



Health & Safety Policy

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POLICY PREPARED FOR:

ORION GROUP
LONDON COURT
LONDON ROAD
BRACKNELL
BERKSHIRE
RG12 2UT

TEL: 08450177456

POLICY PREPARED BY:

M3 ASSOCIATES LTD.
70 HIGH STREET
HOUGHTON REGIS
BEDFORDSHIRE
LU5 5BJ

TEL: 01582 - 866800

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1 General Policy Statements

1.1 Health and Safety Policy Statement

The Orion Group recognises and acknowledges its obligations under the Health and Safety at Work etc Act 1974 and the associated regulations.

The Orion Group will take all reasonable measures to ensure the health, safety and welfare at work of all employees in fulfilment of its moral and legal responsibilities. These measures will be extended to afford the same protection to other persons affected by the company's undertakings.

The Orion Group will ensure that all employees understand their legal duty to work in a safe manner and to co-operate with others to create safe working conditions.

To ensure compliance with the aforementioned Act of Parliament, The Orion Group will ensure that:

1. They provide and maintain a safe working environment, safe and well maintained plant and equipment and safe systems of work;
2. They identify hazards and implement reasonably practicable control measures by carrying out and documenting risk assessments for all company activities;
3. They provide all staff with adequate instruction, information, training and supervision;
4. The same emphasis is given to safety as to other management functions and that safety takes precedence over convenience and profitability;
5. All safety rules and regulations whether internal, client's or regulatory are adhered to in detail;
6. They promote the awareness of health and safety and encourage health and safety best practice throughout the organisation;
7. They have access to competent advice and are able to secure compliance with their statutory duties.

The policy will be kept up to date as there are legislative changes and as the business changes in nature and size. To ensure this, the policy and the way it has operated will be reviewed at least on an annual basis.

On behalf of
Orion Group

R. H. Huntingford
Managing Director

Date:
Review Date: February 2011

1.2 Company Procedures

The Company will:

1. Provide and maintain safe and healthy working conditions at its premises, in accordance with statutory legislation.
2. Ensure that employees are aware of the potential hazards involved with the work, both in-house and on third party premises, ensure that safety training is provided as necessary, starting at an initial induction session for new employees and through refresher training courses. Records shall be kept of all such training.
3. Provide all necessary personal protective equipment and other safety equipment and provide appropriate training in its proper use.
4. Take a pro-active approach to maintaining awareness of current developments in statutory legislation, guidance and general trends regarding health and safety, through the medium of trade journals and Health and Safety Executive publications.
5. Undertake appropriate risk assessments to enable the Company to establish and maintain a safe and healthy working environment.
6. Conduct periodic safety inspections and safety audits.
7. Consult with employees and others on safety related matters.
8. Ensure that awareness of safety amongst personnel is maintained at a high level.
9. Ensure that all employees read and understand the contents of the Company Safety Policy document.
10. Maintain a relationship with appropriate organisations, including the enforcing authorities, to enable changes in legislation and approaches to health and safety to be considered and implemented as necessary.

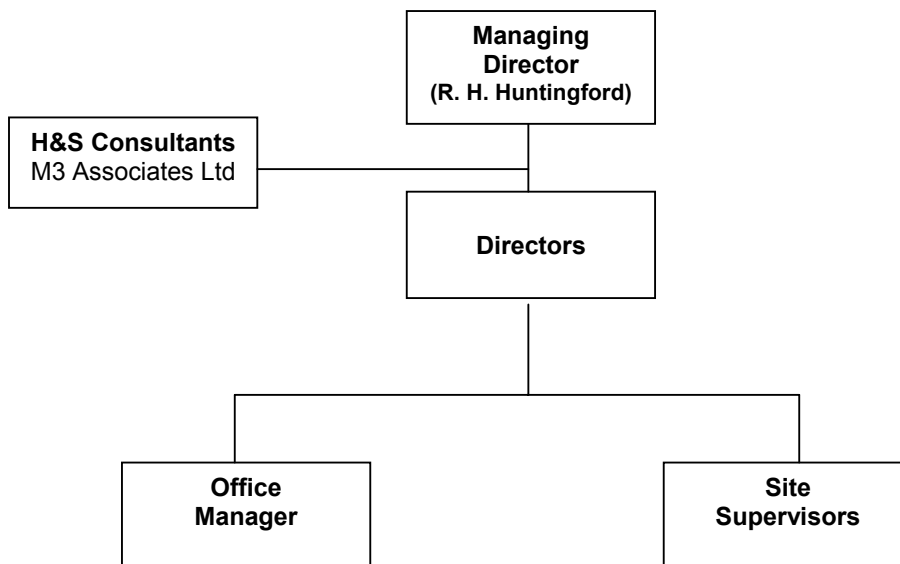
2 Corporate Structure (Health & Safety)

2.1 Introduction

Responsibility for the overall effectiveness of the Company Health and Safety Policy rests with the Director; R. H. Huntingford. Every employee and sub-contractor is responsible to him for health and safety and for complying with the Company Policy and any statutory requirements. The Director with responsibility for Health and Safety is David Bezer.

Whilst the ultimate responsibility for health and safety rests at the highest level, individuals at every other level will need to accept varying degrees of responsibility for the implementation of the Health and Safety Policy and for ensuring safe working practices.

The following diagram shows the corporate structure (health and safety) for Orion Group. M3 Associates Limited will act in an advisory capacity to the Company to assist in compliance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999.



To ensure the successful implementation of this policy, the positions below have the following responsibilities.

2.2 The Directors

The Managing Director (R. H. Huntingford) has the responsibility to ensure that adequate financial resources are provided to enable the Company to meet its obligations with respect to health and safety. He is also responsible for the publication, implementation and review of the Health and Safety Policy and other health and safety related documentation.

The Managing Director and other Directors will ensure that:

1. All employees read, understand, and implement the contents of the policy, including the policies on the environment and alcohol and drug abuse;
2. Personnel receive all necessary training relevant to the safe conduct of the company's undertakings;
3. All necessary personal protective equipment (PPE) is available to company personnel;
4. All equipment purchased or used by the company, including vehicles, is safe for its intended use and is maintained in accordance with manufacturers or statutory requirements;
5. Management systems are in place to ensure that all vehicles are managed and that drivers understand the company policy relating to mobile phone use when driving.
6. Sub-contractors are vetted and that they provide (where relevant) all necessary safety equipment, documentation, satisfactory work and method statements;
7. Suitable and sufficient risk assessments are carried out with respect to materials used and tasks undertaken by the Company and that the assessments are followed and reviewed regularly;
8. Regular health and safety inspections and audits are carried out in accordance with company and statutory requirements;
9. Competent specialist health and safety advice is obtained when in-house expertise is considered insufficient;
10. Due note is taken of the outcome of consultation with employees;
11. Accident records and first aid records are maintained and reviewed;
12. All accidents are reported, to the appropriate authorities when necessary, investigated and corrective action recommended implemented;
13. Adequate first aid facilities are available to all staff and that the location of these facilities is known;
14. Regular fire drills are carried out and that all fire alarms and fire fighting equipment are regularly maintained as appropriate;
15. Electrical installations and equipment are maintained and tested in line with statutory requirements.
16. Risk assessments are conducted for any work at height and that suitable equipment and training are provided.

2.3 Office Manager

1. Read and understand the company policy for health and safety and ensure that it is brought to the notice of all employees under your control.
2. All offices and office facilities are maintained in accordance with the Workplace (Health, Safety and Welfare) Regulations.
3. Ensure that all employees and visitors are aware of the requirements of the emergency plan and know where their assembly point is in the event of an evacuation.
4. Ensure that where construction or other work activities are being undertaken, that affects employees or visitors, that the additional health and safety requirements are brought to their attention and that they comply with the requirements.
5. Ensure that all office machinery is safe, fitted with any necessary guards or safety devices and is serviced and maintained as recommended by the manufacturer.
6. Ensure that risk assessments have been carried out for areas under your control and that appropriate control measures are implemented.
7. Ensure that staff required to use office machinery are trained in its use and are not permitted to carry out any repairs unless authorised.
8. Arrange all necessary insurance and carry out any necessary reporting of incidents to insurers. Provide an appropriate accident investigation report to insurers where necessary.
9. Ensure that fire detection and fighting equipment is maintained, exits kept clear and that emergency procedures are practised on a regular basis.
10. Ensure that when necessary New and Expectant Mother risk assessments are completed.
11. Ensure that first aid facilities are available and replenished when used.
12. Ensure that all accidents are reported in accordance with company policy.
13. Ensure that staff work safely and do not take unnecessary risks.
14. Ensure all necessary welfare provisions are provided and maintained.
15. Set a personal example.

