



# Health, Safety and Environmental Policy

SSG Training & Consultancy Ltd

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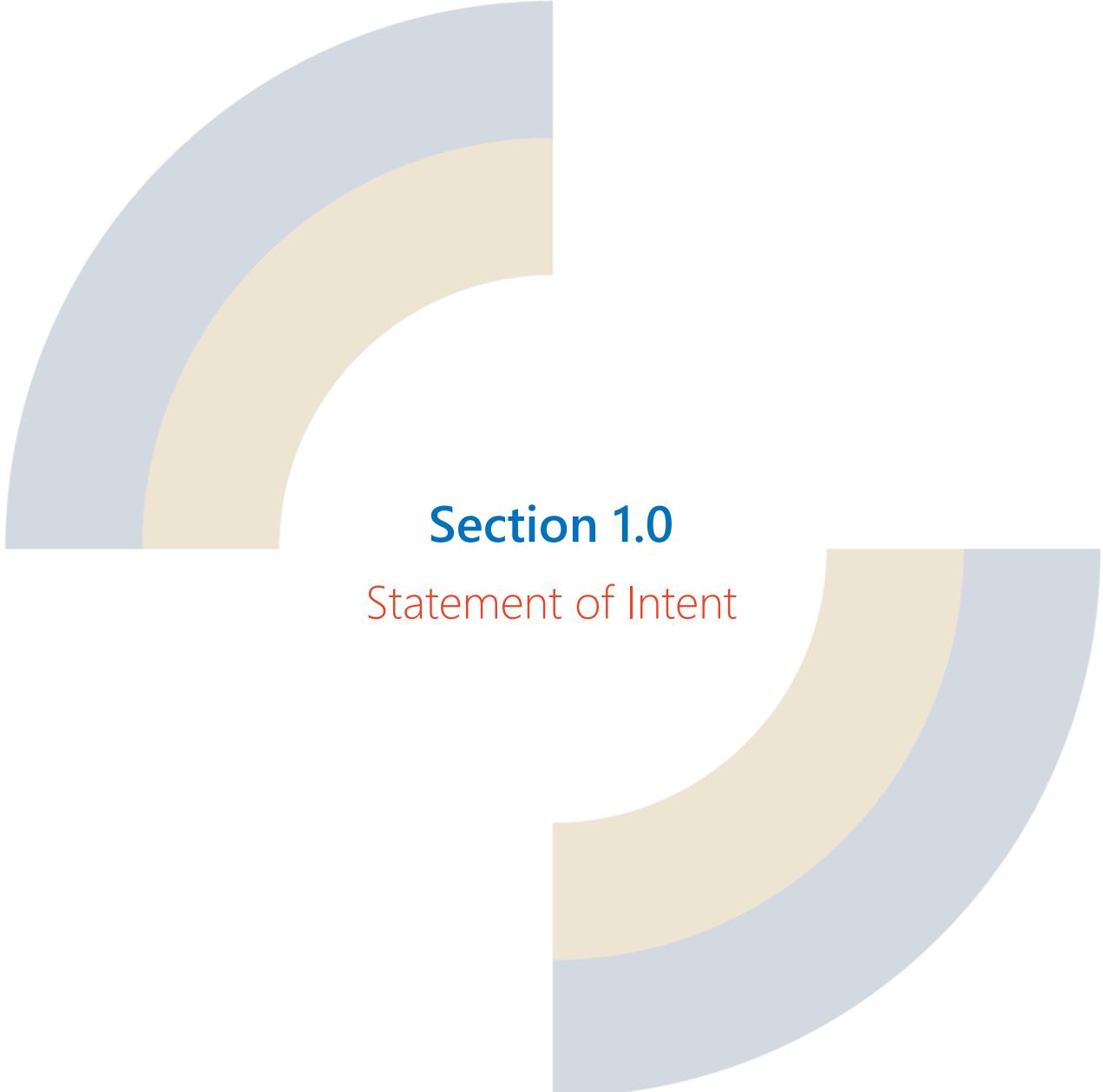
On receipt of this document / revision, please destroy all previous and now obsolete copies.

The next review is due: December 2026.

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## Section 1.0

### Statement of Intent

# 1.0 Statement of Intent

## 1.1 Health & Safety Policy Statement of Intent

The objective of this policy is to attain and maintain high standards of health and safety performance throughout SSG.

All persons conducting activities under the name of SSG will adhere to this Health & Safety Policy.

SSG will comply with the Health and Safety at Work etc. Act 1974 and Regulations subsequently laid under it and meet the standards required therein.

Hazards will be identified, and the risk of injury, disease or dangerous occurrence will be minimised by the achievement and maintenance of high standards of health and safety. These standards will be achieved, so far as is reasonably practicable, by:

- Demonstrating a visible management commitment to high standards of health and safety performance and the promotion of a positive health and safety culture throughout the company.
- Providing and maintaining a safe working environment that is without risk to health, together with adequate facilities and arrangements for the welfare of employees.
- Providing and maintaining plant, equipment and systems of work that are safe and without risk to health.
- Providing and maintaining means of access to and egress from the workplace that are safe and without risk.
- Having in place adequate arrangements for the regular assessment of work activities in order to identify related hazards and to control associated risk.
- Having in place effective systems to protect employees and other persons affected by company activities.
- Having in place adequate arrangements to ensure safety and the absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Providing such information, instruction, training and supervision as is necessary to ensure the health and safety of employees of the company.
- Obtaining the co-operation of employees in enabling statutory obligations under health and safety legislation to be met.
- Committing to a process of continual improvement with respect to health and safety management in all areas of the business, with the active engagement and participation of employees and contractors.

Date: 16<sup>th</sup> December 2025

Signature:



Mark Salmon

Reviewed: Annually

Director Responsible for Health, Safety & Environment

## 1.2 Environmental Policy and Statement of Intent

SSG considers environmental management to be of prime importance and is fully committed to fulfilling all environmental responsibilities as well as continuous improvement of environmental performance. As such SSG will work with clients, contractors, suppliers and the workforce towards achieving this goal.

The objective of this policy is to attain and maintain high standards of environmental performance throughout SSG.

All persons conducting activities under the name of SSG will adhere to this Environmental Policy.

It is the policy of the company to:

- Understand and comply with all legal requirements, codes of practice and regulations.
- Organise operations in order to minimise pollution and disturbance to neighbours and the general public.
- Provide assistance, training and information that may be necessary to personnel at all levels.
- Use materials and resources with regard to long-term sustainability.
- Employ a consistent framework for the management of environmental issues across all its operations.
- Audit environmental performance.

The successful management of environmental issues will be achieved by:

- Identification and management of environmental risks and aspects.
- Prevention of pollution.
- Minimisation of waste.
- Provision of prompt response to incidents and emergencies.
- Promotion of environmental issues and good practice.
- Reviewing and reporting on the content and implementation of this policy.

Date: 16<sup>th</sup> December 2025

Signature:



Mark Salmon

Reviewed: Annually

Director Responsible for Health, Safety & Environment



## Section 2.0

### Roles and Responsibilities

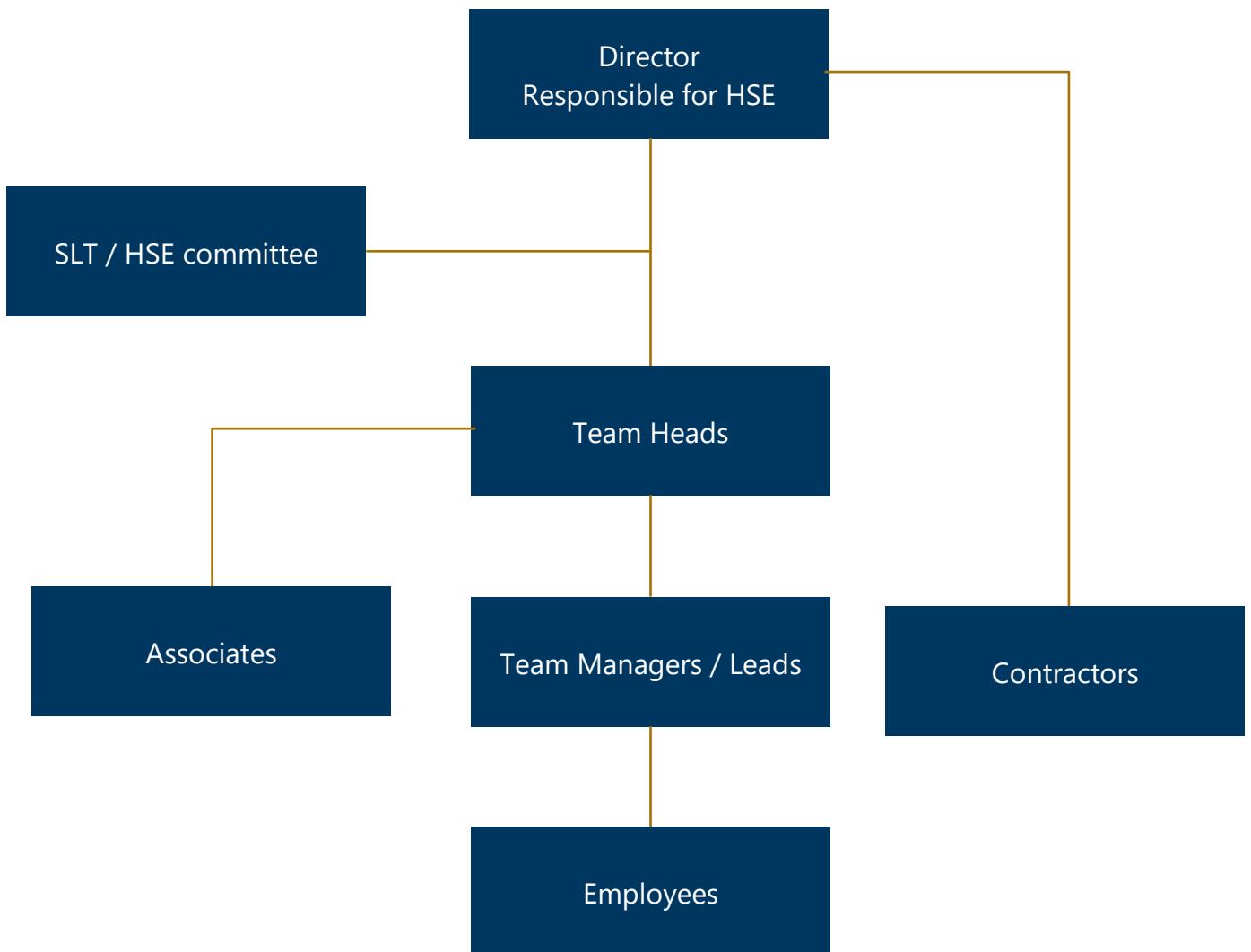
## 2.0 Roles and responsibilities

### 2.1 Introduction

Health, safety and environmental (HSE) management is the responsibility of all personnel of SSG and is a joint responsibility with contractors. It is the responsibility of the director responsible for HSE, SLT members, and team leaders to ensure that all personnel and contractors are properly equipped, trained and motivated in order to ensure high HSE standards at work.

- Employees are deemed to be those persons directly employed, either on a full-time or part-time basis, by SSG and those self-employed persons who undertake work on behalf of SSG.
- Contractors and Associates are deemed to be those persons who work for SSG but who are not direct employees. The term 'contractor' is understood to include all associated subcontractors.
- Suppliers are deemed to be those persons who supply goods and/or services.

## 2.2 Company HSE Organisation Chart



## 2.3 Director Responsible for Health, Safety and Environment

The director responsible for Health, Safety and Environment (HSE) has overall responsibility for the health, safety and welfare of all company employees, for the environmental impact of company activities and fulfilment of all legal duties imposed on him, as the employer, by relevant legislation.

