissal. If, however, the employee is concerned about the health and safety implications of non-disclosure, he or she should seek advice from the Company Directors only, who will then deal with the matter as necessary.

### 3.35 Work Related Stress

The company recognises and accepts that it has a responsibility to control the health, safety and welfare of their employees and this includes looking at the impact of stress at work.

At work, an employee who is severely stressed could become a danger to themselves, as well as to others in the workplace. The company is therefore committed to protecting the Health, Safety and Welfare of our employees, and to identifying and reducing workplace stressors.

The [Health and Safety at Work etc. Act \(HSAWA\)](#), The [Management of Health and Safety at Work \(Amendment\) Regulations \(MHSWR\)](#) and the [Workplace \(Health, Safety and Welfare\) Regulations \(WPHSWR\)](#), with their approved Code of Practice aim to protect people at work exposed to excessive pressure or demand placed upon them.

Reference should also be made to the following Health and Safety Executive (HSE) publications:

- HSG218 Tackling work related stress: A Managers Guide to Improving and Maintaining Employee Health and Well-being
- INDG28 1 rev1 Work Related Stress

All work will be planned to take the following standards into account:

- The Company will identify all workplace stressors and will conduct risk assessments to highlight and control the risks.
- Training will be provided to managers and supervisors in good management practices with regard to reducing stress in the workplace
- Confidential counselling will be provided either in-house or externally
- Adequate resources will be provided to implement the Company stress policy

Staff and their representatives will be consulted with respect to improving stress related work practices within the workplace.

Changes to working practices will be monitored to ensure they do not cause additional stress.

Regular review of risk assessments of procedures and work practices will take place to ensure stressors have not increased.

Managers are to take responsibility for implementation of company policy and the company will take responsibility for providing the necessary resources. Managers and supervisors will ensure good communication with staff if there are organisational and/or procedural changes.

The Company will ensure managers and supervisors are fully trained to discharge their duties and will monitor the workforce for signs of stress.

The company will offer support to staff who are experiencing stress outside work e.g. bereavement or Separation.

### 3.36 Records and Archiving

Records will be maintained of all necessary health, safety and environmental documentation. This will include:

- Health, Safety and Environmental Policy.
- Procedures documents.
- Risk assessments.
- COSHH assessments.
- Statutory documentation (inspections, reports etc.).
- Inspection records.
- Accident Book.
- Health and Safety Plans.
- Other relevant health, safety and environmental documents.

### 3.37 Monitoring at the Workplace

Managers and supervisory staff must ensure that all workplaces and activities under their control meet the requirements set out in this policy.

Appointed Safety Advisors will visit and carry out regular inspections of all workplaces and provide guidance and advice on all aspects of health, safety, welfare and the environment to all

employees. Reports will be presented to the Site Manager on completion of the inspection and a copy of the inspection report will be sent to the Managing Director.

All major accidents and dangerous occurrences will be investigated. A report will be produced and, where feasible, recommendations for preventative and/or corrective action will be made.

All accidents and near misses should be reported to the Site Manager at the workplace.

Analysis of all records, accident information and trends, and overall health, safety and environmental performance will be responsibility of the Managing Director.

Meetings to discuss health, safety, welfare and environmental issues will be held at regular intervals between management and the appointed Safety Advisors.

### 3.38 Construction, Design and Management (CDM)

When undertaking the role of Contractor under the [Construction Design and Management Regulations \(CDM\)](#), Milbury Contractors Ltd (MCL) will comply with our duties under Regulations 8 and 15 as follows:

The company will fulfil its duties under [CDM](#). This will be as a Contractor and occasionally as the PC (Principal Contractor). On some projects we may also be classed as a Designer. All work will be planned in accordance with [CDM](#). In order to achieve this, HSE Guidance has been issued, together with detailed information contained in the Approved Code of Practice.