2.4 Site Supervisors

1. Read and understand the company's health and safety policy and ensure that it is brought to the notice of operatives under your control. Carry out all work in accordance with its requirements.
2. Ensure that all relevant risk assessments have been completed for the work under your control and that workers are aware of the control measures identified.
3. Ensure that all training records are held on site and that all plant, equipment and vehicles are only used by operatives who have the correct training and experience.
4. Make sure that when work at height is required that the correct equipment is available and that operatives are trained in its use and supervised during the work.
5. Understand the Regulations applicable to the work on which your operatives are engaged and insist that these Regulations are observed and that they are incorporated in the requirements of the site's Health and Safety Plan as they affect the work.
6. Ensure that fire and first aid arrangements are in place and are regularly inspected and maintained.
7. Ensure that all employees and visitors are aware of the requirements of the emergency plan and know where their assembly point is in the event of an evacuation.
8. Incorporate safety instructions in routine orders and see that they are obeyed.
9. Ensure that new employees, particularly apprentices and young people, are shown the correct method of working and all safety precautions.
10. Ensure that young employees (under 18 years) do not drive any item of plant or operate any type of tool or equipment except under direct supervision.
11. Commend operatives who, by action or initiative, eliminate hazards.
12. Do not allow "horseplay" or dangerous practical jokes and reprimand those who consistently fail to consider their own safety or that of others around them.
13. Report immediately any defects of plant or equipment.
14. Record any accident, however minor, immediately and, if necessary report it to your manager.
15. Set a personal example by wearing protective clothing and by carrying out your own work in a safe manner.
16. Look for and suggest ways of eliminating hazards. Bring to the notice of management any improvements or additions to the company safety policy which you feel should be made.
17. Organise and undertake as appropriate any on-job training requirements for staff requiring enhanced job competence.

2.5 Employees

1. Take reasonable care for the health and safety of yourself and others, who may be affected by your acts or omissions.
2. Do not intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare.
3. Read and understand the company health and safety policy and carry out work in accordance with its requirements.
4. Use the correct tools and equipment for the job.
5. Wear safety footwear at all times and use, where necessary, all protective clothing and safety equipment provided, e.g. safety helmets, goggles, respirators and so on.
6. Keep tools in good condition.
7. Report immediately to supervision any defects in plant or equipment.
8. Work in a safe manner at all times. Do not take unnecessary risks which could endanger yourself or others. If possible, remove site hazards yourself, e.g. remove or flatten nails sticking out of timber, tie unsecured access ladders, etc.
9. Do not use plant or equipment for work for which it was not intended or if you are not trained or experienced to use it.
10. Warn other employees, particularly new employees and young persons of particular known hazards.
11. Do not play dangerous or practical jokes or "horseplay" on site.
12. Report to supervision any person seen abusing the welfare facilities provided.
13. Report any injury to yourself, which results from an accident at work, even if the injury does not stop you working.
14. Report any damage to plant or equipment.
15. Suggest safer methods of working and Additional training needs to your Supervisor. Undertake any training provided.

2.6 Sub-Contractors

The Company places the following obligations on all of its Sub-Contractors:

1. To comply with all conditions imposed by the Company safety policy and any relevant statutory legislation.
2. Provide a copy of their company safety policy, the contents of which must comply with or exceed the requirements of the Company policy.
3. Provide work method statements and associated risk assessments for consideration by the company prior to commencement of work.
4. Use safe systems of work and carry out work in a way, which avoids risk to themselves or others who may be affected by the work.
5. Provide any personal protective equipment or other safety equipment necessary for the safe conduct of their activities.
6. Inform the Company management of any hazards, potential or actual, in order that action can be taken.

Note: The requirement for a written safety policy and any method statements etc. shall only apply where there is a legal obligation on companies to provide these in this format. Notwithstanding this, the Company shall assure themselves of the adequacy of the health and safety 'philosophy,' and its practical application, for any sub-contractor.

3 Arrangements & Procedures

3.1 Introduction

This section details how the Company intend to put this policy into practice in the workplace, specifying how health and safety issues will be managed. It is the policy of the Company to perform work in the safest manner possible as far as is reasonably practicable.

Responsibility for safety on the premises is delegated to line supervision in accordance with the Organisation chart outlined in Section 2. Site Supervisors are responsible for the safe conduct of work on their sites and this responsibility cannot be delegated to others.

3.2 Means for Policy Revision

The Health and Safety at Work etc. Act 1974 requires the Company to monitor the effectiveness of this policy and to update it as required.

The policy is reviewed annually with the company's safety adviser and, in addition, the Directors meet twice a year to review Health and Safety performance and the policy. Health and Safety is, also, an agenda item on the office monthly performance meeting.

The purpose of the review process is to ensure:

1. The maintenance and development of an effective health and safety policy.
2. The maintenance and development of an effective organisation to ensure that the policy is implemented.
3. The maintenance and development of improving performance standards.
4. The implementation of remedial action by responsible persons when failures or gaps in policy are identified.

To achieve these outcomes all supervisors and employees are instructed to raise health and safety issues with the Health and Safety Director, David Bezer. The company also makes arrangements for the safety adviser to visit the Company's sites at regular intervals to identify and report on any hazards, lack of control measures, defects or breaches of regulations. A copy of these reports is sent to the Health and Safety Director so that remedial action can be taken to prevent a recurrence and so that the Health and Safety Policy can be revised, if necessary.

In addition, as part of the pro-active approach to the effective implementation of the Health and Safety Policy, the Company's safety advisor undertakes annual safety audits, assisted by the Health and Safety Director.

The safety audit undertaken for each major activity examines current performance and adherence to requirements. Where deficiencies are identified, the Directors take practical action to improve standards and modify the safety policy.

3.3 Procedures for Dealing with Health and Safety Issues

Whenever an employee raises a health and safety issue that may cause a problem or which has caused a problem, the company will:

1. Take all necessary steps to investigate the circumstances
2. Take corrective measures where appropriate
3. Advise the employee of actions taken.

3.4 General Workplace Safety

In order to ensure that a safe and healthy working environment exists for all staff and any visitors, within the workplace, good housekeeping standards will be maintained. The 'workplace' refers to any area where the Company work is being carried out including staircases, floors, workshops, ways in and out, washrooms, temporary work areas and client's premises. A safe working environment will be effected by:

1. Keeping traffic routes, including entrances and exits, clear of all obstacles;
2. Ensuring the safe storage of items when not in use, allowing only the lightest or least used items to be stored above head height and making these items easily retrievable;
3. Ensuring the regular disposal of waste materials by not allowing a build up of any, particularly combustible, materials;
4. Ensuring that the workplace is inspected regularly with any faults rectified as soon as possible.

3.5 Training

3.5.1 General Statement

The Directors will ensure that all employees receive job specific training and training on health and safety to assist them in undertaking their duties safely and efficiently. External courses on specific subjects may be utilised along with internal training, as and when appropriate. All training will be recorded in the relevant personnel files.

Although the Directors have a major role to play within the Company's health and safety policy, each Site Supervisor is responsible for ensuring that their subordinates receive appropriate training and induction and should, therefore, liaise with the Directors regarding training needs.

Site Supervisors are required to carry out a site specific induction with all new employees, highlighting any hazards and specific safety rules applicable to the work, **before** putting them to work.

3.5.2 Arrangements

The company will, in consultation with workers:

1. Identify all tasks for which training must be provided to ensure that our employees achieve the necessary level of competence to carry them out.
2. Provide training in the use and maintenance of all equipment, machinery and chemicals.
3. Evaluate training courses to ensure that the training provided is suitable and sufficient and that the trainer is competent.
4. Have procedures in place to ensure that only properly trained and competent persons use equipment and machinery
5. Provide training in the use of personal protective equipment and other safety measures
6. Maintain records of training and ensure that they are signed by the trainer and the trainee. These records will be retained by the company indefinitely. All training results and certificates from external courses will also be retained.

Responsibility for implementing these arrangements is defined in the Organisation and Responsibility Section.