In recognition of the legal duties imposed upon him, the director responsible for HSE will:

- Understand the main requirements of the Health and Safety at Work etc. Act 1974.
- Ensure that every aspect of health, safety and the environment and its implications is given due consideration in all executive decisions.
- Set, monitor and review the effectiveness of the company HSE Policy, ensuring that it meets current legislative requirements and accurately reflects company activities.
- Ensure adequate resources are available to implement the company HSE Policy and to enable legal and moral obligations to be met.
- Seek advice, as and when appropriate, on HSE issues.
- Ensure that all new employees receive adequate induction training as soon as is reasonably practicable after joining the company, and on starting at a new site.
- Ensure all employees and contractors receive suitable information, instruction, training and where appropriate, supervision to ensure their competence for the work they are to undertake.
- Ensure that all plant, equipment and materials are safe and suitable for the work for which they are to be used.
- Ensure that suitable and sufficient risk assessments of company activities are undertaken to identify and implement effective control measures required to eliminate, reduce or control the risk of harm occurring to employees or others who may be affected by the activity.
- Ensure that the results of the risk assessments are effectively communicated throughout the company and to others who may be affected by the activity.
- Ensure employees are provided with PPE as identified by risk assessment.
- Ensure employees are trained in the use and maintenance of PPE.
- In respect of hazardous substances, ensure that appropriate information is available to enable suitable assessment of the process to be conducted.
- Ensure that accidents and near misses are recorded.
- Ensure that all injuries, diseases, dangerous occurrences and significant near misses involving company employees are investigated and, where appropriate, reported as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Maintain effective communication routes throughout the company and ensure employees are aware of the company HSE Policy and other HSE matters as they arise.
- Take immediate action in respect of:
  - Prohibition and improvement notices.
  - Matters of complaint by Health and Safety Executive Inspectors.
  - Concerns by employees or others of HSE standards and
  - Accidents, incidents and near misses involving company employees.
- Ensure maintenance of registers and records as required by current legislation.
- Ensure that HSE management within the company is periodically audited to ensure that high standards of HSE performance are being maintained and to identify areas where improvements are to be made.
- Ensure that HSE performance is regularly reviewed.

## 2.3.1 Duties Under the Construction (Design & Management) Regulations 2015

### Client Responsibilities

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where the company is the client, or is taking on CDM duties on behalf of a domestic client, the director responsible for HSE will ensure that:

- Suitable arrangements are made for managing a project, including the allocation of sufficient time and other resources. Arrangements are suitable if:
  - the construction work can be carried out, so far as is reasonably practicable, without risks to the health or safety of any person affected by the project and
- Welfare facilities provided from the beginning and throughout the construction phase are in compliance with Schedule 2 of CDM 2015.
- Arrangements identified above are maintained and reviewed throughout the project.
- Where there is more than one contractor on site at any time (or it is foreseeable that there will be) the following are appointed in writing as soon as is practicable before the construction phase begins:
  - A principal designer who controls the Pre-construction Phase.
  - A principal contractor who controls the Construction Phase.
- Reasonable steps are taken to ensure that designers (including principal designer), contractors (including principal contractor), and other team members that are appointed have the skills, knowledge, experience, and organisational capability to fulfil their role and secure the health and safety of those working on the project.
- Reasonable steps are taken to ensure that the principal designer and principal contractor comply with their respective duties.
- Pre-construction information is provided as soon as is practicable to every designer and contractor appointed, or being considered for appointment, to the project.
- A Construction Phase Plan is drawn up before the construction phase begins.
- The principal designer prepares and maintains a Health and Safety File.
- The HSE are notified in writing when a project is notifiable. A project is notifiable when:
  - It lasts longer than 30 working days and has more than 20 persons on site at any one time.
  - Exceeds 500 person days.
- All parties involved with the project cooperate with one another.

### Principal Contractor Responsibilities

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where the company is the principal contractor, the director responsible for HSE will:

#### Construction Phase

- Not accept an appointment unless they have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- Not commence work in relation to a project unless satisfied that the client is aware of their duties under these regulations.
- Take reasonable steps to ensure that designers, contractors or other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure the health and safety of those working on the project.
- Plan, manage and monitor the construction phase and coordinate matters relating to health and safety during the construction phase to ensure that, so far as is reasonably practicable, construction work is carried out without risks to health or safety. In particular the general principles of prevention must be taken into account when:
  - Design, technical and organisational aspects are being decided in order to plan the various items or stages of work which are to take place simultaneously or in succession and
  - estimating the period of time required to complete the work or work stages.
- Organise cooperation between contractors (including successive contractors on the same construction site).

- Coordinate implementation by the contractors of applicable legal requirements for health and safety.
- Ensure that employers and self-employed persons apply the general principles of prevention in a consistent manner, particularly when complying with the provisions of Part 4 of the Construction (Design & Management) Regulations 2015 and where required, follow the construction phase plan.
- Ensure that employers and self-employed persons follow the construction phase plan.
- Provide a suitable induction.
- Take the necessary steps to prevent access to the construction site by unauthorised persons.
- Provide facilities that comply with the requirements of Schedule 2 (Welfare) throughout the construction phase.
- Liaise with the principal designer for the duration of the principal designer's appointment and share with them information relevant to the planning, management and monitoring of the pre-construction phase and the coordination of health and safety matters during the pre-construction phase.

#### **Construction Phase Plan and Health and Safety File**

- Draw up a Construction Phase Plan or make arrangements for a Construction Phase Plan during the pre-construction phase, and before setting up a construction site.
- The Construction Phase Plan must set out the health and safety arrangements and site rules taking account, where necessary, of the industrial activities taking place on the construction site and, where applicable, must include specific measures concerning work which falls within one or more of the categories set out in Schedule 3.
- Ensure that the Construction Phase Plan is appropriately reviewed, updated and revised from time to time throughout the project so that it continues to be sufficient to ensure that construction work is carried out, so far as is reasonably practicable, without risks to health or safety.
- Provide the principal designer with any information in the principal contractor's possession relevant to the Health and Safety File during the project.
- Ensure that the Health and Safety File is appropriately reviewed, updated and revised from time to time to take account of the work and any changes that have occurred, if the principal designer's appointment concludes before the end of the project. The Health and Safety File will be passed to the client at the end of the project.

#### **Consultation and Engagement**

- Make and maintain arrangements which will enable the principal contractor and workers engaged in construction work to cooperate effectively in developing, promoting and checking the effectiveness of measures to ensure the health, safety and welfare of the workers.
- Consult those workers or their representatives in good time on matters connected with the project which may affect their health, safety or welfare, in so far as they or their representatives have not been similarly consulted by their employer.
- Ensure that those workers or their representatives can inspect and take copies of any information which the principal contractor has, or which CDM 2015 requires to be provided by the principal contractor, which relates to the health, safety or welfare of workers at the site, except any information which would affect national security, contravene data protection, cause substantial damage to the Company's undertaking or affect ongoing legal contravention or proceedings.
- Provide information that is both as comprehensive as possible and as soon as is practicable.
- Cooperate with all parties involved with the project.
- Report anything they are aware of in relation to the project which is likely to endanger their own health or safety or that of others to the relevant duty holder.

## 2.4 Team Heads

Team heads are responsible for ensuring that the provisions of the Health and Safety at Work etc. Act 1974 associated regulations and company policies are observed within their area of responsibility. Authority is delegated to team heads to oversee and enforce the implementation of the company HSE Policy throughout company operations. Team heads report to the director responsible for HSE for HSE related matters.

Team heads will:

- Understand the SSG HSE Policy.
- Ensure that the SSG HSE Policy is effectively communicated to the personnel under their control.
- Ensure that employees comply with the company HSE Policy.
- Establish and maintain high standards of HSE performance within their area of responsibility.
- Foster a positive health and safety culture amongst all employees.
- Ensure a safe working environment with safe access and egress at all times.
- Ensure safe working practices are observed.
- Develop, implement, record, communicate and monitor the effectiveness of workplace arrangements for HSE specific to their work activities.
- Allocate necessary resources for HSE management within their area of responsibility.
- Ensure that suitable and sufficient risk assessments have been undertaken for work activities within their area of responsibility.
- Ensure that personnel under their control are adequately inducted, trained, instructed and informed.
- Ensure that appropriate equipment is available and maintained in a safe condition.
- Ensure that accidents and near misses are recorded and investigated.
- Maintain all relevant HSE registers, records and documentation, as required by current legislation.
- Carry out routine documented safety inspections of working areas, plant and equipment to identify shortcomings in HSE standards and to initiate remedial action.
- Immediately bring to the attention of the director responsible for HSE matters relating to HSE standards or performance.
- Advise and support clients, contractors, associates, etc. and their safety officers on matters relating to the company HSE Policy and all prevailing legislation.
- Ensure personnel at all work locations are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Communicate HSE matters to employees and contractors via induction training or briefings.

## 2.5 Team Managers / Leads

Team managers / leads are responsible for ensuring that the provisions of the Health and Safety at Work etc. Act 1974, associated regulations and company policies are observed within their area of responsibility. Authority is delegated to team managers / leads to oversee and enforce the implementation of the company HSE Policy in the workplace. Team managers / leads report to team heads.

Team managers / leads will:

- Understand the SSG HSE Policy.
- Ensure that employees comply with the Company HSE Policy.
- Ensure high standards of HSE performance are maintained within their area of responsibility.
- Foster a positive health and safety culture amongst all employees.
- Ensure a safe working environment within their area of responsibility with safe access and egress at all times.
- Ensure safe working practices are observed at all times.

- Assist team heads in the risk assessment process.
- Maintain all relevant HSE registers, records and documentation as required by current legislation.
- Carry out routine documented safety inspections (minimum monthly) of workplaces, facilities, plant, machinery and equipment so as to maintain HSE standards and to initiate remedial action.
- Immediately bring to the attention of team heads management matters relating to HSE standards or performance.
- Advise and support clients, contractors, associates etc. and their safety officers on matters relating to the company HSE Policy and all prevailing legislation.
- Ensure personnel within their area of responsibility are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Ensure that accidents and near misses are reported to team heads as soon as practicable.
- Communicate HSE matters to employees via induction training or briefings.

## 2.6 Employees

All employees of SSG have legal duties under health, safety and welfare legislation while at work to ensure their personal safety and that of others who may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all employees will:

- Co-operate with the director responsible for HSE, team heads and team managers to enable legal duties to be met.
- Comply with ALL requirements of the SSG HSE Policy and associated procedures.
- Not intentionally or recklessly interfere with, or misuse anything, provided by the company in the interests of HSE.
- Actively promote a positive health and safety culture throughout the company.
- Only undertake work for which they have been trained and are authorised, qualified and competent to undertake.
- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- Follow all company health and safety rules and procedures.
- When on clients' sites, follow all site safety rules and procedures.
- Use and maintain in a serviceable condition all plant, machinery and equipment in accordance with the training provided.
- Use and maintain in accordance with instructions and training given and report the loss or defect of all personal protective equipment provided by the company.
- Make themselves aware of all site and workplace first aid, fire and emergency procedures.
- Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- Ensure all accidents are entered in the company's Accident Book.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site (i.e. Site Manager) to ensure appropriate investigation can be undertaken.

All employees are to ensure that the company as their employer is made aware of any form of health condition or disablement that is likely to affect their ability to undertake the work they are assigned. Line managers must be made aware at the earliest opportunity of any health condition or physical impediment to an employee so that a risk assessment can be carried out and measures taken to ensure that the employee is able to continue to work safely.

