#### 1 GENERAL STATEMENT OF SAFETY, HEALTH AND ENVIRONMENT POLICY

An employer has a duty under section 2 (3) of the Health and Safety at Work etc. Act 1974 to:

- o prepare a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for carrying out that policy:
- o revise the policy and arrangements as often as may be appropriate; and to
- o bring the statement and any revision of it to the notice of all of his employees.

The Directors of Industrial Construction (Sussex) Ltd (referred to in this policy document and the accompanying arrangements as "the Company") recognise in addition their duties under section 3 of the Health and Safety at Work etc. Act 1974 and their policy is therefore to ensure, so far as is reasonably practicable, that persons not in their employment who may be affected by their work activities are not exposed to risks to their health or safety.

The Directors of the Company also recognise their duties under the Environmental Protection Act 1990 and their policy is therefore to prevent or minimise emissions and waste and to minimise any adverse impact of their work activities on the natural environment.

The safety, health and environmental policy of the Directors of the Company is to:

- Provide adequate control of the safety, health and environmental risks arising from our work activities;
- Provide adequate time, financial support and other resources to ensure that we comply with our duties under both health and safety and environmental legislation;
- Consult with our employees over matters affecting their health and safety;
- Provide and maintain safe vehicles, plant; equipment; premises and systems of work;;
- Ensure safe handling, use, storage and transport of articles and substances;
- Provide information, instruction and supervision for employees;
- Ensure that all employees are competent to do their tasks and to give employees adequate training;
- Prevent accidents; cases of work-related ill health; and damage to the natural environment;
- Maintain safe, healthy and environmentally friendly workplaces, working environments and working conditions:
- Comply with our legal obligations in relation to the management of safety, health and the environment:
- Cooperate over safety, health and environmental matters with clients and other people in control of premises at which we work;
- Liaise with our clients' other appointees and people on site in addition to our employees over safety, health and environmental matters; and to
- Provide relevant information on safety, health and environmental matters to any other people affected by our work activities.

Unless expressly provided either in this document or in safety, health, environmental or employment legislation nothing in this policy document is intended to confer any benefit (pursuant to the Contracts (Rights of Third Parties) Act 1999) (whether referred to herein by name, class, description or otherwise) on any third party or any right to enforce any provisions contained in this policy and the accompanying arrangements.

The Directors of the Company will ensure that adequate financial and physical resources are available to implement this policy. This policy and related documents will be reviewed at least every 12 months.

| Signature: |     | Date:        | July 2016 |
|------------|-----|--------------|-----------|
|            |     | Londu        |           |
| Version:   | 5.6 | Review Date: | July 2017 |

## 2 ORGANISATION AND GENERAL RESPONSIBILITIES

## 2.1 Explanatory note

To achieve the aims of the 'General Statement of Safety, Health & Environment Policy', it is important that responsibilities and reporting procedures are clear and are understood by everyone involved.

#### 2.2 Organisation

The reporting structure for the Company is shown in the organisational chart on page 4.

A list of personnel and contact numbers is held by all personnel.

## 2.3 Responsibilities and duties

#### **Directors**

The Directors of the Company are responsible ultimately for the management of safety, health and the environment in respect of work activities undertaken by Company personnel and for the implementation of practices under the safety health & environment policy.

## Estimators and sales personnel

Estimators and sales personnel must ensure that they address safety, health and environmental matters in design and specification work in order to eliminate hazards and to reduce risks to acceptable levels, liaising with contracts personnel and with clients' advisers and contractors as necessary.

## Contracts managers and site workers

Responsibility for the management and supervision of safety, health and environmental practices on site is the responsibility of contracts managers who will direct site workers and liaise with the person or organisation in control of the wider site over hazards on site, risk reduction measures and safe systems of work.

Anyone working on site must report to the site manager on arrival for site safety induction before entering onto the wider site and undertaking work activities.

#### Supervisors of sub contractors

Anyone appointing a sub contractor is responsible for the supervision of safety, health and environmental matters in respect of the sub contractor's work (see details in section 3.29 "Managing Suppliers and Sub Contractors").

#### All employees

All employees have a responsibility to:

- Co-operate with the Directors; their representatives or appointees; and with supervisors, managers and other employees over safety, health and environmental matters;
- Not misuse anything provided to safeguard their health and safety;
- Take reasonable care of their own health and safety; and to
- Report all safety, health and environmental concerns in the first instance to their supervisor or manager and then to the Directors.

Failure to comply with the requirements of the safety, health and environment policy and the accompanying arrangements for managing safety, health and the environment may result in disciplinary action being taken and could lead to the termination of employment.

# 2.5 Key Contact Details

#### ICS:

Unit 15, The Granary Whiteways Lane Rodmell Lewes East Sussex BN7 3EX

Telephone: 01273 476758

## Guidance and enforcement for health and safety:

Health & Safety Executive Oxted Council Office Oxted

Telephone: 0845 345 0055

## **Employment Medical Advisory Service:**

Health & Safety Executive Oxted Council Office Oxted

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Telephone:

## **Environment Agency contact:**

Sothern Regional Office Guildbourne House Chatsworth Road Worthing Sussex BN11 1LD