3.6 Alcohol and Drugs Policy

3.6.1 General Statement

The abuse of alcohol and non-prescribed drugs will not be tolerated on the premises of the Company or elsewhere whilst on Company business. It is impossible to work safely whilst under the influence of alcohol or drugs and accordingly they must be prohibited. Anyone found to be under the influence or in possession of either, will be sent home and become subject to the Company's disciplinary procedures later. Should anyone suspect a colleague of being under the influence of alcohol or drugs it is imperative that they advise their supervisor for the safety of all concerned. Drugs prescribed by a doctor or pharmacist may also affect performance and, therefore, the Site Supervisor or the Directors must be informed.

3.6.2 Arrangements for Securing the Health and Safety of Employees

The company will:

1. Identify those affected along with the nature of the problem;
2. Decide whether to invoke the disciplinary procedures;
3. Ensure that adequate supervision is provided to monitor the actions of those affected;
4. Implement and monitor control measures;
5. Provide managers and supervisors with information and training so that they can identify and deal with the immediate issues;
6. Provide health surveillance or counselling, as appropriate.

Responsibility for undertaking these measures has been defined in the Organisation and Responsibilities Section.

3.7 Communication and Consultation

3.7.1 General Statement

It is a requirement of the Health and Safety (Consultation with Employees) Regulations 1996 for employers to consult and communicate with employees on matters relating to health and safety. These regulations complement the Safety Representatives and Safety Committees Regulations 1977, which place duties on employers to consult with safety representatives who have officially been appointed as such by the trade unions.

3.7.2 Arrangements for Communication and Consultation

Consultation will be with the employees directly as there are, currently, no elected 'Representative of Employee Safety'. Employees will be consulted, in good time, on health and safety matters and in particular on:

1. The content of this policy
2. Any rules specific to a site or job
3. Changes in legislation or working best practice
4. The planning of Health and Safety training
5. The introduction of new technology or the alteration of work equipment

Communication and consultation will take place directly with the employees via regular staff meetings held at head office, site meetings, tool-box talks and the distribution of safety literature and memoranda.

Information will only be withheld if:

- It is of significant commercial confidentiality;
- If there is a legal reason for not disclosing it;
- It is of a personal nature.

3.8 New and Expectant Mothers

3.8.1 General Statement

The Company recognises its legal duty to protect the health and safety of new and expectant mothers. To achieve this, a risk assessment will be conducted once the Company has been notified that an employee is pregnant or if a new mother is employed. Measures will be implemented to ensure that new or expectant mothers are not exposed to hazards that may cause them harm.

A “new and expectant mother” is defined as a worker who is pregnant, who has given birth within the previous six months or is breastfeeding. “Given birth” is defined as having delivered a living child or, after 24 weeks of pregnancy, a stillborn child.

Risks may arise from physical, biological and chemical hazards as well as hazards associated with the working conditions and processes.

3.8.2 Arrangements for Securing the Health and Safety of Employees

Measures that will be implemented will include:

1. Assessing the risks involved and introducing control measures that arise from the assessment.
2. Implementing and monitoring the control measures.
3. Monitoring the employee through the development of the pregnancy and repeating risk assessments periodically e.g. every 6-8 weeks or if tasks change significantly.
4. Allowing time off to attend antenatal clinics.
5. Providing adequate and safe facilities for new and nursing mothers including rest facilities and suitable facilities for expressing and storing breast milk.

The persons responsible for implementing these arrangements have been defined in the Responsibilities Section.

3.9 Fire

3.9.1 General Statement

It is the policy of the Company to ensure that suitable arrangements are made regarding fire prevention and means of escape on Company premises and other places of work.

In the event of fire, the safety of life shall override all other considerations, such as saving property and extinguishing the fire.

If a fire is discovered, the alarm shall be raised immediately by the appropriate method (such as operation of a break glass manual call point). This should be the first action taken on discovery of any fire, however small.

All employees are empowered to take this action if they believe there is a fire; no authority should be sought from any other person. The company will always support employees who operate the fire alarm system in good faith, regardless of whether or not it is ultimately determined that a fire existed.

Immediate evacuation of the building must take place as soon as the evacuate signal is given. Everyone must report to the assembly point, which is displayed on the Fire Action Notices.

Re-entry of the building or site is strictly prohibited until the fire brigade officer in charge declares it is safe to do so. Silencing of the fire alarm system should never be taken as an indication that it is safe to re-enter the building.

Employees should report any concerns regarding fire procedures, so that the company can investigate and take remedial action if necessary.

3.9.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with employees:

1. Carry out a Fire Risk Assessment and implement the control measures identified.
2. Stage, regular, fire evacuation drills, inspect the means of escape and maintain, test and inspect fire-fighting equipment and fire warning systems in line with statutory requirements.
3. Ensure that any deaf persons on the premises are aware of the activation of the fire alarm and that disabled persons are given assistance to evacuate the building.
4. Appoint persons to be responsible for specific procedures in the event of a fire.
5. Provide adequate fire safety training to employees, plus specialist training to those with special responsibilities.

The persons responsible for implementing these arrangements have been defined in the Responsibilities Section.

3.10 Accident and Near-Miss Reporting

3.10.1 General Statement

This policy outlines the procedures, which are to be adopted when any employee, visitor or contractor experiences an accident, near miss or dangerous occurrence on any company workplace. This will also apply to members of the public who are injured as a result of the company's activities.

This policy covers reporting and recording procedures for Managers, employees and non-employees. Suitable information and training will be given to all personnel regarding accident reporting and the location and completion of the accident book.

3.10.2 Arrangements for Reporting Incidents

The company will:

1. Provide accident books for the reporting of all accidents resulting in personal injury.
2. Encourage staff to report all near misses to management as soon as possible so that action can be taken to investigate the causes and to prevent recurrence.
3. Identify those accidents that must be reported to the Incident Contact Centre (RIDDOR) and ensure that they are reported.
4. Ensure that injuries, which occur whilst employees are carrying out work duties on a third party site, are reported and that the occupier of the site is informed.
5. Ensure that injuries and near misses to non-employees or members of the public are recorded, reported and investigated where necessary.
6. Regularly review the accident book to ascertain the nature of incidents that have occurred in the workplace. This review will be in addition to an individual investigation of the circumstances surrounding each incident.

3.10.3 Accident and Incident Investigations

All accidents and potentially dangerous incidents will be investigated as soon as is reasonably practicable. All details must be recorded; witnesses will be interviewed and, if necessary, photographs will be taken, by the nominated investigator. Sufficient action should be taken to make the area safe but nothing is to be moved unnecessarily, before the Directors have been informed. At their discretion the Directors may call in the Company Health and Safety Advisor or take control of the situation themselves.

All improvements identified during the investigation will be implemented in a controlled manner. If necessary, the activity will not be restarted until the actions have been completed and tested or temporary control measures implemented.

3.11 First Aid

3.11.1 General Statement

The company is committed to providing sufficient numbers of first aid personnel to deal with accidents and injuries occurring at work. First aid cover will be provided for the whole time that company workplaces are occupied.

Should employees have concerns about the provision of first aid within the organisation, they should inform a responsible person to enable the company to investigate and rectify the situation if necessary.

3.11.2 Arrangements for Securing the Health and Safety of Workers

The company, in consultation with workers, will:

1. Assess the risks involved and the control measures that need to be put into place e.g. provision of Appointed Persons, First Aiders and first aid boxes and equipment as required.
2. Implement and monitor the control measures.
3. Ensure that emergency procedures are developed and implemented.
4. Issue appropriate safety equipment and personal protective equipment to the personnel involved and maintain records of the issue and maintenance of this equipment.
5. Ensure that all operatives are properly instructed and trained in the emergency procedures, personal protective equipment and other safety measures, e.g. ensuring that body fluids are cleaned up in the appropriate manner. Records of training will be maintained.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.12 Provision & Use of Work Equipment

3.12.1 General Statement

The company is aware of its responsibilities under the Provision and Use of Work Equipment Regulations, 1998 (PUWER). In accordance with its general statement of health and safety policy, the Company will take all reasonable steps to secure the health and safety of employees and others who use work equipment in the workplace. Suitable and sufficient risk assessments will be made to minimise the risk that may be involved.

Full consultation, in accordance with the existing procedures laid down, will be undertaken with employee representatives in determining the control measures necessary.

Employees will be given adequate information, instruction and, where appropriate, training to ensure a proper understanding of the health and safety issues involved with the operation and use of items of work equipment. The co-operation of all members of management and staff is required to ensure the full implementation of this policy.