Where there is more than one contractor, or if it is reasonably foreseeable that more than one contractor will be working on a project at any time, the Client must appoint in writing a Designer with control over the pre-construction phase as PD (Principal Designer); and a contractor as PC (Principal Contractor). These appointments must be made as soon as is practicable, and in any event, before the construction phase begins. If the Client fails to appoint a PD, the Client must fulfil the duties of the PD. If the Client fails to appoint a PC, the Client must fulfil the duties of the PC. Client's often cover the role of the PD when they are competent to do so, and under such circumstances they may appoint a CDM Advisor to assist them in fulfilling their duties.

On projects that are likely to exceed 30 days or 500 working person days of construction work, and include more than 20 workers working simultaneously at any point in the project, the HSE (Health and Safety Executive) will be notified by the Client or PD, by means of the F10 HSE Notification of Construction Project online notification system. The F10 must then be displayed on site by the PC.

The appointed PD will be required to produce Pre-Construction Information (PCI) that should be forwarded to all tendering contractors. In order for the PD to produce the PCI, all those involved in the project (i.e. designers, surveyors, buyers etc.) shall cooperate and provide the required information when requested. At the completion of the project, the PD will ensure that a suitable and sufficient Health and Safety File is compiled and supplied to the Client, End User, and/or Building Management Company or Team.

Before appointing a PC, the PD should be liaised with and provided evidence of sufficient competence to undertake the proposed project. After appointment, the PC shall be given sufficient time to prepare a written Health and Safety Plan (H&SP). On receipt, the PC's H&SP should be issued to the PD, the Companies Director with Particular Responsibility for HS&E

matters, and the Project/Contracts Manager approval. Only after their written approval shall any construction works commence. The H&SP must be maintained on site.

Companies who are appointed as the PC shall be given sufficient time to prepare a written H&SP. After completing the H&SP it should be issued to the PD and the Client, the Companies Director with Particular Responsibility for Health, Safety and Environmental matters, and the Projects / Contracts Manager for their approval. Only after their written approval shall any construction works commence on site. A copy of the H&SP must then be maintained on site.

The appointed PC will develop the H&SP by preparing Risk, Noise, COSHH, Vibration and Manual Handling Assessments, where applicable, and will also include Safety Method Statements from Contractors and Sub-Contractors carrying out specific work packages.

The company will ensure that all Sub-Contractors are suitably competent and adequately resourced for any work allocated to them. This applies equally to sub-contracted design work as it does to construction work.

CDM states that the PC is responsible for developing the H&SP and for passing on any relevant information to the PD, for inclusion in the Health and Safety file. Therefore, it is essential that the Site Management Team ensure that the H&SP is read, understood and maintained as necessary, and that any information relevant to the Health and Safety File is compiled and issued to the appointed PD.

All other Contractors and Sub-Contractors on site will be informed of the contents of the H&SP and will be made aware of any significant health and safety risks on site.

Contractors and Sub-Contractors will be consulted regarding safety matters and will be informed of details regarding the Client, PD and PC etc. These details will be highlighted in a notice (F10 HSE Notification of Project) which will be prominently displayed on site.

There are many other requirements under [CDM](#) that have not been addressed in this section of the Companies Health, Safety and Environmental Arrangements. Such as the Selection of Contractors and Sub-Contractors, arrangements for Consultation, Communication and Cooperation etc. Therefore, these will be addressed separately in the following sections.

### 3.39 Co-Operation and Co-Ordination

The [Management of Health and Safety at Work \(Amendment\) Regulations](#) require that where two or more employers share a workplace (either on a permanent or temporary basis), such as on a construction site where numerous contractors and sub-contractors work alongside one another, all involved have to co-operate and co-ordinate their activities to ensure that all their health and safety obligations are met.

In this regard, the Company wishes to build and maintain a healthy and safe working environment where co-operation and care between works at all levels is crucial to be able achieve this. All workers are expected to co-operate with their immediate Client and/or the Principal Contractor and any internal/external safety advisors/officers, and to accept their duties under this policy.

If the Company is to achieve and maintain a safe and healthy environment, all workers must co-operate with the senior management of the Company as well as the Client's representatives and take due care when undertaking their work activities.

The importance of co-operation and co-ordination is also highlighted in the Company HS&E Policy Statement and in the Organization and Responsibilities section of this document. The requirements for co-operation and co-ordination, as required by the [Construction Design and Management Regulations \(CDM\)](#) are also highlighted in Section 3.38.

