

HEALTH & SAFETY POLICY

OUR TARGET IS ZERO INJURIES

**Issue No 15
July 2018**

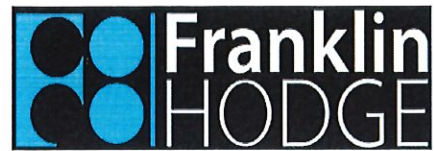
Review date July 2019

Originator: S F Dickinson

Health & Safety Manager

Authorisation: A Bews

Managing Director



HEALTH AND SAFETY POLICY

THE INVOLVEMENT OF EMPLOYEES IN OUR HEALTH AND SAFETY EFFORT IS FUNDAMENTAL

Everyone within Franklin Hodge Industries must comply with this Policy and help achieve its aims.

Together, we must ensure zero tolerance of any practice that could result in injuries and ill health.

The requirement to work safely is a Condition of Employment at Franklin Hodge Industries. There is no acceptable reason for working unsafely and we must remember our moral obligation to our families and each other.

THINK SAFE. BE SAFE

HEALTH AND SAFETY POLICY

Index to Sections

Section 1. Health & Safety Policy Statement

Section 2. Health & Safety Responsibilities

1. All Employees
2. Managing Director
3. Directors
4. Senior Managers
5. Supervisory staff
6. Health and Safety Personnel
7. Other persons on Company Premises

Section 3. General Arrangements: To Ensure Health & Safety at Work

1. Employee Consultation
2. Working at Height
3. Manual Handling Operations
4. Confined Space
5. HAVs
6. Risk Assessment
7. Training and Authorisation
8. Fire Control
9. First Aid provision
10. Accident reporting and investigation
11. Housekeeping
12. Health Surveillance
13. Maintenance
14. Electricity
15. Permits to Work
16. Control of Hazardous Substances
17. Noise policy
18. Personal Protective Equipment
19. Display Screen Equipment
20. Waste Control
21. Employees Working as Contractors
22. Working on Site - Construction Design & Management Regulations (CDM)
23. Sub-Contractors
24. New Plant & Equipment
25. Hazardous Machinery
26. Asbestos
27. Driving
28. Lone working
29. Policy Review and Safety Monitoring

Section 1

Health & Safety Policy:

As managing director I am ultimately responsible for setting the Company's business objectives and for ensuring that the necessary resources and skills are provided to achieve them. My fellow directors and senior managers recognise that our Health & Safety Values and Principles are integral and equal to all other business operations & objectives.

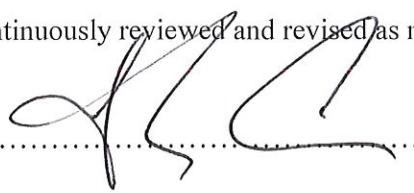
Franklin Hodge Industries Will:

- Establish a Health and Safety system to manage the risks associated with our premises and activities.
- Regularly monitor our performance and revise our Health and Safety System as necessary to ensure we achieve our objective of continuous improvement.
- Provide sufficient resources to meet the requirements of current Health and Safety legislation and aim to achieve the standards of 'good practice' applicable to our activities.
- Actively promote an open attitude to Health and Safety issues, encouraging staff to identify and report hazards so that we can all contribute to creating and maintaining a safe working environment.
- Communicate and consult with our staff on all issues affecting their Health and Safety and, in doing so, bring this policy to their attention.
- Provide adequate training for our staff to enable them to work safely and effectively, and to ensure they are competent and confident in the work they carry out.
- Carry out and regularly review risk assessments to identify hazards and existing control measures. We will prioritise, plan and complete any corrective actions required to reduce risk to an acceptable level.
- Maintain our premises and work equipment to a standard that ensures that risks are effectively managed.
- Ensure that responsibilities for Health and Safety are allocated, understood, monitored and fulfilled.
- Obtain access to competent advice and assistance, thereby ensuring that we are aware of relevant changes in legislation and 'Good Practice'.
- Provide health surveillance for staff where appropriate and maintain records.