Telephone: 08708 506506

# Safety, Health and Environment professional support:

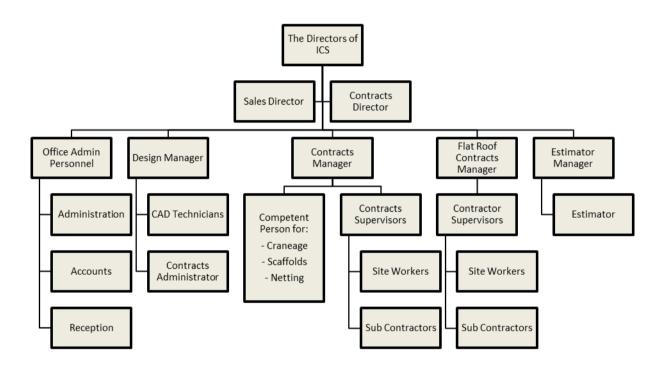
IDP Safety Services Ltd 322 Victoria Drive Eastbourne East Sussex, BN20 8XS

Telephone: 07793431665

## **Emergency and utilities contacts**

See emergency contact list

ICS Organisational Chart



# 3 ARRANGEMENTS FOR MANAGEMENT OF SAFETY HEALTH AND THE ENVIRONMENT

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#### 3.1 Explanatory note

This section sets out the arrangements for the management of safety, health and environmental matters within the Company, including procedures to be followed and the names of people responsible for key activities.

#### 3.2 Emergency Procedures

| Responsibility                                      | Name  |
|---|---|
| Ensuring that information contained in              | Sales Director                              |
| emergency procedures is accurate                    |   |
| Ensuring that employees and temporary staff are     | Office Administrator for ICS office         |
| familiar with action to be taken in the event of an | Site personnel to liaise with controller of |
| emergency   | site  |
| Ensuring that sub contractors are provided with     | Person instructing and supervising sub      |
| and understand emergency procedure                  | contractor                                  |
| information   |   |

The Sales Director will ensure that information on action to be taken in the event of an emergency is provided to all employees. Information will relate to:

- Medical attention.
- Fire.
- Escape of hazardous or environmentally harmful substances.
- General evacuation of premises.

The Office Administrator will take charge of emergency situations on ICS premises including medical attention, fire, explosion and security alerts. All employees must be familiar with emergency procedures in order that they can take charge of evacuation and other emergency action when necessary (e.g. in the absence of the Office Administrator).

Company employees working on sites controlled by clients or other people will liaise with the controller of the site over emergency procedures, including the arrangements for site induction and any site rules.

The Office Administrator will explain the emergency procedures to each new employee during initial induction training, including the evacuation procedure; the calling of emergency services; the provision of first aid; the location, identification and use of fire extinguishers; the use of spillage kits on site; and any other emergency response measures.

Any occurrence on sites of environmental damage to protected species; natural habitats or Sites of Special Scientific Interest; surface water or ground water; or to land such that human health may be affected adversely arising from the activities of Company employees or an imminent threat of such damage will be reported to the Environment Agency in order that remedial work can be agreed.

## 3.3 Accident and Incident Investigation and Reporting

| Responsibility                                 | Name           |
|--|----------------|
| Accident book maintenance                      | Sales Director |
| Investigation of accidents and dangerous       | ICS Directors  |
| incidents                                      |                |
| Reporting accidents, diseases and dangerous    | Sales Director |
| occurrences, actual or imminent environmental  |                |
| damage to the enforcing authority              |                |
| Acting on the results of accident and incident | The Directors  |
| investigations                                 |                |

All accidents and dangerous incidents, however trivial they may appear, must be reported immediately to the Contracts Director who will ensure that the information is recorded in the accident book. This applies to dangerous incidents, damage accidents and injuries sustained

not only by employees but also by members of the public, visitors or sub contractors as a result of ICS work activities or in a working area controlled by ICS.

Even when no injury or harm is sustained, all dangerous incidents and any release of substances harmful to health or to the environment arising from the Company's work activities must be reported to the Contracts Director in order that safety performance can be monitored and to ensure that appropriate action can be taken where there may be a civil claim against the Company for damage to property.

For all reportable accidents and dangerous occurrences including cases where an accident causes an employee to be absent from work for over seven days, the Contracts Director will inform the HSE as soon as possible and within 10 days (15 days for over 7 day injuries) using the online reporting system at <a href="http://www.hse.gov.uk/riddor/online.htm">http://www.hse.gov.uk/riddor/online.htm</a> or by calling the Incident Contact Centre on 0845 300 99 23 without delay for major incidents or fatalities.

#### 3.4 First Aid

| Responsibility                            | Name                 |
|---|----------------------|
| Monitoring the contents of first aid kits | Trained First Aiders |
| Administering first aid when required     | Trained First Aiders |

First aid kits are held in the ICS office and employees must familiarise themselves with the location of first aid kit.

The following people have attended first aid training courses. First aid should be administered when required by trained employees in accordance with the training received.

| Name                 | Type of course      |
|----------------------|---------------------|
| Office Administrator | Emergency First Aid |
| Craig Allen          | Emergency First Aid |

Company employees working on sites controlled by clients or other people must check the arrangements for first aid provision on the site before or upon arrival in order that the site facilities and site first aider(s) can be used for treatment if necessary.

All incidents requiring first aid treatment must be reported to the Contracts Director so that the details can be recorded in the accident book.

First aid refresher training for ICS personnel is undertaken every 3 years and will be organised by the Office Administrator.

