



Eamon Hanley Concrete Structures Ltd

HEALTH AND SAFETY POLICY

2010

Contents

Item

1. Introduction
- 2. Policy**
 - 2.1 General Policy Statement
 - 2.2 Arrangements for reviewing and updating Policy & SMS
 - 2.3 Performance Standards
- 3. Organisation**
 - 3.1 Organisation Chart
 - 3.2 General Responsibilities for Managing Health & Safety
 - 3.2.1 Directors & managers
 - 3.2.2 General duties of Employees
 - 3.2.3 Independent Health & Safety Consultant
 - 3.3 Training & Competence
 - 3.3.1 Training Records
 - 3.3.2 Induction Training
 - 3.3.3 Modular Training (Toolbox Talks)
 - 3.4 Communication of Information
 - 3.4.1 Essential Information & Feedback
 - 3.4.2 Formal Communication
 - 3.5 Effective Supervision & Control
 - 3.6 Consultation with Employees
 - 3.7 Liaison with Fellow Employers
- 4.0 Arrangements**
 - 4.1.1. Risk Assessment
 - 4.1.2. Method Statements
- 4.2 Work at Height
 - 4.3.1. Work Equipment
 - 4.3.2. Mobile Plant & Vehicles
 - 4.3.3. Mobile Elevating Work Platforms (MEWP's)
 - 4.3.4. Portable Electrical Equipment
 - 4.3.5. Lifting Operations & Lifting Equipment
- 4.4. Occupational Health
 - 4.4.1. Manual Handling

- 4.4.2. Hazardous Substances
- 4.4.3. Noise
- 4.4.4. Health Surveillance & Screening
- 4.4.5. Vibration
- 4.5 Scaffold Inspection, Commissioning & Handover
- 4.6. Protection of the Public & Others
- 4.7 Personal Protective Equipment
- 4.8 First Aid & Emergency Arrangements
- 4.9 Welfare Facilities
- 4.10 Housekeeping
- 4.11 Smoking at Work
- 4.12 Drugs & Alcohol at Work
- 4.13 Young Persons at Work
- 4.14 Dealing with the Enforcing Authorities
- 4.15 Work on or near the Railway
- 4.16 Document Control
- 4.17 Records Management
- 4.18 Office Safety
 - 4.18.1. DSE User and Operator
 - 4.18.2. Eye Tests and Corrective Devices

5.0 Measuring Performance

- 5.1 Accident Reporting & Investigation
- 5.2 Proactive Monitoring
 - 5.2.1. Hierarchy Monitoring
 - 5.2.2. Independent Monitoring

6.0 Reviewing Performance

- 6.1 Review Meetings

Company Policy for Health & Safety at Work – Employees Acknowledgement.

1.0 Introduction

This Health & Safety Policy and Safety Management System have been prepared to comply with the statutory requirements of Section 2(3) of the Health & Safety at Work Act 1974. Contained within this document are Eamon Hanley Concrete Structures Limited (EHCS Ltd) policy, organisation and arrangements for occupational health, safety and welfare, for all our business activities in the UK.

At EHCS Ltd health, safety and welfare issues rank equally with other business objectives and achieving good health and safety performance is recognised as being consistent with overall successful business performance. We also recognise that failure to integrate health and safety into our operations will result in harm to people and associated loss.

2.0 Policy

2.1 General Health & Safety Policy Statement

The Company recognises the legal obligation place on it by the Health and Safety at Work Act 1974 and of any other statutory provisions, approved Codes of Practice and any other Relevant Health and Safety Regulations that apply to its activities, with particular regard, through not limited to, the following:-

- To provide adequate resources, including sufficient finance, and access to competent health and safety advice, to achieve the aims of this policy.
- The provision and maintenance of plant and systems of work that are safe and so not cause undue risk to health.
- To consult, on Health and Safety matters, with our Employees and Others who we may control on all matters affecting their health and safety and to ensure that the Policy is kept up to date.
- The provision and maintenance of a safe and healthy working environment with adequate welfare facilities and arrangements.
- To ensure that all Employees are competent to carry out whatever task they are required to do and to supply any further training that they may need.
- To provide, free of charge, to all employees suitable PPE relevant to the tasks they are being asked to carry out.
- The provision of a safe access and egress to and from all workplaces.
- To prevent accidents and work related ill health.
- The safety and absence of risk to health in connection with the use, handling, storage and transport of materials and substances.
- The provision of such information, instruction, training and Supervision as is necessary to ensure that work may be carried out safely and without risk to health
- To review this policy as necessary at regular intervals.