It is the duty of us all at work to:

- To take reasonable care of our own safety
- To take reasonable care of the safety of others who may be affected by what we do or fail to do
- To co-operate so that we can all comply with our legal duties
- To ensure that we do not interfere with or misuse anything provided in the interests of Health and Safety.
- This policy will be continuously reviewed and revised as necessary to ensure its effectiveness

Andy Bews July 2018
Managing Director

A handwritten signature in black ink, appearing to be "Andy Bews", written over a dotted line.

Section 2

HEALTH & SAFETY RESPONSIBILITIES

1. All Employees

Franklin Hodge Industries values the involvement of employees and will encourage participation through consultation. Everyone is expected to take an active role in improving standards by, for example, taking part in training, carrying out risk assessments or undertaking inspections. It is the responsibility of everyone at FHI to comply with and enforce policies and specific safety procedures applicable to their role.

The most significant effect each of us can have on eliminating workplace injuries is by adopting a positive health & safety attitude at all times. It is estimated that 90% of all accidents arise from unsafe behaviour. Everyone should demonstrate personal leadership in respect of health and safety by ensuring that they do not walk past unsafe work practices and by advising their line manager of any unsafe acts or conditions.

We should be aware that our acts and omissions can put others at risk and should never take short cuts that compromise safety.

2. Managing Director

The Managing Director together with the support of other Directors ensures that the Franklin Hodge Industries requirements for health and safety and this health and safety policy are implemented throughout the Company.

Through his personal leadership he communicates the importance of health and safety to the business, promoting continuous improvement by setting targets and ensuring the publication and monitoring of an annual health and safety action plan.

He ensures that adequate resources are available to enable compliance with the Company policies, including the provision of specialist health and safety personnel to support the business in reviewing performance and continually improving standards. As the Director responsible for health & safety he accepts ultimate responsibility for the health and safety of all employees.

3. Directors

Directors are responsible for health and safety within their operations and activities. They ensure that all staff are aware of the health and safety requirements relevant to their role. They are required to appoint competent people so that there is effective supervision of all activities.

They ensure sufficient resources are available to enable compliance with Franklin Hodge Industries health and safety policy/guides and make certain that equipment, machinery and vehicles are suitably maintained.

With their management team they monitor the effectiveness of this policy and compliance throughout their operations, bringing any significant concerns to the attention of the Managing Director and Health and Safety personnel.

4. Senior Managers

Senior Managers are responsible for providing a safe and healthy working environment for everyone working within their team and ensuring compliance with Franklin Hodge Industries policies.

They will ensure compliance through structured training programmes and monitor the condition of equipment, machinery and vehicles through inspection and defect reporting systems.

They will continually promote employee involvement in the health and safety effort and ensure there is good communication regarding health and safety within their areas of responsibility and with other interrelated areas/functions within the organisation.

5. Supervisory Staff

Supervisors, Managers are accountable to their appointed Senior Manager and have day to day, first line responsibility for the health and safety for people under their control. They are required to ensure compliance with Franklin Hodge Industries policies/guides so far as they apply to the activities in their charge.

Through risk assessments they must take an active part in the identification of hazards, development of control measures and the communication of remaining significant risks to all relevant personnel. They will promote involvement through employee consultation and ensure continual improvement in standards by operating maintenance and inspection schemes with effective close out systems.

They must ensure that necessary local procedures are implemented to guarantee the safe operation of plant and equipment and that accident/near miss reporting systems are fully utilised.

6. Health and Safety Personnel

Health and Safety Personnel must support the business in advancing and promoting a health and safety culture and eliminating work related injuries and ill health. They will assist Directors and Senior Management teams in developing a strategic health and safety action plan for the whole Company. Through effective monitoring systems, such as inspections, audits and accident analysis, they will promote compliance with company and legislative requirements.

In the event of an accident the Health and Safety Personnel will provide support with the investigation, to an extent that is proportionate to the severity. In all RIDDOR reportable accidents a root cause analysis investigation by Health and Safety Personnel will be carried out with the appropriate Manager. Where appropriate, learning points from incidents will be communicated throughout the business to prevent recurrence.