### 3.40 Outdoor Work

The [Construction \(Design & Management\) Regulations \(CDM\)](#) - Part 4, applies to work outdoors and requires that consideration is given to ensuring that workers are protected, so far as is reasonably practicable, from adverse weather. This is generally assumed to be poor weather conditions, although these days consideration should also be given to hot weather conditions also.

In non-construction situations the generalities of the [Health and Safety at Work etc. Act \(HSAWA\)](#) will apply.

Reference should also be made to the following Health and Safety Executive (HSE) publications:

- **INDG337** Sun Protection – Advice for employers of outdoor workers
- **INDG147** (Rev' 1) Keep your top on – Advice to outdoor workers

All work will be planned to take the above into account.

This will include the provision of advice and guidance to those likely to be affected and will also include the following:

- Provision of plenty of drinking water for hot conditions
- Provision of protective clothing suitable for extremes of temperature, either hot or cold
- Suitable shelter for extreme conditions
- Adequate heating and a means to heat food and drinks in cold weather
- Advice on the use of sunscreens and if appropriate the provision of the same

The site manager will advise employees and operatives to take breaks from work in the shade, if possible, on hot sunny days.

All employees and operatives should be encouraged to check their skin regularly for unusual spots or moles that change shape, size or colour. Medical advice should be sought if they have any concerns.

Welfare facilities will be established that are suitable for the location. See section on Welfare.

### 3.41 Road and Street Works

Road works will be planned and carried out in accordance with the following:

- [Highways \(Amendment\) Act \(HAA\)](#).
- [New Roads and Street Works Act \(NRSWA\)](#).
- [Traffic Signs \(Amendment\) \(No. 2\) Regulations and General Directions \(TSRGD\)](#).
- Chapter 8 Traffic Signs Manual - "Traffic Safety Measures for Roadworks".
- Department of Transport Advice Notes:
- TA279 Short Duration Stops on Trunk Roads (Including Motorways) for Inspection Purposes

- TA/6/80 Traffic Signs and Safety Measures for Minor Works on Minor Roads Information and advice on the legal requirements and recommendations of Chapter 8 and advisory literature is available from the external Health and Safety Advisor / Consultant.

All work will be planned to take the above standards into account.

The Contracts Manager, in conjunction with the contractor, will ensure that consultation with the Police and Local Authority takes place before work commences and that the following arrangements for road works are planned by the contractor, taking into account these consultations and the above standards:

- Sufficient road signs, traffic cones, lamps, signals etc. of the correct type and size.
- Plant and vehicles are suitably painted, or marked, for road works and are fitted with amber flashing lights and warning devices for use when reversing, where practicable
- Protective clothing and equipment for operatives, including fluorescent/reflective jackets, slipovers or similar
- Protection for pedestrians
- Adequate labour for signing, cleaning signs, attending to lamps, signals etc.
- Training for operatives, supervisors, plant operators etc.

The Site Manager will ensure that all arrangements for signing, lamps, cones, signals etc. are carried out by the contractor, as planned, and that regular checking takes place throughout the working period to clean, replace and reposition traffic safety measures, as necessary. He will ensure that work is carried out as planned and that additional requirements, requested by Police or Local Authority during the works, are carried out.

The Site Manager will ensure that the contractor issues personnel with any necessary protective clothing and equipment and that fluorescent/reflective items are worn at all times.

The Site Manager will ensure that all plant and transport is suitable for use on road works, is operated only by trained and authorised personnel and that any defects noted or reported are rectified. Where defects could affect the safe use of the equipment, it must be taken out of use immediately.

The main hazards associated with road works are:

- Inadequate information for traffic
- Operatives, plant, transport outside signed areas
- Pedestrians not protected

Where lifting appliances are used on road works, safety helmets will be worn by personnel.

Department of Transport booklet "Traffic Warning Signs for Road works", or similar Chapter 8 requirements, will be issued to all Supervisors.