Employees have a duty to co-operate in the operation of this policy by fulfilling the responsibilities place upon them.

As stated, the operations of the Company and this policy/manual will be reviewed every 12 months, change of Company circumstances, change of Company procedures, change of Company Management structure or change of Legislation. If any changes were to occur they will be brought to the attention of all Employees and any others whose health and safety may be affected by the changes.

Signed: _____

Dated: 1st March 2010

Eamon Hanley

Managing Director

2.2 Arrangements for reviewing and updating Policy & SMS

The Health and Safety Consultant is responsible for keeping the Company up to date with developments in occupational health and safety, new and changing health and safety legislation, case law, and best practice.

This Policy and Safety Management System and associated procedures shall be revised in accordance with any significant changes identified above and at least reviewed every 12 months, to ensure that remains relevant to the business operations and up to date.

2.3 Performance Standards

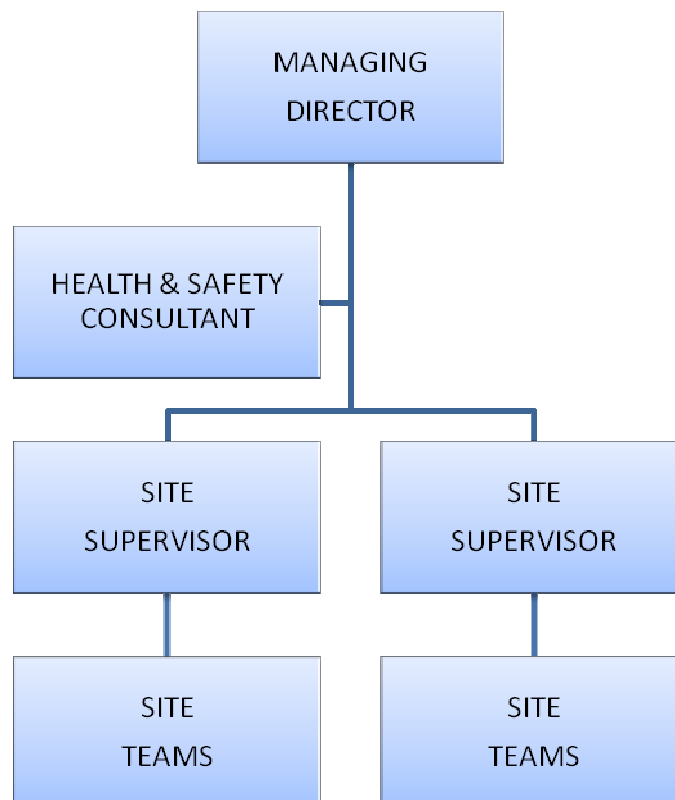
This document details performance standards for health, safety and welfare that must be adhered to.

3.0 Organisation

3.1 Organisation Chart

As stated in the General Policy Statement the management of occupational health and safety at EHCS Ltd is a line-manager responsibility, as the line-management, from the Managing Director – through to Supervisors – through to operatives, are charged with controlling the business operations. Health and Safety is an integral part of all our operations, therefore each member of the line-management is charged with managing health and safety within their sphere of operation.

The following organisation chart defines the hierarchy within the Company:-



3.2 General Responsibilities for Managing Health & Safety

This section covers the basic general responsibilities for Managing Occupational Health and Safety at EHCS Ltd.

3.2.1 Directors and Management

The Managing Director has ultimate responsibility for health safety and welfare at EHCS Ltd.

The Person with prime responsibility is Mr. Eamon Hanley. He is responsible for bringing the policy to the attention of all employees and sub-contractors and ensuring compliance through monitoring arrangements. He is also responsible for:

- Ensuring adequate and appropriate funds are made available for all safety aspects.
- Responsible for providing adequate provisions within the Company for the assessment of risk, preventative measures, protection, emergency procedures, adequate safety surveillance and provide employees with information and training about the workplace health and safety.
- To ensure that Management's competency is adequate for the duties required of them.
- To ensure all employees receive Safety Induction and Safety Awareness Training before and after they start work for the Company.
- To hold regular meetings with and seek advice from the Company Health and Safety Consultant.
- Be aware of the requirements of current health and safety legislation and ensure systems are in place to monitor compliance.
- Ensure that consultation with all employees takes place on a regular basis and the results of these discussions are dealt with as soon as possible.
- He will reprimand or discipline any member of staff for failing to discharge their safety responsibilities.
- Set a personal example with regard to safety matters.

