IPR Environmental

103 Coleraine Road,
Blackheath, London SE3 7NZ

Health and Safety Policy

Created in association with
MB Health and Safety Ltd
Unit 1 Hedley Avenue, Grays Essex RM20 4EL

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Preface

This is the Health and Safety Policy for IPR Environmental Ltd who will be referred to as 'the Company'.

The document contains information which must be followed in order to ensure the continued health, safety and welfare of the Company's employees, contractors and third parties such as (clients, general public etc) whilst continuing to comply with the legislation which governs the work we undertake.

This is a comprehensive document that comprises of the following three sections:

- The Health and Safety Policy Statement.
- The Organisational Duties.
- The Arrangements for Managing Health and Safety.

Health and Safety Policy Statement

This is a general statement of the intentions of the Company with regard to Health and Safety. The policy statement is signed and dated by the most senior member of the Directors and therefore indicates that Health and Safety is highly regarded, with full commitment to it from the most senior level of the Company.

The Organisational Duties

This section commences with a chart showing the safety structure of the company. It is followed by a list of individual responsibilities of personnel and contractors.

Arrangements for Managing Health and Safety

This section will contain information that will need to be followed by all levels of management, to ensure that the Company complies with current legislation and to reduce the risk to all persons who may be affected by the works carried out on the Company's behalf.

In order to reduce accidents and incidents, all personnel and contractors must adhere to the policies whilst carrying out the company's undertakings.

Where help is needed, the company engages the Health and Safety support services of McCormack Benson Health and Safety Ltd, for providing competent advice on safety matters, guidance on risk management, safety auditing, safety inspections, advice on training and, should the need occur, to investigate or advise on accidents.

The Company	-	IPR Environmental Ltd
MBHS	-	McCormack Benson Health and Safety Ltd
HSE	-	Health and Safety Executive
ACoP	-	Approved Code of Practice

Health and Safety Policy Statement

This is the Policy Statement for IPR Environmental Ltd**,** who will be referred to as 'the Company'.

In accordance with its duty under section 2(3) of the Health and Safety at Work etc. Act 1974, in fulfilling its obligations to employees and members of the public who may be affected by its activities whilst maintaining conformity to ISO45001 and its clauses, the Company has produced the following statement of policy in respect of Health and Safety:

It is our aim to achieve a working environment that is free of work-related accidents and ill health and to this end we will pursue continuing improvements from year to year.

The Company recognises its Health and Safety duties under the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, and all concomitant legislation, to ensure, so far as is reasonably practicable, the health and welfare at work of all employees.

Particular attention will be paid to duties required, namely:

- Provision and maintenance of safe plant and systems of work.
- Safe and healthy use, handling and storage of articles and substances.
- Provision of necessary information, instruction, training and supervision.

We undertake to discharge our statutory duties by:

- Identifying hazards in the workplace, assessing the risks related to them, and implementing appropriate preventative and protective measures.
- Providing and maintaining safe plant and work equipment.
- Establishing and enforcing safe methods of work.
- Recruiting and appointing personnel who have the skills, abilities and competence commensurate with their role and level of responsibility.
- Ensuring that tasks given to employees are consistent with their skills, knowledge and ability to perform.
- Ensuring that technical competence is maintained through the provision of refresher training as appropriate.
- Promoting awareness of Health and Safety and of good practice through the effective communication or relevant information.
- Furnishing sufficient resources needed to meet these objectives.

A successful Health and Safety programme is dependent on the participation and co-operation of all employees. All employees are aware that they have a legal duty to:

- Exercise reasonable care for the Health and Safety of themselves and others who may be affected by their acts or omissions at work.
- Co-operate with and assist the employer in meeting statutory obligations.
- Not intentionally or recklessly interfere with anything provided in the interests of health, safety and welfare.

Our Health and Safety Policy will be reviewed annually as a minimum, to monitor its effectiveness and to ensure that it reflects changing needs and circumstances. The Policy will be subject to additional review to reflect changes to legislative requirements, changes to key personnel in the Company, and advancement in technologies which affect the Company's activities.

Copies of this Health and Safety Policy Statement will be displayed in the workplace. The full company Health and Safety Policy will be available for all employees to read.

All employees, external Consultants and Contractors employed by the Company will be expected to comply with this Health and Safety Policy.

Signed: ..... Director Date: 19th July 2023

Review Date: on or before 18th July 2024

Policy Review

It is a requirement of the HASAWA (section 2 (3)) that an Employer shall keep their Health and Safety Policy under regular review to ensure that it remains relevant and reflects the organisation, arrangements and established processes/procedures. The Company will conduct an annual review of this Policy, or more frequently if deemed prudent to do so. This review shall cover all sections of the Policy and shall ensure that:

I. The responsibilities reflect the current management structure of the company.
2. The arrangements for managing Health and Safety remain unchanged.
3. The safe working procedures are still applicable.

Additionally, the Policy shall be reviewed as necessary to reflect any changes in Legislation, significant Company appointments and/or relevant technological advancements.

The Policy review will be completed by the appointed Health and Safety advisors in conjunction with the Company's appointed personnel. Evidence of the Policy review will be summarised in the table below.

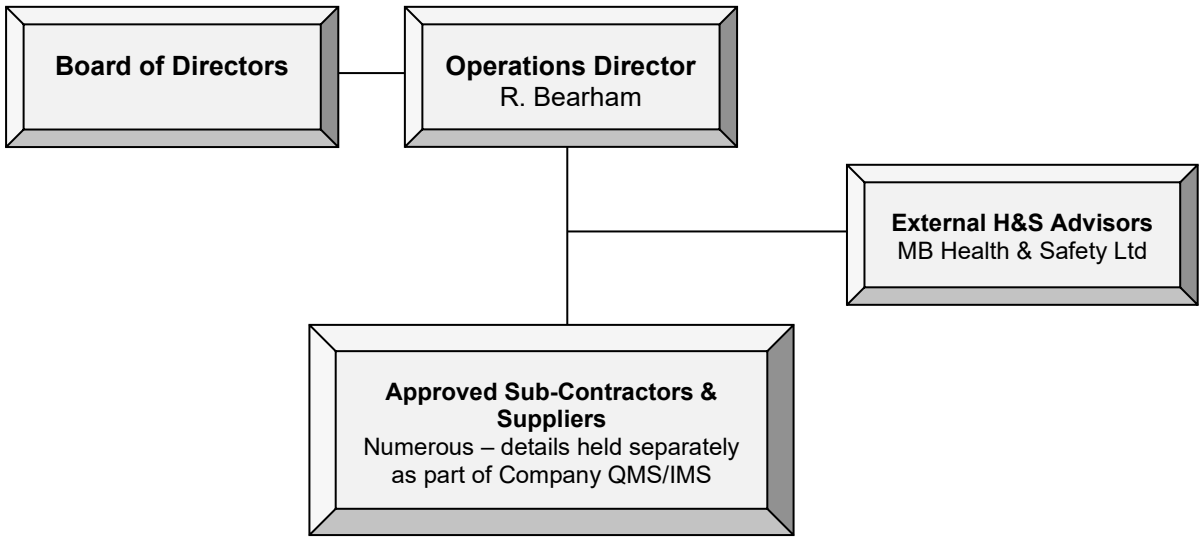
Revision Control & Annual Review Summary