## 3.5 Occupational Health

| Responsibility                                    | Name               |
|---|--------------------|
| Identifying where health surveillance is required | Contracts Director |
| Maintaining records of health surveillance        | Contracts Director |

The Directors of the Company will endeavour to promote and maintain, within reason, the highest practicable degree of physical, mental and social well being of employees. All health aspects of work processes and any procedures that may adversely affect health will be reviewed regularly and subject to risk assessment.

Where risk assessments identify that individual employees or groups of employees are exposed to significant health risks, health surveillance will be introduced.

A "no smoking" policy applies on Company premises and on sites in accordance with both health and safety and statutory requirements such that smoking is prohibited in the following general areas and in any other areas designated specifically as "no smoking" zones:

- Buildings and enclosed structures.
- Company vehicles.

• Anywhere on sites other than in designated smoking areas confirmed by the site manager.

Noise levels at workplaces will be assessed in order that monitoring and action can be taken where required. Measures will be taken to reduce noise at source where reasonably practicable. Hearing protection will be made available where necessary and employees will be informed when they are required by law to use it. Any site rules for the wearing of hearing protection must be followed.

Exposure to vibration from plant and equipment will be assessed and information provided to employees on Hand Arm Vibration Syndrome or whole body vibration where necessary in order that action can be taken.

The Sales Director must be informed if any employee suffers from any medical conditions (allergies, asthma, epilepsy, hernia, etc.) or if any employee is using any prescription drugs or medication which might impact upon his or her work activities (drowsiness, fatigue, etc.) This will allow ICS to manage work activities effectively and avoid exposing employees or other people to any significant risks which might not otherwise be known about. A confidential medical information form must be completed and returned to the Sales Director when employees begin employment and employees must advise the Sales Director of any changes to this information in future.

The consumption of alcohol or drugs (other than prescribed drugs – see above) is prohibited and anyone who is found to be under their influence during working hours will be subject to disciplinary action which may include dismissal.

#### 3.6 Stress, Bullying and Violence

Factors likely to cause stress or incidences of bullying or violence in the workplace will be identified through risk assessments of work activities.

Employees experiencing stress, bullying or violence should refer their concerns in confidence to the Contracts Director in order that issues can be explored and resolved.

## 3.7 Workplaces and Welfare Facilities

| Responsibility  | Name                 |
|---|----------------------|
| Ensuring that workplaces at ICS premises are suitably maintained to provide a safe working environment.   | Office Administrator |
| Confirming that the working environment on site is suitable for ICS personnel to work safely and that adequate welfare facilities are available for use by ICS personnel. | Contracts Manager    |

The Directors of the Company will ensure that reasonable measures are taken to ensure that workplaces and means of access to and egress from places of work are safe and without risks to health.

Any defects or concerns in relation to ICS premises should be reported immediately to the Sales Director who will arrange remedial action as necessary.

Employees must report any defects on site immediately to the Contracts Manager who will then liaise with the Contracts Director and the controller of the wider site as necessary over remedial work.

Welfare facilities (sanitary conveniences, washing facilities and the provision of drinking water) are provided for the use of employees at ICS premises. The Office Administrator will arrange for facilities to be maintained to satisfactory standards.

The arrangements for the provision and use of welfare facilities on site (including arrangements for the use of shared facilities) will be confirmed by the Contracts Manager before work starts on site.

All employees will endeavour to maintain work areas in a safe and tidy condition by:

- Keeping workplaces reasonably tidy.
- Keeping working areas, walkways, exits and fire safety points free from obstructions.
- Complying with the no-smoking policy.
- Informing the Office Administrator (for ICS premises) or the Contracts Manager (for sites) where safety or health hazards have been identified.

#### 3.8 Hazard Identification, Risk Assessment and Risk Control

| Responsibility  | Name  |
|---|---|
| Undertaking risk assessments                                    | The Directors and all Sales, Design and Contracts personnel |
| Reporting significant risk assessment findings to the Directors | Sales, Design and Contracts personnel                       |
| Approval of measures required to remove or control risks        | The Directors, Design Manager and Contracts Manager         |
| Implementation of actions required to remove or control risks   | All personnel in accordance with instructions given         |

Risk assessments will be undertaken using a combination of generic risk assessments for activities, plant, equipment, materials and substances which are undertaken or used repeatedly both on ICS premises and on sites, together with job specific risk assessments for individual sites and contracts.

Job specific risk assessments will be undertaken by the Design Manager and the Contracts Manager at the initial design stage and then developed and adapted such that they remain relevant throughout the design and construction phase of each contract until completion of the contract and exit from the site.

Ongoing liaison with be undertaken with the client; designers; the Principal Contractor or controller of the wider site; and any other sub contractors in order that risks are managed effectively.

Generic risk assessments will be reviewed at least every 12 months or when the work activity changes, whichever is soonest. Hazards will be identified for all activities undertaken by Company personnel, risks assessed and the significant findings recorded. All assessments will:

- Identify the hazards.
- Identify who is at risk.
- Assess existing control measures.
- Identify any further precautions required.

Assessment records will identify who carried out the assessment, requirements for further action and a suitable time scale for implementation and review. Responsibility for undertaking risk assessments will be devolved to Sales, Design and Contracts personnel under the supervision of the Sales Manager, the Design Manager and the Contracts Manager in consultation with those employees who are responsible for carrying out work activities. Employees will be provided with adequate training, instruction and information.

