

Total Piling Ltd.

HEALTH AND SAFETY POLICY

STATEMENT OF INTENT

The Company is committed to high standards of safety, health and welfare for its employees and others who may be affected by its work activities and will comply with The Health and Safety at Work etc Act 1974.

It is our intention that the business operates in such a manner as to achieve the following:

- Compliance at all times with the Principal Contractor's Health and Safety arrangements.
- A healthy and safe environment for employees, subcontractors, customers and others affected by our activities
- The prevention of accidents and ill health at work (including out of office, project and site based activities)
- Compliance with all relevant health and safety legislation and industry best practice
- The provision of health and safety instruction, training and an effective consultation process to ensure the ongoing health and safety competency of our employees, subcontractors and other business partners
- Correct application of relevant construction legislation by employees and subcontractors to project activities in collaboration with project partners so that all project work is carried out safely, with significant operational and residual risks identified and adequately controlled where they cannot be eliminated
- Consultation with our employees and subcontractors on all matters affecting their health, safety and wellbeing
- The setting of health and safety objectives, targets and performance standards
- Continuous improvement and monitoring of the health and safety performance through the development and implementation of an effective health and safety risk management system.

Arrangements are in place to regularly monitor and audit the Company's compliance with the Policy and relevant legislation in association with Safety Measures Ltd, acting as our professional health and safety advisers. Health and safety objectives and targets and this policy document are reviewed each year by the Directors.

SIGNED: *Paul Pendleton*

POSITION: Director

DATE: 13.07.22

Introduction

This document is intended to set out the means by which Total Piling Ltd. will achieve and maintain compliance with all health and safety legislation affecting the Company and its business operations.

The Company will operate a dynamic risk management system and our policy is to have in place a system to ensure:

- ✚ consultation with all interested parties
- ✚ the provision of high quality information and instruction for all employees and subcontractors
- ✚ a programme of employee training and skills development to ensure that staff are competent to undertake their duties safely and in compliance with recognised good practice and sector guidance issued by the Health and Safety Executive
- ✚ compliance with all relevant health and safety legislation.

RESPONSIBILITIES

We have responsibilities under health and safety legislation towards:

- Employees, sub-contractors and other contractors
- Customers, visitors and local communities
- Members of the public

Our obligations can only be met by ensuring that all employees fully discharge their responsibilities. This policy will be reviewed annually.

Therefore, all employees must:

- Take reasonable care for the health and safety of themselves and others who may be affected by their acts or omissions at work
- Familiarise themselves with the contents of this policy
- Co-operate with regard to agreed health and safety arrangements and procedures, be proactive in assessing the Company's day to day health and safety performance and put forward suggestions for improvements where appropriate
- Not interfere with, or misuse, anything provided in the interest of health, safety and welfare
- Report all safety hazards, defects, accidents and near misses, however minor, to the Site Supervisor

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- Assist the Nominated Person in his day to day management of health and safety
- Keep personal tools and equipment in good condition
- Maintain work equipment (including all equipment provided in the interests of health and safety) in a suitable condition and ensure it is used in accordance with manufacturer's recommendations
- Ensure all equipment is stored correctly when not in use
- Maintain a tidy work area at all times
- Suggest ways in which safety and health can be maintained or improved
- Inform their immediate supervisor of any medication that they may be taking which could possibly affect their ability to work in a safe manner or react with any treatment they may receive in the event of an accident
- Work to agreed method statements.

NOTE

Anyone found working to their own, or other persons' detriment, in disregard to this Policy or other procedure, could be held personally responsible in law and may be subject to disciplinary proceedings which may lead to their dismissal. An employee who misuses or fails to wear, personal protective equipment issued and deemed necessary for a task and/or work environment will be subject to disciplinary action.

Board of Directors

The Board of Directors is required to:

- Support the development and implementation of an effective health and safety strategy
- Assist in the annual regular review of the health and safety strategy/policy
- Ensure that there is an effective Health and Safety Policy and that it is reviewed regularly to ensure that it remains suitable for the needs of the business
- Determine health and safety objectives and assigning clear responsibilities to ensure that they are met
- Allocate resources to implement the Policy, achieving the objectives, avoiding personal injury and/or property damage so far as is reasonably practicable through a structured risk management programme
- Assist in the establishment of a system of monitoring and performance measurement that ensures effective implementation and operation of the health and safety policy and strategy.

Director Responsible for Health and Safety – Mr. P Bates

Mr P Bates is responsible for ensuring that the Policy enables the Company to fulfil its legal duties and to manage its activities so that high standards of health and safety are achieved and legal compliance is maintained.

He will monitor conditions and the health/safety performance to ensure that the policy is adequately resourced, effective in its implementation and is developed to meet changing legal obligations and operational requirements. He will also ensure that all work undertaken complies with the Health and Safety at Work etc. Act 1974 and subsequent related regulations, and is carried out only by employees and subcontractors who are deemed competent. Employee competence, safe system of work, regular safety inspections and the agreement on an emergency procedure for each work location are key to effective risk management in this area.

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He will review and audit the Policy annually, acting in association with Safety Measures Ltd., as competent advisors for all health and safety matters (as defined by the Management of Health and Safety at Work Regulations 1999).

It is his specific responsibility to:

- Take overall and ultimate responsibility for the health and safety of employees
- Set health and safety objectives
- Allocate sufficient financial resources to adequately manage health and safety on a day to day basis
- Take executive responsibility for implementing and supervising the Health and Safety Policy and its associated procedures, including risk assessment
- Keep all Directors informed of the health and safety performance
- Audit, review and up-date this Policy annually, when major changes occur, when new plant/equipment/work activities are introduced or following any significant incident
- Ensure that the purchase and design of plant, work equipment, storage facilities and materials are to an acceptable standard
- Demonstrate personal commitment to the Policy in daily contacts with employees, sub contractors and customers
- Take appropriate disciplinary action in the event of any breach or refusal to comply with the statutory or Company safety regulations.

Nominated Person

Mr. P Bates

The key task is to promote “ownership” of this Policy by all employees and subcontractors. Successful achievement of this task is crucial if the arrangements stated are to be implemented successfully.

He will ensure that all employees are aware of their individual responsibilities and have an understanding of health and safety management, commensurate with their duties and the risks encountered in their day to day work. In particular, induction training for new recruits will be thorough and provide an awareness of significant hazards in the work environment, agreed risk control measures and safe systems of work.