Company Approval		R. Bearham	**MBHS Advisor**	T. Smith-Allen
Issue Number	**Date**	**Summary Details**		**By Whom**
2.0	08/2020	Updated Health and Safety Policy following change of external consultancy providing health and safety support		R. Bearham (IPR) T. Smith-Allen (MBHS)
3.0	09/2020	Policy amendments made following further review as part of internal audit against ISO45001. Changes made clarify Company process in respect of legal obligation relative to the employee structure.		R. Bearham (IPR) T. Smith-Allen (MBHS)
4.0	07/2021	Policy reviewed. No significant change to Organisational structure or legislative requirements. Management arrangements updated to include clarification on Home Working, DSE and PPE processes.		R. Bearham (IPR) T. Smith-Allen (MBHS)
5.0	07/2022	Policy reviewed. No significant change to Organisational structure or legislative requirements. Management arrangements updated to include Mental Health & Well-Being and Personal Protective Equipment at Work (Amendment) Regulations 2022.		R. Bearham (IPR) T. Smith-Allen (MBHS)
6.0	07/2023	Policy reviewed. No significant change to Organisational structure, legislative requirements or management arrangements. Company logo updated.		R. Bearham (IPR) T. Smith-Allen (MBHS)

Organisation – Duties, Roles and Responsibilities

Organisation Chart

The Company have identified and included specific responsibilities in relation to Health and Safety, as they relate to each post in the organisation.



Responsibilities

Directors

The Directors have ultimate responsibility for ensuring that the Company fulfils its legal responsibilities, that Policy objectives are achieved, and that effective management is in place for the achievement of the policies concerned with health, safety and welfare. Directors will also ensure that Company policies are reviewed as appropriate, in order to secure continuing compliance with existing policies, current legislation and any changes in the law. To these ends, they will ensure the allocation of the resources necessary to maintain sound and efficient Health and Safety arrangements.
Day to day management of the Company falls under the remit and responsibilities of the Operations Director who, engages with Clients and appointed sub-contractors/suppliers on a regular basis. Company information and monitoring detail is shared amongst the Directors via all forms of communication.

Operations Director

It is predominantly the Operations Director, who is responsible, along with those working on behalf of the Company, for implementing this Health and Safety Policy on a day-to-day basis. This includes appointed sub-contractors and suppliers encouraging and assisting the Company in reviewing and developing safety procedures and ensuring that established rules and safe working practices are adhered to. They must also ensure that all/any employees, as well as those working on behalf of the Company, are suitably competent, properly trained and receive the support they need to perform their duties. A summary of their duties is as follows:

- Ensure that necessary consideration is given at all times to the requirements of this Health and Safety Policy and, in particular, to the following:
  - Induction training including Health and Safety matters.
  - Welfare facilities.
  - Fire precautions.
  - Hazards arising from work activity and required safe methods of working.
  - Carrying out workplace inspections and advising, as and where necessary, on how to improve methods of working.
  - Investigating incidents, accidents and dangerous occurrences and recommending means of preventing recurrence.
  - Advising and assisting with safety training of personnel.

- They know their own responsibilities for implementing this Health and Safety Policy, as well as those of the employees they are responsible for.
- All accidents, incidents, near misses and dangerous occurrences are fully investigated and preventative actions are recommended in close liaison with the Health and Safety Advisor.
- Documented safe systems of work are implemented and adhered to.
- They are aware of, and implement, all safe working practices and procedures.
- Ensuring that all necessary arrangements are made and maintained in respect of emergency plan(s) and procedures.
- Ensuring that all relevant statutory records are regularly maintained and inspected.
- Ensuring that all activities carried out by Company employees will not create a risk or hazard to anyone (either employees or non-employees).
- Ensuring, likewise, that no operation carried out by appointed sub-contractors will place employees, customers or their staff and members of the public, at risk.
- Ensuring that all employees are adequately trained and competent to carry out the work allocated to them without risk.
- Ensuring that, where Health and Safety training needs are identified, arrangements for training will be made as appropriate.
- Ensuring that all Company procedures are adhered to at all times.

Health and Safety Advisor

The Company has appointed MBHS as their Health and Safety Advisor and source of competent advice, to assist in undertaking the measures required to comply with the requirements and prohibitions imposed by or under the relevant statutory provisions.

The Health and Safety Advisor liaises and advises the Operations Director, on behalf of the Board of Directors, on the implementation of this Health and Safety Policy, advising on safe working practices, and providing general health and safety information about precautions in general.

The Health and Safety Advisor has the responsibility for the following:

- Ensuring the Company is aware of statutory obligations and recommended Codes of Practice.
- Advising the Directors of their responsibilities for accident prevention and avoidance of Health and Safety hazards.
- Interpreting and keeping the Directors informed of new and developing legislation and other standards.
- Advising where improvements in Health and Safety standards or practices are appropriate.
- Regular health, safety, and housekeeping inspections which cover buildings, plant, equipment, services, and fire arrangements, to ensure conformity with regulations.
- Assisting with the maintenance of statutory safety records and the completion of statutory safety returns, in addition to providing support with the maintenance of general Health and Safety records required by the Company.
- Advising on possible hazards when considering the introduction of new machinery, new materials, new processes, or changes to existing ones.
- Where agreed within the contract with MBHS, overseeing and reviewing accident investigations and assisting in preparing statistics to enable monitoring of Health and Safety performance.
- Advising on Health and Safety training needs and advising on suitable training programmes.
- The provision of guidance regarding first aid, fire safety, and emergency procedures as required.