This Policy is a live document, which needs to be reviewed from time to time to ensure that it remains current with the Company's activities and changing legislation. It is the responsibility of the Managing Director, with the assistance of the Health and Safety Consultant, to assess the implications of new legislation and best practice, investigation/audit reports, monitoring systems etc.... for the Company and to amend the Policy as necessary.

3.2.2 General Duties of Employees

- All persons at work carry individual responsibilities and these are outlined in the Health and Safety at Work etc Act 1974, as follows:
- To take reasonable care of themselves and others who may be affected by their acts or omissions.
- To co-operate with the employer so far as is necessary to enable the employer to comply with his statutory duties.

All employees are also required to:

- Comply with Directors/Supervisors and Safety Consultants instructions and all company rules and current regulations.
- Read or have explained to you the contents and requirements of the Company Safety Policy.

- Use correct tools and equipment and always wear personal protective equipment as necessary.
- Maintain plant, tools and protective equipment in good order and report any defects to the Site Supervisor.
- Do not take unnecessary risks and avoid unsafe practices. Always work in accordance with Risk Assessments and Method Statements as provided.
- Obey all signs and notices erected by our company and others.
- Develop a personal concern for your safety and that of others.
- Obey site rules and suggest ways of reducing or eliminating hazards.
- Refrain from irresponsible behaviour on site (horseplay etc.).
- Attend any induction, tool box talks and training when requested to do so.
- Report all accidents and injuries to your Supervisor, including "near misses".
- Do not misuse or interfere with anything provided for health, safety and welfare.
- Co-operate with Management on all matters relating to Safety, Health and Welfare, particularly in relation to working safely, using PPE as and when required, obey all safety instructions, help maintain and develop a caring attitude towards the welfare facilities provided.
- Only use or operate tools and machinery if you have been trained in their use.
- You are required by law "to take reasonable care for the health and safety of yourself and of other persons who may be affected by your acts or omissions at work".
- If you feel you have not been consulted or communications have broken down between you and our management brings this to the notice of the Director responsible for Health & Safety as soon as possible.

The Company requires the full support of all employees and sub-contractors to have effective accident prevention.

3.2.3 Independent Health & Safety Consultant

EHCS Ltd employs the services of an independent Health and Safety Consultant to provide professional assistance and guidance to support the line-management. He is appointed as EHCS Ltd competent consultant and helps to discharge the Company's duty under regulations 7 of the Management of Health and Safety at Work Regulations 1999.

The Health & Safety Consultant is responsible for keeping the Company up to date with occupational health and safety: new and changing health and safety legislation, case law, and best practice.

3.3 Training & Competence

EHCS Ltd recognises its general duty to employees under section 2(2)c of Health and Safety at Work etc. Act 1974, to provide all necessary information, instruction, training and supervision. To this end the company continuously assesses the competency level of all employees and where applicable sub-contractors.

3.3.1 Training Records

EHCS Ltd shall maintain training records in the personnel files with copies of certification.

3.3.2 Induction Training

Every new employee shall receive induction training, before commencing work, which includes health and safety, to ensure that they are not exposed to unfamiliar hazards.

The induction is recognised as an opportunity to convey the management beliefs and company values for health and safety management and to help influence the attitudes of all new starters.

A record of induction must be kept, signed by the inductee as an acknowledgment that they have understood the content.

3.3.3 Modular Training (Tool Box Talks)

Modular training in the form of toolbox talks is used to help increase and maintain general levels of health and safety awareness.

The Managing Director, or Supervisors can establish their own frequency of toolbox talks, as necessary (e.g. weekly, fortnightly). However, every operative must receive at least one toolbox talk per calendar month, covering a specific topic, as a minimum.

Additional general toolbox talks are a useful medium for general day to day communication of information such as sharing accident learning or introducing best practice.

A record of attendance must be kept, with the signature of each attendee.

3.4 Communication of Information

3.4.1. Essential Information & Feedback

The 'toolbox talk' medium can be used to help disseminate essential health and safety information throughout the organisation.

It is important to solicit information from the workforce and receive feedback on health and safety issues. A few moments should be taken at the end of each toolbox talk giving the opportunity to raise and discuss issues.

3.4.2 Formal Communications

To ensure that effective communication of important information EHCS Ltd uses the following formal systems:-

- Work Instructions
- Memorandums & General Notices
- Guidance Notes
- Safety Bulletins

Safety Bulletins are a system for communicating up-to-date health and safety information. Important issues, such as accident / incident learning to be shared will be compiled and issued to all employees, as necessary.