Should any employee have concerns about health and safety issues relating to work equipment, these should be reported to their immediate supervisor.

The Provision and Use of Work Equipment Regulations, 1998 (PUWER) apply to all items of "work equipment" provided for "use" or "used", either by employees or the self-employed.

3.12.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with workers:

1. Carry out risk assessments of all work equipment to determine the control measures required to protect operators from injury caused by the equipment, by chemicals used by the equipment or by hazards created by the equipment e.g. dust and noise.
2. Implement all control measures identified in the risk assessments.
3. Ensure that all work equipment, provided for their employees and self-employed persons working for them, complies with the Regulations. The company will also ensure that equipment, provided by their employees or the self-employed but used for the company's work, complies with the Regulations.
4. The company will select, hire and purchase equipment according to its suitability for the job and for its reliability and tested safety characteristics.
5. Ensure that all equipment is routinely inspected, maintained and modified under a planned maintenance programme, for which records will be kept.
6. Provide workers with suitable PPE to protect them from any residual risks that cannot be controlled in any other way.
7. Provide operators with all necessary training, supervision and information required to use the equipment safely.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.13 Use of Hand Tools

3.13.1 General Statement

The company will, in accordance with its general duties, make a suitable and sufficient assessment of the health and safety risks to which our employees may be exposed, whilst working with hand tools.

These risks will then be controlled so far as is reasonably practicable so that neither the company's employees nor others, who would be exposed to them, are put at risk.

3.13.2 Arrangements for Securing the Health and Safety of Workers

The company, in consultation with workers, will:

1. Ensure that the correct tool for the job is provided.
2. Ensure that employees do not misuse tools, which can lead to damage of materials, equipments and the tools as well as possibly leading to injury.
3. Implement a system for reporting defective tools at all workplaces.
4. Inform users of their responsibility to maintain tools and report any defects to their immediate supervisor.
5. Ensure that defective tools are taken out of use and returned to the stores.
6. Implement a system for the replacement of defective tools, which will be made known to all employees.
7. Arrange for tools to be repaired by qualify and competent personnel only.
8. Arrange for regular inspection of electrically powered tools in accordance with the Electricity at Work Regulations all such tools will be tagged showing the date of the last test.
9. Provide personal protective equipment if necessary.
10. Ensure that work areas are kept clear of debris and any items that may impede the safe and efficient use of tool.
11. Provide suitable storage facilities for tools.
12. All employees using tools will be trained in their use and the use of any associated equipment used in conjunction with the prime tool. Any employee who is not familiar with a particular tool must make it known to his or her supervisor.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.14 Control of Hazardous Substances

3.14.1 General Statement

The nature of the work carried out by the Company means that exposure to hazardous substances is a likely occurrence on a daily basis. As a result, strict controls must be in place in order to keep exposure to these substances as low as is reasonably practicable and as far below any Workplace Exposure Limits as is reasonable practicable.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) identify the essential requirements and approach for the control of the hazards and risks likely to be encountered when working with hazardous substances. There are certain substances that are excluded, namely lead, asbestos and ionising radiation, which have their own regulations and codes of practice.

3.14.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Carry out a formal, documented, assessment of health risks to employees;
2. Review the assessment on a regular basis in light of changes to company procedures, substances or changes to legislative requirements;
3. Decide what precautions are needed and implement these precautions;
4. Prevent exposure of employees to health risks. If prevention is not possible then adequate control measures will be introduced;
5. Ensure that control measures are used, maintained, examined and tested with records of these tests kept;
6. Monitor the workplace exposure of employees, if necessary;
7. Provide, where necessary, health surveillance for employees;
8. Prepare plans and procedures to deal with accidents, incidents and emergencies;
9. Provide relevant information, instruction, training and supervision regarding the use of hazardous substances and associated control measures.

The Company accept that the above duties also apply to indirect workers and self-employed personnel, with the exception of the following:

1. Health surveillance, which applies to employees only; and
2. Monitoring, information and training, which applies to employees and others in the workplace.

Employees will be expected to:

1. Make full and proper use of all control measures and personal protective equipment introduced by the Company for their protection; and
2. Where appropriate, at the cost of the Company, present themselves for health surveillance.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.15 Asbestos

3.15.1 General Statement

The Health and Safety at Work etc. Act 1974 requires every employer to ensure the health, safety and welfare at work of all his employees. In addition, The Control of Asbestos Regulations 2006 requires employers to protect employees and others from the risks associated with exposure to asbestos. It is the policy of the company to conduct its undertakings in such a way as to ensure that employees and others are not exposed to risk.

The nature of the work carried out by the Company is such that exposure to asbestos is a possibility, especially in older buildings. Employees need to be aware of the possibility that asbestos containing materials (A.C.M) may be present on sites that the Company are working on and that all asbestos containing materials **must** be treated as hazardous.

3.15.2 Arrangements for Securing the Health and Safety of Workers

When working on site all employees are reminded that if they are in any doubt, they must ask their Supervisor **before** working on any material suspected to contain asbestos.

The company will:

1. Identify asbestos in the workplace by appropriate means and maintain a register of these locations (The workplace refers to any place where company work is being carried out).
2. Request an appropriate Asbestos Survey Report, from clients, prior to starting any construction work.
3. Implement suitable control measures, if any asbestos is identified.
4. Ensure that the location of asbestos is suitable marked and that a management plan is in place to ensure that the condition of the asbestos and any control measures is adequate and that employees and sub-contractors are notified of its location.
5. Employ a specialist company to remove asbestos, if necessary.
6. Request a Four Part Clearance Test Report, if any asbestos has been removed by specialist contractors, prior to starting or resuming work.
7. Provide workers with any information, instruction and training required to ensure that they understand the risk posed by asbestos and can identify materials that may contain asbestos (e.g. UKATA approved Asbestos Awareness Training). Records of training should be signed by employees and retained by the company.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.16 Machine-Made Mineral Fibres (MMMF)

3.16.1 General Statement

The Company will, at times, be involved in the handling of MMMF. The term MMMF will include glass fibre, Rockwool, and other similar materials.

It will be the policy of the company that unless the client indicates otherwise, work involving the use of MMMF shall proceed in accordance with the standards laid down in Guidance Note EH46 entitled 'Man-Made Mineral Fibres'.

It is appreciated by the company that, according to the latest epidemiological information, MMMF is a suspected carcinogen and should be handled with the same caution and strict safety procedures outlined above for asbestos.

MMMF have a current maximum exposure limit under the COSHH Regulations 2002 (see Hazardous Substances section) and requires a full risk assessment on exposure to be carried out.

3.17 Risk Assessments and Method Statements

3.17.1 General Statement

The Company acknowledges its legal duty to carry out risk assessments of all the tasks that it performs. The object of a risk assessment is to identify all the significant hazards present within the workplace and to identify measures to control the risks that employees and others are likely to be exposed to, as a result of these hazards. The purpose of the employer's assessment is to identify any measures necessary to keep employees safe. This duty extends also to temporary workers, sub-contractors, visitors and members of the public.

When an evaluation of the risks has been considered, the principles of prevention (Control measures) should be applied.

3.17.2 Arrangements for Securing the Health and Safety of Workers

The Company will:

1. Carry out risk assessments for all tasks carried out by the Company
2. Implement and monitor the control measures identified in the risk assessments.
3. Ensure that the risk assessments are documented.
4. Ensure that the risk assessments are linked to the tasks.
5. Ensure that safe working practices are developed and implemented.
6. Ensure that the risk assessments are made available to the employees involved.
7. Ensure that those involved in risk assessment training are identified and recorded.

3.17.3 Method Statements

When a client requests the production of a method statement, the Directors will ensure that these are produced. Whilst there is no legal requirement for method statements, they are recognised as a useful health and safety management tool for use on different projects. They combine all relevant health and safety information in one document, which reflects the actual working procedure.

It is the policy of the Company that method statements will be produced when requested by clients and that they will reflect the working practices. All employees and sub-contractors will be trained in the requirements of the method statement and will be expected to work in accordance with the method statement produced for the contract they are working on.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.18 Personal Protective Equipment (PPE)

3.18.1 General Statement

The company will provide PPE when the risk presented by a work activity cannot be adequately controlled by other means. All reasonable steps will be taken by the company to secure the health and safety of employees who work with PPE.