Health and Safety Personnel will seek to establish good working relations with Trade Organisations and Statutory Bodies in order that they can be aware and, where possible, be involved in the development of applicable regulations.

7. All Other Persons on Company Premises

- a) Contractors shall not work on the premises until the relevant safety rules are read, understood and accepted.

Contractors must receive a copy of the publication 'SITE RULES FOR CONTRACTORS' and sign to say that they have read, understand and accept the conditions as set out.

- b) All visitors including contractors must sign and register in the reception area upon arrival. If appropriate, they should wear protective clothing and/or equipment and keep to gangways in the factory unless authorised by management to move to a work area.

- c) Contractors and visitors intending to carryout work on site should inform the Foreman, Supervisor or Manager of the area in which they are going to work of any risks to health and safety their activities might pose.
- d) Children are not allowed on Company premises without express permission of Senior Management, and not allowed in factory areas.

Section 3

GENERAL ARRANGEMENTS

The arrangements to control Health and Safety in the Company include the following:

1. Employee Consultation

In order to ensure that accident prevention is ongoing at the Company, health, safety and welfare are discussed with the nominated representatives at the monthly Operations Meeting. By consultation and joint involvement of management and employees the company wish to promote a healthy and safe working environment for all concerned.

Health and safety will be included as an agenda item at the monthly Operations meeting alongside other business issues, ensuring that policy decisions are made that best suit the business needs.

2. Working at Height.

We will provide a safe working environment for all employees who may be required to work at height. We will achieve this by;

- Identifying work activities that may involve working at height
- Eliminating the need to work at height whenever it is reasonably practicable to do so
- Ensuring that, where work at height cannot be eliminated, we will use the risk assessment process to evaluate and manage risk
- Implementing a safe system of work which will prevent falls of persons, materials and equipment
- Provide suitable plant and equipment to allow safe access for persons and equipment
- Ensuring working platforms and any supporting structures are appropriate and designed in accordance with current standards
- Ensuring that regular inspections of all equipment required for working at height are undertaken (a register of equipment for working at height will be maintained)
- Providing adequate information, instruction and training to ensure that only competent persons are engaged in working at height.
- All powered equipment used for lifting and access will be hired and certificates obtained from the hirer.
- Training will be provided for working at height and inspection of working at height equipment.
- All access equipment will be erected by competent persons and examined at regular intervals in accordance with the requirements of the Work at Height Regulations 2005, Franklin Hodge employees will be IPAF and PASMA trained for working with Scissor Lifts, Mobile Elevated Work Platforms and Mobile Scaffolds.
- FHI do not undertake roof work.

Ladders

Management will assess the need for ladders, stepladders and access equipment and will arrange provision of suitable types.

All access equipment will be erected by competent persons and examined at regular intervals in accordance with the requirements of the Work at Height Regulations 2005, Franklin Hodge employees will be IPAF and PASMA trained for working with Scissor Lifts, Mobile Elevated Work Platforms and Mobile Scaffolds.,

Ladders will only be considered where a risk assessment has shown that the use of other more suitable work equipment is not appropriate because of the low risk, short term duration of the task or restrictions where the work is located.

Short term duration is deemed to be 15 to 30 minutes

If the nature of the work, dictates that many of the tasks are of longer term duration an alternative method of working at height will be considered.

- All ladders shall be in good working order with
- All rungs intact
- No movement between stiles and rungs
- No cracks
- No lashings or bindings

Light tools should be carried in a shoulder bag or on a belt to free both hands for climbing.

- Where a ladder is to be used for work of a short duration one hand must be free to hold onto the ladder at all times. Stretching must be avoided
- Ladders and step ladders will be subject to pre-use inspection by the site supervisor and to regular inspection by users.
- Ladders will be angled correctly 1 in 4
- The top of the ladder will rest against a solid surface
- It is Company policy that no ladders are used unless securely footed and tied or footed by a second person.
- The ladder will be tied at the top and protrude at least 1 metre above the platform level.
- Aluminium ladders must **not be used** near any overhead power lines.
- Step ladders must be fully opened before use and checked for defects.
- Only one person is on a ladder at any one time.