Copies of such written information could also be posted on the notice boards. For personnel with access to the Company's computer network this information may be sent electronically.

Certain formal communications may require the recipient to sign and return an acknowledgment slip accepting that they have received, read and understood the communication.

3.5 Effective Supervision & Control

At EHCS Ltd we have established four general principles for effective supervision to help ensure control of our core operations, due to the mainly peripatetic nature of the work, and compliance with the established performance standards – for all elements of the business – not just health and safety.

The four general principles for effective Supervision are:-

1. Every job should be surveyed and a suitable and sufficient **risk assessment** and **method statement** carried out.
2. Ensure the correct **competence** levels of those allocated duties, in relation to the task(s) to be undertaken and the work equipment to be used.
3. Ensure the effective **communication** of the required performance standards and essential information. E.g. Control measures
4. Establish and implement the suitable levels of imposed and self-supervision depending upon the degree of risk and the competence levels of the operatives involved. Always ensure a minimum level of imposed supervision.

3.6 Consultation with Employees

Legislation requires employers to hold consultation with employees and to recognise the rights of employees and union safety representatives and safety committees. EHCS Ltd will comply with the relevant legislation as a minimum standard.

Toolbox talks to be used as a medium for consultation. Management will always be approachable on all health and safety matters.

'Involvement and participation by individuals so that the health and safety becomes a collaborative effort. Soliciting the opinion of the workforce in health, safety and welfare issues.'

3.7 Liaison with Fellow Employers

EHCS Ltd recognises its duty under the Management of Health and Safety at Work Regulations 1999, to communicate with fellow employers to ensure information about hazards and control measures is shared. This will enable suitable arrangements to be made.

4.0 Arrangements

4.1.1 Risk Assessment

The identification of hazard, assessment of risk, establishing and enforcing of control measures to eliminate or control risk, are the cornerstones of effective safety management.

The Management of Health and Safety at Work Regulations 1999, Regulation 3, requires employers to make suitable and sufficient assessment of the risks to health and safety and to keep records of the significant findings. The Company has developed risk assessment processes to comply with this statutory requirement.

The risk assessment process uses a qualitative technique, which relies upon the judgement of a competent person (or Risk Assessor). The Risk Assessor must be appointed by Management having been deemed competent in the particular techniques used.

The risk assessment process contains other pieces of legislation require specific risk assessment such as the Manual Handling Operations Regulations 1992, of which arrangements are made within further sections of this policy.

A Specific Risk Assessment must be carried before each job commences.

4.1.2 Method Statement

A Method Statement(Safe System Of Work), will be developed for all operations, incorporating the findings from the risk assessments for any associated risks to that particular task.

All Method Statements should include the following:

- The clients details
- Details of the location
- Description of the activities to be undertaken
- Personnel involved in the task
- Specific equipment to be used
- Drawing Register
- Sequence of events or work method
- Significant hazards identified through the risk assessment
- Specific control measures to be adopted

The Method Statement should be communicated to all operatives and a record of attendance must be kept, with the signature of each attendee.

The Method Statement, once submitted and approved by the client, must be formally communicated to all employees involved in the operation before commencing.

4.2 Working at Height

Under the Work and Height Regulations 2005 EHCS Ltd will comply with the hierarchy to avoid, prevent and mitigate the need to work at height at all times and will always consider collective protection over personal where applicable.

Work at Height is deemed under these regulations as any place from which if measures required by these regulations were not taken a person could fall a distance liable to cause personal injury including below ground.

EHCS Ltd will ensure that working platforms used for construction provided by the Principle Contractor will be under an inspection schedule by the Principle Contractor.

EHCS Ltd will also ensure that a regime for the inspection of equipment used in Work at Height, provided by EHCS Ltd, is implemented.

4.3.1. Work Equipment

All work equipment (including hand tools, appliances, lift trucks, computers, trestles etc.) must be designed and suitable for the purpose for which it is to be used and only used for operations for which it is designed.

The use of work equipment is restricted to those persons appointed to do so and must only be repaired and maintained by nominated competent persons. A service log recording all repairs and maintenance must be kept for all plant equipment and vehicles.

Line-management must ensure that all employees receive all necessary information, instruction and training in the use of work equipment, including where appropriate written instructions.

Any work equipment found to be defective must be reported to the immediate Supervisor who will arrange for the equipment to be taken out of use and clearly marked as defective.

4.3.2 Mobile Plant & Vehicles

Only authorised trained and competent personnel are to operate mobile plant and vehicles.