Employees

All employees of the Company will ensure that:

- They are fully conversant with this Health and Safety Policy.
- They co-operate with the Company in meeting its statutory duties.
- They take reasonable care of themselves and others who may be affected by their acts or omissions.
- They do not intentionally or recklessly interfere with or misuse anything provided in the interest of Health and Safety.
- All accidents, incidents, near misses and dangerous occurrences are immediately reported verbally to the Operations Director.
- They are fully conversant with all emergency procedures applicable to the area in which they are working.
- All equipment provided for personal safety is used and maintained in a condition fit for that use, and any defects are reported immediately to the Operations Director.

- Where an employee identifies any condition which in his or her opinion is hazardous, the situation is immediately reported to the Operations Director verbally, by telephone or e-mail.
- During the course of their normal duties, they use equipment and facilities that are fit and proper for the intended purpose in a safe, correct manner, as provided within the following categories:

    - Arranged, provided and/or otherwise approved by the Company.
    - Provided by the Client or Contractor with specific authorisation that they may be used by employees of the Company.
    - Provided for unrestricted use by members of the general public.

Company Appointed Sub-Contractor/Consultants/Suppliers

The Company may require, from time-to-time, the services of contractors/Consultants to undertake specialist or non-routine work activities which Company employees are unable to undertake. All contractors/Consultants appointed by the Company must be able to provide auditable evidence of their competency.
A summary of their duties is as follows:

- Will be required to show that they have the necessary expertise and equipment to carry out the particular tasks they have been employed for.
- Will be required to ensure that their work is carried out in a safe manner and that their operatives have been given adequate training.
- Where a Contractor/Consultant is bringing 10 persons or more onto the Company premises, they will be required to nominate a 'Safety Supervisor'. This person is required to liaise with the Company Directors and/or MBHS to ensure that all arrangements for safety, health and welfare are dealt with. The appointed Contractor/Consultant ‘Safety Supervisor’ will also be required to carefully monitor and supervise the personnel they are responsible for, ensuring compliance with all relevant regulations and the requirements of the Company Health and Safety Policy.
- Contractors/Consultants are reminded of their responsibilities, not only to their own employees, but also to all other contractors’ employees and others who may be affected by their works, including members of the public.
- They must ensure that the Company is provided with any information available that may affect Health and Safety on site.
- Where any works of a hazardous or dangerous nature are contemplated, they must provide risk assessments and discuss and agree the most suitable method of carrying out the operation with the Company prior to commencing work.
- All plant and equipment provided by the Contractor/Consultant for use by their own personnel, requiring regular inspection or testing, must be maintained and tested as required. Copies of all necessary certificates and registers must be available for review by the Company. Where weekly inspections are required, copies of documentation must be provided to the Company.
- Contractors/Consultants who will use any material or substances likely to jeopardise the Health and Safety of others must provide the Company with specific risk assessments (as required by Control of Substances Hazardous to Health Regulations 2002) that provide all necessary and adequate safety measures.
- Where noise from any work equipment being used by Contractor/Consultants (or personnel working on their behalf) is likely to exceed the first action level of 80dba, as defined by the Control of Noise at Work Regulations 2005, the Contractor/Consultant should inform the Company in order to ensure that adequate steps are taken to reduce exposure to Company employees.
- Contractors/Consultants are requested to ensure that their employees make proper use of any welfare facilities provided by the Company and that they co-operate fully with the Company Directors.
- Contractors/Consultants are requested to ensure that all fire precautions are taken while working on site, that designated fire escape routes are kept clear at all times, that they provide adequate fire equipment suitable to their tasks, and that they co-operate fully with the site fire plan.
- Contractors/Consultants must inspect their working area at the beginning of every shift to ensure that it is safe to proceed with their task. They are responsible for briefing their personnel on all safety issues on site and providing documentary evidence to the Company that this has taken place.

Designated Responsibility Summary

Topic	Responsible Department
Health and Safety Policy review	Directors
Health and Safety administration	Company Directors
Facility administration	Company Directors
Health and Safety training	Company Directors
Premises risk assessments	Company Directors, Employees
Work activity risk assessments	Company Directors, Employees
Display screen equipment assessments	Company Directors, Employees
Manual handling assessments	Company Directors, Employees
COSHH assessments	Company Directors, Employees
Fire risk assessments	Company Directors, Employees
Expectant/New mother risk assessments	Company Directors, Employees
Young Person risk assessments	Company Directors, Employees
First Aid	Company Directors
Emergency Planning	Company Directors, Employees
Vetting Contractor/Consultants	Company Directors
Monitoring of Health and Safety in the workplace	Company Directors, Employees
Site inspections	Company Directors
Audits	Company Directors
Accident, Incident and Near Miss investigations	Company Directors

*** The Company have agreed a level of support from MBHS on the above topics. If assistance is required please refer to the current contract agreement for clarification of service support level provided.*

Visitors and Third Parties

Company premises
Visitors to premises used by the Company may not be aware of the risks associated with the site, therefore all visitors must:

- Proceed, on arrival, to the agreed meeting location.
- Be made aware of the Company requirements and rules for visitors.
- Be accompanied by the person they are visiting, who in turn is responsible for the visitor's safety and ensuring that visitors are aware of any hazardous process or situation they may be exposed to.

Site locations/work areas/premises
Work locations where the Company carries out its routine tasks remain under the control of the Company Client that operates there. All persons working on behalf of the Company, including any visitor, may not be aware of the risks associated with the site, therefore all must:

- Have authorisation from a Company representative, who in turn will liaise with the Client site team, so that appropriate permissions can be provided for access to the work area.
- Comply with the existing site rules (Client derived) that are communicated on arrival by way of an induction process.
- Adhere to any designated traffic/pedestrian routes.
- Stay within the designated areas they have been nominated or instructed to visit.

Training and Competency

Preventing accidents and ill health caused by work is a key priority for everyone at the Company. The Directors recognise that competent employees and sub-contractors are valuable and that providing Health and Safety information and training helps them to:

- Ensure people working on behalf of the Company are not injured or made ill by the work they carry out.
- Develop a positive Health and Safety culture, where safe and healthy working becomes second nature to everyone.
- Find out how Health and Safety could be managed better.
- Meet legislative requirements.

Where necessary, the Directors will be provided with all relevant additional training, which will enable them to undertake the Health and Safety responsibilities that have been allocated to them. The Operations Director will be responsible for ensuring that the Company and those working on their behalf maintain the ethos of continual improvement in Health and Safety standards and culture.

The Company will establish a competency matrix that covers all employees and those working on behalf of the Company. The matrix will outline all levels of training that has been achieved, skills and held competencies including any required refresher or renewal dates of training. This matrix will be reviewed an annual basis, as a minimum, and will provide the Directors with sufficient information to create a rolling Training and Development plan. It will be the responsibility of the Directors, or their nominated representative, to ensure that the competency matrix is kept up to date and reflects the standards held by all personnel.