For employees with a **limited understanding of English**, the Company will follow the recommendations and guidance published by the Health and Safety Executive. Where practicable, the guidance (Operational Circular 167/12) will be followed to provide information and guidance to employees and sub contractors with limited understanding of English.

Training, guidance and information on a “one to one” basis will be given in a customised format e.g. safe practice guidance publications issued by the Health and Safety Executive in foreign languages. Other measures taken will include the use of internationally recognised pictorial warning signs, training briefings in relevant alternative languages to English and the provision of English language training ranging from key words only to oral written fluency in English for longer term workers.

Each employee or sub contractor in this category will be individually assessed to ensure that he or she can follow agreed safe systems of work. Follow up safety information, instruction and guidance will be issued to a similar format.

It is also his responsibility to ensure that:

- All employees and subcontractors receive sufficient training, instruction and information to carry out their work safely and competently
- An effective and positive channel of communication exists between employees and management
- All work carried out, and all plant, machinery and equipment comply with the Health and Safety at Work etc. Act 1974, and other key legislation, including the Construction (Design and Management) Regulations 2015, the Management of Health and Safety at Work Regulations 1999, The Provision and Use of Work Equipment Regulations 1998, The Control of Vibration at Work Regulations 2005 and The Work at Height Regulations 2005
- First-Aid facilities are in place in accordance with current Regulations and the risk assessment, and responsible persons are appointed as first-aiders
- Statutory notices, abstracts etc. are displayed as required and all Statutory and Company Registers are provided and used
- Periodic Statutory tests, inspections, safety audits and maintenance of premises and employees workplaces are carried out where applicable
- Fire precautions and appliances are in place and are tested/maintained/kept up to date with the latest legislative requirements; you are familiar with the emergency evacuation procedures and emergency plan for each project location

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- Suitable personal protective equipment and clothing is issued where necessary and that employees understand the need for it and use it as instructed
- Any defective plant, equipment or structure is promptly isolated and that nothing hazardous to health and safety continues in use
- All hazards to safety or health are eliminated where possible, risk is minimised as far as is reasonably practicable and safe systems of work in place; that persons at risk are advised of any precautions to be taken and that records of inspections/site monitoring are kept and remedial action to comply with legislation is taken as required
- Other contractors (as necessary), sub-contractors, and visitors receive all necessary information and supervision to enable them to comply with legal requirements, their contractual obligations and Company rules
- Conduct an annual review of the Company's health and safety performance and compliance
- Review any safety notices or guidance from the HSE and action where necessary
- A culture of "good safety is good business" is adopted by all sections of the Company.

Site Supervisors

Site supervisors are required to keep up to date with the arrangements described in the Health and Safety Policy, and have a full understanding of risk assessments, method statements and safe working procedures relevant to the project for which they are responsible, and be fully aware of the Company's responsibilities under the **Construction (Design and Management) Regulations 2015** (whether operating as a Principal Contractor or as a Contractor).

They will ensure that:

- ✚ all work activities are carried out safely
- ✚ work equipment and machinery is operated safely and only by "safety competent" and currently qualified personnel
- ✚ full information on site safety arrangements is effectively communicated to all relevant contractors, sub contractors and other parties with a legitimate interest
- ✚ employees and other site contractors/subcontractors are fully consulted as appropriate on risk controls and method statements for each project
- ✚ any hazard to health is sufficiently controlled

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- ✚ the Company cooperates in the development of a site emergency plan and will ensure cooperation in its implementation.

The role is central to the implementation of effective risk management in practice.

Specific tasks will vary according to site, project and location but core duties will include:

- Co-operating closely with the Nominated Person to ensure that all project work is carried out safely in accordance with recognised good industry practice
- Being fully aware of and comply with the site safety procedures, rules and requirements at all times
- Providing adequate supervision, information and instruction to ensure that all employees and sub contractors under their control are fully conversant with requirements relating to health and safety
- Ensuring that relevant protective safety equipment, clothing etc. provided by the Company for work activities is suitable for the task, issued and used correctly
- Ensuring that all plant and equipment is in good working order, safe to use, suitable for the intended purpose and that all safety devices are fitted and properly maintained
- Dealing positively with equipment defects
- Contribute to risk assessments, method statements and the development of safe systems of work in areas under their control
- Ensuring that all employees under their control are aware of welfare arrangements, including first aid and emergency procedures
- Ensuring that necessary site and self discipline controls are maintained at all times.

A programme of toolbox talks and site safety briefings is in place for each project. This allows for dissemination and reiteration of project/site/task safety arrangements and an opportunity to consult with employees and subcontractors.

The key duties of the Company's Health and Safety Advisers are:

- ✚ To keep up to date with current sector legislation and good practice
- ✚ To encourage a pro-active approach to all Health and Safety matters and to promote a positive approach to all risk management functions
- ✚ As requested, carry out site safety inspections and submit a report on the findings, recommendations etc.
- ✚ Provide advice on safe working practice, training requirements and on any health and safety aspect associated with the delivery of a project
- ✚ Assist with the investigation of a significant incident and, if confronted with a risk of imminent danger to life, immediately take any remedial action considered necessary
- ✚ Carry out an annual audit of the Company's health and safety performance to assess compliance with legislation affecting the Company's business operations.

ORGANISATION

1. Systems and Procedures

We recognise the importance of health, safety and welfare, and will adopt a systematic approach towards ensuring that a healthy and safe environment is provided and maintained for all employees and others who may be affected by our work activities.

It is therefore our ultimate aim that in conducting our activities, account must be taken by all parties of the need to:

- Take a proactive rather than reactive approach to managing health and safety responsibilities
- Formulate and maintain safe working systems
- Take all necessary steps to establish the causes of accidents and risks to health, which may occur, and to ensure that reasonable measures are taken to prevent recurrence
- Ensure that no process, chemical, plant or item of work equipment is introduced unless it complies (where required) with statutory testing or examination requirements; also to ensure that, so far as is reasonably practicable, the health and safety of employees etc. will not be affected
- Encourage the closest possible liaison between the Directors, employees and sub contractors in matters relating to health and safety
- Ensure that all legal requirements relating to our activities are fully complied with, and progressively improve upon the levels of health and safety performance.