The company acknowledges that health and safety hazards will have been identified if this equipment is used. It is the intention of the company to ensure, through the proper use of this equipment, that any risks are reduced to a minimum.

Whilst it is generally recognised that the use of PPE can be undertaken without undue risks to health, it is appreciated that some employees may have genuine reservations and concerns. The company will seek to give information and training to enable a better understanding of these issues.

3.18.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Provide and replace PPE, as necessary, at no cost to the employee.
2. Carry out an assessment of proposed PPE to determine whether it is suitable.
3. Take any necessary measures to remedy any risks found as a result of the assessment.
4. Ensure that where two or more items of PPE are used simultaneously that they are compatible.
5. Arrange for adequate accommodation for the correct storage of PPE.
6. Implement steps for the maintenance, cleaning and repair of the PPE.
7. Train managers and staff in the safe use of PPE and maintain records of this training.
8. Inform employees of the risks.
9. Review the arrangements if new or different substances are used or if work processes change.
10. Ensure that all records are signed and kept.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.19 Visitors to Company Premises

Section 3 of the Health and Safety at Work, etc. Act 1974 imposes a duty on every employer to conduct his business in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment are not exposed to risks to their health and safety. This general duty is extended by section 4 of the Act and refers to persons having control of the premises as well as to employers (and indeed the self-employed).

The term 'persons not in his employment' can therefore mean:

1. Officials, i.e. Health and Safety Executive Inspectors, Police, Local Authority personnel or client's representatives.
2. Other contractors engaged to carry out work on the Client's premises.
3. Businesspersons, i.e. sales representatives, buyers and others engaged on official business with the Company.
4. Others, i.e. delivery drivers, general public, etc.

Visitors to Company premises shall, where reasonably practicable, be accompanied at all times. All visitors will be made aware of any company rules appropriate to their undertaking and will be expected to sign in when arriving and sign out when leaving the premises.

3.20 Noise Control

3.20.1 General Statement

The company will take all reasonable steps to ensure that the risk of hearing damage to employees who work with noisy equipment or in a noisy environment is reduced to a minimum. The company also recognises that noise levels below those that cause hearing damage, in offices for example, can still cause problems such as disturbance, interference with communication and stress and will take all reasonable steps to reduce noise levels as far as possible.

The company will also take all reasonable steps to minimise the disturbance caused by noise from company premises affecting people in the neighbourhood and co-operation is required of all members of management and staff.

3.20.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Carry out noise assessments where any doubt exists as to whether machinery or plant owned or used by company employees has a noise output in excess of 80 dB(A), or a peak output in excess of 135 dB(A).
2. Implement control measures to reduce noise levels at source or to protect workers from the source of noise.
3. Mark areas as Hearing Protection Zones, when required and make hearing protection mandatory in these areas.
4. Provide suitable and effective hearing protection to employees working in high noise levels where the noise levels cannot be reduced by engineering means.
5. Provide for the maintenance, repair or replacement of protective equipment and provide training in the selection, fitting and use of protective equipment.
6. Maintain all equipment and monitor all procedures introduced to reduce the noise exposure of employees.
7. Provide adequate training and supervision of employees as part of its hearing conservation and noise control policy. All employees who are subject to high levels of noise will be provided with information, instruction and training about the harmful effects of noise and what they must do in order to protect themselves.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.21 Electricity

3.21.1 General Statement

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

Where a problem arises related to electricity at work, employees must inform the Site Supervisor immediately and the Company will then take the necessary measures to investigate and remedy the situation.

3.21.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with workers:

1. Ensure that electrical installations and equipment are installed in accordance with the Institute of Electrical Engineers (IEE) Wiring Regulations;
2. Maintain the fixed installation in a safe condition by carrying out routine safety testing;
3. Inspect and test portable and transportable equipment as frequently as required (the frequency will depend on the environment in which the equipment is used and the conditions of usage, i.e. how carefully it is handled);
4. Promote and implement a safe system of work for maintenance, inspection and testing;
5. Prohibit live working unless absolutely necessary, in which case a permit to work must be issued before work begins;
6. Ensure that employees who carry out electrical work are competent to do so;
7. Prohibit all work by the Company's staff on equipment or systems above 650 volts: such work will be carried out under contract by approved contractors who are required to be competent, trained and equipped for this work;
8. Exchange safety information with contractors, ensuring that they are fully aware of (and prepared to abide by) the Company's health and safety arrangements;
9. Provide suitable personal protective equipment and facilities to maintain it in good condition;
10. Maintain detailed records in line with statutory requirements and best practice;
11. Provide information, instruction and training to all employees to enable them to carry out their duties without putting their health and safety at risk. Only competent persons should carry out electrical work. If it is found necessary to use in-house technical staff to carry out such work, they will be adequately trained to the level required.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.22 Permits to Work

3.22.1 General Statement

As part of the duties under Section 2 of the Health and Safety at Work Act 1974 the company has introduced permits to work for the following work activities:

1. Hot work
2. Entry into confined spaces
3. Electrical work
4. Excavation work
5. Roof work.

It is the intention of the company to introduce new or modify existing permits to work as necessary and to review their use as appropriate.

The permit to work system applies to all work carried out on site and employees, contractors and all visitors are expected to comply with the requirements of any permits that are in force.

Employees working off site, for example on another company's site or premises, are expected to abide by all permits to work being operated on that site. Where no such permits are in use, employees must operate the permit procedures of the Orion Group. If additional permits are deemed to be necessary for certain off-site work then this should be raised with the appropriate person and the need for the permit determined.

Should employees experience any problems with the operation of permit to work systems, they should immediately inform a responsible person (usually a manager or supervisor) so that the company can investigate and rectify the situation.

3.22.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Plan the work to be carried out and consider potential risk areas;
2. Determine the need for permit systems to ascertain whether present permit systems apply or whether a new permit needs to be developed;
3. Determine equipment needs and make available the equipment necessary for test work and permit implementation;
4. Audit permit use on site (and off site when necessary);
5. Review permit operation periodically, modify permits as necessary and implement follow-up action if "failure" incidents occur;
6. The company will provide the necessary information and training to ensure that workers, supervisors, contractors and visitors are fully aware of the permits in use and are competent to undertake the tasks and tests prescribed in the permits.

The person responsible for the implementation of this policy is defined in the Organisation and Responsibilities Section.

3.23 Office Safety

3.23.1 General

In order to ensure office safety, the following conditions will be employed by the Company in addition to the policy on working with display screen equipment:

1. All traffic routes, walkways and emergency exit routes must be kept free from obstruction.
2. All cables must run along walls and not along floors, thereby reducing the likelihood of a trip hazard. Cable holders should be used to ensure the safe use of computer and printer cables, wherever possible.
3. Workstations should be organised to provide the maximum freedom of movement for staff. They should be free of clutter. Bags and briefcases should be stored under the desk away from walkways.
4. Items should be stored safely on shelves or in filing cabinets and not left in a pile on the desk. Heavier items should be stored on lower shelves, lighter items on higher shelves.
5. On no account should any employees stand on a chair to reach an item. Kick stools or stepladders should be used.
6. Electric kettles, coffee makers and water dispensers should be stored and used away from computers, photocopiers, fax machines etc.
7. Guillotines and paper shredders should only be used if the guard is in place.
8. Clothing etc. must never obstruct heaters as this presents a fire risk.

3.23.2 Storage

Materials and objects need to be stored and stacked in such a way so that they are not likely to fall and cause injury.

It is the policy of the Company to ensure that:

1. All items are stored safely so as not to fall and cause damage to persons, building or equipment.
2. Walkways and emergency routes are kept clear of items to ensure safe exit routes in the event of an emergency.
3. Storage racking and shelving is of adequate strength and stability for the loads to be placed on them.
4. The maximum load of storage areas is never exceeded.
5. All storage racking and shelving is regularly checked to ensure that they are not damaged in any way. If damage is noted, that this is recorded and the necessary action taken.
6. Employees are encouraged to report any problems, including damage, to the racking so that its safety can be assessed.
7. Maximum load notices are fixed to racking and shelving to assist in its safe function.
8. Items stored are easily retrievable by employees through safe working procedures and without putting themselves at risk.

9. On no account are emergency exit route signs, fire extinguishers, or emergency exit doors to be obstructed by any item.
10. All employees expected to use pallet stackers or other pallet trucks, must be given the necessary training in its safe use.