## 2.7 Associates and Contractors

All associates and contractors who undertake work on behalf of SSG have legal duties under health, safety and welfare legislation while at work to ensure the health and safety of themselves and others that may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all associates and company contractors who undertake work on behalf of SSG will:

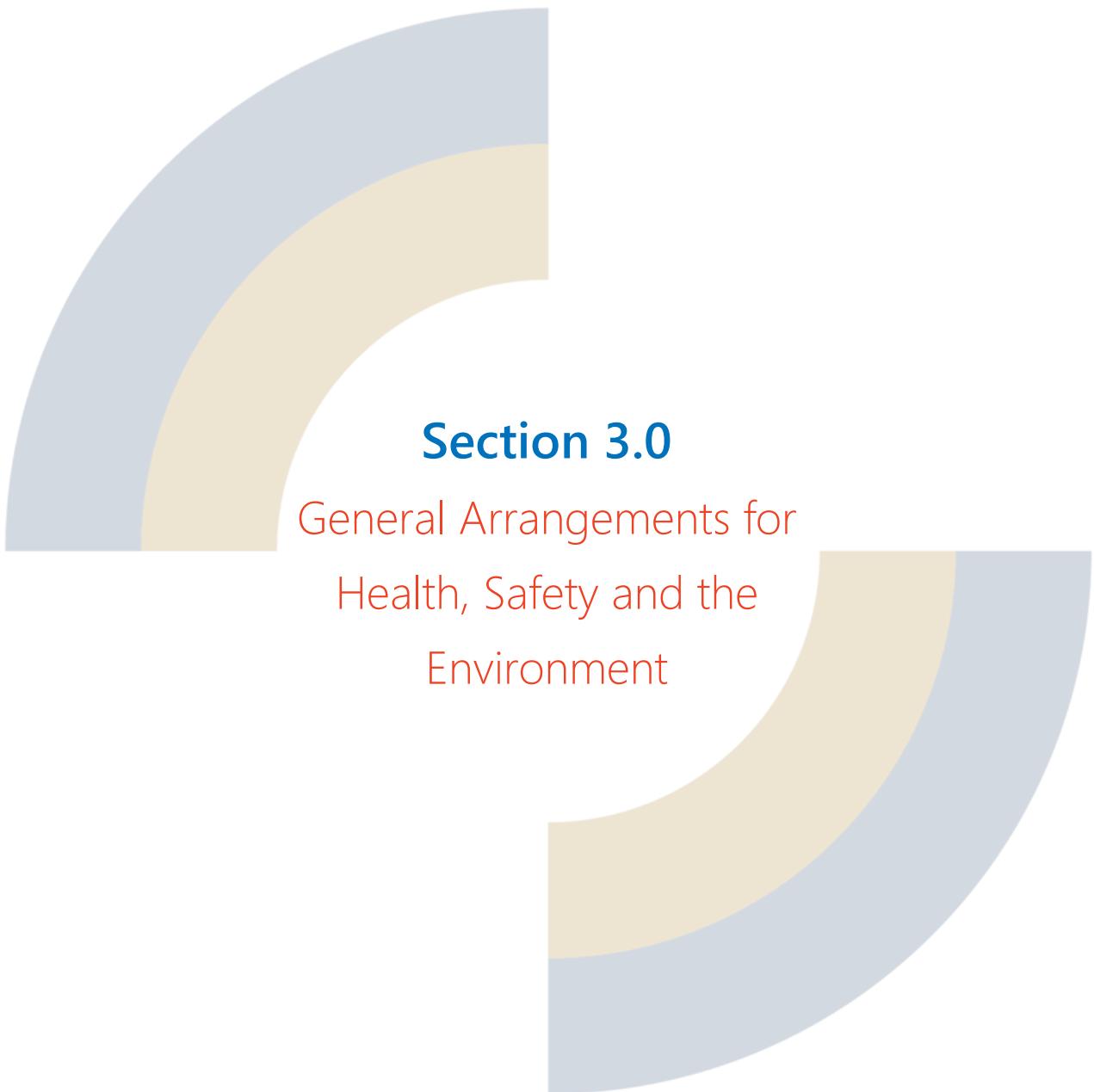
- Co-operate with the director responsible for HSE, team heads, team managers and their own employer to enable them to comply with their legal duties.
- Comply with ALL requirements of the SSG HSE Policy and other rules and procedures in place and notified to them.
- Not intentionally or recklessly interfere with or misuse anything provided by the company in the interests of HSE.
- Actively promote a positive health and safety culture on site.
- Only undertake work for which they have been trained and are qualified and competent to undertake.
- Ensure that risk assessments and method statements relating to their work are presented to the director responsible for HSE and team heads prior to commencement of work, if they are not following the Safe System of Work provided by SSG.
- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- When on site, follow all site safety rules and procedures.
- Use and maintain in a serviceable condition all plant and equipment, in accordance with the training provided.
- Use and maintain in accordance with instructions and training given and report the loss or defect of all personal protective equipment provided by SSG and their own employer.
- Make themselves aware of all company first aid, fire and emergency procedures.
- Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- Ensure all accidents are entered in the company Accident Book and in their employer's Accident Book.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

## 2.8 Health, Safety and Environment Resource - Internal

SSG utilise the services of HSE professionals employed by the company to provide professional advice and guidance and to support line management as required to ensure effective implementation of the HSE Policy and all associated policies and procedures, by means of regular reviews and monitoring of workplace activities.

The HSE resource will as required:

- Maintain close contact with the Health and Safety Executive, and any appointed HSE consultants / advisors and other organisations from whom information may be obtained regarding HSE matters.
- Ensure that SSG is aware of statutory obligations and recommended codes of practice by interpreting and keeping management and employees informed of new and developing legislation and other standards.
- Provide guidance notes and HSE briefings to the company directors, other employees and contractors.
- Assist in identifying appropriate training (in-house or external).
- Attend meetings where HSE input is required.
- Collate and analyse accident information and advise on trends and action areas.
- Carry out accident investigations and report as required.
- Undertake other such related duties as may be directed.



## Section 3.0

### General Arrangements for Health, Safety and the Environment

## 3.0 General arrangements for health safety and the environment

The attainment and maintenance of high standards of HSE within SSG will be achieved by the identification of hazards associated with the activities undertaken by the company. Effective precautions and control measures to eliminate, reduce or control the risk of harm to ALL persons exposed to the hazards will be identified and implemented.

### 3.1 Review and Update

- The company's HSE Policy and performance will be reviewed annually and any necessary updates will be made.
- No alterations will be made to the company's HSE Policy, including the organisational structure and associated arrangements, without the prior consent of the director responsible for HSE.

### 3.2 Communication and Consultation

- HSE information, where it relates to company activities, will be communicated throughout the company as it becomes available by the quickest possible means.
- Meetings and briefing sessions will be held at all levels in the organisation. At a minimum these will comprise:
  - Company induction.
  - Safety briefings / toolbox talks.
  - Quarterly HSE committee meetings.
  - Annual 1:1s / staff appraisals.
- Concerns over the standards of HSE within the company or issues relating to HSE are to be brought immediately to the attention of management.
- The company consults with its employees on HSE matters in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.
- In the absence of elected health and safety representatives, the company will consult staff individually or in groups on matters of health and safety.

#### 3.2.1 Non-English Speaking Workers / Low Literacy Levels

- The company will ensure that all information, instruction and training is provided to all employees in a language and format that the employee can readily understand. This may include any translated inductions, safety briefings, signage, works procedures, risk assessments, health and safety updates and all other forms of communication deemed necessary to ensure that the employee is competent to carry out their work activities.
- Adequate time will be allocated to consult with employees where language and/or literacy may be an issue, to enable employees to absorb and respond to information provided.

#### 3.2.2 Display of Information

Relevant health and safety information is displayed on a dedicated noticeboard as follows:

- Health and Safety Policy Statement of Intent – signed and dated by the director responsible for HSE.
- Health and Safety Law poster – contact details are filled in and where applicable, provision of the Health and Safety Law poster leaflet.
- Employers' Liability / Public Liability Insurance Policy – current and in date.

### 3.3 Associate and Contractor Management

- Associates and contractors are formally assessed to ensure that they are competent to conduct required work and to determine whether their systems for managing HSE meet company standards and requirements, including where appropriate, subcontractor management.
- A list of approved associates and contractors (and their subcontractors) authorised to work for the company is compiled and maintained.
- The use of contractors who are not on the approved list is prohibited.
- Associate and contractor performance is assessed annually and approved status is reviewed / updated accordingly.

Management will ensure that:

- Only associates and contractors on the Approved Contractor List and who are competent to perform the work are subcontracted to undertake work on behalf of the company.
- All contractors receive induction training on arrival at company premises.
- Associates and contractors receive suitable information, instruction and training to ensure their competence for the work they are to undertake.
- An appropriate level of supervision is provided to contractors engaged in company business.
- Company risk assessments include measures to protect contractors.
- Contractors provide risk assessments and method statements for approval prior to commencing work, making certain that their risk assessments have taken into account how their activities may affect Company employees and other persons.
- Electrical appliances to be used by contractors have been tested and are safe to use.
- The quality of contractor's work is monitored to ensure that it is being conducted safely.
- All contractors on premises under the control of the company are accounted for.

### 3.4 Training and Competence

- All new company employees will receive induction training as soon as reasonably practicable.
- A record of the induction process will be maintained.
- Training needs and competence requirements will be analysed to ensure the provision of appropriate training.
- Individual training needs are initially identified on induction and are reviewed annually.
- Directors, team heads, team managers, leads and employees all attend health and safety training relevant to their role and work activities.
- Employees will be provided with a suitable level of supervision until deemed competent to undertake tasks unsupervised.
- Employees shall only carry out work for which they hold the appropriate competences.
- Occupational competence will be maintained via continued membership of appropriate trade associations.
- Further training shall be given:
  - For periodic refresher training
  - When required by current best practice
  - When being exposed to new or increased risks
  - When being transferred or given a change in responsibility and/or
  - When there is a change in work methods, technology, equipment or practices.
- A training record will be maintained for all employees.
- All induction and training records and, where issued, certificates of training, qualifications and competence will be held in the company office.

- Training standards will be kept under review to ensure that the requirements of current legislation and risk assessments are met.

### 3.5 Risk Assessments, Method Statements and Safe Working Procedures

- Risk assessments will follow a standard format.
- Risk assessments will be reviewed at least annually or:
  - When company operations change.
  - Following an incident / near miss.
  - Following a change in legislation or industry best practice.
  - The company will generate safe working procedures as and when required.

Management will ensure:

- Where significant hazards are evident and there is a risk of harm or injury from a work activity, an appropriate risk assessment will be undertaken and communicated to all those at risk, in accordance with the Management of Health and Safety at Work Regulations 1999.
- Safe working procedures are produced based on the findings of risk assessments.
- That all risk assessments and safe working procedures are communicated to all who may be affected by the activity.
- That all personnel who may be affected by the activity are made aware that if any aspect of the activity or the environment in which it is conducted alters then a review of the risk assessments must be undertaken and appropriate changes to safe working procedures effected before the work is continued.
- That master copies of all risk assessments and safe working procedures are maintained on the server.