The Company recognises that the provision of **information** to, and **consultation** with, its employees and sub contractors is fundamental to the successful implementation of this Policy. The guidance contained in the HSE publication “Consulting employees on Health and Safety” INDG232 will be followed. This is achieved through site toolbox talks, discussion on risk assessments and method statements ahead of each project and one to one meeting as part of our training needs analysis initiative. We also operate an “open door” policy where any employee or subcontractor can raise an issue of concern directly with the Director Responsible for Health and Safety.

This is in addition to specific legal duties under:

- ✚ Sections 2(2) c, 2(6) and 2(7) of the Health and Safety at Work etc. Act 1974
- ✚ The Safety Representatives and Safety Committees Regulations 1977
- ✚ The Health and Safety (Consultation with Employees) Regulations 1996

The Company will ensure that suitable arrangements are in place for employees and sub contractors to comment on any aspect of their work that they believe may affect their health and/or safety.

This will be achieved by giving all employees an induction talk, to include:

- Site rules and PPE
- Welfare facilities
- First Aid/emergency procedures
- Significant risks and main control measures
- Employer/client/principal contractor requirements

The induction checklist will form the basis of employee safety induction. This will be varied as required to take into consideration new legislation, revised work practices, risk assessment reviews and new work equipment.

The subject of the health and safety performance will feature at all management meetings and employees/sub contractors will be encouraged to raise any issue of concern directly with the Nominated Person if considered urgent.

Employees will be notified by memo of any relevant health and safety issue arising between meetings where this affects their health, safety and wellbeing.

2. Arrangements for implementing Policy

2.1 Competence

All employees shall have the skills, competence and experience to fulfil their roles and duties. Where appropriate, this will be confirmed by the issue of individual certificates of competence e.g. work equipment use.

As required to address ongoing training needs, employees will be given the opportunity to undertake further training where appropriate with a nationally recognised provider e.g. CSCS/CITB.

2.1.1 Identifying Training Needs

All employees will be regularly reviewed to determine if they are capable of performing their tasks competently and safely. Competency will be assessed with regard to required skills, experience, knowledge and capabilities considered necessary.

The training needs for each employee will be determined and incorporated into an annual training and employee development plan and matrix. Employees will be regularly consulted to gather information on training requirements; training will also take account of risk assessment findings and the general health and safety performance e.g. inspections, accidents, and near misses, new/revised legislation.

Training will be given to enable all directors, managers, employees and subcontractors to fully understand the requirements and demands of their work and the arrangements for ensuring the health and safety of themselves and others. All employees will receive information and training in the health and safety aspects of their work.

Training will be given in a number of ways including internal and external courses and direct on the job training under personal supervision.

Training will provide suitable and sufficient instruction to all employees to ensure that they have sufficient, up to date knowledge to recognise hazards and implement required safety arrangements and procedures and understand their responsibilities in order to comply with Company and legislative requirements.

Induction training will be given as early as possible to employees commencing employment or undertaking new duties. This will include the provision of general safety information, site safety and welfare arrangements. Young people (under 18), those new to the industry and those with limited understanding of English will receive intensive safety induction training and will be subject to close, responsible and experienced supervision, particularly during their initial period of employment.

All employees have a legal responsibility to co-operate with their training programme and to put into practice any instructions or guidelines issued.

2.2 Fire

The Company will comply with the **Regulatory Reform (Fire Safety) Order 2005** in all its operations and locations of work. Fire procedures for working on sites and the site emergency plan will be produced in conjunction with the customer/person/principal contractor's representative/client in day to day control of the site or premises (where appropriate). Details of these will be briefed to employees and subcontractors. All potential hazards will be identified in the risk assessment for each site or premises and steps taken to adequately manage risk where a hazard may be identified. We shall cooperate with site safety induction training offered by the Principal Contractor/Client etc. and comply with agreed fire safety procedures for each site.

Where the Company acts as the **Principal Contractor** (under The Construction Design and Management Regulations 2015) for a project and that project has a high fire risk to be controlled, then a fire safety plan will be produced. This will form part of the risk management plan for the site.

Fire extinguishers will be provided on all vehicles. Work areas should be left clean and tidy and free of loose flammable material. Where an extinguisher has been used or appears defective, the Nominated Person should be informed, in order that it can be replaced or recharged without delay.

In order to comply with the Regulatory Reform (Fire Safety) Order 2005, a fire risk assessment will be carried out at Head Office and necessary precautions and procedures installed.

The Principal Contractor will be expected to provide a site safety induction to all employees and subcontractors of Total Piling Ltd. This will cover all aspects of site precautions and emergency exit routes.

Hot work such as welding, gas cutting, grinding and bitumen boiling will only be permitted under a Permit to Work signed by the Principal Contractor/Client. This will include instruction in fire prevention, screening of combustible materials and the availability of fire extinguishers. The storage and use of petroleum spirit shall comply with HSE and local authority legislation.

2.3 Risk Assessment/Method Statements/Safe Systems of Work

As required by **The Management of Health and Safety Regulations 1999**, all significant hazards will be identified, and the associated risks assessed. Significant risks will be recorded. Simple, effective control measures will be agreed, with the active participation of the employees affected. Safe systems of work will be produced, and implemented in respect of all work activities where a significant risk has been identified. Site Supervisors, employees and (where appropriate) sub contractors will be fully consulted in the risk assessment process and given information and training if required to ensure effective risk management across all operations.

Activities where risk assessment will be carried out will include:

- ✚ Hot works, LPG
- ✚ COSHH, dust
- ✚ Site access/exit
- ✚ Use of access equipment e.g. stepladders, scaffold, working platforms
- ✚ Working at Height
- ✚ Use of work equipment, hand tools and power tools
- ✚ Manual handling and materials movement
- ✚ Specific site hazards e.g. overhead and underground services, difficult access, weather conditions, pedestrian and vehicle traffic/segregation, steep grounds, water, other contractors
- ✚ Loading/unloading vehicles
- ✚ Storage of tools and materials
- ✚ Electricity/Noise/Vibration/First Aid
- ✚ Lone Working
- ✚ Site and removal/delivery transport
- ✚ Confined Spaces
- ✚ Asbestos
- ✚ Excavations
- ✚ Plant

A set of risk assessments covering the company's activities is in place. These will be customised for each project, task and location/premises. Site visits/inspections will highlight unique hazards associated with a project. Where it becomes clear that a hazard is present that has not been assessed or there is a major alteration to the task involved, this should be brought to the attention of the Nominated Person.