Contractors, licensees or other people working on Company premises who are not employed by or under the full control of the Directors will be responsible for carrying out risk assessments for their work activities and providing copies to the person who has instructed them. Sub contractors undertaking work on site for the Company are required to assess risks in respect of their activities before starting work and to provide copies of assessment records to the Contracts Manager. Further details are set out in the "Managing Suppliers and Sub Contractors" section of these arrangements (see section 3.29).

#### 3.9 COSHH and Substances Hazardous to the Environment

| Responsibility                                  | Name                                  |
|---|---------------------------------------|
| Identifying and undertaking assessments for all | Office Administrator for ICS premises |
| substances that need a COSHH assessment         | Contracts Manager for site work       |
| Ensuring that all actions identified in the     | Office Administrator for ICS premises |
| assessments are implemented.                    | Contracts Manager for site work       |
| Ensuring that all relevant employees are        | Office Administrator for ICS premises |
| informed of the findings.                       | Contracts Manager for site work       |
| Checking that new substances can be used        | Office Administrator for ICS premises |
| safely before they are purchased.               | Contracts Manager for site work       |

All assessments will be reviewed at least every 12 months or when work activities change, whichever is soonest. Substances deemed to be "hazardous" will be subject to appropriate control measures. This will involve the:

- Identification of hazardous substances used or encountered by Company personnel;
- Assessment of the risks involved, taking into account the nature of use and impact on the health of people and the environment;
- Introduction of control measures necessary to reduce the risks to an acceptable level; and:
- Effective monitoring of control measures.

Details of training undertaken by Company personnel for the handling, transportation or use of hazardous substances will be held with the Company training records.

A record will be kept with the information for each contract of chemicals used in the construction or repair of buildings so that their use can be monitored for environmental management purposes and for the management of health and safety.

#### 3.10 Diseases

| Responsibility                                    | Name               |
|---|--------------------|
| Reporting to the Contracts Director incidences of | All personnel      |
| diseases contracted by employees whilst at work   |                    |
| Reporting notifiable diseases to HSE when         | Contracts Director |
| required  |                    |

Upon the reporting of a notifiable disease contracted by Company personnel, the Contracts Director will advise on any safety, health or environmental control measures to be implemented.

## 3.11 Legionellosis

| Responsibility                                    | Name              |
|---|-------------------|
| Identifying all Company equipment/plant which     | Sales Director    |
| needs to be included in a written scheme of       |                   |
| inspection and testing                            |                   |
| Responsibility for ensuring that effective        | Sales Director    |
| maintenance procedures are put in place           |                   |
| Ensuring that the scheme and all maintenance      | Sales Director    |
| work is implemented and monitored                 |                   |
| Identifying potential legionellosis hazards to    | Contracts Manager |
| which ICS employees or sub contractors may be     |                   |
| exposed to on site                                |                   |
| Responsibility for ensuring that effective safety | Contracts Manager |

| and health management procedures are put in |  |
|---|--|
| place for on-site legionellosis hazards     |  |

Currently, risk assessments for Company plant, equipment and activities do not identify any significant legionellosis hazard needing to be included in a written scheme of inspection and testing (other than the small, self-contained air conditioning unit in the computer server room which is serviced by DB Green Limited and air conditioning systems in vehicles where such systems are part of service and maintenance arrangements).

The Sales Director will ensure that reasonable steps are taken to identify potential legionellosis hazards in the workplace and to prevent or minimise the risk of exposure and these are outlined below

## 3.12 Lone Working

Where the risk assessment process identifies lone working as a matter requiring further control measures, additional action must be taken in accordance with agreed procedures as follows:

- The person carrying out the work must have participated in the risk assessment process for the work activity concerned and therefore understand fully the nature and level of the risks concerned. Where the risks preclude lone working from taking place, the worker will be accompanied by at least one other person.
- The person carrying out the work must have undertaken any training required for the work activity and be sufficiently experienced to work alone.
- The location in which the person is working should be confirmed between that person and the Contracts Manager before work commences (address, map, grid reference or other method which is suitably specific) and details entered into the "gang sheet" for the project concerned. The Office Administrator (or, in case of absence, the Office Administrator's assistant) will then liaise with the lone worker by telephone to confirm that the lone worker has left the site safely at the end of the working shift.
- There will be an agreed system of communication between the lone worker and the Office Administrator with contact as necessary at pre-arranged times between the two people for the duration of the work activity. The frequency of contact should be increased in proportion to the level of risk involved. The lone worker should initiate contact. If no contact is received, the Office Administrator should attempt to make contact. If no contact can be made within an agreed period after the pre-arranged contact time, the Office Administrator should initiate a visit to the lone working site (by whoever is available to respond fastest).
- At the end of the work activity, the Office Administrator must be able to account for the safety of the lone worker. There should be a pre-arranged time for the lone worker to report back.

All employees must be familiar with the principles of lone working so that they can apply appropriate procedures to work where necessary.

## 3.13 Manual Handling

| Responsibility                                     | Name                            |  |
|--|---------------------------------|--|
| Ensuring that risk assessments are undertaken      | Sales Director for ICS premises |  |
| for all manual handling activities                 | Contracts Manager for site work |  |
| Monitoring manual handling procedures and          | Sales Director for ICS premises |  |
| arranging for the provision of further information | Contracts Manager for site work |  |
| and training                                       |                                 |  |

Manual handling tasks will be undertaken in accordance with the provisions of the Manual Handling Operations Regulations 1992. This will be achieved through:

The elimination of all manual handling operations where possible.