Mobile Elevated Work Platform (MEWP)

If selected for use:

- Only a suitably trained and competent person operates the platform e.g. hold a suitable qualification such as a training certificate from the International Powered Access Federation (IPAF) or a CPCS card that covers the equipment being used etc.
- That fall arrest equipment is provided and used by the person or persons inside the platform
- No one in the platform will climb out over the guard rails unless the platform is specifically designed to allow this
- All hand tools are secured to the platform with safety ropes to prevent them falling should they be dropped

- A suitable means of descent from the platform is provided in case of an emergency
- Maintenance and test records (dated within the last 6 months) of the equipment are available for inspection

Mobile Scaffolding Tower

If selected for use:

- The tower will have been erected by a suitably trained and competent individual e.g. PASMA trained etc.
- The relevant components show no signs of rust or damage
- A suitable means of access is provided inside the tower
- Toe boards and guard rails are provided at the suitable heights (Toe board 150mm, intermediate guard rail 470mm and the top guard rail 950mm)
- That weather and ground conditions are properly considered as these may adversely affect the stability of the tower and also its suitability for the task
- Manufacturers guidelines are followed in relation to the height to base width ratio
- That an inspection regime is in place to ensure the tower remains safe at all times in line with the requirements of PASMA

Fixed Scaffolding:

If selected for use:

- FHI will ensure that it has been designed, erected, altered and dismantled by a competent person or the work is supervised by a competent person
- It is only erected on a firm level foundation that is capable of taking the load of the scaffold
- It is braced and tied to a permanent structure or otherwise stabilised
- If it is to be loaded then it must be appropriately altered to withstand the extra weight
- That platforms are fully boarded and wide enough for work and access
- That scaffold boards are properly supported and do not over hang excessively i.e. More than four times its thickness
- That there is a safe ladder or other means of access to the platform. If a ladder is used it must be tied off and extend at least one meter above the platform to provide a safe handhold
- It is regularly inspected and formal detailed inspections are made at least every 7 days or sooner if something occurs that may have affected its strength and/or stability

3. Manual Handling Operations

An assessment of the risks from manual handling of loads has been carried out and where reasonably practicable hazardous manual handling has been eliminated.

All site work will be assessed and manual handling risks will be minimised and controlled by:-

- Changing systems of work
- Provision of lifting, handling equipment
- Instruction and training for employees
- Issue and use of appropriate PPE

A Pro-Forma sheet is contained within the generic risk assessments for carrying out Manual Handling Risk assessments, it is the responsibility of the contract coordinator to undertake risk assessments for Manual Handling.

Information is given to employees regarding safe manual handling techniques in the Employee Health and Safety Handbook and during company induction.

Employers Responsibilities

- ☐ Avoid the need for hazardous manual handling, as far as is reasonably practicable
- ☐ Access the risk of injury from any hazardous manual handling that can't be avoided
- ☐ Reduce the risk of injury from hazardous manual handling as far as reasonably practicable.

Employees Responsibilities

- ☐ Follow appropriate systems of work laid down for their safety
- ☐ Make proper use of equipment provided for their safety
- ☐ Co-operate with their employer on matters of health and safety
- ☐ Inform the employer if they identify hazardous handling activities

- ☐ Take care to ensure that their activities do not put others at risk

Lifting Procedure

Adopt a good posture;

When lifting from a low level, bend the knees. But do not kneel or over flex the knees;

Keep the back straight, maintaining its natural curve (tucking in the chin helps);

Lean forward a little over the load if necessary to get a good grip;

Keep the shoulders level and facing in the same direction as the hips;

Get a firm grip;

Try to keep the arms within the boundary formed by the legs. The best position and type of grip depends on the circumstances and individual preference; but must be secure. A hook grip is less tiring than keeping the fingers straight. If you need to vary the grip as the lift proceeds, do it as smoothly as possible.

Good Handling Technique

Here are some important points, using a basic lifting operation as an example.