### 3.6 Personal Protective Equipment

Company management will ensure that:

- Personal Protective Equipment (PPE) is provided and used at work wherever risks to health and safety cannot be adequately controlled in other ways, in accordance with The Personal Protective Equipment at Work (Amendment) Regulations 2022.
- PPE is provided to employees as required by current legislation and as identified by risk assessment to supplement existing control measures.
- PPE provided is fit for purpose and appropriate to the risk involved.
- Suitable facilities for the storage of PPE are provided and used, including on site.
- Contractors provide and wear PPE to required standards.
- Information, instruction and training will be given to all employees and contractors on the safe use and maintenance of PPE.
- Employees, contractors and associates will, in accordance with instructions given, make full use of all PPE provided and maintain it in a serviceable condition and report its loss or defect immediately.
- On work sites, PPE is provided and worn in accordance with the requirements of the principal contractor or client.
- When visiting construction / work sites, safety hard hats, safety footwear and hi-visibility jackets to the appropriate standard shall be worn at all times whilst work is being conducted on behalf of the company, without exception.
- Team heads will check PPE use and enforce compliance. Disciplinary action may be taken if employees fail to wear PPE as directed.
- Under PPER 2022, the types of duties and responsibilities on employers and employees under PPER 1992 remain unchanged but are extended to limb (b) workers, as defined in PPER 2022.
- If PPE is required, the company shall ensure their workers have sufficient information, instruction and training on the use of PPE.
- A limb (b) worker now has a duty to use the PPE in accordance with their training and instruction, and ensure it is returned to the storage area provided by their employer.

### **3.7 Employment of Young Persons**

- Risk assessments will be carried out, or reviewed, to identify and address the risks to young persons (i.e. those under the age of 18), when employed by the company.
- Protection will be provided from any risks to the health and safety of young persons associated with their lack of experience, lack of awareness of existing risks or immaturity, in accordance with the Management of Health and Safety at Work Regulations 1999.
- Unless as part of their training, or where the work is carried out under the supervision of a competent person and where the risk has been reduced to the lowest reasonably practicable level, young persons will not be employed where the work:
  - Is beyond their physical or psychological capability.
  - Involves exposure to toxic or carcinogenic substances or substances which cause heritable genetic damage, harm to unborn children, or cause any other chronic health effect.
  - Involves an accident risk which they may not reasonably recognise due to their insufficient attention to safety or lack of experience or training and/or
  - Involves a risk to health from extreme temperatures (hot or cold), noise or vibration.
- Young persons will be supervised at all times when performing any task which may put them at risk.

### **3.8 Employment of New and Expectant Mothers**

- Risk assessments of the activities undertaken by SSG will take into account the needs of pregnant employees and new mothers, in accordance with the Management of Health and Safety at Work Regulations 1999. The assessment will identify and address the risks to the unborn child, a child of a woman who is still breastfeeding and to the mother and will determine which tasks the employee can perform.
- The assessment will ensure that adequate steps are taken to avoid the risk to new and expectant mothers arising from exposure to physical, biological and chemical agents and from working conditions.
- Where the risk cannot be avoided then working hours may be temporarily adjusted or suitable alternative work will be offered. If this is not viable then suspension on full pay will be exercised for as long as is necessary to protect the health and safety of the mother and that of her child.

### **3.9 Employment of Persons with Disabilities**

- Company risk assessments take into account the needs of employees with disabilities, in accordance with the Equality Act 2010.
- Employees are to ensure that the Company, as their employer, is made aware of any form of disablement that is likely to affect their ability to undertake the work they are assigned.
- Where appropriate, employees with disabilities will be monitored at regular intervals (e.g. by routine medical examination) to ensure their suitability for the work on which they are employed.

### **3.10 Workplace Monitoring and Safety Inspections**

- Monitoring systems will be put in place to ensure that the activities of employees and contractors are carried out in a safe manner in compliance with company risk assessments, safe working procedures and method statements.
- Monitoring systems will be put in place to ensure that equipment and the general working environment are maintained in a safe condition in line with company risk assessments, safe working procedures, method statements and, where appropriate, manufacturers' requirements.
- Periodic, documented workplace and site safety inspections will be conducted by management.

### 3.11 Infectious Diseases / Pandemic

- The company will establish a Business Continuity Plan to include measures to put in place to:
  - Partially / fully close down the company / sites. Closure / shutdown plans will ensure that any suspension of activities is safe and allows the company / site to recommence operations promptly after any suspension is lifted.
  - Establish communication channels, internal and external.
  - Keep staff informed of all ongoing developments and requirements.
  - Assess each member of staff to determine safety critical roles. If appropriate individuals may be classified via a RAG rating system, based on clinical vulnerability, childcare issues, caring responsibilities, ability to work from home, reasonable adjustments etc. These and other criteria will be taken into account, on a case-by-case basis, to determine individual availability for work and to identify a core team and potential support roles to facilitate any required shutdown and subsequent return to work.
  - Facilitate re-opening of premises and a safe return to work, taking into account the impact of shutdown e.g. on the water supply, ensuring that any potential issues such as legionella are identified and addressed.
- During a pandemic the company will endeavour to keep informed of all ongoing developments via monitoring government and reputable media information sources. Government advice and guidance with respect to health, safety, hygiene and social distancing / close working measures will be adhered to.
- The company will assess the ongoing situation and make any necessary decisions to minimise business impact and balance staff availability with business demand, including adjustments to staffing levels (e.g. via redundancies, contract changes, short term working, lay-off, furlough etc.). In some cases, this may necessitate changes in roles, responsibilities and potentially a company / team restructure.
- The company understands that the impact on mental health and wellbeing will vary from person to person, dependent on individual circumstances. The company will strive to provide appropriate support (e.g. via Mental Health First Aiders) to those employees suffering illness, bereavement or other issues.
- A training needs analysis will be undertaken to identify safety-critical training and extensions to certification, in conjunction with course availability, including online options.
- The company shall review, revise and where necessary develop additional risk assessments for work activities taking into account:
  - Any changes to health and safety regulations and/or guidance as provided by the HSE, PHE, NHS etc.
  - Revised office / site set-up and capacity, staggered start / finish and break times.
  - Resource limitations.
  - Changes to work activities, ways of working.
  - Safety critical work, including maintenance activities and statutory inspections.
  - High risk work – potential reduction.
  - Availability of plant, equipment, materials, and goods, including existing and additional PPE / RPE and additional stocks of e.g. gel sanitiser.
  - Adjustments to capacity of workspaces.
  - Signage.
  - Personal hygiene measures.
  - Enhanced cleaning regimes – touchpoints / communal areas and waste management.
- Appropriate emergency arrangements will be put in place, including:
  - Procedure for becoming symptomatic / illness in the workplace.
  - Adjustments to first aid protocols e.g. no mouth-to-mouth.
  - Adjustments to rescue plans.
  - Training emergency responders (first aid and fire) in any changes to procedures.
  - Allowing for longer response times due to pressure on NHS services.
  - Acquiring additional PPE / RPE as necessary.
  - A review of first aid / fire warden cover.

## 3.12 Health and Wellbeing

### 3.12.1 Workplace Wellbeing

- SSG recognises that the workplace and working environment have a significant impact on employees' health and wellbeing, with good management benefiting staff engagement, productivity and retention.
- The company is committed to the promotion of a healthy work / life balance and implements the following arrangements:
  - Management has an open-door policy and encourages direct communication at all levels within the company.
  - Employees are consulted on changes / improvements to the work environment.
  - Periodic assessment of wellbeing and job satisfaction levels.
  - Implementation of an ongoing programme of wellbeing initiatives and events.
- All Employees have access to an Employee Assistance Programme through Celnor Group.

### 3.12.2 Mental Health

- The company recognises that mental health problems can affect all employees regardless of their position within the organisation.
- In undertaking duties with regards to mental health, SSG aims to:
  - Positively promote a workplace culture based on trust, support and mutual respect, where employees are able to talk openly about their job and their mental health and report difficulties without fear of discrimination or reprisal.
  - Eliminate from the workplace, factors with the potential to have a detrimental effect on employees' wellbeing, e.g. bullying, harassment, inequality, discrimination or victimisation.
  - Reduce the stigma around mental ill-health to help build a healthy and resilient workforce.
  - Educate the workforce about the advantages of good mental wellbeing and its influence over the quality of working and personal life.
  - Ensure that managers are equipped to appropriately respond to mental health disclosures, providing training as appropriate.
  - Provide necessary resources and appropriate support for all employees suffering from mental health conditions.

### 3.12.3 Workplace Stress and Common Mental Health Problems

- Company employees are to declare any aspect relating to their health that may put them at risk while undertaking the work for which they are employed or that may be affected by the environment in which it is to be undertaken.
- SSG recognises the ill health effects associated with workplace stress and common mental health problems (CMHP) such as anxiety and depression.
- The company is committed to the promotion of wellbeing in the organisation and preventing employees from being subject to undue stress whilst at work.
- To the extent that is reasonably practicable, the company will endeavour to balance job demands and pressures with individual capabilities, and to support staff suffering from stress or common mental health problems (CMHPs) such as anxiety and depression.
- The following arrangements are in place:
  - To identify all workplace stressors and conduct risk assessments to eliminate and control stress and CMHPs.
  - To consult with team heads and team leads on all proposed actions relating to the prevention of workplace stress and CMHPs.
  - To provide training for team heads and team leads to enable them to recognise the signs and symptoms of, and to deal with issues around stress and CMHPs.
  - To provide assistance, advice and support through employee assistance programmes and counselling for those affected by stress and CMHPs caused through both work and external factors.
  - To provide support for employees returning to work after periods of absence due to mental health problems.

- A personal risk assessment may be undertaken to identify the extent and causes of employees' stress, together with reasonable adjustments to support staff, including any necessary interventions to prevent and manage stress more effectively. Working hours may be temporarily adjusted or suitable alternative work may be offered to staff.

### 3.12.4 Fatigue

- SSG recognises that an imbalance between the demands of work and time for rest and recovery can result in fatigue, leading to increased risk of errors, accidents, injuries and ill health.
- The company is committed to preventing employees from being subject to undue fatigue whilst at work and implements the following arrangements
  - Provide advice and practical guidance to employees to help identify the symptoms of fatigue
  - Encourage employees to take scheduled breaks
  - Fatigue, as an identified potential hazard, is subject to risk assessment, taking into account the nature of the work, the work environment and workload
  - Employees are consulted on working hours and shift patterns
  - Where necessary, limits are set on working hours, overtime and shift-swapping, to guard against fatigue

### 3.12.5 Digital Burnout

- SSG recognises the impact of prolonged use of digital devices (desktops, laptops and phones) on health and wellbeing and that this can lead to burnout and stress.
- Where digital devices are provided to assist employees in their job role, the company will:
  - Provide support and guidance on managing technology use to safeguard wellbeing and maintain digital balance
  - Provide advice and practical guidance to employees to help manage time spent online
  - Encourage employees to take regular breaks from digital devices and to reduce screen time
  - Not contact employees outside of normal working hours with general work enquiries
  - Implement systems to divert emails and calls to other members of staff during periods of absence and leave
  - Minimise the volume of internal emails sent out to staff after normal working hours and during periods of leave and absence
  - Encourage employees to turn emails off at the end of the working day
  - Incorporate arrangements for the management of digital devices into a workplace wellbeing strategy and programme
- Team heads and team managers are encouraged to ensure employees disconnect with work and manage digital distractions to maintain a healthy work / life balance.
- The company will provide support and guidance on managing technology use to safeguard wellbeing and work-life balance.

### 3.12.6 Occupational Health Monitoring and Surveillance

- Employees will be provided with occupational health monitoring / surveillance appropriate to the risks to health and safety resulting from their employment, as identified by risk assessment or legal statute, in accordance with the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).

### 3.12.7 Health Referrals

- Employees will be referred to a medical professional as and when necessary if any concerns are raised with respect to their health or fitness to perform work duties.

## 3.13 First Aid Provision

- The company will provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work, in accordance with the Health and Safety (First-Aid) Regulations 1981.

- Suitably trained persons will be nominated as qualified First Aiders or Emergency First Aiders to ensure adequate provision of first aid. These details will be prominently displayed in all company workplaces and will be communicated through induction training.
- A qualified First Aider or Emergency First Aider shall be present or immediately contactable for assistance at all times whilst routine work is being undertaken.
- Company employees will familiarise themselves with workplace / site first aid arrangements and facilities.
- First Aid kits shall be held in all company vehicles with the contents checked on a regular basis and restocked if necessary.
- Where work is conducted on a client's premises, employees are to familiarise themselves with the first aid facilities and procedures arranged by the client.