- Where manual handling is necessary, the risks will be assessed and additional precautions will be introduced where required.
- Training in "correct" lifting techniques will be provided where necessary but will not be relied upon as the sole means of reducing manual handling risks.

The Sales Director will monitor the effectiveness of control measures on ICS premises by visual inspection and consultation with employees. The Contracts Manager will do so for work undertaken by ICS personnel on site,

Generic risk assessments will be reviewed at least every 12 months or when the work activity changes, whichever is soonest. Job specific risk assessments will be prepared for each contract.

#### 3.14 Personal Protective Equipment (PPE)

| Responsibility                             | Name                                  |  |
|--|---------------------------------------|--|
| Provision of personal protective equipment | Contracts Director acting through the |  |
|  | Contracts Manager                     |  |

The need for PPE will be established by risk assessments carried out by the Directors and all Sales, Design and Contracts personnel. PPE will then be provided to employees free of charge. Employees must ensure that they use PPE where necessary and maintain it in accordance with the suppliers' instructions. Defects or loss must be reported immediately to the Contracts Manager who will liaise with personnel over replacements.

## 3.15 Asbestos Management

| Responsibility  | Name                                    |
|---|---|
| Ensuring that an asbestos management plan is prepared, implemented and kept up to date for ICS premises   | Contracts Director                      |
| Providing relevant information to contractors working on ICS premises   | Contracts Director                      |
| Confirming with the client, designer(s) or CDM Coordinator the details of any Asbestos Containing Materials (ACMs) on sites where ICS personnel will be working | Design Manager and Contracts<br>Manager |
| Preparing a safe system of work in or near areas containing ACMs and ensuring that the system is implemented.   | Contracts Manager                       |

A suitable register and management plan has been prepared for all asbestos containing materials (ACMs) which exist or which are presumed to exist in ICS premises. The register and management plan is held by the Contracts Director.

Before work is undertaken either on ICS premises or on sites controlled by clients or any other person, the Design Manager will gather information about the presence of any ACMs on the site so that the work can be planned in such a way as to prevent ICS personnel or other people affected by ICS work activities being exposed to asbestos fibres. The Design Manager will liaise with the client; any other designers; the CDM Coordinator; and any other parties as necessary before then liaising with the Contracts Manager who will produce and implement a safe system of work for the job.

Procedures for removing asbestos cement material will be in accordance with HSE Asbestos Essentials advice sheet A14, namely:

- Check with the premises owner that only asbestos cement is present.
- Protect nearby surfaces from contamination. Cover with 500-gauge polythene sheeting and fix with duct tape to non-asbestos surfaces.

Disposal of ACMs must be carried out only in accordance with procedures based on strict legal requirements. Details of disposal procedures are available from the HSE "Asbestos Essentials" series via <a href="http://www.hse.gov.uk/asbestos/essentials/index.htm">http://www.hse.gov.uk/asbestos/essentials/index.htm</a>

Refer also to section 3.30 - Waste Management.

#### 3.16 Lead

Work activities which are likely to involve exposure to lead, lead compounds, dust, fumes or vapours (including work with or exposure to Lead-Based Paint or "buried" lead paint) will be subject to risk assessment in order to establish whether exposure will be "significant", in which case the Contracts Manager will put in place and implement a safe system of work and appropriate safety precautions.

#### 3.17 Working at Height

Where work is to be carried out at height, the Design Manager will liaise with the Contracts Manager over the proposals for the work in order to apply the principles of the hierarchy of control, namely:

- · Avoid work at height where this can be achieved.
- Where work at height cannot be avoided, use work equipment or other measures to prevent falls (with collective protection measures taking priority over personal protection measures).
- Where the risk of a fall cannot be eliminated, work equipment should be used or other measures to minimise the distance and consequences of a fall.

Once the design has been confirmed, the Contracts Manager will carry out a risk assessment for the work proposed and discuss the assessment with the ICS personnel and any sub contractors who are to undertake the work.

"Height" is interpreted as one step or higher above ground level (including drops from level ground into excavations) and includes working at height on vehicles, plant and machinery. Generic risk assessments will be undertaken for routine activities which take place repeatedly.

Ladders may be used for access or for short duration work only, where the risks have been assessed and where ladders are considered to be suitable for the work. Ladders will be inspected before each use and checked regularly by the site workers concerned to ensure that they remain safe to use.

Scaffolding (including tower scaffolds) must be erected only by a competent person being someone who has attended specific training and who has suitable experience. Where an independent tied scaffold has been erected by a sub contractor for use by Company employees, a handover certificate must be obtained and retained for record purposes. The Company's competent person will re-inspect all scaffolds under the Company's control once every seven days or after any alterations have been made to the scaffold or after any event that may have destabilised the scaffold, whichever is the earlier.

Tower scaffolds and any other working platforms must be erected, used, dismantled and stored strictly in accordance with the manufacturer's instructions.

Mobile Elevating Work Platforms and any other powered access equipment must be operated only by people who have undertaken appropriate training.

Safety nets will be installed by competent riggers as close as possible below the working area in order to minimise the fall distance. The use of nets and any fall restraint or fall arrest harnesses will be used only when specified by risk assessments (and after considering whether other measures can be taken to prevent falls happening, rather than minimising the height and consequences of falls). Users of such equipment must be appropriately trained. Where safety nets are used by ICS personnel, they will be inspected by a competent person before they are first used and then once every seven days or after any alterations have been

made to the nets or after any event that may have damaged or destabilised the nets, whichever is the earlier.