An annual training plan will be established following the review of the competency matrix. The plan will include both internal and external training requirements. Specialist training, both operational and required by legislation, will be included.

Records of all training will be included on the competency matrix and copies of attained certification kept on employee personnel files.

Occupational Health

Where deemed necessary by the Management Team, the Company will arrange for an Occupational Health Practitioner to conduct pre-employment medical assessments appropriate to the job requirements.

General health conditions are included within the pre-employment screening and where deemed necessary, continued at intervals, as prescribed by the appointed Occupational Health Practitioner.

Health risks are included within the company risk assessment process that identifies significant hazards and subsequent control measures/monitoring to be applied.

On-going monitoring of Occupational Health is completed at appropriate intervals by the Management Team and includes the use of a health questionnaire relating to general topics (completion is required for each employee). Health surveillance records for each employee that is exposed to specific hazards/issues etc will be maintained for 40 years from the date of the last entry due to possible delay from exposure of the hazard to the onset of ill health.

Mental Health & Well-Being

The Management Team recognise that employees or those working on behalf of the Company do so for a large proportion of their lives and as such can impact on an individuals' well-being. The overlapping and interaction between an individual's home and work life are recognised as potentially creating an increase in general stresses and pressure that they may feel. As such, all are made fully aware that they can approach the Management Team or designated individuals that have received specific training, to discuss any issue or concern that they may have

To this end the following goals have been established:

- Build and maintain a workplace environment and culture that supports mental health, overall health and wellbeing, and prevents discrimination (including bullying and harassment)
- Increase employee knowledge and awareness of mental health and wellbeing issues and behaviours
- Reduce stigma around depression and anxiety in the workplace
- Develop a programme of initiatives for identified at-risk areas
- Facilitate employees' participation in initiatives that support wellbeing and mental health
- Provide training and resources to deliver these initiatives
- Provide support for those affected by wellbeing issues

Lone Working

The Company endeavours to avoid lone working whenever possible. However, the Operations Director from time to time, will be a "lone worker" at either their home address or when visiting/working at clients' premises.

Whilst there is no legal requirement to conduct a specific, separate risk assessment for lone workers the Company will ensure that issues and hazards that may significantly affect or impact those lone working are included within the relevant activity or task based risk assessments. These assessments will also include the relevant mitigation control measures required to eliminate, avoid or at lease minimise the outcome of any hazard to as low as reasonably practicable.

Those employees that are selected or identified as being a lone worker will be sufficiently experienced and fully understand the risks and precautions involved in their work and the location that they work in. The Directors will outline and set the limits to what can and cannot be done while working alone and will ensure anyone that is lone working is:

- competent to deal with the requirements of the job
- suitably trained in the use of any technical solutions provided
- able to recognise when to seek advice from elsewhere.

Any person that is lone working must:

- Ensure they have read and understood any risk assessments that have been compiled for the activity they are working on, especially any detailed arrangements where lone working is applicable.
- Ensure they adhere to any systems developed for their protection while working alone.
- Take personal responsibility for sharing information regarding their whereabouts (time out, location being visited, contact details, expected time of return).
- Report any incidents concerning lone working to enable systems to be reviewed and revised.
- If not returning to the Company base at the end of the last visit, notify a fellow Director to inform them that they have left their client/location and they are okay (or otherwise).

Refusal to Work on the Grounds of Health and Safety

Any person(s) working on behalf of the Company will at all times exercise diligence in monitoring their safe working environment for themselves and other persons in the working area.

It is a condition that any person(s) working on behalf of the Company shall comply with the following:
If any situation arises which a person believes will, or has, resulted in an unsafe working environment for some or all, they must bring their concern to the attention of the Operations Director so it can be investigated and resolved to an acceptable conclusion, if possible.

- The person(s) must clearly describe what the concerns or issues actually are.
- If a Company Director cannot be immediately contacted the relevant work should stop.
- The most senior member of staff will check that there are no instructions or information available to resolve the issue.
- If one of the Company Directors does not support the concern, a 'second opinion' is to be sought to either verify the findings or support the concerns.
- Providing the concern is genuine, even if it is ultimately seen to be unfounded, the employee will not be the subject of any detrimental action by the company.

The Company will take all reasonable measures to ensure that those persons covered by this process (employees, self-employed, contractors/consultants) are aware that their continued employment will not be affected in the event of any invoking of this policy.

Accident, Incident and Near Miss Reporting

Accidents (no matter how minor an injury may be), incidents, and near misses will be included in the accident book located at the company premises.

If an accident, incident, or near miss has occurred in a work situation then a Director will review the events to establish the actual or underlying cause. This process should enable the Company to establish which existing processes require amending and/or identify additional control measures that will be required to prevent a re-occurrence.

The fact that there is an accident at work premises does not, in itself, mean that the accident is work-related – the work activity itself must contribute to the accident. An accident is 'work-related' if any of the following played a significant role:

- the way the work was carried out
- any machinery, plant, substances or equipment used for the work
- the condition of the site or premises where the accident happened

The Company recognises and accepts the legal duties placed upon them by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 that require them to report and record some work-related accidents.

The timescales for reporting and/or recording accident information is:

- Accidents resulting in the death of any person, specified injuries to workers, non-fatal accidents requiring hospital treatment to non-workers and dangerous occurrences must be reported without delay (fatal accidents or accidents resulting in a specified injury to a worker can be reported by telephone 0845 300 9923). **A report must be submitted to the HSE within 10 days of the incident.**
- Over-seven-day injuries, where an employee or self-employed person is away from work or unable to perform their normal work duties for more than 7 consecutive days. **A report must be submitted to the HSE within 15 days of the incident.**
- Over-three day-injuries will be recorded using the Company accident book/form and filed securely to protect any personal information.

Incapacitation means that the worker is absent or is unable to do work that they would reasonably be expected to do as part of their normal work.

The Company also accept that they must report, without delay, confirmed diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work. These diseases include:

- carpal tunnel syndrome
- severe cramp of the hand or forearm
- occupational dermatitis
- hand-arm vibration syndrome
- occupational asthma
- tendonitis or tenosynovitis of the hand or forearm
- any occupational cancer
- any disease attributed to an occupational exposure to a biological agent

All reporting of any accident/incident, occupational disease etc will be reported online via the Health and Safety Executive website.