### 3.42 Overhead Electricity

The [Electricity at Work Regulations \(EAWR\)](#) give requirements for temporary electrical installations.

Reference should also be made to the following Health and Safety Executive (HSE) publication; GS6 Avoidance of Danger from Overhead Electric Lines gives guidance on the precautions to be taken and will be complied with on Company sites, or is expected to be complied with on sites on which Company employees are required to work.

Reference should also be made to British Standards:

- BS 5744 Code of Practice for Safe Use of Cranes (*Overhead/Underhung Travelling and Goliath Cranes*)
- BS 7121 Safe Use of Cranes also gives advice on precautions which will be complied with.

Information and advice on the requirements of the Regulations, Guidance Notes and Code of Practice is available from the external Health and Safety Advisor / Consultant, as required.

All work where overhead cables exist will be planned to take the above standards into account.

At pre-contract stage, the Contracts Manager will arrange for any necessary diversions or confirm safe distances, clearances, precautions etc. with the Electricity Board.

All sub-contractors likely to be affected will be informed of any overhead cables on the site.

The Site Manager will ensure that the necessary protection is erected in accordance with the above standards. The protection provided will be checked by the Site Manager, or other responsible appointed person, at regular intervals and maintained.

Appropriate action must be taken against any person(s) who disregard, or damage protection provided.

The main hazards are contact with or being in close proximity to the cables, by plant or vehicles, or by operatives handling long objects, e.g. scaffold tube, ladders etc. The fact that electricity can "arc" across gaps must always be taken into account.

Where work is to be undertaken beneath, close to or involves the diversion of electricity cables, the cables may need to be made dead and a Permit to Work system operated. In these cases, the external Health and Safety Advisor may be consulted for advice at an early stage.

### 3.43 Waste Management and Removal

The following regulations cover waste removal:

- The [Hazardous Waste \(Miscellaneous Amendments\) Regulations \(HWR\)](#).
- The [Environmental Protection \(Waste Recycling Payments\) Regulations \(EPWRP\)](#).
- The [Waste Management Licensing \(England and Wales\)\(Amendment and Related Provisions\) Regulations \(WLEWR\)](#).

All waste disposal must be via a "licensed waste contractor" approved by the Environment Agency. All waste will only be disposed in a suitable specified waste disposal site.

All waste removal movements will be recorded on a recognised consignment note.

The [Pollution Prevention and Control Act \(PPCA\)](#); Duty of Care Regulations gives you responsibility for all your waste until its final disposal site. This requires you to prevent uncontrolled releases of material (e.g. prevent leaks of diesel from tanks by using bunds or the spread of waste materials by high winds by netting over waste collection skips). As you have a responsibility to ensure your waste is handled by competent, responsible contractors it is important that you only use licensed contractors.

Hazardous waste as defined by the List [WLEWR](#) must be disposed of in accordance with [HWR](#) and the Consignment Note Procedure followed. Any hazardous wastes activities will need careful planning to reduce the risks of exposure to an acceptable and approved level.

All Waste Disposal will be properly planned to take into account the type of waste that requires disposal.

Producers of hazardous wastes may need to be registered with the Environment Agency and allocated a registration number before consignments are collected. (Check this with your Waste Collection Contractor in advance) Controlled waste (your general waste) must not be stockpiled or treated (including bonfires) on sites or at premises without the appropriate Waste Management License from the Environment Agency ([WLEWR](#)).

All hazardous waste will be assessed to ensure all safety precautions are taken and that the waste is only removed to a licensed disposal site.

Monitoring and supervision of all waste removal will be undertaken by a competent person only.

The competent person will ensure all resources are made available and all necessary steps are taken to ensure the waste is disposed of properly.

The competent person will ensure that the consignment note is effectively use and passed on to all relevant persons/organisations.

The waste consignment note must describe the:

- Transferred waste
- State whether the waste is loose or contained
- State the quantity of waste being transferred
- State the name and address of the producer
- State the name and address of the carrier, his registration number and issuing authority
- State the place of transfer
- State the date and time of transfer
- Contain signatures of both the produced and carrier

All transfers of hazardous waste will be undertaken in suitable enclosed containers.