The handling of materials at height will be avoided so far as is reasonably practicable. Mechanical aides will be used to lift materials into the positions where they are required in order to minimise handling. Materials will not be stored at height other than for short duration use as part of work activities in progress, unless such storage is necessary and there are secure storage facilities.

#### 3.18 Lifting Operations

All lifting equipment (including lifting accessories) used by ICS personnel must be subject to regular, thorough inspection by a competent person. Further inspections and tests recommended by the competent person must then be implemented in accordance with the written scheme for the equipment.

Any craneage work or other lifting operations must be subject to a lift plan to be developed by the Design Manager and the Contract Manager in conjunction with any hire company supplying the lifting equipment and in consultation with the ICS Appointed Person who will supervise the operations.

### 3.19 Construction (Design & Management) Regulations 2015 (CDM Regulations)

ICS will comply with the provisions of the CDM Regulations when undertaking construction work.

ICS personnel acting as designers will:

- Eliminate hazards and reduce risks during design
- Provide information about remaining risks
- Check that the client is aware of his/her duties and that a CDM co-ordinator has been appointed
- o Provide any information needed for the health and safety file

Where ICS act as contractors, the Contracts Director and the Contracts Manager will:

- o Plan, manage and monitor their own work and that of their workers
- Check the competence of all their appointees and workers
- o Train their own employees
- Provide information to their workers
- Comply with the specific requirements in Part 4 of the Regulations (specific provisions for safety and welfare on construction sites)
- o Ensure that there are adequate welfare facilities for their workers
- Check that the client is aware of his/her duties
- Co-operate with the principal contractor in planning and managing work, including reasonable directions and site rules
- Provide details to the principal contractor of any contractor whom he engages in connection with carrying out the work
- o Provide any information needed for the health and safety file
- o Inform the principal contractor of problems with the plan
- Inform the principal contractor of reportable accidents, diseases and dangerous occurrences arising during the work

When ICS act as the Principal Contractor, the additional duties set out in the Approved Code of Practice to the CDM Regulations will also be followed.

The Directors will ensure that anyone working under their instructions is competent and has undertaken suitable training for the work concerned.

The Contracts Manager will check that adequate welfare facilities are available for use by ICS personnel and any sub contractors working for the Company.

#### 3.20 Vehicles

| Responsibility                                    | Name                 |
|---|----------------------|
| Identifying all vehicles needing maintenance      | Sales Director       |
| Ensuring that effective maintenance procedures    | Sales Director       |
| are in place                                      |                      |
| Ensuring that regular inspections of vehicles are | Sales Director       |
| carried out                                       |                      |
| Ensuring that all identified maintenance is       | Sales Director       |
| implemented                                       |                      |
| Ensuring that records of vehicles and             | Office Administrator |
| maintenance are maintained                        |                      |
| Checking that new vehicles meet health & safety   | ICS Director         |
| standards before purchase                         |                      |
| Ensuring that vehicles are insured fully for the  | Office Administrator |
| people using them and for the purposes for        |                      |
| which they will be used                           |                      |

No person may use a vehicle unless they have received appropriate training or instruction for the vehicle concerned and they are authorised and insured to use it, including the necessary endorsements on their driving licence. All Company vehicles will be inspected regularly and will be maintained such that they are safe to use.

If defects are identified, employees must stop using the vehicle concerned and notify the Contracts Director immediately for further instructions.

Anyone using their own, private vehicle for Estate business must ensure that they have in place suitable insurance cover for business use and a current road fund licence; and that the vehicle is both fit for purpose and in suitable condition, including possession of a valid MoT certificate where applicable.

# 3.21 Plant and Equipment

| Responsibility  | Name               |  |
|---|--------------------|--|
| Identifying all plant and equipment needing maintenance   | Contracts Director |  |
| Ensuring that effective maintenance procedures are in place   | Contracts Director |  |
| Ensuring that regular inspections of plant and equipment are carried out  | Contracts Manager  |  |
| Arranging testing of lifting equipment by a competent person  | Contracts Manager  |  |
| Arranging testing of any water systems on ICS premises requiring a written scheme for the purposes of controlling legionellosis | Sales Manager      |  |
| Ensuring that all other identified maintenance of plant and equipment is implemented.   | Contracts Manager  |  |
| Ensuring that records of equipment and maintenance are maintained   | Contracts Director |  |
| Checking that new plant & equipment meets health & safety standards before purchase   | Contracts Director |  |

No person may use any machinery or equipment unless they have received appropriate training or instruction and they are authorised to use the items concerned. All Company plant and machinery and any equipment belonging to ICS or supplied by a third party and used by ICS personnel must be properly guarded and safe to use.

If defects are identified, employees must stop the use of the plant or equipment, isolate it so that it cannot be used pending repair and notify the Contracts Manager immediately for further instructions.

#### 3.22 Mobile Phones

Employees should avoid excessive use of mobile phones and should use a landline where one is readily available as an alternative.

Where mobile phones are used at work or for work related purposes, they should not be used in situations where their use would be hazardous, such as when on a ladder or when full concentration is needed for the work activity concerned.

Mobile phones should not be used whilst driving vehicles unless a hands free kit has been fitted in the vehicle, including a bracket to hold the phone securely. Irrespective of the existence of hands free kit, use of mobile phones whilst driving should be avoided and mobile phones should not be used when the circumstances require higher levels of concentration from the driver.