### 3.13.1 Medication

- Tablets and medicines are not kept in first aid kits as first aid at work does not include giving tablets or medicines to treat illness. The only exception to this is where aspirin is used when giving first aid to a casualty with a suspected heart attack, in accordance with currently accepted first aid practice. First aiders may keep a small amount of aspirin to hand, separate from first aid kits, for this purpose.
- Employees who have their own medication such as inhalers for asthma or EpiPens for the treatment of severe allergic reactions (e.g. to peanuts, bee stings) are expected to administer this themselves if able to do so and must not use these to treat any other employees. First-aiders should not administer medication to other employees but may assist employees to do so themselves and/or contact emergency services as appropriate.
- If it is identified that Schedule 19 medication may need to be administered in an emergency, First Aiders will be given additional training in its use.

## 3.14 Incident Recording, Reporting and Investigation – Injuries, Diseases and Dangerous Occurrences, Near Misses

### 3.14.1 Accident Book Records

- An Accident Book compliant with general data protection requirements is kept in the office and on each work site. Accident report forms are removed from Accident Books and are held securely in personnel files located in the main office and in site offices, in accordance with general data protection requirements.
- All injuries occurring no matter how trivial are to be recorded in the Accident Book provided on the site where the accident takes place, and also in the company Accident Book held at the company premises.

### 3.14.2 Incident Reporting

- All recordable incidents and near misses are notified to company management.
- All reportable accidents and dangerous occurrences occurring on company premises are to be reported to the director responsible for HSE so that an investigation can be conducted.
- The company notifies their insurers of any RIDDOR reportable incident.
- In the event of a written diagnosis of an occupational disease or a specified injury or fatality occurring to a company employee, statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 will be met.
- Accidents involving a member of the public / third party resulting in direct transport from the scene of the accident to hospital for treatment will be reported in accordance with RIDDOR 2013.
- All accidents, dangerous occurrences and near misses occurring on site are to be reported to site management, in the first instance, so that an investigation can be initiated.
- Reports of accidents involving contractors will be forwarded to their employer to enable statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 to be met.

### 3.14.3 Covid-19 Reporting

RIDDOR reporting requirements specifically for Covid-19 are adhered to as follows:

What to report:

- RIDDOR reporting requirements relating to cases of disease or death from Covid-19 only apply where an employee has been infected with coronavirus through:
  - Deliberately working with the virus, such as in a laboratory
  - Being incidentally exposed to the virus
- Incidental exposure can occur when working in environments where people are known to have Covid-19, for example in a health or social care setting.
- You should only make a report under RIDDOR when one of the following circumstances applies:
  - An accident or incident at work has, or could have, led to the release or escape of coronavirus (SARS-CoV-2). This must be reported as [a dangerous occurrence](#).
  - A person at work (a worker) has been diagnosed as having Covid-19 attributed to an occupational exposure to coronavirus through either deliberately working with the virus or being incidentally exposed to it. This must be reported as [a case of disease due to exposure to a biological agent](#).
  - A worker dies as a result of occupational exposure to coronavirus through either deliberately working with the virus or being incidentally exposed to it. This must be reported as [a work-related death due to exposure to a biological agent](#).

### 3.14.4 Incident Investigation

- All accidents, near misses and dangerous occurrences involving company employees or third parties will be investigated to an appropriate degree in accordance with the actual / potential severity of outcome, in order to determine root causes and identify remedial actions to prevent recurrence.
- Learning outcomes and remedial actions taken are disseminated throughout the company following an incident investigation in order to reduce the potential for recurrence.

## 3.15 Enforcement Authority Visits

- HSE Inspectors, Environmental Health Officers and Fire Officers all have statutory authority to visit company premises and work sites to enforce legislation under their control.
- Management will ensure the fullest co-operation with all visiting enforcement officers and the company will always be responsive to recommendations and advice received. The director responsible for HSE and company management will liaise with visiting Enforcement Officers and ensure that they are accompanied, as required, during their visits.

## 3.16 Fire Safety

- The director responsible for HSE is the designated responsible person tasked with ensuring that the company fulfils its duties under the Regulatory Reform (Fire Safety) Order 2005. The responsible person will be trained in Fire Safety Management.
- In accordance with Article 8(1) of the RRFSO, the responsible person ensures that general fire precautions are in place, as set out below.
- The company has an established Fire Safety Policy and fire risk management strategy in place.
- A fire risk assessment to identify fire and explosion risks for work premises, including sites under the control of the company, will be undertaken prior to commencement of work, in accordance with the Regulatory Reform (Fire Safety) Order 2005 and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).
- Where the company office is part of a multi-tenanted building, company management will coordinate and co-operate with the landlord and other responsible persons within the building to ensure that fire safety regulations are met.
- On construction sites that are considered to be high risk or over an original contract value of £2.5 million, site fire risk assessments and fire procedures will be in accordance with the Fire Prevention on Construction Sites: The Joint Code of Practice 10<sup>th</sup> edition, issued by the Fire Protection Association.

- Where the Code of Practice does not apply, as a minimum, sites will comply with HSG 168 Fire Safety in Construction Work and CDM 2015 Regulations 29 through to 32.
- Based on the results of the fire risk assessment, adequate means of raising the alarm, fighting the fire and means of escape will be provided to ensure the safe evacuation of personnel in the event that a fire occurs.
- Fire precautions and prevention measures, appropriate to the level of risk, will be taken throughout premises and property under the control of SSG.
- An adequate fire plan will be in place, prominently displayed in offices and throughout the workplace, and communicated to all employees, contractors and visitors on induction.
- In the event of a fire in offices or on site, the priority will be to raise the alarm and ensure all personnel are evacuated safely. The alarm is to be raised and the local fire authorities summoned.
- The person discovering the fire may attempt to extinguish the fire using portable appliances if the fire is of a small nature, personnel are not put at risk and they are confident and competent to do so. The person should remain available to brief the fire authorities on arrival. Under no circumstances should a person attempt to extinguish a larger fire. The primary aim should be to evacuate from the building or work site.
- A designated fire warden and deputy are appointed for the company office and for each work site, tasked with maintaining the Fire Log, ensuring that checks of systems and appliances are conducted as specified in the Fire Log and conducting fire drills and workplace inspections.
- The designated fire warden and deputy (and other employees as considered necessary) will be trained in basic fire safety and the use of portable fire-fighting appliances, as found on the premises and in company vehicles.
- Emergency procedures and evacuation routes will be communicated to all employees as part of their induction training.
- Maintenance of fire alarm systems will be conducted by a competent, specialist authority under contract.
- Stores or materials shall not be left along access or egress routes where they may hinder escape in an emergency.
- Consideration will be given to neighbours who may be affected by a fire to ensure that they are made aware of the fire and evacuated safely.
- When visiting sites or clients' premises, employees familiarise themselves with the fire arrangements of the client, including emergency procedures and evacuation routes.
- Whilst working on company premises, contractors are to familiarise themselves with emergency procedures and evacuation routes.

### **3.17 Smoking Policy**

- In compliance with the Smoke-free Regulations 2006, company premises and workplaces are smoke-free. Disciplinary action will be exercised if employees or contractors smoke whilst on company sites, premises or in company vehicles.
- "No Smoking" signage is clearly displayed on company premises and company-managed work sites.
- Smoking is only permitted in those external areas designated by management. Designated areas will be advised to employees on induction.
- Smoking is strictly prohibited in areas where flammable liquids are stored or used.
- Whilst working on premises owned by the client, or on the site of a principal contractor, the smoking policy of that client or principal contractor will be adopted and, as such, all employees and contractors who undertake work on behalf of the company are to adhere to that policy.

### **3.18 Alcohol and Controlled Substances**

- Disciplinary action will be exercised if, while under the influence of alcohol or controlled substances (drugs), employees or contractors enter company premises, a site under the control of the company or drive company vehicles.
- Company employees and contractors shall not have alcohol or controlled substances in their possession whilst working on company premises, on sites under the control of the company or driving company vehicles.

- Any person known or strongly suspected of being under the influence of alcohol or controlled substances will be removed from the workplace / work site immediately.

### 3.18.1 Prescribed Drugs and Over the Counter Medicines

- Staff must disclose to management / HR the use of either prescribed drugs or over the counter medicines that may adversely affect their work (e.g. some antihistamines can cause drowsiness, a particular risk while driving or using machinery). Such disclosure will be treated in accordance with statutory data protection requirements.

## 3.19 Violence towards Employees

- Incidents of violence, threatening and/or abusive behaviour by employees whilst at work will result in disciplinary action.
- In the event that company employees are faced with aggression or threat of violence, a non-confrontational position is to be adopted.

## 3.20 Visitors

- Visitors to company premises are to be accompanied at all times and remain the responsibility of their host during fire, evacuation or other unusual, or unplanned, circumstances.

## 3.21 Lone Workers

- Wherever practicable, company employees are not to work alone in high-risk activities or areas.
- Lone working is not permitted where there is a reasonably foreseeable risk that the work may result in an accident, violence or harm. A log is maintained of sites where there has been an incident involving threatening, intimidating and/or violent behaviour.
- Staff are not permitted to return to a site on their own where a previous incident of threatening, intimidating and/or violent behaviour has occurred.
- Where it is unavoidable, the lone worker will ensure that management is aware of their whereabouts and the nature of the work being undertaken. The lone worker will make contact with nominated personnel at pre-arranged times throughout, and on completion of, the activity. Such arrangements will be documented in a specific risk assessment or company procedure which will be communicated to all persons potentially involved.
- Lone workers are included in the Company Liability insurance cover, in accordance with the Employer's Liability (Compulsory Insurance) Act 1969.

## 3.22 Mobile Phones

- It is an offence under the Road Vehicles (Construction and Use) Regulations 2003 (as amended) to use a handheld phone or similar device when driving.
- No calls are to be made or received by the driver of a moving vehicle unless the vehicle is fitted with a working 'hands free' kit and it is considered that it is safe to do so.
- Calls dealt with in this way are to be short duration calls only. Longer duration calls are to be dealt with by pulling over to the side of the road into a suitable parking area when it is safe to do so to continue the conversation.
- No calls are to be made / received on mobile phones while operating any plant, machinery or equipment unless the plant, machinery or equipment has been stopped in a safe place for that purpose, switched off or made safe.
- Mobile phones must not be used whilst employees carry out hazardous work activities.
- Mobile phones must not be used in the vicinity of gas storage areas, chemical and oil storage areas or in the vicinity of other flammable substances.

### 3.23 Working from Home

- A risk assessment is carried out in conjunction with SLT / team heads for each home-worker to identify any potential risks.
- Home visits are undertaken as and when required depending on the outcome of the risk assessment.

### 3.24 Environmental Management

- The company will ensure that all staff are trained in the Environmental Policy and are given information, instruction and training to ensure its implementation in all company operations.
- Any complaints in connection with environmental issues shall be investigated and action taken accordingly.
- Current UK environmental legislation will be regarded as the minimum standard of acceptable environmental performance for the company.
- The company will implement measures to ensure that the business makes the most economic use of transport. Sharing of company vehicles will be optimised and travelling to company premises will be minimised to reduce the company use of fuel.
- The company will attempt to eliminate or reduce the use of ozone-depleting chemicals and timber sourced from forests that have not been independently certified as sustainable.
- The company will attempt to reduce energy and water consumption and minimise carbon dioxide emissions. The company will also promote the use of energy efficient products and source its energy from safe and sustainable sources.
- The company will ensure that its operations do not cause a nuisance to the community through the generation of dust, noise or odour.
- Paper will be used sensibly with increased use of electronic communication to reduce the need for paper consumption.
- The company will check work sites for endangered species, protected plant species, trees subject to a tree preservation order and protected archaeology before work starts.
- Control measures will be introduced to reduce the environmental impact of company work activities to a minimum and to comply with all required environmental safeguards.
- Subcontractors will be selected on the basis that they comply with these environmental commitments and agree to be bound by the company Environmental Policy.
- Procedures and facilities shall be put in place to manage any foreseeable spillages of liquids related to company work activities.