- ☐ Stop and think
- ☐ Plan the lift. Where is the load to be placed?
- ☐ Use appropriate handling aids if possible.
- ☐ Do you need help with the load?
- ☐ Remove obstructions such as discarded wrapping materials.
- ☐ For a long lift, such as floor to shoulder height, consider resting the load mid-way on a table or bench to change grip.
- ☐ Position the feet, feet apart, giving a balanced and stable base for lifting (tight skirts and unsuitable footwear make this difficult).
- ☐ Leading leg as far forward as is comfortable and if possible, pointing in the direction you intend to go
- ☐ Keep close to the load;
- ☐ Keep the load close to the trunk for as long as possible. Keep heaviest side of the load next to the trunk. If a close approach to the load is not possible, slide it towards you before trying to lift;

- ☐ Don't jerk;
- ☐ Lift smoothly, raising the chin as the lift begins, keeping control of the load;
- ☐ Move the feet;
- ☐ Don't twist the trunk when turning to the side;
- ☐ Put down, and then adjust;
- ☐ If precise positioning of the load is necessary, put it down first, then slide it into the desired position.

4. Confined Space

We will ensure that every effort is made to avoid entry into a confined space, where this cannot be avoided; a suitable and sufficient assessment of the risks must be carried out. Entry into confined spaces will only be permitted under a permit to work with a developed safe system of work which will include emergency procedures.

Employees who are required to work in confined spaces will receive training on confined space entry, the permit to work system, hazard recognition and control procedures. Authorised entrants, attendants and supervisors in charge of entry will receive training in their respective confined space duties and responsibilities.

5. Hand Arm Vibration Syndrome

What Must Be Done

Every employer should endeavour to minimise the vibration created by his Work activity. Where the work activity produces vibration in excess of 2.5m/s^2 , he has a duty to reduce the exposure of his employees to vibration so far as is reasonably practicable.

Protection of the work force from hazardous vibration, which may cause "Hand Arm Vibration Syndrome", is a statutory duty under the Health and Safety at Work etc. Act 1974 with additional guidance contained in HSG 88.

The key requirements can be summarised as follows;

- ☐ Identify if there is a vibration problem
- ☐ Assess the vibration levels and compare with the "Action Levels" established in the guidance (see below)
- ☐ Take measures to reduce vibration at source, as far as is reasonably practicable;
- ☐ Where vibration levels cannot be reduced below the action levels, establish a vibration management programme
- ☐ Provide employees with information regarding all stages of the assessment and the vibration management programme
- ☐ Keep control measures and procedures under review to ensure that they are adequate, working and maintained

Carrying Out Assessments

Initial information on vibration levels is to be sought and provided by manufactures/suppliers of equipment that is a source of vibration at work.

This information is to then be assessed initially to determine what further assessment is required; these initial assessments can be carried using the chart available in the guidance or the HAVS exposure calculator on the HSE web-site.

Should exposure to vibration at work be identified as being a significant risk, further and more detailed assessments should be carried out by a competent person.

Where the company have identified exposure to vibration at work as being a significant hazard, then the company must be in receipt of information to ensure that:

- ☐ An adequate assessment is provided identifying activities as a source of vibration and assessments for these activities;
- ☐ Results of vibration assessments are available;
- ☐ Each employer is taking appropriate action;
- ☐ Each individual employers activities do not put others at risk;
- ☐ Where it appears from information provided or from his own assessments that employees or others are not put at risk,

They are provided with information about the risk and that steps are taken to prevent damage from vibration;

Strategy For The Control Of Vibration

Control of Vibration at Source

When purchasing new or hiring equipment, the company shall specify that where practicable, such machinery does not produce a vibration level more than 2.5m/s^2 whilst in normal operation.

Where existing equipment or processes have been shown to expose workers to vibration levels in excess of 2.5m/s^2 . The equipment or process will be examined to establish whether engineering controls will reduce vibration levels, specialist subcontractors may be used to advise on available technology, equipment shall be correctly and adequately maintained.

Education and Enforcement

Managers and Supervisors shall be trained to a basic understanding of the effects of vibration, all members of the work force shall be given training on the effects of vibration.