# 3.23 Display Screen Equipment (DSE)

Users of display screen equipment will be made aware of the provisions of the Health and Safety (Display Screen Equipment) Regulations 1992. The Directors of the Company will make the following provision for employees who use computers or other display screen equipment regularly:

- adequate training and information;
- proper breaks or changes of activity;
- work stations suitable for employees and which meet, where necessary, the standards in the Regulations
- eye tests if they request them.

DSE assessments will be carried out by arrangement with the Office Administrator and records of assessments, together with details of action taken will be kept with the health and safety records.

### 3.24 Electrical Safety

| Responsibility  | Name                 |  |
|---|----------------------|--|
| Ensuring that a competent person undertakes electrical testing on fixed electrical installations (wiring, distribution boards, etc.) in ICS premises      | Sales Director       |  |
| Ensuring that a competent person undertakes electrical testing on portable electrical appliances and electrical plant and equipment used by ICS personnel | Contracts Director   |  |
| Ensuring that all remedial works are undertaken   | Contracts Manager    |  |
| Ensuring that records of testing of fixed installations and portable appliances are maintained and kept up to date  | Office Administrator |  |

All employees are required to inspect the leads and plugs of electrical equipment before use for signs of damage or loose connections. Any defects must be reported to the Contracts Manager so that repairs can be carried out as necessary. **NEVER USE POTENTIALLY DANGEROUS EQUIPMENT.** 

Electrical inspections and associated repairs will be undertaken by approved contractors.

# 3.25 Gas safety

LPG cylinders must be used, stored and disposed of in accordance with the Codes of Practice issued by the LP Gas Association.

Anyone using gas equipment must have suitable training and instruction and must follow the requirements of any safe system of work, including hot work permits where applicable.

## 3.26 Fire Safety

| Responsibility  | Name               |
|---|--------------------|
| Ensuring that fire risk assessments are prepared for ICS premises and reviewed at least every 12 months   | Sales Manager      |
| Ensuring that fire extinguishers on ICS premises; in ICS vehicles; and any extinguishers taken to sites by ICS personnel are maintained under a service contract with a competent contractor and checked at least every 12 months | Contracts Director |
| Ensuring that any other fire safety measures at ICS premises (detection and alarm systems; fire suppression equipment; etc.) are maintained in accordance with regulatory requirements and manufacturers' instructions            | Sales Director     |
| Ensuring that fire risk assessments are carried out in respect of ICS activities as part of the risk assessment process for work on site.   | Contracts Manager  |

The Directors will arrange for the implementation of suitable and sufficient arrangements to plan, organise, control, monitor and review all fire safety measures at their business premises in order to comply with fire safety legislation, including the development and implementation of an effective emergency plan.

The Office Administrator will take charge of emergency action in the event of fire at ICS premises (see "Emergency Procedures" section 3.2). All employees must be familiar with emergency procedures in order that they can take charge of evacuation and other emergency action when necessary (e.g. in the absence of the Office Administrator).

Company employees working on sites controlled by clients or other people will liaise with the controller of the site over emergency procedures, including the arrangements for site induction and any site rules.

The Office Administrator will explain the emergency procedures to each new employee during initial induction training, including the evacuation procedure; the calling of emergency services; the provision of first aid; the location, identification and use of fire extinguishers; and any other emergency response measures.

Maintenance and servicing of fire extinguishers is arranged by the Office Administrator and is undertaken by approved contractors

#### 3.27 Water Use

The Directors will seek to minimise environmental impacts arising from water use by using water more efficiently in relation to their work activities and by using water storage and recycling techniques where such measures are cost effective.

### 3.28 Visitors

Visitors are required to make arrangements through a member of the Company staff before entering on to Company property. The member of staff will then be responsible for seeing the visitor onto and off the Company premises, making sure that the visitor's whereabouts can be accounted for and that any hazards have been satisfactorily addressed.

Visitors to ICS sites must report to the person in control of the site and follow the site induction procedure, after which they must be supervised either by the ICS site manager or by the person in control of the overall site.

Any incidences of trespass, damage to property or personal injury sustained by visitors must be reported to the Contracts Director so that a record can be made (including an entry in the Accident Book) and appropriate action taken for security, health and safety and insurance purposes.

## 3.29 Managing Suppliers and Sub Contractors

| Responsibility   | Name               |
|--|--------------------|
| Ensuring that a suitable approved list of suppliers and sub contractors is available and kept up to date   | Contracts Director |
| Ensuring that all suppliers and sub contractors used by the Company are provided with relevant general safety, health and environmental information and are on the approved list | Contracts Director |
| Providing sub contractors with safety, health and environmental information specific to the job which they have been asked to undertake and then supervising the sub contractors | Contracts Manager  |
| Monitoring work undertaken by sub contractors (as far as is reasonably practicable)  | Contracts Manager  |

Sub contractors engaged by the Directors to work for the Company will be suitable for the work undertaken. This will be achieved by the:

- Selection of competent sub contractors, having regard to the level of risk.
- Identification of unusual or significant hazards and provision of information about these
  hazards at or before the appointment stage to sub contractors, including the location of
  materials containing or presumed to contain asbestos and details of other work
  activities taking place on the wider site.
- Discussion of site risk assessments with sub contractors where required.
- Ongoing monitoring of sub contractors to ensure that they are working satisfactorily.

All sub contractors will be required to act and work in a safe manner; to accept and follow the rules and procedures of the Company; to provide details of training undertaken by their personnel; and to confirm details of their insurance cover before starting work.