Accident/Incident records, including accident book entries and RIDDOR notifications will be retained for 3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the

age of 21). Retention of other medical records related to particular topics or events are detailed within the relevant section of this policy.

Clarification on the criteria, further advice and guidance if required, relating to the above will be sought via the HSE website and MBHS.

The Workplace (Health, Safety & Welfare) Regulations 1992

The Directors ensures that any premises where they are working from meet the health, safety and welfare needs of all its employees, contractors, members of the public and people with disabilities. Due consideration is given to the working environment, ensuring it is adequate in respect of ventilation, working temperature, lighting, cleaning materials, traffic routes, prevention of falling objects, translucent doors, general welfare, toilets, washing facilities, drinking water and eating facilities. If clarification on requirements or standards are required, the Operations Director will discuss the matter with the external H&S Advisor(s) who will refer to the relevant HSE Approved Code of Practice (L24).

Welfare facilities are provided by the client when employees are required to work away from the Company premises. When these facilities are not available, the Operation Director ensures that suitable provision is made by either utilising facilities that are readily available to the public (where works are being completed within a 10 hour period) or a purpose-built mobile oasis unit comprising:

- Suitable toilet facilities for the number of persons working on site;
- Suitable washing facilities to include hot and cold running water, hand basins large enough to wash, face, hands and forearms. Soap and towels or hand dryers will be provided and restocked as necessary.
- A suitable rest area to include tables and chairs with backs, a kettle or urn for boiling water and a means for preparing food i.e. gas ring or microwave oven.
- A suitable supply of fresh drinking water;
- An area for the storage of clothing and drying room for drying wet clothing.

Home Based Working

The Company recognises and accepts that their health and safety responsibilities are the same for those employees that are appointed or required to work from home, as they are for any other member of the workforce.

Before a member of the workforce is authorised to work from home, either on a temporary or permanent basis, the Company will give due consideration to the following areas:

- The nature and duration of the work to be undertaken?
- Whether the work activities can be safely carried out from home?
- Is specialised equipment, including remote access to IT systems, and/or skill set required to carry out the tasks required?
- The control measures that will need to be implemented to protect them?
- How communication will be maintained between the Company and the homeworker?

The Company will undertake a ‘suitable and sufficient’ assessment relating to home working in collaboration with the proposed homeworker covering the aforementioned topics in sufficient detail, to enable the Management Team to make a decision on whether home working can be carried out in a manner that ensures the health, safety and wellbeing of the individual concerned.

The Manual Handling Operations Regulations 1992

The Company is aware of the requirements placed upon it by the regulations. In order to meet these legislative requirements and to protect those employees who may be affected by manual handling activity, the Company will:

- So far as is reasonably practicable avoid the need for hazardous manual handling.
- Conduct a suitable risk assessment for any hazardous manual handling that cannot be avoided.
- So far as is reasonably practicable reduce the risk of injury from hazardous manual handling.

Manual handling risk assessments will be conducted by the Directors, assisted by the Health and Safety Advisor, if agreed by contract, and will take into account:

- The task being completed and how the risk(s) can be reduced.
- The individual(s) conducting the task and any training requirement.
- The load involved in the activity and any method that could be used to reduce it to a more manageable size.
- The work environment where the activity will take place.

Those working on behalf of the Company are made aware of their responsibilities and duties during the Company induction process and via a manual handling guidance document. All person(s) working on behalf of the Company will:

- Follow any implemented safe systems of work.
- Use any supplied equipment in the manner they have been trained to do.
- Co-operate with the Company on Health and Safety matters.
- Appointed contractor personnel report to their line manager/supervisor if they identify hazardous handling activities, who will in turn liaise with the Company Operations Director for resolution.
- Make sure that their work activities do not put others at risk.

The Health and Safety (Display Screen Equipment) Regulations 1992

The Management Team will consider tasks undertaken by employees and any individual that is identified as being a DSE "user" of display screen equipment, e.g. PC/laptop users, are required to complete a workstation self-assessment form. The HSE definition of a "user" - a person who uses DSE on a daily basis for an hour or more at a time - will be applied by the Management Team.
Completed forms are reviewed by the Management Team, assisted by the Health and Safety Advisor, and any issues or queries will be discussed with the DSE user. The assessments will consider factors such as the workstation set-up, equipment (chair, keyboard, screen, etc.), the environment (lighting, heating, etc.), and types of work being completed.

The Company will ensure that free eye/eyesight testing and correction is available for those employees identified as using DSE.

The Management Team ensure that all relevant training and information is provided to an employee to enable them to undertake the work involving DSE in a safe manner.

The Health and Safety (Consultation with Employees) Regulations 1996

The Directors recognise that having, and maintaining, a mechanism for communicating relevant Health and Safety information is important in establishing an on-going positive Health and Safety culture. To this end, the Company will consult with employees and those working on behalf of the Company (or their representatives) on the following:

- The introduction of any work activity or issue which may substantially affect their Health and Safety at work, for example the introduction of new equipment or new systems of work.
- The contact details of the person nominated as the company competent person with regards to Health and Safety.
- Information on the risks and dangers arising from the work activities, measures implemented to reduce or get rid of these risks, and what employees should do if they are exposed to a risk.
- The planning/organisation for Health and Safety training.

Additional information is readily available via the HSE "What you should know" poster which is held electronically as Company premises is a residential dwelling. The use of safety posters, leaflets, safety pamphlets and verbal safety information is provided electronically as and when appropriate.

The Company encourages all those working on their behalf to enter into the spirit of the regulations by taking part in discussions with their appointed contact person. Any required actions from the discussions are agreed with both parties and escalated through the Directors for opinion and rectification where necessary. Any action taken as a result of the information given will be communicated directly to them.

The Company fully involves, or will involve, non-English speaking employees, including labour only. The Directors, assisted by the appointed Health and Safety Advisors, if appropriate or necessary, will utilise documents that are readily available on the HSE website in different languages. These documents and any specific site instructions will be aided by pictograms and interpreters if required.

The Electricity at Work Regulations 1989

The Company will ensure electrical equipment is physically capable of doing the job and designed and constructed so that mechanical and electrical stresses do not cause the equipment to become unsafe. Electrical equipment will be visually checked by the user to spot early signs of damage or deterioration. The user's visual check will include:

- Switching off and unplugging the equipment before any checks.
- Checking that the plug is correctly wired (but only if they are competent to do so).
- Ensuring that the fuse is correctly rated by checking the equipment rating plate or instruction book.