All mobile plant and commercial vehicles must be subject to regular maintenance and servicing accordance with the manufacturer instructions and statutory provisions e.g. Lifting Operations and Equipment Regulations 1998. In addition all mobile plant and commercial vehicles must be subject to weekly formal inspections by the operator. Any defects identify must be reported to the Managing Director and the finding and remedial action recorded in the report.

All mobile plant with a risk of rolling over must be fitted with an appropriate rollover protection systems (ROPES) and seatbelts(s).

4.3.3 Mobile Elevating Work Platforms (MEWP's)

MEWP operators must hold a current CITB CTA Card, IPAF Operators Certificate or equivalent.

All employees using the telescopic boom variety of MEWP's shall be subject to the wearing and use of fall arrest equipment. All MEWP's shall have a clearly designated anchor point within the platform that is capable of sustaining the likely force imposed.

4.3.4 Portable Electrical Equipment

It is the policy to use 110v or low voltage battery operated hand tools wherever possible. Where 240v hand tools are to be used they must be used in conjunction with a residual current device (RCD).

ONLY 110V POWER TOOLS WILL BE USED ON SITE

All portable electrical equipment must be inspected and portable appliance tested as per the recommended guidelines ie; 110v every 3 months, by a competent person. An inventory of all equipment must be maintained and all new equipment is added to the list. Each piece of equipment must be clearly marked with the date of the test and the dated of re-testing.

4.3.5 Lifting Operations & Lifting Equipment

A person(s) shall be appointed, who has received appropriate training to be deemed competent, to plan and supervise lifting operations, as necessary to ensure that they are carried out in a safe manner.

Lifting equipment (e.g. cranes, lorry-loaders, hoists, etc.) and lifting accessories (e.g. chains, slings, shackles gin wheels and ropes etc.) will be the responsibility of a nominated person (and deputy), and they will be responsible for the storage, maintenance and inspection of all lifting equipment and accessories owned and controlled by EHCS Ltd as required by the Lifting Operations & Lifting Equipment Regulation 1998 (LOLER'98).

All lifting equipment shall be inspected and thoroughly examined, as required by Regulation 9 of LOLER'98. Copies of all inspection reports and certificates shall be kept on site and made available for examination when required.

A Slinger / Signaller must visually inspect all lifting equipment before each use. Any defects identified must be reported to the immediate Foreman, with the equipment removed from use and clearly marked as defective.

All lifting equipment must have a Safe Working Load (SWL) clearly marked on it, with the required Safe Working Load established before use.

Suitable storage accommodation must be provided to prevent physical damage or deterioration.

4.4. Occupational Health

4.4.1 Manual Handling

The Manual Handling Operation Regulations 1992 requires employers to avoid manual handling operations and where they cannot be avoided to make an assessment of the risk of injury to establish control measures to reduce those risks as low as reasonably practicable.

EHCS Ltd recognises that manual handling is inherent part of the operative's trade and that the special handling techniques used in for some tasks are essential enabling skills.

Where possible mechanical handling will be used wherever possible.

Operatives and other operatives who are required to carry out manual handling operations will require guidance and training in the correct handling techniques.

4.4.2 Hazardous Substances

Arrangements have been developed to assess the effects of any substances identified as hazardous to health and the adoption of relevant control measures, as required by the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

The Company will provide written COSHH assessments (C.O.S.H.H.) for all those products to be used which have been assessed as hazardous to Health. Where necessary the Company will request the Company Safety Consultant to assist them in making the necessary assessments.

All suppliers of materials are required to provide all relevant health and safety information about their products to form the basis of the COSHH risk assessment. This information is to be requested for each product before procurement stage, so that consideration can be made for the use, handling and storage of that substance as per COSHH.

Before work starts the Site Manager/Supervisor will ensure that any special protective clothing, or equipment, required is available for use at work. They will also ensure that, before employees are set to work they will be instructed in the safe use of any product they are using in accordance with the written assessment. The Site Manager/Supervisor will take into account the circumstances and conditions in which the substance is being used when instructing the workforce. The Site Manager/Supervisor will ensure that any necessary protective clothing or equipment is provided and used.

4.4.3 Noise

Similar to other pieces of legislation, the Noise at Work Regulations 2005, which came into force in April 2006 requires a risk assessment to be made, to ascertain the noise levels employees are exposed to, establishing and implementing precautions to avoid or protect against excessive noise levels. The regulations require all exposure to noise to be reduced so far as is reasonably practicable and specifies the following action levels:-

- First Action Level 80 dB(A), exposure should be reduced below this level and hearing protection must be provided if requested.
- Second Action Level 85 dB(A), exposure must be reduced below this level and hearing protection zones created where hearing protection must be worn.
- Peak Action Level 137pc, is used for peak sound levels such as explosions or impact noise.