### 3.25 Waste Management

- Waste shall be managed in accordance with the Environmental Protection Act 1990, Part 2 and the Waste (England and Wales) Regulations 2011.
- The company shall comply with the Waste Duty of Care Code of Practice 2016 at all times.
- Staff are given information, instruction and training to ensure waste materials are managed in a compliant manner.
- The waste hierarchy of control shall be applied to all waste materials with the highest option selected first where practicable.
- Products and processes are carefully designed to eliminate the production of waste materials wherever possible.
- Waste materials are segregated wherever possible and stored securely in appropriate facilities to prevent their release.
- A Waste Transfer Note or similar documented information is produced for each shipment of waste, based on the Environment Agency's template. Records are retained for at least two years.
- The appropriate six-digit EWC code is selected and clearly identified on all waste transfer and consignment notes.
- All third-party waste contractors shall be checked using the Environment Agency Public Registers to ensure they hold a valid Carrier's License and Environmental Permit for the wastes involved.

## 3.26 Facilities Management

- A Buildings and Facilities Log will be maintained for company premises, that identifies statutory inspections and tests and establishes a calendar schedule for these. All services / maintenance carried out on facilities will be logged.
- Service agreements are in place for larger items of office equipment (e.g. photocopier).

### 3.26.1 Cleaning

- The premises, including welfare facilities are cleaned on a regular basis, using light hoovers and floor cleaners.
- Bins are emptied regularly, and waste is disposed of.
- Periodic inspections of the premises are conducted to ensure that this is being kept in a suitably clean and hygienic condition.

## 3.27 Welfare Provision

- The company is committed to providing a safe and healthy work environment that takes into account the welfare needs of all its employees, including those with disabilities.
- Welfare provision will be in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992 and Schedule 2 of the Construction (Design and Management) Regulations 2015.
- Ventilation will be adequate to ensure the comfort of employees. Where mechanical ventilation or air conditioning is provided, regular cleaning, maintenance and inspection will be conducted.
- In offices, temperature will be maintained at no less than 16°C but whenever practicable will be maintained in the range 19.4° C – 22.8° C. Windows, skylights or glass partitions will not allow excessive temperatures to be reached in the offices during hot weather.
- Lighting will be suitable and sufficient and, so far as is reasonably practicable, be from natural light to enable people to work, use facilities and move from place to place safely and without experiencing eye strain.
- Eating and rest facilities with adequate access to boiling water and a means to heat food will be provided.
- Welfare facilities will be adequate with sufficient toilets, hand washing and drying facilities. A wholesome supply of drinking water will be available.
- Suitable storage and drying facilities for clothing will be provided, as required.
- Workstations will be comfortable, with safe and suitable chairs and sufficient space.

## 3.28 Safety Signage

- Appropriate safety signs and notices will be posted throughout company premises and on company-managed sites, as identified via risk assessment and in accordance with the Health and Safety (Safety Signs and Signals) Regulations 1996.

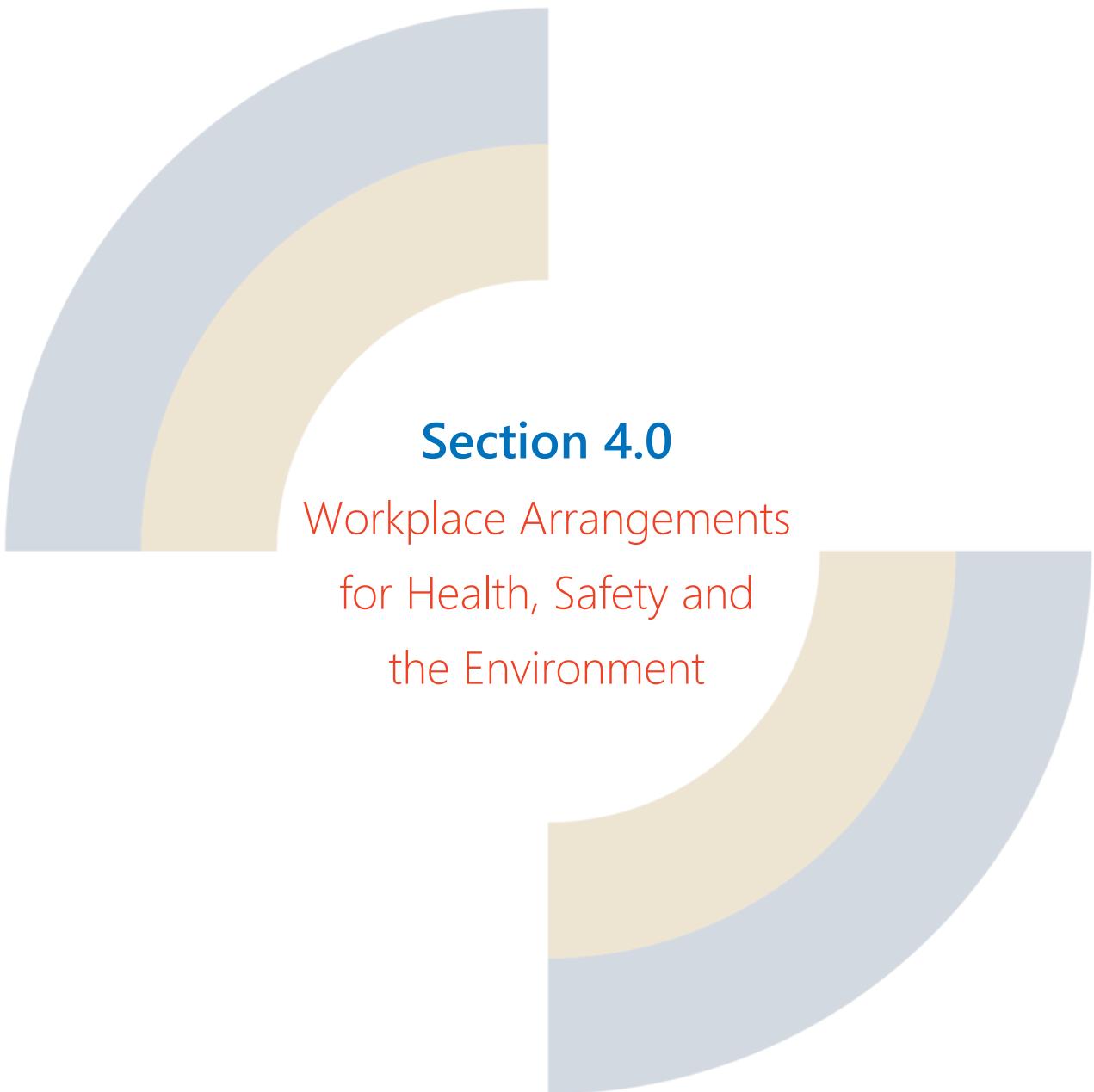
## 3.29 Access and Egress

- All workplace access and egress routes are kept clear at all times.
- Emergency escape routes are unobstructed. Stores or materials shall not be left in access or egress routes where they may hinder escape in an emergency.
- If employees are unable to access their working area safely, they must inform their team head and not take personal risks.

## 3.30 Security

- CCTV is an integral part of security arrangements for company premises and is operated in accordance with the company's CCTV Policy. With regards to the operation of a surveillance system, the company remains committed to full compliance with the Information Commissioner's Office (ICO) Code of Practice.

- Access to company premises is restricted to authorised persons only and all reasonably practicable security measures are taken to prevent unauthorised access. All unauthorised persons are immediately escorted off the premises.



## Section 4.0

Workplace Arrangements  
for Health, Safety and  
the Environment

## 4.0 Workplace arrangements for health, safety and the environment

The following topics have been identified as significant in terms of workplace hazards and detail the company's policy on how the risk to personnel exposed to them will be reduced or controlled.

### 4.1 Petrol Driven Cut-Off Saws

- Petrol driven saws are used to provide certified training to clients.
- The abrasive / cutting wheel marking system will conform to either Annex A of BS EN 12413 and BS ISO 525 or ANSI B 7.1 OSHA.
- Trainers receive certified training in the use of cut-off saws, including changing of wheels.
- Only trained and competent personnel who have been appointed by management are permitted to change any class of abrasive wheel.
- The company will ensure that suitable storage facilities are available in order to keep wheels clean and free from damage and that a sufficient quantity of suitable eye protection to BSEN 166B is available when required.
- Guards or shields supplied by the manufacturer are correctly fitted to all machines while in use and are not altered in any way.
- Defective abrasive wheel machines / petrol driven cut-off saws are taken out of use immediately.

### 4.2 Air Conditioning Systems

- Air conditioning systems are fit for purpose and maintained in good working order, according to manufacturers' guidelines. Filters are regularly cleaned and replaced.
- Records are kept of all inspections, tests and maintenance performed on air conditioning systems.
- Air quality is periodically tested to ensure a sufficient supply of fresh / purified air from air conditioning systems, uncontaminated by injurious or offensive fumes, gas or vapour.

### 4.3 Asbestos and Asbestos Containing Materials (ACMs)

- The company will comply with its duty to manage asbestos in company premises as required under the Control of Asbestos Regulations 2012.
- An Asbestos Management Survey will be conducted for all company premises constructed prior to 2000 by a competent surveyor to assess the risk and determine appropriate controls.
- The company will act on the recommendations of the survey report in order to manage any associated risk.
- Prior to any refurbishment work a Refurbishment and Demolition Survey will be conducted.
- All locations where asbestos or ACMs are identified as being present will be recorded in an Asbestos Register.

Any work undertaken on company premises on licensed asbestos products will be undertaken by a specialist licensed contractor. Work on non-licensed asbestos products will be undertaken by a suitably competent contractor. In such cases, it is the responsibility of the contractor to notify the HSE of the work, to keep appropriate records and to conduct health surveillance for their workers.

Company employees shall not generally conduct work involving exposure to asbestos / ACMs. Confirmation will be obtained from the client / principal contractor, if practicable, that the nature of the work does not involve exposure to asbestos / ACMs prior to work commencing. If asbestos / ACMs are discovered, or suspected, that have not previously been identified in the Asbestos Survey the following action is to be taken:

- Work is stopped, the area is secured, and measures are put in place to ensure that the asbestos / ACM remains undisturbed.
- Company management and the client / principal contractor are to be informed in order to ensure that an assessment is undertaken, and an action plan developed before work is allowed to continue.

In compliance with the Control of Asbestos Regulations 2012, training is mandatory for anyone liable to be exposed to asbestos fibres at work. As a minimum, a half day UKATA approved asbestos awareness course will be undertaken, supplemented by annual refresher training.

## 4.4 Bottled Gases

- Gas bottles shall be stored in a designated, secure gas storage facility in the open air when not in use. Cylinders are secured in position to prevent toppling.
- Bottled gas storage facilities comply with BCGA Code of Practice CP44: The Storage of Gas Cylinders.
- Clear signage is displayed on gas storage facilities identifying products stored, warning of access restrictions and prohibiting smoking / naked flames.
- Empty gas cylinders are collected by the supplier on a regular basis to prevent build-up.
- An inventory of gas cylinders stored on site (location and quantity) is maintained and provided to emergency services in the event of an incident.