Young workers (under 18) will receive an individual risk assessment along with a structured induction covering tasks to be undertaken, hazards in the general work environment, sufficient training, instruction and information on work to be carried out. Supervision will be close, responsible and experienced. The Company will comply with Regulation 19 of the Management of Health and Safety at Work Regulations 1999 in respect of all employees under the age of 18 and school/college students on an approved period of work experience.

The Company will comply with Regulation 18 of the Management of Health and Safety at Work Regulations 1999 in regard to any risk to a **new or expectant mother**. Tasks will be reviewed and steps taken to ensure that a safe system of work is in place. Wherever practicable, alternative work will be provided if necessary to manage risk. Supervision will be empathetic to the needs of new or expectant mothers.

Method Statements will be produced where a high residual risk requires work activities to be carried out in a particular sequence and to have emergency measures in place to ensure safety. These will be produced selectively where a project, task or site may prove significantly hazardous. Areas where method statements will be carried out include:

- ✚ Excavations
- ✚ Asbestos
- ✚ Work over/near water
- ✚ Confined spaces
- ✚ Formwork and steel-fixing
- ✚ Work at height

Statements will be produced in association with the site Principal Contractor, after consultation with employees and subcontractors and will take the activities of adjacent contractors working on site into account.

Safe Systems of Work

Based on the risk assessment process, a written, **safe system of work** will be produced for each of our services to demonstrate that hazards are eliminated or remaining risks minimised. Systems will either be conveyed verbally to employees (for simpler tasks) or recorded (for more complex tasks) as e.g. in a permit to work situation, high risk environments and operations. The methodology for determining the safe system of work will be as follows:

- ✚ Setting up the task and obtaining any necessary authorisation (e.g. permit to work)
- ✚ Planning of job sequence
- ✚ Specification of the approved safe working methods including the means of getting to and from the task location
- ✚ The working environment must be inspected in advance of work commencing e.g. consider activities of other contractors
- ✚ Dismantling/disposal of equipment or waste at the end of, or during, the task

When working adjacent to occupied premises, the Nominated Person will establish at the project planning stage if any special precautions are required. He will discuss the scope of work with the person in charge of the premises or site and produce a risk assessment to include any special precautions to be taken. The person in charge of the premises or site will be asked to advise the Nominated Person of any risks which could affect our proposed work activities. These will be included in our safety management arrangements for the project.

2.4 The following are our risk management arrangements in respect of our key hazards

2.4.1 A key aim will be to satisfy the requirements of the **Provision and Use of Work Equipment Regulations 1998**. Guidance issued by the Health and Safety Executive (INDG 291) will be followed. This will be achieved through completion of Risk Assessments, employee training and assessment of individual competence, consultation, and the drafting of procedures to cover safe systems of work. All work equipment will be operated only by trained, certificated and authorised personnel and conform with CE markings or equivalent. It will also be subject to a regular visual safety inspection by an experienced employee and examined/tested in compliance with statute by a "Competent Person".

Employees and subcontractors will operate the following work equipment only where competence has been determined through training and individual certification by a nationally recognised body:

-  disc operated cutting/grinding tools
-  cartridge operated fixing tools

The Company will comply with the **Lifting Operations and Lifting Equipment Regulations 1998**. All lifting appliances and lifting gear will be subject to examination/test by a Competent Person. Test certificates and conformity report forms will be kept available for inspection.

The arrival of exceptionally high, bulky or heavy loads will be arranged and authorised by the Client. Care shall be taken to verify that roadways, bridges, platforms etc on the route inside the works or site area are capable of carrying the vehicles and their loads adequately.

No one other than the driver shall ride on tractors, dumpers or other powered-driven vehicles except on seats provided specially for the purpose. All such vehicles shall be effectively immobilised and secured at the end of every working shift. Persons working on or near vehicles must be safeguarded during loading or unloading operations.

Total Piling Ltd. plant including that provided for our use by the Principal Contractor/Client for the project, which may include scaffolds, scaffold towers, hoists, lighting towers etc. shall be inspected and confirmed suitable for use prior to any use occurring. All equipment supplied to the site by Total Piling Ltd. will be provided "safe to use" and the operator employed will be properly trained and competent in its use.

2.4.2 **Powered machinery, hand held power tools and hand tools** will be subject to regular, visual “safe condition” inspection and also testing. Users of all such equipment should inspect tools before each use; tools and equipment that are available for general use will be inspected periodically and a detailed record kept of inspection and maintenance.

2.4.3 In order to comply with the **Personal Protective Equipment at Work Regulations 1992**, it is our Policy that all employees and subcontractors will wear suitable personal protective equipment (PPE) at all times whilst on site. The Nominated Person will be responsible for carrying out the PPE Risk Assessment and for the identification, issue and monitoring of the wearing of such equipment. He is also responsible for implementing suitable control measures on a day to day basis, and for ensuring that all equipment is suitable for its intended purpose, bears the appropriate CE marking or equivalent, is in good condition and operated safely, within agreed procedures and subject to a regular safety inspection.

2.4.4 The Company will comply with the **Control of Vibration at Work Regulations 2005**. Where it is known that work equipment and tools in regular use produce high levels of vibration, an assessment of exposure to the user will be carried out. Where necessary, control measures will be introduced to eliminate or minimise exposure to the user. The guidance published by the Health and Safety Executive “Vibration – Solutions you can handle” HS (G) 170 will be followed.

2.4.5 Potentially hazardous situations where work can only be carried out under a **Permit to Work** system will be identified by the Principal Contractor’s Site Manager or the Construction Phase H&S Plan. The Principal Contractor will be asked ahead of work starting that the work area has been checked for underground, buried services, structures, culverts, drains, soft spots, etc., and that these have been identified, notified, and disconnected/diverted/made safe prior to access to the works being permitted. An exclusion zone will be established where any hazard has not been made safe.

2.4.6 Any employee engaged in operations where **underground or overhead services** may exist shall consult with the Main Contractor/Client to establish a safe system of work and/or a permit to dig. Adequate safe steps shall be taken to locate and identify such services, e.g. electronic location and hand dug trial holes.