3.24 Display Screen Equipment

3.24.1 General Statement

All reasonable steps will be taken by the Company to secure the health and safety of employees who work with display screen equipment (DSE).

The Company acknowledges that health and safety hazards may arise from the use of this equipment. It is the intention of the Company to ensure that any risks are reduced to a minimum. Although work with display screen equipment is generally not considered high risk it can lead to muscular and other physical problems, particularly eye fatigue and mental stress. It has been recognised that these can be overcome by the good ergonomic design of equipment, furniture, working environment and the tasks performed.

3.24.2 Arrangements for Securing the Health and Safety of Employees

The Company will, in consultation with employees:

1. Carry out an assessment of each workstation, taking into account the DSE, the furniture, the working environment and the employee;
2. Provide employees with training and information in the safe use of display screen equipment;
3. Take all necessary measures to remedy any risks found as a result of the assessment;
4. Take steps to incorporate changes of task within the working day, in order to prevent intensive periods of on-screen activity;
5. Review software to ensure suitability for the task;
6. Arrange for the provision of eye and eyesight tests at regular intervals or where a visual problem is experienced;
7. Arrange for the free supply of any corrective appliances (glasses or contact lenses) where required specifically for working with DSE;
8. Advise employees and all persons applying for work with DSE, of the risks to health and how these are to be avoided.
9. The Company will give sufficient information, instruction and training as is necessary to ensure the health and safety of employees who use DSE. This provision also applies to persons not in direct employment, such as temporary staff employed through agencies.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.25 Environmental Policy

The Company recognises the responsibilities placed on them by the Environmental Protection Act 1990 and as such are committed to operating in such a way that work activities do not have a negative effect on the environment.

Wherever possible in purchasing its materials, equipment and consumable items the Company will give preference to purchasing items that do least environmental harm. This means items should:

1. Not be supplied with excessive packaging;
2. Have low energy consumption;
3. Be re-usable or at least recyclable;
4. Have low (or zero) solvent use in manufacture;
5. Have low (or zero) solvent emission in use;
6. Ideally be carbon neutral.

The Company will be proactive in environmental control and to self-regulation rather than being reactive after the event.

The Company will seek to minimise the generation of wastes, taking into account the nature of work, through the reduction, reuse, or recycling of materials, equipment and consumables.

Working to current legislation and regulatory standards are deemed the minimum requirements but the objective of the Company is to surpass this minimum standard.

It is the policy of the Company to ensure that all waste produced is disposed of in accordance with the requirements of the Environmental Protection Act 1990 and the Regulations made under this Act.

This philosophy is accepted and implemented from the Directors and throughout the workforce.

3.26 Stress

3.26.1 General Statement

The company recognises that, whilst a degree of stress can be a positive force at work, excessive pressures can have a negative effect on health and on performance at work. The company is committed to promoting good health at work; it is therefore concerned to recognise any negative effects that stress may have on individual members of staff, and to provide suitable support mechanisms for members of staff suffering from the negative effects of stress.

Through the risk assessment process, the company will continue to identify hazards and assess all mental and physical risks to health and safety with the objective of reducing them, as far as is reasonably practicable.

3.26.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Ensure, so far as is reasonably practicable, that excessive stress is eliminated from the work environment and that the necessary risk assessments are completed and acted upon in the case of workplace stressors
2. Provide suitable support mechanisms for members of staff suffering from the negative effects of stress
3. Encourage a working environment where members of staff who feel they are suffering from the negative effects of stress can approach their managers in confidence, in order that the necessary support mechanisms can be put in place
4. Encourage a culture where stress is not seen as a sign of weakness or incompetence
5. Ensure adequate rehabilitation of employees returning to work after periods of absence
6. Provide suitable training and guidance for line managers to enable them to recognise symptoms of negative stress in their staff and themselves
7. Provide suitable training and guidance to line managers to enable them to undertake the necessary risk assessments in relation to stress in the workplace, and to arrange for implementation of effective control measures where appropriate
8. Provide information and training for staff in general on the effects of stress at work, effective communication, handling difficult situations, time management and employee relations
9. Undertake general health promotion activities within the workplace.

Members of staff will be offered any relevant counselling, help with stress reduction techniques and a full appraisal of their work situation. All referrals will be dealt with in complete confidence.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.27 Driving and Mobile Phones

3.27.1 General Statement

The company is committed to maintaining the safety of its employees whilst they are driving vehicles on company business. The following arrangements have been put in place, by the Directors, to ensure the safe operation of vehicles. The Directors will ensure that all control measures identified are implemented and managed effectively.

These arrangements and procedures created from them; do not override the legal requirements that apply to all drivers. All drivers must obey the Highway Code and all other relevant legislation while driving on company business. Absolute priority must be given to the safety and well-being of all drivers and passengers in all vehicles owned or hired by the Company.

A list of approved drivers will be maintained by the Directors.

3.27.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Ensure that all drivers hold a current, valid driving licence for the class of vehicle they are expected to drive;
2. Maintain recent copies of licences on file;
3. Assess the risks involved and the control measures that need to be put into place;
4. Implement the control measures identified in the risk assessments;
5. Ensure that all vehicles have a valid tax disc and MOT certificate, if required;
6. Ensure that vehicles are maintained, inspected and serviced in line with statutory requirements and manufacture's recommendations;
7. Maintain records for each vehicle;
8. Provide drivers with all the necessary procedures and documentation to deal with any situations that may arise.
9. Instruct drivers not to use hand held mobile phones whilst driving.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.28 Abrasive Wheels

3.28.1 General Statement

All reasonable steps will be taken by the company to ensure the health and safety of employees who work with grinding machines, which incorporate abrasive wheels. When used properly, abrasive wheels serve an important purpose. However, the company acknowledges that health and safety hazards may arise from the use of this equipment. It is the intention of the company to ensure that any risks are reduced to a minimum.

3.28.2 Arrangements for Ensuring the Health and Safety of Workers

The company will, in consultation with workers:

1. Carry out an assessment of the work activity
2. So far as is reasonably practicable, take measures to reduce the risks found as a result of the assessment
3. Ensure that all equipment used for grinding operations is maintained in good condition and is suitable for the task
4. Advise all employees, including new employees, who work or will work with abrasive wheels of the risks to health and safety and of the results of assessments.
5. The company will give sufficient information, instruction and training to ensure the health and safety of workers who use abrasive wheels. This provision also applies to persons not in direct employment such as temporary staff and contractors. Training in the use of abrasive wheels will cover aspects of health and safety legislation in general and the Provision and Use of Work Equipment Regulations 1998 in particular.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.29 Manual Handling

3.29.1 General Statement

Statistics show that manual handling is one of the most common causes of absence through injury at the workplace. More than one third of lost time accidents are caused in this way. These injuries may often have long-term effects. It is the policy of the company to reduce the risk of manual handling injuries and to provide control measures and guidance to ensure safe lifting and carrying at the workplace.

3.29.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Assess the risks involved and the control measures that need to be put into place;
2. Implement and monitor the control measures;
3. Ensure that safe working practices are developed and implemented;
4. Provide and maintain suitable manual handling equipment and keep records of all maintenance and statutory inspections;
5. Issue suitable personal protective equipment to workers and maintain signed issue records and records of any maintenance or inspections;
6. Provide workers with information, instruction and training on manual handling, the safe working practices, equipment and use of personal protective equipment and other safety measures;
7. Maintain signed records of all instruction and training;
8. Ensure that manual handling activities are supervised appropriately.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.30 Workplace Transport

3.30.1 General Statement

The company will take all reasonable steps to ensure the safety of all employees working with workplace transport, as well as to ensure the safety of others who may be affected by operations. The company will ensure, as far as is reasonably practicable, that all workplace transport activities are safe and will seek to inform and train employees and others to implement this policy.

Should employees have any problems relating to workplace transport safety, they should immediately inform a responsible person (usually a manager or supervisor) so that steps can be taken to remedy the situation promptly.