#### 3.30 Waste Management

The Directors will seek to apply the principles of the "Waste Hierarchy" – namely to minimise the amount of waste entering the waste stream, to re-use and recycle any waste that is produced and to dispose of waste only as a last resort – and then only in accordance with statutory requirements.

Procedures for dealing with the following matters are summarised in the Company's detailed procedures for managing waste:

- Hazardous waste.
- Waste Electrical and Electronic Equipment (WEEE).
- Transport and disposal of waste.
- Site Waste Management Plans (SWMPs).

## 3.31 Energy Use

The Directors will seek to minimise environmental impacts arising from energy use by using energy more efficiently in relation to their work activities and by using energy derived from clean technologies where reasonably practicable.

Energy efficient designs and materials will be specified in design work where reasonably practicable.

Energy Performance Certificates (EPCs) will be obtained from an accredited energy assessor for ICS premises when required.

## 3.32 Communication, Provision of Information and Consultation

| Responsibility                                   | Name          |  |
|--|---------------|--|
| Provision of suitable consultation and access to | The Directors |  |
| training and information                         |               |  |

ICS currently have around 15 staff based in an open plan office at one location and, as such, ongoing communications take place between all staff members on a daily basis.

The Sales Director and Contracts Director are personally involved in the setting up, supervision and management of each contract and therefore have personal knowledge of and input into the risk assessments, method statements and other health and safety related matters for each work activity.

Formal provision of information and consultation within the workforce takes a number of forms within ICS including the following:

- Ongoing monitoring, with annual external audit and review procedures.
- Ongoing training provision via external consultants (refer to the Company training matrix for details of training undertaken by personnel and future training needs analysis).
- Tool box talks.
- Participation in risk assessments and method statements.
- 6 weekly office meetings.
- · Monthly managers' meetings.
- · Monthly sales meetings.
- · Internal contract handover meetings.
- Office health and safety notice board (including health and safety policy statement, statutory health and safety law poster and employer's liability insurance certificate).

All members of staff, visitors and sub contractors will be provided with details of any significant risks to their safety and health on Company premises or on sites or working areas under the control of the Company, together with details of any significant environmental protection requirements.

The provisions of the Construction (Design and Management) Regulations 2015 provide further arrangements for additional, formal communication and consultation procedures (see section 3.19 in this policy and arrangements document).

### 3.33 Training and Supervision

| Name   |  |  |
|--|--|--|
| Office Administrator for office personne<br>Contracts Manager for site personnel |  |  |
| Office Administrator for office personnel  |  |  |
| Contracts Manager for site personnel   |  |  |
| The Directors, Design Manager and<br>Contracts Manager                           |  |  |
| The Directors, Design Manager and Contracts Manager                              |  |  |
| Office Administrator   |  |  |
| ICS Directors  |  |  |
| ICS Directors  |  |  |
|  |  |  |

The Directors of the Company will ensure that all members of staff are provided with adequate safety, health and environmental training for work undertaken for the Company, using the services of an external training provider for formal training (refer to the Company training matrix for details of training undertaken by personnel and future training needs analysis).

Induction training will be arranged for all new permanent and temporary staff (including agency staff and volunteers) by the Directors, Design Manager and Contracts Manager in accordance with the reporting responsibilities. Induction training will be undertaken by employees and temporary workers before starting work and will include details of emergency procedures, as well as the identification of any potentially hazardous activities and the risk reduction measures required.

All employees will be provided by the Directors (via managers) with safety, health and environmental awareness training and proper instruction on the safe operation of equipment and working procedures as necessary.

### 3.34 Appointment of "Competent Person"

| Responsibility                     | Name              | Location   |
|------------------------------------|-------------------|------------|
| Competent health and safety advice | Phase Consultants | External   |
|                                    | Limited           | consultant |

The nominated "competent person" for the Company is Phase Consultants Limited. This appointment is made to meet the requirements of Regulation 7 of the Management of Health and Safety at Work Regulations 1999 (as amended).

Further advice can be obtained from:

- IDP Safety Services Limited 07793431665
- Health and Safety Executive www.hse.gov.uk
- Environment Agency 08078 506506

#### 3.35 Monitoring

| Responsibility                                   | Name          |
|--|---------------|
| Ensuring that the policy and other documentation | The Directors |
| is reviewed and updated on annual basis          |               |
| Ensuring that the policy is implemented          | The Directors |
| throughout the Company                           |               |
| Ensuring that records of monitoring are          | The Directors |
| maintained and that action is taken where the    |               |
| need is identified                               |               |

Monitoring is aimed primarily at the prevention of accidents and ill health; to check working conditions; to ensure that safe working practices are being followed; and to prevent environmental damage. To do this the Directors of the Company will undertake regular monitoring of safety, health and environmental compliance and best practice.

#### 3.36 Review and Audit

| Responsibility  | Name          |
|---|---------------|
| Ensuring that there is an annual review and audit of safety, health and environmental matters | The Directors |
| Implementing findings of review and audit   | The Directors |

The Directors of the Company will monitor the effectiveness and usefulness of this policy. Review of safety, health and environmental performance across the Company and the functioning of the policy is the task of the Directors with assistance (upon request) from the Competent Appointed Person.

The policy will be reviewed whenever is appropriate, such as after significant changes within the Company, changes to legislation or because of feedback on safety, health or environmental performance. In any event, the policy will be reviewed not less than once every 12 months.