As part of the assessment, a competent person using specialist equipment, usually the Safety Consultant must measure noise exposure. The noise exposure is calculated over an equivalent eight-hour shift known as the Lep'd.

Engineering solutions must be considered as the first line of control. When the adoption of reasonable engineering or management control fails to reduce the exposure to an acceptable level, only then will resource be made to the use of Personal Protective Equipment. All noise assessments will be reviewed periodically and if the process changes (i.e. new plant and equipment). Noise exposure shall be considered during the selection of new plant and equipment.

4.4.4. Health Surveillance & Screening

Exposure to certain substances requires regular health surveillance to be carried out, to identify any hazardous effects. Health surveillance will be undertaken where identified in the COSHH risk assessment. In addition certain pieces of legislation also require health surveillance i.e. the Control of Asbestos and Work Regulations and the Control of Lead at Work Regulations.

All new employees must complete a pre-employment medical questionnaire, which is contained in the application form.

The recruitment manager must vet the medical questionnaire. Any medical conditions identified should be referred to the Safety Consultant for advice. Driver/Plant Operator medical checks to be carried out as recommended by the Ministry of Transport for Large Goods Vehicle drivers.

4.4.5 Vibration

Vibration exposure from prolonged work with powered hand held tools or equipment can have an adverse effect on the hands and arms of the user. Various forms of injury can be caused by not effectively controlling vibrating equipment, collectively known as hand arm vibration syndrome (HAVS). The best condition is vibration white finger (VWF), which is a reportable disease.

The Managing Director of EHCS Ltd must consider the risks of health from vibrating work equipment as part of the risk assessment process.

All controls established must as a minimum requirement be provided in accordance with those specified in the Health and Safety Executive's guidance booklets HS(G)88 Hand arm vibration and HS(G)170 vibration solutions.

4.5 Scaffold Inspection, Commissioning & Handover

The inspection of any Scaffold and the recording of such is usually the responsibility of the Principal Contractor.

For any scaffolds erected by a EHCS Ltd contractor than an Advanced Scaffolder will carry out the statutory inspections.

4.6 Protection of the Public and Others

All reasonably practicable measures must be taken to secure the workplace to prevent the public and others (such as fellow workers, visitors, trespassers etc.), especially children being at risk of injury.

Each location must be assessed considering the nature of the work and the location of the workplace and its environment, to establish the necessary control measures.

4.7 Personal Protective Equipment

All Personal Protective Equipment purchased must meet the necessary European Standards and carry the CE Mark.

The risk assessment process together with our client arrangements (i.e. Site Rules, Permit-To-Work Systems etc...) should identify a requirement for PPE. Personal Protective Equipment will only be specified as a last resort in the hierarchy of controls.

An assessment of the PPE must be carried out as required by the Personal Protective Equipment Regulations 1992, to ensure the correct selection and suitability for the user. Employees have a statutory duty to use PPE provided as part of a safe system of work and not misuse or interfere with it.

All new employees receive a full issue of PPE when they commence employment. If any item of PPE required is missing, expired, damaged or defective then it shall be replaced upon request. A record of all PPE issued must be maintained, signed for by the recipient.

No charge can be made to employees for the issue of PPE.

4.8 First Aid & Emergency Arrangements

Management will ensure the Company's legal requirements for first aid are fully complied with, in accordance with the Approved Code of Practice. First Aiders will be properly trained by a recognised training body. The Site Manager or a Supervisor will be responsible for calling the emergency services when required. In the event of minor injuries, these will be recorded in the accident book. Should any accident occur, the Site First Aid personnel will be informed immediately. The First Aiders' details will be communicated to all personnel at the initial induction, in addition all first aiders will display a first aid sticker on their hard hat. First Aiders will be expected to refresh their training as per regulations.

All First Aid kits are to be subjected to checks whether used or not they are to be checked in conformity with the contents list with the first aid kit. Should any first aider use any equipment from the first aid box then it is their duty to ensure it is resupplied or a new first aid box acquired. Only specified first aid contents will be allowed in first aid kits/boxes as detailed in the HSE Guidance Notes.

The condition and contents of First Aid Kits are included on the Weekly Site Inspections.

All first aiders are given advice on Hepatitis B inoculations as part of their training course they are advised to see their G.P. and have the inoculation.

The Site procedure for dealing with accidents will be covered in the site induction.