## 4.5 Chemicals / Hazardous Substances

All hazardous substances / chemicals used or generated by the company will be subject to a CoSHH assessment to identify the measures required to reduce the risk of harm occurring to employees as a result of exposure, in accordance with the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).

Company management will ensure that:

- All hazardous substances / chemicals used by the company are identified and inventoried.
- Safety data sheets for all hazardous substances used by the company will be obtained from suppliers.
- A comprehensive assessment of the processes involving the use of hazardous substances or those generating hazardous by-products such as dust and fumes is carried out.
- Regular reviews of assessments of processes involving the use of, or contact with, hazardous substances are undertaken.
- Appropriate control measures are put into place to prevent, reduce or control the exposure of all personnel to the harmful effects of hazardous substances and by products of processes.
- Suitable and sufficient PPE / RPE is provided to employees exposed to hazardous substances and materials. Employees are adequately trained in the use of any specialist PPE / RPE.
- Appropriate information, instruction and training will be given to employees exposed to hazardous substances and materials.
- Suitable storage of substances.

### 4.5.1 Domestic Cleaning Products

- Where possible, non-hazardous domestic cleaning products will be used in office premises.

## 4.6 Construction Site Hazards (General)

- All employees required to visit construction sites are aware of the dangers inherent to those sites. These include but are not limited to:
  - Contaminated ground.
  - Demolition work.
  - Dust and fumes.
  - Excavations.
  - Lifting operations and lifting equipment (including craneage, forklift trucks, goods hoists / passenger hoists, lifts / escalators).
  - Noise.

- Plant, work equipment and machinery.
- Working at height (including ladders, scaffolding).
- Working near / over water.
- Whilst employees may be exposed to the above hazards on site, they may not necessarily have any active direct involvement in work activities associated with these hazards.
- All employees visiting site will report to site management on arrival.
- All employees visiting site will ensure that they receive adequate induction from site management, to include site hazards.
- The relevant PPE will be provided. This will comprise but not be limited to high-vis jacket / vest, hard hat and protective boots. Hearing protection and eye protection will be provided when identified by risk assessment.
- When necessary, additional information, training and instruction will be provided regarding construction site hazards.
- Employees inexperienced in construction site hazards will be accompanied by an experienced employee at all times until they are deemed competent.

## 4.7 Display Screen Equipment

- The company recognises the need to protect staff from the risks of working with display screen equipment (DSE), such as PCs, laptops, tablets and smartphones.
- All staff who use DSE daily, for an hour or more at a time, are classified as 'DSE users' and are subject to the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992.
- In accordance with DSE regulations, all DSE users will be the subject of an ergonomic assessment to identify the measures required to reduce the risk of harm as a result of DSE use.
- Employees whose work requires them to use DSE daily for a significant part of the day will be entitled to a free vision screening or eye test on request. Where such examinations identify the requirement, the company will provide, free of charge, corrective appliances required specifically for DSE work.
- Employees whose work requires them to use DSE for a significant part of their working day are to vary their work routine such that they perform other work activities away from their display screen equipment. Where practicable, discretion will be exercised as to when employees can take breaks. It is recognised that short, frequent breaks are more satisfactory than occasional, longer breaks e.g. a 5-10 minute break after 50-60 minutes continuous screen and/or keyboard work is likely to be more effective than a 15-20 minute break every two hours.

## 4.8 Driving on Company Business

- All driving activities will be managed in accordance with the Company Driving Policy (S.P.03).
- Employees are expected to adhere to the Driving Policy at all times.
- All staff driving on company business must be qualified and medically fit to drive the vehicle and hold adequate insurance. Employees must inform the company of any disqualifications or other reasons such as medical conditions that may affect their ability to drive or operate vehicles or plant.
- All staff who drive on company business possess a valid driving licence. Drivers are required to report any endorsements or penalty points incurred to their line manager.
- The company monitors the number of points on individual licences and conducts annual checks via the DVLA under authorisation from staff.
- If driving their own vehicles on company business, drivers are required to provide proof of valid MOT and insurance certificate to their line manager on an annual basis, in order to verify business use insurance cover.
- Drivers are required to have eye tests in accordance with DVLA requirements.
- Where considered necessary employees will be provided with company vehicles to allow them to travel to and from locations where they are required to undertake work on behalf of the company and where agreed for their private use.

- The company will provide vehicles for use that are in roadworthy condition, meet all current legislative requirements and are fit for their intended use. Vehicles will be insured, taxed, serviced and maintained in a roadworthy condition at no expense to the individual user.
- Employees provided with a company vehicle will ensure the vehicle remains in a safe and roadworthy condition and servicing schedules, as recommended by the manufacturer, are adhered to. Defects are to be immediately reported to the company office and remedial action taken at the earliest opportunity.
- All those driving on company business will at all times meet the requirements of the Road Traffic Act and follow the guidance detailed in the Highway Code.
- All those driving on company business will drive courteously and in a non-aggressive manner.
- All those driving on company business will plan their journeys to ensure that sufficient time is allowed for the journey taking into account prevailing weather and road conditions.
- For long journeys, the company will support the cost of overnight accommodation.
- Penalties incurred for breaches of the Road Traffic Act and other relevant legislation will be met by the individual employee. Disciplinary action may be taken against employees who frequently or excessively incur penalties for breaches of road traffic legislation whilst driving on company business.
- All driving activities will be managed in accordance with the Company Driving Policy, Codes of Practice and Safe Systems of Work.
- Drivers must sign that they will comply with these procedures and records will be maintained.
- Company vehicles may be fitted with trackers, dashboard cameras and voice recording devices.
- Company vehicles may be fitted with speed limiting devices, set in accordance with speed restrictions contained in the Highway Code for each class of vehicle.
- Driving may be monitored to ensure compliance with speed limits and good driving practices.

## 4.9 Dust and Fumes, Respiratory Protective Equipment

- All training conducted by company employees and associates that result in the generation of dust or fumes will be subject to an assessment under the Control of Substances Hazardous to Health Regulations 2002 (as amended).
- Control measures to protect personnel exposed to dust or fumes will be identified and put in place. All personnel likely to be exposed to dust or fumes are to be informed of the harmful effects and of the precautions and control measures to be implemented to prevent, reduce or control exposure.
- Where identified by the risk assessment, suitable personal protective equipment will be provided to supplement other control measures. Personal protective equipment is to be worn by all personnel identified in the assessment in accordance with the training and instruction provided.
- Where the need to wear respiratory protective equipment (RPE) is identified via CoSHH assessment, suitable and appropriate RPE with the required assigned protection factor (APF) will be provided in accordance with HSE Guidance (HSG53, 4th edition 2013, Respiratory Protective Equipment at Work – A Practical Guide).
- Each person who is required to wear RPE with tight-fitting facepieces will undergo a fit test for each type of RPE worn, prior to first use and at suitable intervals thereafter, in accordance with HSG53, Appendix 4.
- All persons wearing RPE with tight-fitting facepieces will be clean shaven within the previous eight hours, as per HSE guidance, to ensure effectiveness of protection.

## 4.10 Electricity and Portable Electrical Appliances

The company recognises the need to ensure that all fixed electrical installations shall be safe at all times. This will be achieved by:

- Conducting a documented inspection of the fixed electrical installation at intervals not exceeding five years, or at a frequency specified on the Electrical Installation Condition Report.
- Ensuring access to electrical distribution panels is unobstructed.

- Ensuring all electrical distribution panels and points of electrical isolation are clearly marked, identifying the circuits and equipment they control.
- Restricting access to all rooms containing electrical installations to authorised persons only.
- Ensuring adequate signage is in place warning of access restrictions and potential hazards (fire, electrocution).

The company recognises the need to ensure that all electrical equipment shall be safe at all times. This will be achieved by:

- The use of battery-operated tools or 110 volts within the workplace wherever practicable.
- Wherever practicable, circuits will be protected by residual current devices (RCD) where mains voltage is to be used.
- Electrical appliances used outdoors (such as electrical pressure washers) will be protected by a 30mA RCD. RCDs will be tested regularly by operation of the test button and will undergo a combined inspection and test, conducted by a competent person, at regular frequencies in accordance with HSE guidance.
- Sufficient socket outlets will be provided, and the use of adaptors and extension leads is to be discouraged. Sockets are not to be overloaded.
- Workplace tools used on site will be in good condition and double insulated.
- All equipment is to be switched off before unplugging or cleaning.
- All electrical equipment shall be switched off and unplugged when not required for use.
- Undertaking assessments to identify hazards associated with each individual item of machinery and implement specific safety rules and procedures for the authorised operative to follow.
- Ensuring all electrical appliances and equipment are periodically examined and tested at a frequency in accordance with current HSE guidance, HSG107 Maintaining Portable Electrical Equipment.
- Maintaining a record of all inspections / tests of electrical equipment and appliances.
- Ensuring that equipment operators regularly carry out a visual inspection of equipment and associated cables and plugs for signs of obvious damage.
- Ensuring that all safety devices and guards are serviceable and in place prior to the use of equipment.
- Immediately reporting and prohibiting the use of defective equipment, including leads and plugs.
- Only authorised and competent persons will be permitted to repair or alter electrical equipment. Temporary or makeshift repairs are not to be undertaken.
- Staff are not permitted to bring their own electrical equipment to the workplace without management authorisation.

## 4.11 Flammable Liquids / Fuels

- All flammable liquids / fuels shall be stored in accordance with the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).

Management will ensure that:

- Only the required quantity of flammable liquids / fuels is stored on company premises for immediate use.
- All flammable liquids / fuels shall be kept in approved containments and in an approved stowage. Each storage area shall be designated as a 'No Smoking Area'.
- The storage and use of flammable liquids / fuels are subject to a risk assessment to ensure adequate control and mitigation measures are in place to protect against foreseeable incidents.
- All persons involved in the storage, handling, use and transport of flammable liquids / fuels will be supplied with suitable information, instruction and training on the precautions and actions to take to safeguard themselves and others.
- When not in use, containers of flammable liquids / fuels are kept closed and stored in suitable cabinets or bins of fire-resisting construction, which are designed to retain spills (110% capacity volume).
- Containers are located in designated areas away from the immediate work process area and do not jeopardise the means of escape from the area.

- Flammable liquids / fuels are stored separately from other dangerous substances that may enhance the risk of fire or compromise the integrity of the container (e.g. energetic substances, oxidisers and corrosive materials).
- No more than 50 litres of highly flammable liquids or 250 litres of flammable liquids with a higher flashpoint of up to 55°C will be stored on site.
- The carriage of flammable liquids / fuels will satisfy The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009.

## 4.12 Housekeeping

- In order to promote a safe working environment and good hygiene standards, high standards of housekeeping will be maintained at all times throughout company premises.
- All materials will be stored to reduce the risk of injury to personnel and to minimise fire risk.
- Combustible materials will not be stored adjacent to heat / ignition sources.
- Rubbish will not be allowed to accumulate and will be safely disposed of on a regular basis.
- All spillages will be cleared up immediately.
- Vehicular and pedestrian access and egress routes shall be maintained at all times, both internally and external to buildings. Routes are to be kept clear for emergency purposes.

## 4.13 Legionella / Water Hygiene

- Legionnaires' disease is contracted through inhalation of tiny airborne droplets or particles of water containing viable Legionella bacteria. Given the right conditions, the bacteria can grow in hot and cold-water systems, air conditioning etc. The bacteria grow rapidly in water temperatures that range between 20°C – 45°C. Those most at risk of contracting the disease are the elderly and people whose immune system is impaired.
- A responsible person and deputy shall be appointed who shall be responsible for identifying and assessing sources of risk and putting in place a management plan (including a written scheme for the prevention and control of risk for each water system) to comply with general legislation and the Approved Code of Practice L8: The Control of Legionella Bacteria in Water Systems.
- Appropriate control measures for individual premises will be identified in legionella risk assessments.
- Call-out arrangements for automatic water systems are in place.
- Annual audits of the arrangements in place to control legionella in water systems will be undertaken.