Live services or services liable to become live must not be opened or connected to, or interfered with, in any manner except by authorised personnel and by arrangement with the Client.

2.4.7 Where instructed, Total Piling Ltd shall initiate safe **excavation** to include prior location and protection of buried cables, pipes services etc.

No excavation work is to commence without the agreement of the Principal Contractor/Client. Excavations shall be adequately supported where necessary to prevent falls of earth or other material. Suitable physical barriers shall be erected to prevent persons falling and notices exhibited where necessary. Excavations will be inspected at the start of each shift before any work is commenced.

2.4.8 Agreed safe systems of work will be produced in consultation with the Principal Contractor to work in a **confined space** where it is not practicable to undertake the work by alternative means. Only persons adequately trained will be allowed to work in confined spaces. The Company shall produce proof of suitable training for those employed and involved.

Prior to any work in a confined space, an assessment of risks and a written method statement shall be agreed between the Principal Contractor/Client and Total Piling Ltd. This will include a Permit to Work system and will include checking the atmosphere within the confined space before and during work. A register shall be maintained of the results and frequency of atmosphere testing.

All employees and will adhere to HSE guidelines. Employees who are to carry it out and they shall be physically capable, have received adequate instruction and training, and will hold the appropriate training certificate. An emergency procedure shall be established, and all necessary protective and rescue equipment must be to hand and inspected by a competent person prior to entry. The method statement and permit must be strictly supervised and followed.

Confined spaces include sewers, manholes, tanks, bore holes, etc., but can be found in bridge beams, ventilation-ducting etc.

2.5 Health Surveillance

Risk Assessment will identify circumstances where **health surveillance** will be required. Guidance issued by the Health and Safety Executive (HSG 61) will be followed.

Generally, there will be a need if:

- ❖ There is an identifiable disease or health condition related to work activities
- ❖ There is a valid technique for its identification
- ❖ There is a likelihood that the disease or condition may occur as a result of our work activities
- ❖ The surveillance will protect further the health of our employees

The company carries out regular health surveillance comprising of audiometric testing, HAVS and skin checks.

2.6 Protection of Members of the Public

When planning site work, consideration will be given to the protection of the public. Guidance issued by the Health and Safety Executive "Protecting the Public – Your Next Move" HS (G) 151 will be followed on sites where there is a possibility of children and members of the public entering the area where work is being undertaken or where vehicles, plant etc. are being operated. A priority will be to ensure that our vehicles enter, leave and move around sites safely.



Where work takes place on or adjacent to public roads, a traffic management system will be devised and a safe system of work implemented - subject approval by the relevant authorities.

2.7 Services – Underground and Overhead

The Company should have been informed by the customer/principal contractor etc. of any known services on or near to the premises or site. Each work location will be checked in advance of work commencing to determine what (if any) services are present. Overhead services are obvious and easily located. If work has to take place close to overhead power lines/cables, enquiries will be made to the power supplier to obtain accurate information on clearance distances and the precautions to be taken. In this event, a detailed method statement will be produced. Guidance issued by the Health and Safety Executive “Avoidance of danger from overhead power lines” Guidance Note GS 6 will be followed. Such precautions shall include a trained and competent Banksman, where appropriate and shall be documented by the Client and Total Piling Ltd.



2.8 Working in/on/at “Public” Buildings

In addition to taking normal precautions, special care should be taken as follows:

- ✚ Ensure all power tools are isolated when not in use
- ✚ Tools will be kept in closed containers and inaccessible to children and members of the public
- ✚ All work equipment and any access equipment will be securely stored
- ✚ Detailed guidance in HS(G) 151 “Protecting the Public” will be followed.

2.9 Work at Height

The following sub-sections contain details of the Company’s standard **control measures** for satisfying the terms of the **Work at Height Regulations 2005**.

This deals with the use of **access equipment** where **work at height** is involved. The site supervisor will follow and enforce these procedures unless there is a site specific assessment detailing and enforcing more stringent control measures. All employees and (where required) sub contractors will be given guidance, training and instruction on safe working at heights and on the regular (recorded) safety inspection of all access equipment; in addition, they will be given details of any specific work at height hazards and risk control measures in advance of each project. The production of risk assessments and method statements involving work at height is subject to consultation with employees, sub contractors and clients. These assessments and statements will also satisfy the Company’s responsibilities under the **Lifting Operations and Lifting Equipment Regulations 1998**, particularly where equipment is used to facilitate movement of equipment, materials etc. on site.

◆ **Ladders**

Ladders should only be used as a means of access and they should not be used at any time to undertake work. The ladder should be placed on firm, level stable ground and secured to prevent slipping or falling. Ladders must not be used as a working platform unless it is reasonable to do so, taking into account the nature of the work being carried out and its duration together with the risks to the safety of any person arising from the use of the ladder.

Ladders should be suitable and of sufficient strength for the intended purpose and erected in such a way that they do not become displaced and (where the length is more than 3 metres) they must be secured to prevent falling or slipping.

If used as a means of access, there must be suitable handholds to provide a safe stepping off point. If the ladder run is greater than 9 metres, there should be an intermediate landing area or rest platform (where practicable).

◆ **General Scaffolds**

Scaffolds should be erected, altered and dismantled only by trained and competent persons and not altered or tampered with by any unauthorised person. Employees and sub contractors must work in accordance with the National Access and Scaffolding Confederation Publication “Preventing Falls in Scaffolding and Falsework” (SG4U) and the Health and Safety Executive publication. Scaffolds must be inspected before use and 7 days thereafter, or if the structure has been exposed to severe weather conditions. A trained and competent person must undertake the inspection.



◆ **Mobile Towers**

Mobile towers should only be erected or altered by operatives who have received PASMA training and who have been assessed as “competent persons”. The erection of a tower must be in accordance with the manufacturer’s design instructions. The configuration of bracing and ledgers varies according to the supplier or manufacturer. It is therefore essential to have a copy of the erection manual or instructions. Manufacturer’s instructions may be found fixed to the tower.