Managers and Supervisors shall ensure that workers under their Authority comply with the requirements of this vibration management programme.

Supervisors have the authority and are expected to hire in Diamond Core Drills as required where there is the potential to exceed the daily trigger time.

Supervisors have the authority to approve extended/ additional breaks for operators to get warm, exercise their hands and rest from using vibrating tools during inclement weather.

Health Surveillance

Employees will be provided with appropriate health surveillance in relation to the risks identified by the risk assessment. Employees who are exposed to vibration levels above 2.5m/s^2 may be the subject of medical surveillance to ensure the effectiveness of the vibration management programme.

6. Risk Assessment

The requirements of all modern safety legislation require employers to ensure that appropriate risk assessments have been undertaken and suitable control measures implemented *prior to any hazardous task commencing*.

All risk assessments should:

- Identify hazards.
- Assess the level of risk that those hazards present.
- Select suitable and sufficient control measures

A **Hazard** is a condition or practice with the potential to cause harm.

A **Risk** is the likelihood that the harm or damage will occur.

A **Hazard** is a condition or practice with the potential to cause harm.

A **Risk** is the likelihood that the harm or damage will occur.

Procedure

There are five distinct stages in a risk assessment, and all five must be given consideration.

1. identify all hazards i.e. those conditions or practices that have the potential to cause harm or damage;
2. identify who might be harmed, or what might be damaged;
3. evaluate a level of risk for each possible event;
4. select appropriate control measures;
5. Confirm that those control measures shall be effective.

How To Carry Out Risk Assessments

- ☐ Clearly detail the place of work and the task to be carried out;
- ☐ Identify the hazards of the job;
- ☐ Identify who could be harmed, or what could be damaged;
- ☐ Achieve a risk rating figure by using the tables, Potential x Severity;
- ☐ Select appropriate control measures which are considered to reduce the risk rating figure;
- ☐ Recalculate to demonstrate that the controls are appropriate.

Communicate the results of the risk assessment to ALL who may be affected.

PROBABILITY	(P)	SEVERITY (S)	(S)
Improbable	1	Negligible	1
Remote	2	Minor	2
Possible	3	Severe	3
Probable	4	Extreme	4

Allocate numbers to the two elements and read from the risk rating table below, the conclusions indicate the action to be taken.

RISK LEVEL (R)				
P/S	S	S	S	S
	1	2	3	4
P1	-	-	D	C
P2	-	D	C	B
P3	D	C	B	A
P4	D	B	A	A

A = Hazard MUST be avoided (or level of risk reduced significantly & reliably by controls).

B = Hazard SHOULD be avoided (or level of risk reduced significantly & reliably by controls).

C = Risk to be controlled as far as reasonably practicable.

D = Risk to be controlled as far as reasonably practicable.

- = No control measures necessary.

An assessment will take place to assess the risks to health and safety of all employees, contractors and visitors and to do what is reasonably practicable to control these risks. The results of risk assessment will be communicated to everyone about the risks to health and safety. Information to staff will contain prevention and protective measures to overt the identified risks.

7. Training and Authorisation

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations. Training will be provided for the following situations:

- Induction training for new employees (Health and Safety awareness, company procedures etc.)
- The introduction or modification of new/existing machinery or technology
- A change in employee position/work activity or responsibility.

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the company will be formally recorded.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

Employees are formally authorised and appointed by their managers or supervisor to use the plant and equipment provided. Employees shall not use any plant or equipment unless authorised to do so. Prior to authorisation, managers and supervisors must ensure the employee has received appropriate training and have been assessed has competent.

A register of appointed persons to use certain types of equipment will be maintained.

The company will ensure that employees working on construction sites receive site induction which covers site hazards and rules.

8. Fire Control

All personnel will be made aware of the evacuation procedure should the fire alarm sound. The Company will appoint Fire wardens and Marshals to supervise evacuation and ensure everyone is aware of what to do should they discover a fire. The Safety Officer will ensure regular inspections of firefighting equipment takes place. The effectiveness of the alarm systems and the evacuation procedures will be checked as recommended by the fire risk assessment.