3.30.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Make careful and thorough assessment of the risks associated with workplace transport activities and implement appropriate control measures;
2. Ensure that only qualified workers operate workplace transport;
3. Ensure that there are safe vehicle and pedestrian routes;
4. Ensure that all vehicles are inspected, serviced, maintained and fitted with appropriate safety devices such as seat belts, warning lights, warning beepers etc;
5. Wherever possible, physically segregate traffic from pedestrians with the use of barriers;
6. Establish safe working practices for all activities involving workplace transport;
7. Define responsibilities for safety throughout the workforce, i.e. "organise for safety", and promote a positive attitude to safety in general amongst the workforce;
8. The company will give the information, instruction and training necessary to ensure the health and safety of all operators and any others affected by the machinery. Managers responsible for supervising the operation of the machinery will be appropriately trained.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.31 Safety Signs & Signals

3.31.1 General Statement

The company is aware that it must provide and maintain safety signs where risks cannot be adequately controlled using other health and safety measures alone. The company has carried out risk assessments, as required by the Management of Health and Safety at Work Regulations 1999 and these identify where safety signs and signals are required.

The company will provide and maintain the safety signs identified by the risk assessments. The company will also provide and maintain the safety signs required by fire safety legislation.

The company will ensure that the safety signs provided comply with the requirements of the Health and Safety (Safety Signs and Signals) Regulations 1996.

3.31.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Identify where safety signs are needed by risk assessment.
2. Provide safety signs that comply with the specifications laid down by the Health and Safety (Safety Signs and Signals) Regulations 1996.
3. Clean signboards as frequently as necessary to ensure they remain visible and check they remain securely fastened.
4. Test and maintain illuminated signs and acoustic signals.
5. Train employees in the meaning of safety signs.
6. Ensure that employees who use verbal communication or hand signals are competent in their use, including training them on the code used by the company.
7. The company will provide sufficient information, instruction and training to all employees on the meaning of safety signs and what could happen if they are ignored. Managers and supervisors will also be given appropriate training.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.32 Working at Height

3.32.1 General Statement

When employees are expected to work above the ground and away from solid platforms, scaffolds or other access equipment may be appropriate. Due to the nature of the work carried out by the Company, working at heights is an aspect of the job that cannot be avoided. There are inherent dangers from working at heights and it is the policy of the Company that strict procedures must be in place.

All reasonable steps will be taken by the Company to provide a safe working environment for employees required to carry out their trade or professional skills at height. The Company will provide the necessary preventative and protective measures to prevent falls of persons or materials from the workplace and will liaise with any other persons involved in the work activity.

3.32.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with workers:

1. Carry out an assessment of the risks involved in work at height and take steps to eliminate or control them;
2. Provide all the necessary equipment to allow safe access to and egress from the place of work as well as emergency rescue equipment;
3. Provide suitable plant to enable the materials used in the course of the work to be safely lifted to and stored, if necessary, at the workplace;
4. When working in an open environment, assess the effect of weather conditions on the type of work being undertaken and, if necessary, halt work temporarily (once the work, plant and equipment have been left in a safe condition) until such time as it is safe to continue;
5. When working at dusk, night or dawn, provide sufficient local lighting, so that work can be carried out safely and access and egress are easily visible;
6. Arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so;
7. Appoint a competent person to be responsible for the supervision of the erection, altering and dismantling of scaffolding and for the inspection of equipment used in work at height;
8. Provide any information, instruction and training that an employee may require to carry out their work in a safe manner when working at height.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.33 Welfare Facilities

3.33.1 General Statement

The company recognises its duty to provide a healthy working environment and suitable welfare facilities. Welfare facilities is a wide term, embracing both sanitary and washing accommodation at workplaces, provision of drinking water, clothing accommodation (including facilities for changing clothes) and facilities for rest and eating meals.

The need for sufficient suitable hygienic lavatory and washing facilities in all workplaces is obvious. Sufficient facilities must be provided to enable everyone at work to use them without undue delay.

3.33.2 Arrangements

The Company will:

1. Ensure an assessment is undertaken of the general workplace condition.
2. Ensure the workplace is adequately ventilated and temperature controlled where possible.
3. Ensure that the workplace lighting meets a satisfactory standard.
4. Ensure good housekeeping standards are maintained and waste is cleared on a regular basis, so as not to give rise to blocked access routes and possible slips, trips and falls etc.
5. Ensure that adequate sanitary conveniences, washing, changing and drying facilities are provided as appropriate.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.34 Waste Disposal

3.34.1 General Statement

This company is committed to ensuring the health, safety and welfare of its employees and of others who may be affected by the waste materials, which result from our work. Our policy is to arrange for the disposal of all waste products regularly, safely and in accordance with statutory requirements.

Waste produced on construction sites is classed as controlled waste and as such must be controlled to comply with legislation.

The waste disposal arrangements will be regularly reviewed. Recycling initiatives will be taken where reasonably practicable in order to help protect the environment and make better use of resources.

3.34.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Carry out a risk assessment to identify any control measures required to protect workers and an environmental assessment to determine the appropriate methods of waste disposal;
2. Implement control measures to protect workers when they are handling waste materials;
3. Ensure that the company has all the necessary waste disposal licenses;
4. Provide suitable receptacles for the collection of controlled waste and ensure that the containers are clearly marked with the type of waste that they are designed to hold;
5. Ensure that waste containers are only supplied and removed by a licensed waste disposal contractor;
6. Determine which waste items can be recycled and supply the appropriate, clearly labelled, containers or ensure that the materials are taken to the Company's recycling facility;
7. Ensure that arrangements are made with a licensed company for the removal of special waste, e.g. liquids, asbestos and other hazardous substances;
8. Supply workers with any personal protective equipment necessary for the safe handling of waste materials and maintain signed issue records;
9. Provide workers with sufficient information, instruction, training and supervision to ensure that health and safety and waste disposal regulations are complied with.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.35 Lone Working

3.35.1 General Statement

The Company will ensure, so far as is reasonably practicable, that employees and self-employed contractors who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety. Measures will also be adopted to protect anyone else affected by solitary working.

Solitary working exposes employees and others to certain hazards. The Company's intention is either to entirely remove the risks from these hazards or, where complete elimination is not possible, to reduce them to an acceptable level.

3.35.2 Arrangements for Securing the Health and Safety of Workers

The Company will, in consultation with workers:

1. Carry out an assessment of the risks of working alone and implement the control measures identified;
2. Provide adequate systems of communication and ensure that a system of escalating emergency response is in operation;
3. Provide lone workers with adequate personal protective equipment and maintain records of its issue;
4. Provide workers with all the necessary information, instruction, training and supervision to enable them to recognise the hazards and appreciate the risks involved with working alone;
5. Where necessary, establish clear procedures to limit what can and what cannot be done while working alone;
6. Utilise a written permit to work system where the risks are considered high.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.36 Hand Arm Vibration

3.36.1 General Statement

The company will take all reasonable steps necessary to ensure that the risk of illness to employees, who work with vibrating hand-held equipment or equipment that causes whole body vibration, is reduced to a minimum.

The company recognises that vibrating hand tools can cause a range of conditions which are collectively known as Hand-Arm Vibration Syndrome as well as diseases such as Carpal Tunnel Syndrome. The symptoms of these diseases include:

- Tingling and numbness in the fingers
- Inability to feel things properly
- Loss of strength in the hands
- The fingers going white (blanching) and becoming red and painful on the return of circulation (Vibration White Finger)

The company also recognises that vibrating machinery can cause Whole Body Vibration which may give rise to back and neck pain.

Symptoms may appear after a few months or may take several years. Repeated exposure may make the symptoms permanent. These symptoms can reduce an employee's ability to work and could seriously affect the person's family and social life.

3.36.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Assess the risk of vibration to employees and implement control measures as required;
2. If employees are exposed to more than the daily (A8) Exposure Action Value (2.5ms⁻²) then the company will:
 - a. Introduce a programme of controls to eliminate the risk or to reduce exposure to as low a level as is reasonably practical e.g. job rotation, purchasing low vibration equipment, using jigs to operate equipment remotely etc;
 - b. Provide health surveillance for those employees who are still regularly exposed to levels above the action level.
3. Decide if employees are likely to be exposed above the daily (A8) Exposure Limit Value (5ms²) and take immediate action to reduce exposure if they are;
4. Provide information and training, to employees, on the health risks and actions to control the risk;
5. Keep a record of risk assessments and control measures;
6. Keep records for any employees undergoing health surveillance;
7. Review and update risk assessments regularly.

The company must ensure that employees do not exceed the daily exposure limit value for vibration. If they do then steps must be taken to reduce exposure and identify the reasons

for the excess vibration (this part does not apply until 6th July 2010 if machinery was first provided to employees prior to 6th July 2007).