The following basic guidelines should be followed before and after use of mobile towers:

Before Use

After a tower has been erected, the following checks should be made before it is used:

- it is vertical and square, and that the horizontal braces and platforms are level.
- outriggers or stabilisers are positioned and secured properly

- all base plates or castor wheels are fully in contact with the ground, including those on stabilisers or outriggers; all castors should be locked
- the spigot and socket joint locks holding the frames together are secured
- all the bracing members have been located in accordance with the supplier's manual
- all guardrails and toe boards are in position
- all access stairways and ladders are in position and firmly fixed
- the base to height of platform ratio does not exceed 1:3 when working externally or at a ratio of 1:3:5 internally.

During use

During use, the tower should be kept in good order. A competent person should inspect the tower regularly to ensure that the structure has not been altered in any way. All damaged parts should be replaced before the tower is used again.

2.10 The Construction (Design and Management) Regulations 2015

These regulations apply to work carried out by the Company and place duties on all parties involved in construction work.

A project is notifiable to the HSE if the construction work is scheduled to last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project; or exceed 500 person days.

Where a project is not notifiable much of the regulations are still applicable, notably the requirement for all projects to have a Construction Phase Plan prepared covering the work to be carried out.

Where applicable (i.e. if there is more than one contractor) the Client must appoint a competent Principal Designer to ensure that health and safety is taken into account at the design and planning stage of a project. The client (or his agent) must then appoint a Principal Contractor to manage and co-ordinate health and safety activities on site. The Principal Contractor must develop the Construction Phase Plan, detailing how they intend to manage the project, providing details of site rules and site emergency and welfare arrangements.

As the construction phase progresses, the principal contractor should collate information from suppliers and contractors, in order to produce the health and safety file ready for handover at the end of the project.

The client must ensure that the principal designer and principal contractor are "competent". Contractors who sub-contract work must ensure that the sub-contractors are "competent".

2.11 Noise

The company will comply with the requirements of the **Control of Noise at Work Regulations 2005** in all its business operations and site activities. Total Piling Ltd shall

advise the Client of any plant or machinery which is likely to emit noise at or in excess of permitted values. We shall take all steps necessary to reduce noise levels wherever possible. Adequate protection against noise from any source shall be provided by the company for its employees. Hearing protection zones should be established by the Principal Contractor/Client and suitable notices/signs should be displayed where required and observed at all times.

2.12 Contractors and Subcontractors

- ✚ Contractors (working on our premises/sites if we are acting as the Principal Contractor)

It is the responsibility of contractors to ensure that their employees adhere to, and co-operate with, legislative and Total Piling Ltd. rules in regards to health and safety whilst on our premises.

When working on our premises, it is the responsibility of the Contractor to ensure that the health, safety and welfare of our employees, visitors and others is not put at risk from their work activities and practices, and that safe systems of work are adhered at all times. Where a contractor has been engaged to work at Head Office, they will report to the prearranged designated person when first arriving on site. They must become familiar with any Health and Safety rules that may apply to the part of the site in which they will be working.

- ✚ Subcontractors (working for us on site)

Where subcontractors are to carry out work for Total Piling Ltd. on site, they will be asked to complete a subcontractor assessment and to provide evidence of health and safety competence in advance. Copies of Risk Assessments, Method Statements, Safety Plan or similar documentation will be assessed by the Nominated Person to confirm that risks to health and safety are being properly managed and responsibilities fully addressed.

The work activities of these subcontractors will be monitored regularly to ensure that their methods of work are safe, and do not put the safety of our employees and others at risk. Subcontractors will be given information and guidance necessary for the work involved. Any shortcomings in their performance will be raised and remedial action taken as appropriate.

A copy of this policy will be issued to all subcontractors used regularly, and a copy issued to others on request.

Mr. Adrian Bennett is responsible for managing contractors and subcontractors.

2.13 Manufacturers and Suppliers

The Company will ensure, in so far as is reasonably practicable, that all work equipment conforms to the appropriate manufacturing standard and is suitable for its intended

application. Manufacturers and suppliers will be asked to provide relevant information in regard to its safe operation, use and maintenance.

2.14 **Manual Handling**

The nature of the work in the company involves procedures which cannot avoid manual handling. The company will carry out risk assessments wherever there is a significant risk of manual handling injury and, as far as reasonably practicable, reduce risk to a minimum.

Mechanical aids are available to assist with many of the operations and it is all employees' duty to ensure these aids are used whenever it is possible to do so.

Manual handling training will also be given to employees and repeated on a regular basis. All employees are required to use the principles of good practice whenever carrying out manual handling:

- Assess the load
- Plan the lifting operation
- Position feet close to the load
- Get a good grip
- Bend the knees - keep a straight back
- Keep head up while lifting

2.15 **Driving**

Vehicles shall only be driven by "authorised drivers" who hold a valid driving licence; safety belts must be worn in all road vehicles (where this is a legal requirement). Authorised drivers should immediately notify any defect to their Supervisor. Road traffic accidents and dangerous occurrences must be reported immediately.

Mobile phones should not be used when driving any vehicle unless a hands free kit is used. This includes making/answering calls or using the text messaging feature.

Employees using their personal vehicles on company business must ensure they have suitable insurance cover which includes 'business use'.

2.16 **Display Screen Equipment (computer workstations)**

Staff identified as "Users", as defined by the **Health and Safety (Display Screen Equipment) Regulations 1992 (revised 2002)**, will receive an individual Assessment of their workstation and their work environment. Significant risks will be recorded, practical remedial measures taken where appropriate, and "Users" given information and guidance on recognised good practice. Assessments will be subject to periodic review.

2.17 **First-aid**

The terms of the **Health and Safety (First-Aid) Regulations 1981** will be complied with as a minimum standard of cover and practice. Details of trained First Aiders will be displayed prominently for the benefit of all employees, customers and visitors, and brought to the attention of all new employees at their induction.

Stock levels of items required under the Regulations will be checked at regular intervals and boxes will be kept secure, yet quickly available when required. Specific arrangements will be made, in cooperation with the Principal Contractor/Client, to provide cover where employees work on sites away from Head Office. In addition, First Aid containers are kept in all vehicles. Each driver is responsible for keeping their container fully stocked at all times.

Arrangements will be made to access first aid support on site, as part of site safety plan, and to summon the emergency services if required.

2.18 Accident Procedure

Details of all accidents will be recorded in the Accident Book and investigated by the Nominated Person.