Notices will be displayed around the building identifying evacuation and fire fighting procedures.

The Safety Manager will ensure Fire Wardens and Marshals receive adequate training.

The company operate a strict no smoking policy within any of its buildings, smoking is only allowed in designated areas, visitors and contractors will be made aware of these restrictions.

9. First Aid Provision

People trained in first aid will be appointed to provide adequate cover at the Company office and for those working on site the manager/supervisor in charge will ensure they have access to first aid facilities. The number of trained first aiders will be maintained at a minimum of two per office/factory premises, which is the assessed number to maintain suitable cover taking into account holidays and illness. Each site installation team will have an engineer trained in emergency first aid at work and each vehicle will carry a suitable first aid kit.

A nominated qualified first aider will ensure that First Aid boxes/kits are checked and replenished on a monthly basis. Their names are prominently displayed in a number of areas around the building. All arrangements are made to ensure the requirements of the First Aid at Work Regulations are met.

10. Accident Reporting and Investigation

All injuries, accidents and incidents that have been reported by employees must be investigated by the departmental Supervisor and Safety Officer to establish the root cause and implement measures to prevent a recurrence.

Defects in procedures, plant or equipment must be rectified to prevent a recurrence.

Injury accident: -

All accidents must be reported to the Supervisor and Safety Manager by the first aider, the injured person or the safety representative.

Details of injuries requiring treatment must be entered into the Company Accident Book (B1510) and the site accident book.

The reporting of injuries, diseases and dangerous occurrences will be conducted as required by current legislation. If the accident results in the employee being incapacitated for more than seven consecutive days the company will notify the enforcing authority as required by the RIDDOR Regulations.

11. Housekeeping

Managers and Supervisors have responsibility to provide and maintain clean and tidy work areas and safe means of access and egress. Supervisors will monitor the cleanliness of floors and ensure all litter and waste is despatched in the appropriate receptacles. Employees will be instructed in the correct storage and stacking methods as part of their safe working procedures

12. Health Surveillance/Occupational Health

The Company will conduct Health Surveillance where the following criteria apply: -

An adverse health condition is related to the work concerned.

There is a reasonable likelihood that an ill health condition may occur as a result of a particular activity.

Surveillance is likely to further the protection of employees.

Occupational Health Surveillance currently undertaken is:

- Dermatitis
- Lung Function
- Audiometry
- HAVS

The QHSE Manager is responsible for arranging occupational health reviews with a suitable provider.

All staff will be made aware of the Drugs and Alcohol Policy. The policy is designed to promote an atmosphere in which drug and alcohol abuse is not tolerated and to ensure that employees use of drugs or alcohol does not impair the safe and efficient running of the organisation, or result in risk to the health and safety of themselves, other employees or third parties.

13. Maintenance

The Company will ensure that all relevant plant and equipment will meet the appropriate British/European Standards and legal requirements. Regular inspections will be carried out by the Company of all plant and equipment and where examinations are a legal requirement by statute, and then the Company will appoint a competent person to fulfil that duty, e.g. cranes, lifts, lifting tackle, power presses, fire alarms, fire fighting equipment and pressure vessels.

Hazardous maintenance activities will be subject to risk assessments.

Extraction units used to remove fumes and dust will be subject to routine maintenance to prevent unacceptable levels of emissions into the atmosphere and to ensure extraction levels are maintained. Records of work and inspections carried out on LEV will be kept.

Employees will be reminded of their responsibility to report defects and to use the guarding systems provided.

The engineering maintenance department are responsible for ensuring all plant, equipment and electrical services are maintained in good condition.

The building maintenance department are responsible for ensuring that other building services, the building fabric and structure are maintained in a safe condition.

14. Electricity

Only trained and competent persons will be authorised to work on electrical equipment and distribution systems. The Company will endeavour to ensure that duty holders have appropriate knowledge of the Electricity Regulations and I E E Wiring Regulations in order that they can properly discharge their responsibilities. Appropriate safe systems of work will be developed subject to the degree of risk involved in the work. Fixed installations and portable equipment will be subject to periodic inspections. All portable appliances will have a unique Number and records of date and test outcome will be logged in a register.