- Checking that the plug is not damaged and that the cable is properly secured, with no internal wires visible.
- Checking the electrical cable is not damaged and has not been repaired with insulating tape or an unsuitable connector (damaged cable will only be replaced with a new cable by a competent person).
- Checking that the outer cover of the equipment is not damaged in a way that will give rise to electrical or mechanical hazards.
- Checking for burn marks or staining that suggests the equipment is overheating.
- Ensuring any trailing wires are positioned so that they are not a trip hazard and are less likely to get damaged.

If employees are concerned about the safety of equipment, they are advised to stop it from being used and report the matter to a member of the Directors, who will arrange for the faulty equipment to be removed from service until a qualified electrician undertakes a more thorough check.

Electrical Equipment at a Client Location

Electrical equipment used at a client location is limited and would only be used for a non-routine task. If this situation occurs, the Operation Director will ensure that any Company supplied electrical equipment is treated in a more stringent manner due to the potentially harsh nature of the working environment.

Tools that use 110v will be subjected to a thorough visual inspection on a weekly basis by the operator, a formal visual inspection by a competent person on a monthly basis, and a combined inspection/test before use and at three-monthly intervals thereafter.

Where site rules allow, the use of 240v tools will be restricted with the added protection of a suitable RCD.

Tools that use 240v will be subject to a thorough visual inspection by the operator on a daily/every shift basis, a formal visual inspection by a competent person on a weekly basis, and a combined inspection/test before first use and then on a monthly basis thereafter.

All electrical tools will be subject to Portable Appliance Testing (PAT) at intervals, in line with the guidance given by the HSE.

The Personal Protective Equipment at Work Regulations 1992

The Company recognises that Personal Protective Equipment (PPE) should only be used when risks cannot be avoided or sufficiently reduced by other preventative measures or through work re-organisation. The company will ensure that there is sufficient supply of PPE when required and that all employees are suitably trained in its safe storage and use.

PPE will be provided free of charge to all employees. Allocation of PPE will be supervised by the Management Team who will monitor it's use and, in consultation with those wearing it, ensure that it remains suitable, wearable and provides the correct level of for the task in hand. Other persons working on behalf of the Company e.g. self-employed, labour agency will be obliged to meet/provide specific PPE requirements. Where this is not possible, the Management Team may decide to provide any required PPE but the cost of this provision will not be at the Company expense. In these instances, agreement on payment for PPE will be with the persons "employer" and not the person (unless they are one and the same e.g. self-employed person).

It is the employee's and sub-contractor's duty to not misuse or interfere with any Health and Safety equipment, including PPE, supplied for their safety. All PPE issued must be worn, used and stored as per the manufacturer's specification.

The Company ensures that Respiratory Protective Equipment (RPE) is selected whilst taking into consideration the characteristics of the RPE wearer's needs. Any nominated wearer of RPE will be subject to face piece fit testing to ensure that the RPE fits the wearer correctly. All users of RPE are provided with suitable training specific to the equipment and a maintenance programme will be implemented where appropriate. It is the responsibility of the authorised wearer of RPE to ensure it is checked before each and every use.

The Personal Protective Equipment at Work (Amendment) Regulations 2022

The Company recognise the amendments that have been made relating to the types of duties and responsibilities that both they and their employees under PPER 1992 remain unchanged but have now been extended to limb (b) workers, as defined in PPER 2022. The Regulations provide clarification on those that would be classified as a worker under "limb (b)" and generally they are those that:

- carry out casual or irregular work for one or more organisations

- after 1 month of continuous service, receive holiday pay but not other employment rights such as the minimum period of statutory notice
- only carry out work if they choose to
- have a contract or other arrangement to do work or services personally for a reward (the contract doesn't have to be written) and only have a limited right to send someone else to do the work, for example swapping shifts with someone on a pre-approved list (subcontracting)
- are not in business for themselves (they do not advertise services directly to customers who can then also book their services directly)

Limb (b) category of "worker" is generally not used by the Company.

These changes do not apply to those who have a 'self-employed' status.

The Control of Substances Hazardous to Health Regulations 2002

The work activities undertaken by the Company mean that those working on their behalf are likely to encounter hazardous substances that are created as a by-product or waste output by a Clients process. The Operations Director, on behalf of the Company, liaises with Client(s) on a regular basis to arrange the sampling, labelling and subsequent collection of the waste products/materials they have created.

Before any hazardous substances are encountered during the waste collection process, a safety data sheet (SDS) will be requested from the Client so that it can be reviewed and an appropriate assessment made of the risks from that substance undertaken by Operation Director. The collection process selected will be that which removes a person from direct contact or where that is not possible, a method that creates the least/likely contact along with control measures to be used in mitigation wherever possible.

Assessments will consider storage, handling, and aspects of use, exposure, PPE requirements, workers' health, and emergency actions. The Operation Director will brief those working on their behalf on any hazard or substance precautions, with written records being held at the Company premises. Employee Health Surveillance records, as specified by and within this legislation, will be retained for 40 years from the date of the last entry.

Following the assessment, any substance or material that has a flammable content will be stored in a separate area and disposed of appropriately ensuring that any sources of ignition are removed.

In order to comply with the legislative requirements placed upon it, the Company will provide adequate control of exposure to substances by:

- Applying the eight principles of good practice
    - *Design and operate processes and activities to minimise emission, release, and spread of substances hazardous to health.*
    - *Take into account all relevant routes of exposure - inhalation, skin absorption, and ingestion - when developing control measures.*
    - *Control exposure by utilising measures proportionate to the health risk.*
    - *Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health.*
    - *Where adequate control of exposure cannot be achieved by other means, provide, in conjunction with other control measures, suitable Personal Protective Equipment.*
    - *Check and review regularly all elements of control measures for their continuing effectiveness.*
    - *Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks.*
    - *Ensure that the introduction of control measures does not increase the overall risk to Health and Safety.*
- Ensuring that the Workplace Exposure Limit is not exceeded.
- Ensuring that exposure to substances which can cause occupational asthma, cancer, or damage to genes that can be passed from one generation to another, is reduced as low as is reasonably practicable.
- Ensuring that records of tests and examinations of control systems and protective equipment identified as control measures under the legislation are retained for at least 5 years.

The Work at Height Regulations 2005 (amended 2007)

It is the policy of the Company to comply with the Work at Height Regulations 2005, which apply to all work at height where there is a risk of a fall liable to cause personal injury. A place is 'at height' if a person could be injured falling from it, even if it is at or below ground level. 'Work' includes moving around at a place of work (except by a staircase in a permanent workplace) but not travel to or from a place of work.