The Reporting of Injuries Diseases and Dangerous Occurrence Regulations (RIDDOR) require that major accidents and those requiring over 7 days absence from work are reportable to the relevant authority. However only major accidents (e.g. serious fractures, amputations) should be reported immediately by telephone all other injuries should be reported over the internet (www.hse.gov.uk).

All accidents will be investigated in order to:

- Establish the cause
- Determine the extent of injuries and damage
- Decide on action necessary to prevent a recurrence

If any member of the public, visitor or uninvited visitor is involved in an accident or is injured, details must be entered in the Accident Book. All reportable accidents or dangerous occurrences will be investigated by Mr P Bates and a report issued. Where appropriate, this will be carried out in conjunction with the Principal Contractor/Client and action taken to prevent a recurrence.

2.19 Electricity

In accordance with **The Electricity at Work Regulations 1989**, the Company will maintain a register of electrical equipment and ensure that the equipment is visually inspected and tested on a regular, risk assessment basis to ensure that it is safe for normal use. All portable appliances will be examined prior to first use. The findings of inspections and tests will be recorded. HSE Guidance publication HS(G) 141 entitled "Electrical Safety on Construction Sites" will be adhered to in respect of tests and inspections. Any hired electrical equipment will be similarly inspected and tested. Day to day, all cabling, plugs and connections will be properly organised, visually inspected, recorded and maintained to minimise any risks, in accordance with the

Regulations. Specifically, all employees are required to regularly check and inspect plugs and cables for loose connections, faults and wear or damage. Faults and/or defects should be reported to the Site Supervisor and equipment isolated until a repair is carried out.

If a source of electricity at 110 volts single phase 50 cycles is available, suitable equipment (i.e. Small power tools, hand-lamps, office and stores lighting etc.) it shall be used. In cases where the available supply is 220/224 volts, Total Piling Ltd. shall provide suitable transformers to 110 volts to serve any such equipment. In no circumstances may a second transformer be used to step-up the supply from a low voltage system. If for any reason these supplies are inadequate, further reference should be made to the Principal Contractor/Client.

Wherever possible, all portable electrical equipment will be operated at 110 volts and/or battery powered.

Employees will not carry out maintenance on electrical equipment or plugs without prior authority and training. Employees' personnel electrical apparatus is not to be used without prior permission. The mains electricity supply at Head Office will be inspected by a Competent Person and a certificate of test produced, in accordance with the timescale laid down in the Regulations and IEE guidance. Mr. P Bates (Nominated Person) will arrange for inspection/testing to be carried out by a Competent Person at intervals recommended by the Health and Safety Executive.

2.20 Premises and Welfare Facilities

Environment, welfare and other related facilities will be maintained to the standard required by the Health and Safety at Work etc Act 1974 and the **Workplace (Health, Safety and Welfare) Regulations 1992**. Particular attention will be given to the general fabric, temperature, and ventilation, purity of air and water supplies, lighting, sanitary conveniences and noise. The provisions of the regulations will be taken into account when assessing the safety of each planned work location and premises.

Welfare facilities, arrangements and standards on site will be provided, in consultation with the Principal Contractor, Client, and occupier if appropriate.

These will include:

-  Sanitary conveniences
-  Washing facilities
-  Drinking water
-  Changing rooms and lockers
-  Rest facilities

These facilities will be subject to regular inspection and remedial action taken immediately if the highest practicable standards are not met or facilities are not provided.

2.21 Control of Substances Hazardous to Health (COSHH)

Details of control measures are listed in the COSHH Assessments.

We shall comply with the requirements of the **COSHH Regulations 2002 (amended 2004)** and related legislation. All necessary precautions will be taken in the use, storage and transportation of any material or substance. The least hazardous type of any substance will be used or purchased in order to minimise any associated risk. There will be regular assessments and monitoring to ensure that this is achieved. No hazardous substance will be used unless a full assessment has been carried out and all appropriate risk control measures are in place.

Substances covered by the Regulations will typically be denoted by warning symbols as shown below:



The Nominated Person will manage the Company's responsibilities under the Regulations. This includes identifying all substances in use and assessing the risk to employees (and others) from the substance, taking into account the manner in which it is used and the quantities involved.

The risk associated with using a substance must be assessed by carrying out a systematic review and considering:

- Specific substance being used – manufacturer's data sheets
- Quantity being used
- Its form i.e. liquid, dust, solid or vapour
- How can it harm? I.e. by inhalation, skin contact, absorption through the skin, ingestion
- Who will be exposed to the risk and for how long?
- Can a less hazardous substitute be used?

Staff will be trained and instructed in the use of any hazardous substance where appropriate. This includes identifying all substances in use and assessing the risk to staff (and others) from the substance, taking into account the manner in which it is used and the quantities involved. Health surveillance for respiratory issues will be carried out for staff as required by substances in use and emissions.

The Nominated Person is responsible for managing the Company's responsibilities under COSHH legislation:

2.22 Alcohol and Drugs

The misuse of alcohol and drugs can adversely affect an employee's ability to carry out a task in a safe manner. Alcohol and illegal drugs should therefore not be consumed or brought onto our premises or onto the premises where we are carrying out any work.

Any employee found with alcohol or illegal drugs on their person or is found to be under their influence whilst at work will face disciplinary action and possible dismissal. This also applies to any employee found to be misusing any substance(s) that has a detrimental effect on their standard of work or general conduct.

2.23 Engineering and Maintenance Policy

All new and existing machinery, plant, equipment, facilities and buildings will be sufficiently designed, constructed and installed so as to be safe and without risk to the health and safety of employees. An adequate planned maintenance system will be operated in respect of all work equipment, and records maintained

Safe systems of work will be used and updated, such that protection against foreseeable maintenance hazards is provided. All legislative maintenance, testing and inspections are carried out and records kept in accordance with statutory provisions, insurer and fire authorities approved codes.

Contractors' and hired plant and equipment must be examined before use to ensure it satisfies all relevant legislation, and is in a well-maintained and safe condition.