A safe method of work will be drawn up by a competent person for all waste removal operations. The safe method of work will contain the following information:

- Type of waste (Hazardous, non-hazardous etc.)
- Location of waste
- Location of suitable disposal site
- Competence of waste removal operatives
- Issue of waste consignment note
- Necessary special precautions (PPE, Wheel Scrubs etc.)
- Amount of waste requiring removal
- Notification to necessary authorities (if and when required)
- Who is likely to be exposed to any hazards/risks
- Control measures for reducing the hazards/risks

Further information on waste removal can be obtained from the external health and Safety.

### **3.44 Company vehicle and Driving at Work**

The use of a company vehicle for company business is covered under the [Provision and Use of Work Equipment Regulations \(PUWER\)](#) and the [Road Safety Act \(RSA\)](#).

Company drivers will be assessed to ensure they are competent drivers and have a current licence for the type of vehicle they are to drive.

Company drivers will be given adequate information and resources to ensure they can carry out their role safely and effectively. It is not a specific offence to drive when tired, however a driver is more likely to commit a driving offence whilst tired. This may be as significant as causing death by dangerous driving and there has recently been a successful conviction of a driver who fell asleep at the wheel.

Company vehicle drivers are advised to take frequent breaks during long journeys. Drivers should allow for a minimum 15-minute break every 2hrs. Vehicles should only be stopped in a safe area, preferably a lay-by which is well lit during the hours of darkness. Drivers should take this opportunity to get out of the vehicle if safe to do so or open a window for fresh air.

Reference should also be made to The Highway Code which provides further guidance for drivers.

Company vehicles will be maintained and serviced in accordance with the manufacturers' recommendations.

All accidents occurring while driving for the Company will be reported to the relevant manager to ensure the accident is reported in the correct manner.

Seat belts must be worn when fitted in the vehicle.

Smoking is not allowed by any staff in any Company vehicle.

No person will be allowed to travel in the box section of any vehicle.

Whilst offloading, hands and feet are to be kept clear of the tail lift.

Ensure all loads are secure and in particular ensure that they will not fall when the vehicle door/shutter is lifted.

Under no circumstances should mobile telephones be used whilst driving unless a suitable hands-free arrangement is in place. Where possible hands-free kits will be supplied and should be used if it is necessary to use whilst a vehicle is in motion and it is safe to do so.

### **Mobile Telephones & In-Vehicle Technology**

The [Road Vehicles \(Construction and Use\) Regulations \(RVCUR\)](#) apply to the users of mobile telephones when driving.

All users of mobile telephones must not use a handheld phone when driving. "Hands-free" phones are acceptable providing that the phone does not have to be held in the hand at any time when in use.

The user must exercise proper control of the vehicle at all times. Never use a handheld mobile phone or microphone when driving. Using hands free equipment may also distract the users' attention from the road and should only be used when on the move if it is considered safe to do so. It is far safer not to use any telephone while driving - find a safe place to stop first.

There is also a danger of driver distraction being caused by in-vehicle systems such as route guidance and navigation systems, congestion warning systems, PCs, multi-media, etc. Do not operate, adjust or view any such system if it will distract your attention while you are driving;

you must exercise proper control of your vehicle at all times. If necessary, find a safe place to stop first.

Transport drivers must not consume any intoxicating liquids or drugs during the workday or shift.

### 3.45 Laser Equipment

The current primary standard for laser radiation safety in the UK is:

- **BSEN 60825-1** Safety of Laser Products Part 1: Equipment Classification Requirements and Users Guide.

Further information is given in the document Safety in Use of Lasers on Site (Chartered Institute of Building Services Management, Technical Information Services). The laser hazard classification scheme rates lasers in increasing degrees of radiation hazard as Class 1, 2, 3A, 3B or 4, according to the measured quantity of laser radiation emitted.

All work will be planned to take the above standards into account.

Only competent operators should use and install this equipment, arrangements should be made to minimise access to the work area by persons not directly involved in the work process if there is a risk of laser light entering the eye.

If lasers of Class 2 or above are to be used specialist advice should be sought.