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.37 Work Related Upper Limb Disorders

3.37.1 General Statement

The company is aware that some repetitive activities or combination of activities can result in the condition referred to as WRULD or RSI. This commitment extends to taking all reasonable precautions necessary to secure the health and safety of employees through the application of engineering and sound ergonomic principles. Due to the nature of WRULD it is a clear responsibility of all employees to consult and inform management of perceived risks and of any symptoms.

3.37.2 Arrangement for Securing the Health and Safety of Employees

The company will, in consultation with workers:

1. Carry out a risk assessment of all activities to identify the risks that could lead to WRULD;
2. Evaluate the possible control measures identified in the risk assessment and implement the most suitable measures e.g. changing the way the job is done, engineering improvements, equipment improvements etc.
3. Establish capability needs for each task and then ensure that tasks are fitted to the individual, as far as reasonably practicable;
4. Implement a self and management referral system for employees who may experience symptoms;
5. Implement an occupational health system, if required;
6. Ensure that all applicants are made aware of the job requirements and of their responsibilities to report symptoms;
7. Provide adequate information, instruction and training on the tasks to be carried out and on the causes and symptoms of WRULD;
8. Provide adequate, competent supervision.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.38 Young Persons

3.38.1 General Statement

The company is aware of the additional risks that may follow as a consequence of the employment of young persons and will take all measures necessary to minimise those risks, so far as is reasonably practicable. The company will assess and document the additional risks and measures provided to ensure the health and safety of young persons.

The company is aware of the statutory restrictions imposed upon work undertaken by young persons and will comply with these restrictions. Young persons will be given the raised level of information, instruction, training and supervision required to enable them to work safely.

Employees' concerns regarding young persons in the workplace should be addressed to their Supervisor or a Director and measures will then be taken to investigate the circumstances and provide a solution.

3.38.2 Arrangements for Ensuring the Health and Safety of Workers

All reasonable steps will be taken by the company to secure the health and safety of young persons. Young persons may be schoolchildren placed with the company on work experience programmes or apprentices employed by the company. These arrangements will also apply to other young persons under 18 and to inexperienced workers in general.

The company will, in consultation with workers:

1. Ensure that there is thorough preparation before young or inexperienced workers arrive, enabling a risk assessment to be undertaken of any hazards to which they may be exposed;
2. Ensure that all control measures identified, in the risk assessment, are implemented;
3. Ensure that young persons receive a thorough induction on arrival, not only to provide an introduction to work but to explain any health and safety rules, regulations and precautions that must be taken.
4. Inform all employees of their responsibilities and provide clear details of the extent of the work that may be undertaken by the young persons;
5. Identify the activities in which young persons are to be engaged, ensure that all risks are controlled and a safe system of work implemented.
6. Determine whether it will be necessary to impose any limitations or special arrangements on medical grounds (e.g., where a young person suffers from asthma, defective colour vision or hearing impairment, etc);
7. Ensure that young persons are adequately supervised by experienced and competent supervisors until they have demonstrated that the level of supervision can be safely reduced.
8. Carry out a training needs analysis so that the young person can be provided with the information, instruction and training necessary to bring them up to an acceptable level of competence.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.39 Selection and Control of Sub-Contractors

3.39.1 General Statement

The Company acknowledges that they have a responsibility to select sub-contractors that are suitable to carry out the contracted work and to control the activities of the sub-contractors while they are on site. The company recognises that it cannot pass on its health and safety responsibilities by signing a contract. In addition the Company must ensure that, if any work is further sub-contracted, that adequate procedures are in place to select and control any additional sub-contractors.

Clients, contractors and sub-contractors all have duties and responsibility under health and safety law but the extent of the responsibilities of each party will depend on the circumstances.

3.39.2 Arrangements for the Selection of Sub-Contractors

The company has the following arrangements in place for the selection and control of sub-contractors.

1. They will identify all aspects of the work that the sub-contractor will be required to carry out including preparation and completion phases. This will involve assessing the risks, deciding what information, instruction and training is required, how to co-ordinate and communicate with all parties and the level of management and supervision required.
2. Sub-contractors are assessed to ensure that they are competent (i.e. they have sufficient skills and knowledge) to do the job safely and without risks to health and safety. The degree of competence required will depend on the work to be done as will the assessment method. Assessment may be on the basis that the sub-contractor has worked with the company previously and is known to have robust health and safety performance. In other cases a more formal process is used involving the completion of health and safety questionnaires.
3. If any part of the work is to be further sub-contracted then evidence is obtained that a suitable sub-contractor selection process is employed.
4. Sub-contractors are informed of the health and safety performance that is expected. They are given a copy of the Health and Safety Policy so that they can review the arrangements in place.
5. Risk assessments will be carried out and then meetings will be held with sub-contractors to consider the risks, from each others work, that could affect the health and safety of the workforce or anyone else. Agreement will then be reached on the control measures required.
6. The company will provide its sub-contractors with the information and instruction that their employees require to ensure their health and safety. If necessary, training will be provided or proof of training will be requested. Information and instructions, about the risks arising from their work, will include safety rules and procedures and procedures for dealing with emergencies. This exchange of information will include details of any risks that the sub-contractors could not reasonably be expected to know about.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.40 Construction and Demolition

3.40.1 General Statement

It is Company policy to ensure that the risk from all construction and demolition work is both managed and controlled effectively. The objective is to ensure that, in so far as is reasonably practicable, all persons will be protected from major injury and lost time. The Company will comply with the Construction (Design and Management) Regulations 2007 (CDM) while carrying out construction work.

3.40.2 Arrangements for Ensuring the Health and Safety of Workers

The Company have in place suitable and sufficient arrangements to ensure that:

- All construction and demolition work, including alterations to plant, movement of plant between sites and internal structural changes are carried out in accordance with the requirements of the CDM Regulations 2007 or, where they may not apply, with best industry practice.
- A written plan and site rules are prepared prior to the construction phase commencing and that the construction phase is managed and monitored.
- Safe systems of work are used so as to maintain a safe place of work for all workers, visitors and members of the public who may be affected by the work.
- There are appropriate procedures to be followed in the event of serious and imminent danger at work.
- The competent persons defined in the legislation (e.g. CDM Co-ordinator) are appointed.
- Site Managers have overall responsibility from the start of the project for ensuring all safety, health and environmental considerations are taken into account.
- Employees are consulted over any work that is to be carried out in order to ensure that safety, health and environmental issues of any proposed work are understood.
- Contracts for construction or demolition works should explicitly explain the methods that will be employed to carry out all work safely. The contract should address such issues as access, working at heights, preventing falling materials, structural stability, excavations, construction vehicles, emergency procedures, fire precautions and welfare.
- Projects are notified to the HSE (Form F10) if the construction work is likely to last longer than 30 days or will involve more than 500 person days of construction work.
- Sub-contractors are provided with the relevant parts of the construction plan along with any other information they require to carry out their work safely.
- Suitable welfare facilities are provided from the start and maintained throughout the construction phase.
- All workers have site inductions and any further information and training needed for the work
- There is regular liaison with the CDM co-ordinator regarding the design.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.

3.41 Lift Trucks

3.41.1 General Statement

All reasonable steps will be taken by the company to ensure the health and safety of employees engaged in or affected by lift truck operation.

The company fully recognises and acknowledges that health and safety hazards will arise from the use of lift trucks. It is the company's intention to ensure that all risks are reduced to a minimum and to this end will seek to give adequate information, instruction, training and supervision to give a fuller understanding of these issues.

3.41.2 Arrangements for Securing the Health and Safety of Workers

The company will, in consultation with workers:

1. Carry out an assessment of all tasks involving the lift truck, taking into account the type of truck, the working environment the substances transported or handled;
2. Take necessary measures to remedy risks found as a result of the assessment;
3. Ensure that operators are fully trained by an accredited trainer and that they are sent on refresher training (Generally every 3 years);
4. Ensure that the fork lift truck is serviced and maintained in line with the manufacturer's recommendations;
5. Ensure that a Thorough Examination of lifting gear and accessories is carried out by a competent engineer every 6 months or as advised by the engineer;
6. Make sure that the operatives carry out pre-use checks;
7. Provide sufficient information, instruction and training to ensure the health and safety of workers who operate lift trucks. This provision also applies to persons not in direct employment such as temporary staff and contractors.
8. Formally review operator performance periodically and document the findings and any remedial action required.

The person responsible for implementing this policy is defined in the Organisation and Responsibilities Section.