2.24 Environmental Management - reference Environmental Policy

It is our policy to do all that is reasonable practicable to:

- Maintain current and reliable information on the environmental impact of the goods and services that we supply
- Understand the sensitivities of our customers, including the pressures of growing and changing statutory and public concern about environmental issues, and assist them in complying with environmental best practice
- Identify opportunities to reduce any environmental impact of our activities at an early stage and adopt these changes where appropriate
- Communicate our environmental performance both within the Company and to the wider community
- Raise staff awareness of environmental issues and promote individual good practice
- Require our suppliers to provide goods and services with the minimum adverse environmental impact, and give preference to environmentally aware suppliers whenever possible
- Ensure that we purchase goods and materials which comply fully with UK government and EU legislation and recognised environmental best practice

- Make efficient and environmentally responsible use of energy, water and other natural resources
- Take all reasonable steps to prevent pollution of both the local and wider environments
- Employ sound waste management practices
- Develop and maintain emergency procedures to deal effectively with any significant environmental hazards which may arise as a result of our activities.
- Recycle equipment, waste products, and redundant items and reduce the consumption of consumables.
- Use, store, control and dispose of hazardous materials in line with the best environmental practices.

Employees are asked to co-operate in the operation of this policy and make a positive contribution to environmental protection by making themselves aware of the Company's environmental policy and complying with the control measure

2.25 Waste materials - reference Environmental Policy

If required by legislation and any works undertaken, all waste materials will be removed from site by a licensed waste removal service.

2.26 Visitors

On arrival at Head Office or on site, all visitors will report to reception and complete the visitors' book. The member of staff responsible for the safety and welfare of visitors will ensure that all health and safety rules and procedures are followed at all times and that the visitor(s) depart safely.

2.27 Visiting other locations

Directors and employees are required to take all reasonable precautions to ensure their own health and safety when visiting any other location. They are required to observe the safety procedures of the host organisation, and to avoid any hazardous situation.

2.28 Smoking

Smoking is only permitted outside in designated areas. On sites, smoking is permitted only in specified areas. Employees and sub contractors are not permitted to smoke in any premises, on any site, in company vehicles and in private vehicles used to convey another employee or subcontractor. The Company will comply with the Health Act 2006.

2.29 External/Internal Audits and Inspections

Total Piling Ltd.
Health and Safety Policy

As part of the Company's continued commitment to measure and improve the effectiveness of our health and safety management system, an external health and safety organisation (Safety Measures Ltd.) will undertake an annual audit of our arrangements. The Company will positively respond to any recommendations arising from the Audit process. In addition, site safety inspections will be carried out at regular times by the Site Supervisor and the Nominated Person to ensure that agreed risk control measures are in operation, effective in their implementation and that control measures are reviewed, revised etc. in the light of the safety performance, changing site conditions and work undertaken. Safety Measures Ltd. also act as Competent Person as defined by The Management of Health and Safety at Work Regulations 1999 (Regulation 7). Their role includes working closely with Mr. P Bates as Nominated Person to devise and apply protective measures, to keep the Company up to date with new or changing legislation, help with the investigation of major accidents, dangerous occurrences etc. and to carry out in depth site safety inspections if requested. Other advice, guidance and information are given on an ad hoc basis as required.

Appendix

Asbestos Policy and Procedures

1. Introduction

The company acknowledges and accepts its responsibilities under the **Control of Asbestos Regulations 2012** and will comply with all codes of practice and guidance issued by the Health and Safety Executive in respect of exposure of its employees and others to asbestos arising from its operations.

Although covering only commercial premises, The Control of Asbestos Regulations 2012 and other associated health and safety legislation place a duty on our Company to ensure that the risks to staff and others are minimised.

Under normal operating conditions there is no potential for operatives to be exposed to asbestos, as sites have been prior assessed and cleared, however there may be occasions when asbestos is encountered illegally buried. Due to this potential relevant operatives will receive Asbestos Awareness Training and if asbestos is encountered work will be immediately stopped and the matter reported to the Principal Contractor for the site.

This policy sets out the procedures to be followed before work commences and whilst work is taking place.

All employees/sub-contractors will be expected to follow the requirements set out in this policy and work in the manner laid down. Any breaches of the requirements of this policy could lead to disciplinary action being taken against the offender.

2. Working Procedures

As mentioned above, it is recognised that Asbestos Containing Materials (ACMs) were widely used in commercial and domestic properties prior to the mid 1970s. As stated above as Total Piling do not work on buildings there is little potential for encountering the presence of ACMs during our work activities. However it is considered appropriate to include this policy in its entirety.

The main aims in hazard control are;

-  To prevent, so far as practicable, generation or release of fibres and their subsequent spread as respirable airborne asbestos fibre;
-  To fully respond to the need to protect and prevent exposure of both employees and non employees who may be at risk from the presence or release of any asbestos fibre

Examples of areas where ACMs might be found are;

- Window sills
- Glass insulation
- Textiles and ropes

- Paper felt and cardboard
- Asbestos cement
- Decorative textural coatings
- Vinyl floor tiles
- Sprayed coatings
- Lagging material
- Insulating board

Given that our work requires some disturbance of materials with the use of hand and battery operated tools, we can accept that the disturbance of ACMs would lead to fibre release.

2.1 Prior to commencement of work

Before work commences on any site, the employee/sub contractor must ensure that no asbestos containing materials will be disturbed by the work to be undertaken.

The employee must follow the procedure laid below in order to gather as much information as possible;

- Ask the client if an asbestos survey has been carried out and if so have ACMs been identified
- Ask the client whether an asbestos register is in place and if so ask to see it
- Ask to see any building plans that might signify the presence of asbestos
- Ascertain the age of the building
(Buildings erected after the mid 1980s are unlikely to contain ACMs)
- Carry out a visual inspection of the working area

If there are substances that are likely to be disturbed which cannot be definitively identified as not being ACMs, **do not carry on with the work.** Substances that we can assume do not contain ACMs are brick, wood, glass and stone. Inform the client of the situation verbally and then contact the office via mobile phone and await instructions.

If it is clear that no ACMs are present or likely to be disturbed, continue with the work implementing the usual control measures, i.e. cordoning off the immediate area and using correct personal protective equipment.

2.2 During Work

Whilst carrying out the work the employee should be continually vigilant and monitor the situation fully. If during the course of the work, material is discovered that could possibly be ACM and could possibly be disturbed by the work activities you should carry out the following;

- Stop work immediately
- Seal the area off as practicably as possible
- Inform the client of the situation
- Inform the Nominated Person
- Do not intentionally disturb the material
- Do not return to the area if the possible ACM has been disturbed
- Do not take any samples of the material

If necessary, the incident will be reported to the Health and Safety Executive.