In accordance with these regulations, the Company will:

- Avoid work at height wherever possible.
- Use work equipment or other measures to prevent falls where they cannot avoid working at height.
- Where a risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall, should one occur.

Before any work at height takes place, the below must be followed:

- If there is an alternative means of carrying out work, which removes the need to work at height, this should be utilised.
- All work at height must be properly planned and organised.
- All work at height must be carried out under appropriate supervision, in as safe a way as is reasonably practicable.

For all work at height, the Company will:

- Use the most suitable equipment.
- Give collective protection measures (e.g. guard rails) priority over personal protection measures (e.g. safety harness).
- Take account of the work conditions and the risks to the safety of all those at the place where the work equipment is to be used.
- Plan for emergencies and rescue.
- Take into account weather conditions that could endanger Health and Safety.
- Ensure that those working at height are trained and competent.
- Ensure that the place where work at height is done is safe.
- Ensure that the equipment is appropriately inspected.
- Ensure that the risks from fragile surfaces and falling objects are properly controlled.
- Take account of the relevant risk assessments that have been carried out.

The Regulatory Reform (Fire Safety) Order 2005

The work activities undertaken by the Company are completed at Client premises. The Client, or their representative, will be deemed to be the “Responsible Person” as defined by this legislation and they will make a suitable and sufficient assessment of the risks to which relevant persons are exposed whilst working at the premises. This assessment will be used for the purpose of identifying the measures they need to take to comply with the requirements and prohibitions imposed on them by the Order. The nature of the assessment will vary according to the type and use of the premises and the risks associated with that use. The relevant information contained within the fire risk assessment will be briefed by the Client to those working on behalf of the Company by way of site induction and emergency plan briefings. All persons working on behalf of the Company will adhere to the relevant mitigation measures established for each work location they are at.

Company administration and management tasks are completed at desk space within residential addresses of the Directors. These tasks pose a low fire risk and no specific control measures, aside from those that are deemed to be good practice, are necessary.

The Provision and Use of Work Equipment Regulations 1998

As a means of ensuring that tools and equipment provided for work activities are suitable, the Directors will conduct a suitable assessment to consider the current provision of protection and preventative measures.

All tools and equipment purchased, and used by employees, will have suitable control measures to protect employees against risks associated with dangerous parts of machinery, e.g. fixed guards, interlocked guards, etc. All users of Company tools and equipment will be suitably trained in their use. The Directors ensures that all relevant information and instructions on the use of work equipment is readily available for review.

Equipment will be checked by the user prior to use, ensuring that all controls, indicators, switches and displays are clear and free from obstruction, dirt, damage, etc. If any faults, defects or concerns on Company owned equipment are identified during the pre-use checks it is the responsibility of the user to notify the Operations Director and await a decision on rectification/replacement. Appointed Contractor personnel will be required to implement the same pre-use review and report any failure or issues to their Supervisor for a solution. All faulty/defective tools, regardless of who they are owned by, will be removed from service to prevent them being used

On occasions, the Company may need to hire in equipment, due to specialised work or quantity of work. The equipment will only be obtained from approved hire companies which supply the appropriate training and supporting documentation to ensure all employees and sub-contractors are suitably trained in the use of the equipment.

The Management of Health and Safety at Work Regulations 1999

The Company will make appropriate arrangements for effective preventative or protective measures identified as a result of risk assessments. The Directors, assisted by the Health and Safety Advisor, will ensure that:

- All premises and activities subject to risk assessments are assessed in accordance with the relevant legislation, using an appropriate documented format.
- Such assessments are repeated whenever any of the following factors occur:
  - Change in legislation.
  - Change in control measures.
  - Significant change in work carried out.
  - Transfer to new technology.
  - Original assessment is no longer valid.
- Assessments are recorded and copies held within the management systems operated by the Company.
- The results of all such assessments are communicated to, and available for inspection by, all employees (an acknowledgement form will be used to ensure that all persons affected by the work activity or premises have read and understood the content and the role they must undertake).
- All assessments identify necessary protective and preventative measures.
- Specific assessments are completed for specified groups – Young Persons, Expectant/New Mothers.

The Directors will monitor safety performance on an informal daily basis by visual inspections, observations and ensuring discussions relating to health and safety topics/issues with those working on behalf of the Company.

The Company have appointed MBHS as their source for Health and Safety assistance and competent advice and will have ready access to a suitably competent advisor. This access will include random visits to a location where their work activities are being undertaken if it is within the scope of service agreed with MBHS. The site visit will be used to monitor performance and ensure that all employees are aware of, and implementing, the standards which have been set and are required. The appointed Health and Safety Advisor will compile a report following each visit, detailing topics discussed and any actions required for completion.

If deemed required by the Directors and within the scope of service agreed with MBHS, the allocated Health and Safety Advisor will undertake an annual audit of safety standards following a standard set of questions established to ascertain the level of legislative compliance of the Company. At least one of the Directors will participate in the audit process and provide answers and documentary evidence on behalf of the Company.

The Health and Safety (First Aid) Regulations 1981

The Company will utilise the First Aid facilities and personnel at each site. Where a site has no existing facility, the Directors will make suitable arrangements to ensure a minimum of an ‘emergency aid’ qualified person is included in the site team.

Each Company vehicle is equipped with a First Aid kit which is easily accessible to all employees at any one time during working hours. The kits are checked and restocked by the Company every three months, unless the employee notifies the Directors that supplies have been used up, in which case items will be restocked as and when required.

Violence and Aggression

The Company, both as an organisation and a Directors, will not tolerate harassment and violence of any kind. This stance is followed throughout the Company and includes the relationships between colleagues, employees and client staff, and between staff and any other third party.

Issues of harassment and violence will be treated as disciplinary offences (up to and including dismissal or, if appropriate, criminal action). The list below is an indicator as to what constitutes harassment or violent conduct. It is not an exhaustive list and other issues may be considered by the Directors as equal to those listed below:

- Physical violence.
- Verbal violence and aggression (abusive language, swearing).
- Sexual innuendo.
- Intimidation.
- Invasion of personal privacy.

- Exclusion of individuals.
- Abusive or prank phone calls/emails.

The Lifting Operations and Lifting Equipment Regulations 1998

The Company will utilise lifting equipment, namely a forklift truck if available, that is made available by a Client. If more complex lifting is required, the Company will use the services of either a specialist contractor or Hire Company for lifting equipment who will be responsible for ensuring that assessment(s), known as "Thorough Examination", are completed in line with legislative requirements and frequency so as to ensure that the equipment being used is suitable for the intended task. This assessment will ensure that lifting equipment provided for use at work is:

- Strong and stable enough for its particular use and marked to indicate safe working loads.
- Positioned and installed to minimise any risks.
- Used safely, i.e. the work is planned, organised, and performed by competent people.
- Subject to on-going thorough examination and, where appropriate, inspection by competent people.