Installation and use will be supervised by a competent person who will also warn any person entering the work area of the risks associated with laser light.

Ensure the correct covers are fitted to the equipment.

Minimise the risk of stray reflections and ensure that the laser light cannot escape from the working area and affect other persons working nearby.

For lasers of Class 2 and above warning signs will be positioned to advise of their use.

All electrical equipment should be inspected, tested and maintained as required by the [Electricity at Work Regulations \(EAWR\)](#).

Personal Protective Equipment may be required, refer to manufacturer's instructions for further guidance.

### 3.46 The Office Environment

It is the policy of the Company to comply with the [Workplace, \(Health, Safety & Welfare\) Regulations \(WPHAWR\)](#).

While it is understood that the majority of risks associated with the activities of the Company are likely to be site based, the Company recognises that there are risks associated in the Office environment. Therefore, the following points will be adhered to:

All walkways (corridors, open office spaces) are to be kept clear of slip and trip hazards and other obstructions. In particular:

- Computer and telephone cables should not lie across the floor
- Loose floor coverings, stairs and handrails, worn treads, etc., shall be reported to the Supervisor for immediate action
- Remove any loose items left on the floor
- Clean up all spillages

Ensure that all equipment, including desks and chairs, are in sound condition, suitable and properly placed. When sitting keep all legs of a chair on the floor - do not tilt backwards or stand on chairs.

All filing cabinets should be fitted with anti-tipping devices and not be overloaded in order to prevent tipping.

Use handles to open and close drawers to prevent pinching fingers. To avoid back injury, jammed drawers should not be pulled excessively.

Ensure sufficient lighting is available to carry out work in a safe and proper manner.

Maintenance of office equipment, including computers, word processors, communication systems and electric's etc should only be carried out by an appointed competent person. 240V office equipment will be appropriately tested (PAT) on an annual basis and labelled as such.

All regular users of Visual Display Screen Equipment/Units (VDU) will be assessed annually. The Director responsible for safety will ensure that any identified issues are suitably managed.

### Site Offices & Portable Cabins

Where applicable, site offices will comply with the requirements of [Workplace, \(Health, Safety & Welfare\) Regulations \(WPHAWR\)](#) or the [Construction Design and Management Regulations \(CDM\)](#) as applicable.

Temporary site office buildings and portable cabins must be fire-rated to a minimum of 1-hour fire resistance, and must meet The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation. The distance between any such temporary buildings and permanent structures should be at least 10 metres. Where the distance is less than 6 metres then the temporary building must be constructed to provide a Class 1 surface spread of flame performance and 30 minutes fire resistance to all surfaces (floors included if temporary buildings are to be stacked). Where this is not achievable, such as when an existing unit is to be utilized, the risk may be mitigated by applying a suitable exterior quality fire resisting material (e.g. Fireline board) to the effected elevations.

The Projects/Contracts Manager will ensure that an appropriate Fire Risk Assessment is carried out and complied with.

All fire extinguishers shall comply with the relevant British Standard and will be serviced and maintained at regular intervals (annually). Training will be provided to members of staff in their safe and proper use.

All site offices must be cleaned out daily and wastepaper shall not be allowed to accumulate. Particular care must be taken to ensure that combustible waste/litter does not build up underneath site cabins. Where this is possible, the gap beneath the cabins should be skirted to prevent waste/litter getting underneath it.

Any liquefied petroleum gas heating appliances shall be used in accordance with the requirements of company policy. Reference should be made to the relevant section on LPG in this policy.

Any electrical installation shall be to the requirements of the Institution of Engineering and Technology (IET) Wiring Regulations, as amended (BS 7671: incorporating Amendment 2) and shall only be installed, tested, altered and maintained by competent qualified electricians.