## 4.14 Manual Handling Operations

The company recognises the need to ensure that all hazardous manual handling operations shall be avoided, or where this is not practicable be assessed and made as safe as reasonably practicable at all times, in accordance with the Manual Handling Operations Regulations 1992 (as amended). This will be achieved by:

- Wherever possible, the requirement to conduct hazardous manual handling operations will be avoided by use of a forklift truck or other suitable mechanical means. Where manual-handling operations cannot be avoided then mechanical aids will be utilised, the load split to reduce the risk of harm, or group-handling techniques will be used.
- All manual handling activities will be screened against the filters outlined by the HSE in the guidance document L23 or by using HSE tools such as the MAC or ART tool.
- Where required, detailed assessments of manual handling operations will be conducted to identify risks and control measures required to protect those at risk from the manual handling operation.
- Manual handling risk assessments will consider the task, individual, load, environment (TILE) and any other factors.
- If suitable mechanical means cannot be provided to carry materials and equipment up / down stairs, a specific manual handling risk assessment will be prepared to include the reasons for this.
- The results of the manual handling operations risk assessment will be communicated to all employees.
- Employees will be adequately trained in correct manual handling techniques and the use of any handling aids provided.

- Employees will follow the established safe system of work and use any handling aids provided, in line with training.
- Appropriate information relating to the weight, centre of gravity or the heaviest side of the load will be provided to those personnel involved in the manual handling of the load.
- Where vehicles are used to eliminate or reduce manual handling operations, loads shall be checked as secure by the driver prior to moving the vehicle.

## 4.15 Noise

- The company aims to protect employees' hearing from excessive noise whilst at work, in accordance with the Control of Noise at Work Regulations 2005.
- The company will seek to ensure, as far as is reasonably practicable, that all equipment used, hired or purchased will only generate noise levels below those recommended by applicable approved codes of practice and official guidance notes.
- Where noise levels are likely to exceed the Lower Exposure Action Value perceived at the operator's ear an assessment will be conducted and control measures identified and implemented to reduce or control personal exposure.
- Suitable ear defenders providing adequate attenuation will be provided where appropriate to all affected personnel, at no cost to them, together with appropriate instructions on their use.
- Where noise levels are likely to exceed the Upper Exposure Action Value perceived at the operator's ear the wearing of hearing protection will be enforced and hearing protection zones identified.
- In no situation will the exposure limit value (ELV) be exceeded.
- All employees will use hearing protection provided for their protection.

## 4.16 Practical Demonstrations

- All practical demonstrations carried out for training purposes will comply with the provisions of the training procedure.
- Risk assessments will be carried out for all practical activities. All recommendations and safe working procedures will be complied with.

## 4.17 Work Equipment

- Company employees will only use work equipment that is correct and suitable for the job and will ensure that the equipment is maintained in an effective state, in efficient working order and in good repair, in accordance with the Provision and Use of Work Equipment Regulations 1998.
- Sufficient clear and unobstructed working space will be provided around work equipment to allow persons to work without the risk of injury.
- Adequate lighting and ventilation will be provided to allow personnel to operate work equipment safely.
- Equipment will be regularly inspected and tested as required by current legislation and defects or loss reported immediately. Records of inspection and maintenance will be held in the main office.
- Defective equipment will be taken out of service immediately to a place where it cannot be brought back into use until it has been repaired by a competent person.
- Only authorised and competent persons will undertake maintenance, repairs, testing, installation or alterations of any nature to any plant or equipment.
- Where required all safety devices and guards will be operable and in use.
- Where the use of the equipment involves a specific risk to health and safety, the use of the equipment will be restricted to personnel who are trained, competent and authorised in its use.
- All employees will receive adequate training and instruction in the use and safe operation of all plant and equipment that they are required to operate.
- Plant and work equipment must not be used when unprotected members of the public are present.

#### 4.17.1 Hand / Small Tools

- All hand / small tools are of a suitable quality and used only for their intended purpose and in the correct manner. They are kept clean, well maintained and stored in a safe manner and condition so as not to cause an obstruction or danger to others when not in use.

### 4.18 Slips, Trips and Falls

- Trailing leads and hoses are laid to minimise the risk of trips. Cable protection is fitted when possible to reduce the risk of tripping. Where practicable, trailing cables are eliminated by routing cables above head height.
- Floor coverings will be sound and in good state of repair. All spillages will be cleared away immediately.
- All corridors, accesses, egresses and stairwells will be adequately lit and kept clear of obstacles and rubbish.
- Offices and working areas will be kept tidy at all times and all rubbish will be removed at the end of each day.

### 4.19 Solar Panels

The company recognises the need to ensure that all solar powered installations and associated plant and equipment shall be safe at all times. Management will ensure that:

- Solar panels and associated heating systems are inspected, maintained and serviced under contract.
- Unauthorised personnel do not undertake any form of work on solar panels.
- Access to, and work on, solar panels is restricted to authorised personnel and contractors only and is subject to separate, independent risk assessment and method statement, including for access arrangements (e.g. for roof access).
- Clear access is maintained to all control panels.
- Emergency shut-off / isolation switches are installed and clearly labelled as to function.

### 4.20 Storage Racking, Materials Storage and Handling

- All racking designed for the storage of materials will be fit for purpose and capable of supporting the required loads.
- All racking systems will be of good mechanical construction, of sound material, adequate strength and installed and maintained in accordance with the manufacturer's instructions.
- The maximum safe working load and design configuration is conspicuously displayed.
- Company personnel will be trained in safe methods of stacking materials on the racking and removing materials from the racking.
- All storage racking will be visually inspected on a weekly basis and a record of inspections will be kept on file.

### 4.21 Vibration

Hand Arm Vibration and Whole Body Vibration can occur from regular and frequent use of:

- Handheld power tools.
- Hand guided power equipment.
- Powered machines which process handheld materials.
- Plant and vehicles.

In accordance with the Control of Vibration at Work Regulations 2005 management will:

- Conduct assessments to determine the risks from vibration to employees.
- Decide if employees are likely to be exposed above the daily exposure action value (EAV) and if they are:

- Introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable and
- Provide health surveillance (regular health checks) to those employees who continue to be regularly exposed above the action value or otherwise continue to be at risk.
- Decide if employees are likely to be exposed above the daily exposure limit value (ELV) and if they are:
  - Take immediate action to reduce their exposure below the limit value.
- Vibration levels shall be a consideration when purchasing or hiring equipment used by the company.
- If a hand-arm vibration measurement system is used, then it shall measure according to the requirements of BS EN 5349-1:2001. In addition to the measurement methodology standard, any equipment used to measure hand-arm-vibration magnitudes shall comply with BS EN ISO 8041:2005.

## 4.22 Weather Conditions

Consideration of the anticipated weather conditions will be given to ensure that suitable precautions are taken to safeguard those undertaking or those who may be affected by the work:

- Employees are aware of the increased risk of slips, trips and falls in wet, muddy, and icy conditions and the need to wear appropriate footwear.
- Employees are aware of the effects of working in cold conditions and the precautionary measures to take to avoid hypothermia or cold stress.
- Employees are aware of the effects of strong sunlight and the precautionary measures to take to avoid sunburn or heat exposure.

Industry guidance will be consulted when deciding the maximum wind speeds for working at height.

The decision to continue or suspend work at height will be based on wind speed, control measures already in place to prevent the fall of personnel or materials, position and height of the work activity and the size of materials being handled.

## 4.23 Working at Height

### 4.23.1 General

- All work at height will be conducted in accordance with the Work at Height Regulations 2005 (as amended).
- The company's overriding principle is to do all that is reasonably practicable to prevent anyone from falling.
- The company shall:
  - Avoid work at height where they can.
  - Use work equipment or other measures to prevent falls where they cannot avoid working at height.
  - Where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distances and consequences of a fall should one occur.
- The company will ensure:
  - All work is properly planned and organised
  - All work at height takes account of weather conditions that could endanger health and safety
  - Those involved in work at height are trained and competent
  - The place where work at height is done is safe
  - Equipment for work at height is appropriately inspected
  - The risks from fragile surfaces are properly controlled
  - The risks from falling objects are properly controlled
- It is prohibited to drop or throw anything from a height unless sufficient and adequate controls have been identified via risk assessment and implemented. Lowering materials must be conducted in a controlled manner, using ropes or via chutes into skips.

#### 4.23.2 Risk Assessment

- Before carrying out any work at height, including the use of ladders, a risk assessment of the work to be undertaken will be conducted. The risk assessment will take into account weather conditions and other aspects of the environment to ensure the safety of personnel at height and identify the measures required to protect persons working at height and all others affected by the activity.
- All equipment identified by the risk assessment and provided for working at height will be sound and fit for purpose and will be the subject of regular inspection and testing to ensure its continued suitability for the job.

#### 4.23.3 Scaffolding and Towers

- All scaffolds and mobile tower scaffolds shall be erected by trained operatives or competent contractors (i.e. CISRS Scaffolder or PASMA Towers for Users certified) in accordance with current legislation, British Standards, approved Codes of Practice, company procedure and industry standards (NASC TG20:21 The Definitive Guidance for Tube and Fitting Scaffolds or EN1004:2020).
- 'Designed' scaffolds will be designed by a competent person in accordance with current standards, guidance and Codes of Practice, or built to a standard configuration such as outlined in TG20:21.
- Scaffolds will be erected by appropriately trained, competent employees in accordance with industry standards (NASC SG4:15) and design specifications.
- All scaffolds will be inspected by a trained and competent person, and records of such inspections kept:
  - Prior to use
  - After any substantial addition or dismantling
  - After alteration
  - After any event likely to affect its strength or stability and
  - Weekly
- Where practicable, handover certificates will be issued to the company and a joint inspection carried out.
- Employees of SSG shall not use any scaffold unless it has been erected and inspected as above.
- During erection, unauthorised access to scaffolds will be prevented by the use of appropriate barriers and signage.
- Where SSG use portable tower scaffolding the person responsible for erecting, dismantling and using the equipment will be trained and competent.

#### 4.23.4 Ladders and Stepladders

- All persons using ladders and stepladders will be fully trained and aware of the hazards and risks.
- Ladders, including stepladders, used by the company will be of the correct type (Class 1 or EN 131 Professional) and in good condition. Measures must be taken to ensure that ladders and stepladders are secure, on a solid footing and, in the case of access ladders, are effectively secured to prevent movement.
- Ladders will be the subject of regular inspection by a competent person and defective ladders will be taken out of service immediately and reported to line management.

#### 4.23.5 MEWPs

- All work involving the use of MEWPs is planned and conducted in accordance with HSE guidance GIS6 The Selection, Management and Use of Mobile Elevating Work Platforms.
- Mobile Elevated Work Platforms shall only be operated by fully trained, competent operators with current IPAF certification.
- Safety harnesses will be worn at all times whilst work is being conducted from boom-style MEWPs (e.g. cherry pickers). The requirement for use of a safety harness in other types of static MEWP (e.g. scissor lift) will be determined via risk assessment.
- Where a harness is worn, this is used in conjunction with a short work restraint lanyard secured to a suitable anchorage point within the basket.

- When working next to or over water, a risk assessment is carried out to determine whether the greatest risk of injury to the operator is from falling from the MEWP basket or drowning if the MEWP falls into the water. Life jackets are worn in preference to harnesses where the risk of drowning is greater.
- A rescue plan is in place for falls from MEWPS which is incorporated into emergency procedures.

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