4.9 Welfare Facilities

The requirements of the Construction (Health, Safety and Welfare) Regulations 1996 (as amended CDM 2007) and the Health and Safety at Work Act 1974 along with the HSE's Construction Site Welfare Facilities Guidance Notes will be adhered to at all times.

Additional facilities will be provided as per the client's contractual requirements and the desire to project a good company image.

An employee found to be defacing or misusing the Welfare Facilities will face the disciplinary action.

4.10 Housekeeping

Housekeeping is an essential feature of accident prevention e.g. trip hazards, fire hazards, etc.

The subject of housekeeping must be integrated into all monitoring and auditing arrangements to ensure high standards of housekeeping are maintained.

4.11 Smoking at Work

It is Company policy not to permit smoking within its premises, including offices, canteens, car parks, factory, workshops etc. Unless in a designated smoking area.

Smokers must ensure that all cigarettes etc. are properly extinguished and disposed of.

If a non-smoker employee or Contractor requests, during the normal course of their work (whilst in smoking areas) arrangements will be made to protect that employee from the discomfort of tobacco smoke. This may include designating specific areas or activities as no smoking e.g. the company vehicles.

4.12 Drugs & Alcohol at Work

Alcohol or drug abusers can adversely affect the safety of themselves and fellow workers whilst at work. Therefore if any employee or sub-contractor is known to be, or strongly suspected of being affected by alcohol or drugs they are to be referred to their immediate Foreman who must arrange for their removal from the workplace.

Employees are not permitted to bring prohibited substances onto company premises or to work.

Any employee who is required to take prescription substances that may affect their performance at work must inform their Foreman. Alternative duties may be allocated to these employees and they must be prohibited from driving/operating plant equipment and working at height. The Company tolerance for alcohol consumption during working hours and its affects at work is inline with the current Road Traffic and Highways Legislation.

The Company reserves the right to test any employee who it suspects of abusing drugs. Also the right to dismiss any employee who is found to be positive or who refuses to comply with the request for a test to be undertaken. The company operates a separate Substance Abuse Policy.

4.13 Young Persons at Work

A young person at work is a person under the age of eighteen (18) years and can be an employee, visitor or student on work experience.

A young person is not permitted to operate/drive plant equipment or work at height where they are exposed to a risk of a fall likely to cause personal injury unless they are in training under direct supervision.

Before a young person starts work e.g. trainee, apprentice etc. A suitable and sufficient risk assessment must be carried out on all their activities. Any residual risk that remains that can not be eliminated and has been controlled so far as is reasonably practicable must be communicated to their parents/guardian and written consent obtained.

4.14 Dealing with the Enforcing Authorities

The Managing Director will meet any representative of an Enforcing Authority e.g. the Health and Safety Executive, Local Authority, Environment Agency, Police etc. Unless this responsibility has been delegated to another appointed person in his absence. The visiting officer must be directed to the Manager/Supervisor or if they wish to proceed unaccompanied the Manager/Supervisor must be notified directly.

Full co-operation must be given to assist them in the execution of their duties.

If enforcement action is taken such as a Prohibition Notice or Improvement Notice issued, then the Manager/Supervisor to whom it is issued must comply with any immediate requirements and contact the Managing Director and the Independent Health & Safety Consultant directly.

The Independent Health & Safety Consultant will be able to provide EHCS Ltd with any practical interpretation and advice on the necessary corrective action required to comply with the Notice.

The Health and Safety Consultant will liaise with the relevant inspector and inform him/her of corrective action taken and confirm this in writing.

If as part of an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution, then the company appointed solicitor should be present.

If as part of an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution and the Police and Criminal Evidence Act (PACE), then the company appointed solicitor should be present.

4.15 Work on or near the railway

All projects undertaken for the rail authority or a rail authority approved contractor on or near the railway must be carried out in strict compliance with the rail authorities document '*Contractor Conditions Safety*' and their line safety standards.

4.16 Document Control

This Policy & SMS is subject to the Company's quality management procedure for document control and must not be reproduced, unless clearly marked as an 'UNCONTROLLED COPY'

4.17 Records Management

All records of formal monitoring and auditing, accident investigation reports, training records, PPE registers, records of inspection and testing, minutes from review meetings, risk assessments and medical reports shall be kept for a minimum of five years.

Accident statistics and details of enforcement action should be indefinitely.

All records should be kept in such a manner that they are ready retrievable and protected where practicable from damage, deterioration or loss.

4.18 Office Safety

All clerical and administration employees are required to receive general office safety instruction and training, as appropriate.