### **3.48 Behavioural Safety**

The Company accepts that safe behaviour at work is of paramount importance and, as such, needs to be treated as a critical work related skill. It is estimated that up to 90% of workplace injuries are caused by unsafe behaviour. Therefore, company management will endeavour to promote an understanding of safety and to identify how we can positively influence behaviour, and will operate a number of initiatives to support a reduction in unsafe behaviour, such as:

- Visible health and safety leadership is invaluable and, as such, Site Supervisors and Site Managers will be trained in behavioural safety techniques through attending courses such as CITB ConstructionSkills ABC, SSSTS, SMSTS and other appropriate construction industry training.
- All employees will receive on-going training to recognise both safe and unsafe practices and are encouraged to stop unsafe activities and suggest improvements to working methods through attending on site Team Briefs, Toolbox Talks and other necessary construction industry training.
- Through our Internal Reporting System and on Site Suggestion Boxes, all employees will have the opportunity to report unsafe working conditions/practices. Operatives can also make confidential reports to their line managers.
- All senior managers of the Company are strongly committed to an 'Open Door' management style and operatives are encouraged to voice any concerns or opinions directly to Senior Managers in a relaxed environment.
- Operatives will receive feedback on their safety performance on site and actions resulting from their suggestions through regular Briefings and Toolbox Talks.
- A Red, Yellow and Green Card system will be operated on all of our sites.
  - If operatives keep a good attitude towards health and safety and are found to be fully complying with the Safe Systems of Work, they may be issued with a Green Card. This will result in a monetary reward or gift voucher.
  - If operatives are found to be ignoring Safe Systems of Work, they will be issued with a Yellow Card. This is a warning that highlights the seriousness of their acts or omissions. After which they will be required to re-read the RAMS for their work activity and attend another safety induction or briefing and further Toolbox Talk if necessary.
  - If an individual is given two Yellow Cards within a 3-month period, this will result in immediate suspension from work, pending a disciplinary hearing within (one week) which may lead to a final warning or dismissal.
  - If an operative blatantly ignores Safe Systems of Work, putting themselves or others at serious risk, they will be issued with a Red Card. This will result in immediate suspension from work, pending a disciplinary hearing within (one week) which may lead to a final warning or dismissal.
  - If an individual is given two Red Cards within a 6-month period, this may lead to a final warning or dismissal.

The Company will periodically assess the strength of our safety culture and plan future improvements accordingly.

All of our Employees will be encouraged to play their part in Behavioural Safety by displaying a good attitude towards health and safety, by setting a good example and encouraging others to do likewise, and report site managers, supervisors or operatives that disregard safety instructions and procedures (this can be done anonymously).

Safety procedures, instructions, equipment, and tools have been provided to keep our Operatives, sub-contractors and Visitors safe! - following them is mandated throughout the company to enable the best chance of doing a job safely.

- Also see Section 3.2 - Communication and Consultation

### Section 4: CLOSING MESSAGE

Our Health, Safety and Environmental Policy is designed to ensure that you fully understand the role that you and Milbury Contractors Limited must play in helping to provide a safe and healthy working environment.


Together we must seek to identify and eliminate hazards at work and to reduce the number of accidents and incidents to zero.

*With your personal help and cooperation, we firmly believe that we can achieve this.*

### Section 5: DECLARATION

On behalf of Milbury Contractors Limited, I hereby declare that I have received a copy of, read and understand, the above-mentioned Company's Health, Safety and Environmental Policy and arrangements, and that I will endeavour to observe the conditions and provisions contained therein.

Signed:



Date:

March 21, 2024

**Andy Kennard**

For and on behalf of MCL

### SAFETY POLICY COMMUNICATION

It is the duty of every employer to prepare and update as necessary a policy for Health, Safety and Welfare. It is also a duty for employers to communicate this policy to their employees.

For the purposes of ensuring safety on site, both employees and subcontractors are required to read, understand and adhere to this policy.

It is important that you read through the policy carefully, as it will contain important information on company safety procedures and safe systems of work. It also contains responsibilities for you to undertake and comply with.

If you have any questions about this Safety Policy, or any suggestions on safety improvements please pass these to Milbury Contractors Ltd (MCL)

After you have read through this safety policy, please detach this sheet, sign and date it and pass it back to MCL.

<b>Name:</b>	
<b>Date:</b>	
<b>Occupation:</b>	
<b>Position:</b>	
<b>Signature:</b>	