Copies, or evidence, of the latest Thorough Examination(s) will be required by the Company before any lifting equipment is used on a project or task.

The Control of Noise at Work Regulations 2005

The work activities undertaken by the Company do not pose a significant issue regarding the creation of excessive noise levels. However, as those working on behalf of the Company are working at Client premises there may be occasion where the work activities undertaken by Client create noise at a level that could be significant. To this end, the Operations Director will:

- Liaise with the Client before works commence to ascertain if any works likely to create excessive noise levels are being carried out whilst collection is completed.
- Advise personnel working on behalf of the Company working in the area where any noise is identified at the first action level (80dba) that they should wear hearing protection (appropriate hearing protection made available free of charge to employees).
- Implement and enforce the mandatory wearing of hearing protection personnel working on behalf of the Company in any area where noise is identified at the second action level (85dba) with appropriate hearing protection provided free of charge to employees.
- Ensure that the Client limits any works that generate excessive noise whilst waste collection is completed.

The Dangerous Substances and Explosive Atmospheres Regulations 2002

The Company will ensure that where a dangerous substance is, or **is liable** to be, present, a suitable and sufficient assessment of the risks will be completed by a competent person. The regulation imposes a duty to classify workplaces into hazardous and non-hazardous areas. These areas will be defined and signage indicating their location will be posted around the site.

Where elimination of a substance cannot be achieved, the Company will:

- Reduce the amount of dangerous substances to a minimum.
- Avoid any minimal release.
- Control the release at source, i.e. by extraction systems.
- Prevent the formation of an explosive atmosphere.
- Following any release, the collection, containment, and removal will be done in a controlled and safe manner.
- Avoid ignition sources.
- Segregate incompatible substances.
- Ensure that containers of dangerous substances will be appropriately labelled that clearly identify the contents and any associated hazards.

Provide those working on behalf of the Company with suitable and sufficient information, instruction and training on the appropriate precautions and actions to be taken in order to safeguard themselves and other employees at the workplace, where a dangerous substance is present.

The Company will liaise with the Client, who is responsible for the premises (and the dangerous substance(s)), so as to ensure that appropriate procedures and arrangements, necessary to deal with an accident, incident, or emergency relating to a dangerous substance in the workplace, are in place.

The Control of Asbestos Regulations 2012

The Company appoint a suitably competent and licensed Asbestos Removal Practitioner on the rare occasion that a Client requests the removal of any Asbestos Containing Materials (ACMs). This type of waste removal is specialised and will only be allocated to those Company appointed sub-contractors and/or suppliers that have personnel trained to carry out removal works. The Company liaise with the most appropriate sub-contractor and is then guided by their specialist knowledge on issues such as removal methodology, notification requirements to the HSE, disposal locations etc.
The Client will be provided with a structured Method Statement/Risk Assessment in advance of the removal so that they can familiarise themselves with any requirements that they need to fulfil e.g. clearing of space, alternate access route to allow creation of safe working zone etc.

Work Transport Safety

All work vehicles provided and used by the Company will be suitable for the purpose for which they are provided.

The Company will ensure that vehicles are provided with a safe way to get into and out of the cab, and any other parts of the vehicle that need to be accessed regularly. All company vehicles will provide protection for drivers against any event that can harm them (e.g. bad weather, falling objects, inhospitable environment, vehicle overturns, etc.).

Drivers of company vehicles are required to conduct a pre-use visual inspection. This check includes ensuring all lights and indicators are working and that they have clear and unobstructed visibility around the vehicle.

All work vehicles provided by the Company will be suitable for their intended purpose and capable of carrying any specified load intended. The Safe Working Load (SWL) MUST NEVER exceeded by company drivers.

Workplace vehicles will be subject to a routine maintenance program by a competent and qualified person. This includes any legislative requirements placed upon types of equipment, e.g. hi-abs.

All those employees required to use work vehicles will either have an existing qualification that they have achieved through training, or the Company will provide adequate resources to train the employee (using a suitably qualified, competent trained person) in the safe use and operation of the vehicle. Training will be reviewed, monitored and provided on an on-going basis to ensure suitable CPD (Continuous Professional Development) is maintained.

The Company will authorise nominated employees to drive company work vehicles. This authorisation will only be given on the proviso that the employee is suitably trained, qualified (where appropriate) and competent to drive the vehicle.

The Construction, Design and Management Regulations 2015

The Construction (Design & Management) Regulations (CDM) are the main set of regulations for managing the health, safety and welfare of construction projects. CDM applies to all building and construction work and includes new build, demolition, refurbishment, extensions, conversions, repair and maintenance.

The CDM Regulations define three main roles for managing the health and safety of a construction project.
The Client has overall responsibility for the successful execution of the project and the Principal Designer (PD) and Principal Contractor (PC) lead on different phases of the project.

The Principal Designer and Principal Contractor have an important role in co-ordinating health and safety. All three duty holders must have good working relationships from the outset if the project is to be delivered in a safe and healthy manner. This enables the provision and flow of information to ensure that health and safety is considered when making decisions.

This is the arrangement for the majority of projects. The only exception is when the client does not need to appoint a principal designer or principal contractor because the work is to be undertaken by a single contractor.

The Company is aware of the specific responsibilities issued to designated duty holders within a project and will follow the applicable guidance notes/industry information regarding management of a construction project.

Contractor

When the Company have been appointed as a Contractor on a construction project, they are aware they have the responsibility to manage and control health and safety risks for their employees and any contractors (including self-employed sub-contractors) that they have appointed. To do this the Company will:

- Provide detail on meeting the Client's requirements.
- Review and implement mitigation on any preconstruction information provided by the Principal Designer.
- Review the relevant parts of the construction phase plan and any other requirements identified by the Principal Contractor.
- Only use a workforce that have the right skills, knowledge, training, experience and provide suitable levels of supervision for those working on their behalf.
- Ensure those carrying out the work that the Company have been appointed to complete have the right plant, tools, equipment, materials and personal protective equipment.
- Provide relevant information and instructions to workers by briefing workers on relevant risk assessment and method statements.
- Co-ordinate their work with those of other contractors and the Principal Contractor.
- Inform the principal contractor of any intention to sub-contract elements of their work.