4.18.1 DSE User & Operator

The Health & Safety (Display Screen Equipment) Regulations 1992, requires employers to identify Users and Operations (operators are the self-employed, agency workers and contractors) of display screen equipment and to carry out an assessment of their work activities and workstation.

A User (or Operator) is defined as a person dependent on using a display screen, who is required to use equipment every day for a minimum of two (2) hours. Once Users (or Operators) have been identified, a competent assessor must undertake the risk assessment. Following the assessment the control measures established as reasonably practicable will be implemented and could include:-

- Redesigning tasks and work routines to include regular breaks.
- Provide correct workplace equipment to improve ergonomics.
- Make changes to the environment e.g. lighting, ventilation, temperature etc.
- Provide User/Operator training and instruction.

4.18.2 Eye Tests & Corrective Devices

All employees, who have been identified as DSE Users and use corrective devices for sight (glasses or contact lenses) for close work, are required to wear them when operating DSE.

The Company makes the following contributions for sight tests and corrective devices to employees who have been identified as users after a DSE assessment:-

- Up to £40 contribution towards corrective devices
- Up to £15 contribution towards sight tests.

Monies are redeemed through personal expenses upon the provision of a receipt.

Employees who wear corrective devices and are required to use light eye protection are entitled to prescription safety glasses free of charge.

5.0 Measuring Performance

5.1 Accident Reporting and Investigation

Certain injuries, ill health and dangerous occurrences are required by law to be reported to the enforcing authority (usually the Health & Safety Executive), under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

However it is the policy of EHCS Ltd to investigate all accidents and incidents, including near misses. The purpose of the investigation is to identify the causation and to establish and enforce measures to prevent reoccurrences and not to apportion blame.

Some organisations claim to have a 'no blame culture' for accident reporting and investigation to ensure that every employee feels that they can report accidents to co-operate with any investigation without fear of retribution. However, we promote a 'just and fair culture' which is similar to 'no blame' but there may be some apportion of personal responsibility. Investigations must not lay blame indiscriminately; all accident investigated shall be objective, open and fair.

All employees are encouraged to report all accidents or incidents no matter how minor. The reporting of accidents by employees to the Company shall always remain a high profile topic e.g. regularly repeated toolbox talks, notices etc...

Any employee who fails to report a work-related accident or fails to co-operate with or deliberately misleads an investigation will be referred for disciplinary action.

All injuries must be reported to the immediate line-manager who will ensure that the appropriate level of investigation is undertaken and the report kept.

All accidents will be recorded in the company accident book and a separate accident investigation form will be completed particularly highlighting any recommendations to prevent a reoccurrence.

The forms must be completed for all accidents. The individual completing the form keeps a copy and the other copy is entered into head office accident file once all the remedial actions are complete and closed out.

In addition to the Accident Report Book & Form, the HSE must be notified under RIDDOR on a F2508 for all relevant accidents/incidents.

It is the responsibility of the relevant Contracts manager to ensure that RIDDOR injuries, ill health and dangerous occurrences are reported. However this duty may be performed by others (e.g. H & S Consultants). The Health and Safety Executive's RIDDOR report details are listed below:-

- Telephone 0845 300 99 23
- Fax 0845 300 99 24
- Email riddor@natbrit.com
- Information www.riddor.gov.uk

5.2 Proactive Monitoring

The purpose of proactive monitoring is ensure that the established performance standards are being adhered to and to help prevent an accident or ill health. The primary objective of the hierarchy monitoring is not just to identify failure in the form of unsafe acts or conditions, but to measure success and recognise positive good behaviour.

5.2.1 Hierarchy Monitoring

Each member of the line-management within the operational hierarchy of the organisation (Managing Director through to first line Supervisors) shall undertake health and safety inspections at a predetermined frequency. Hence the term 'Hierarchy Monitoring'. The inspection shall observe workplace operations and be carried out using a checklist style proforma to record the findings.

Copies of the monitoring report are sent to the immediate direct line-manager. Where appropriate copies will be issued to the individual responsible for completing a specific action. All corrective remedial actions remain open until closed out as complete.

5.2.2. Independent Monitoring

Independent Monitoring is similar to the Hierarchy Monitoring but is carried out by the Independent Health and Safety Consultant. This monitoring is carried out on a regular basis and reported to the Managing Director.

6.0 Reviewing Performance

6.1 Review Meetings

A six monthly Safety Management review meeting should be held with the company Directors and Health and Safety Consultant to monitor implementation and development of the Health and Safety policy and overall safety performance.