Employees own equipment will be subject to portable appliance testing prior to use on site. Work is never carried out on live conductors.

15. Permits to Work

As part of organising safety systems employees and contractors must be issued with a permit to work for hazardous operations that involve one or more of the following:

- a) Working at height
- b) Working in confined spaces
- c) Working with electricity
- d) All hot working
- e) Demolition

The person authorised to issue the permits must ensure that a complete and detailed risk assessment is carried out ensuring that all control measures are identified and completed with the persons carrying out the work.

16. Control of Hazardous Substances

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from the substance will be undertaken in line with the Control of Substances Hazardous to Health Regulations (COSHH). Alternative less harmful substances will be used wherever possible.

Assessments will consider storage, handling, aspects of use, exposure, PPE requirements, workers health and emergency situations. Supervisors will brief staff on any hazard or substance precautions, with written records being accessible within each department.

Where appropriate, atmospheres will be monitored to check the effectiveness of control measures.

All assessments will be reviewed on a regular basis.

17. General Noise Policy

- a) The Company has a legal duty to take all reasonable steps to protect the hearing of employees and others and to reduce noise at source to the lowest practicable level.
- b) Following an assessment of noise levels the company will implement a hearing conservation policy in those areas where employees are at most risk from hearing damage.
- c) Areas and operations identified as placing hearing at risk will be brought to the employees attention
- d) In identified areas with high noise levels it will be mandatory to wear hearing protection. Employees will also have a mandatory requirement to wear hearing protection every time they operate identified noisy equipment.
- e) All managers and supervisors will understand their specific responsibility on noise levels within their departments and will enforce the use of hearing protection by operators or visitors where it is a requirement.
- f) It will be the duty for all employees to comply with the company's Hearing Conservation
- g) Policy and to cooperate by using personal protection and maintaining guards and enclosures in position.
- h) The Directors and Senior Management of the company will give full backing to the policy the policy and will support all those who endeavour to carry it out.

Personal Protection

The Company will ensure that adequate supplies of suitable hearing protectors are available.

Policy on Existing Machines and Equipment

Consideration will be given to the reduction of noise at source by the fitting of other effective means of noise emission reduction, e.g. damping, enclosures etc.

Purchasing Policy for New Machines

It is the intention of this Company that when purchasing new plant and machinery to ensure that the plant and machinery has been designed and constructed so that risks resulting from the emission of airborne noise have been reduced to the lowest level, in particular at source. The specification for any new piece of plant or equipment will include reference to its noise emission during normal production.

18. Personal Protective equipment

- a) The Company will conduct an assessment of its operations to ensure that suitable protective equipment is provided to employees who may be exposed to a risk to their health and safety while at work.
- b) The equipment will be appropriate for the risks involved and suitable for the conditions where exposure to risk may occur. The criteria for provision of the equipment will take account of ergonomic requirements, the state of health of the wearer and the size and comfort factors involved.
- c) The issue of any protective equipment will be determined on its ability to control the risk and will conform to approved standards carrying a certificate or CE mark of conformity.
- d) The Company will ensure that all personal protective equipment provided to employees is maintained in working order and in good repair.
- e) Employees who are provided with personal protective equipment will be informed of its use and limitations. Employees are also to be instructed to report loss or damage or any defect in the equipment provided.
- f) Employees have a legal duty not to misuse or damage protective equipment and to use and store correctly.

19. Display Screen Equipment

The Company will conduct an analysis and assessment on all employees who are using display screen equipment, so as to evaluate the health and safety risks to employees who are exposed to, as a consequence of using the equipment.

Assessments will be made of each work station to include ergonomics and lighting.

The arrangements for eye testing will be in accordance with the company procedure which is available from the personnel department

All such steps that are necessary to ensure that all the requirements of the Health & Safety (Display Screen Equipment) Regulations will be taken by the Company.

20. Waste Control

Hazardous and special wastes will be disposed of using carriers who are registered and licensed. Every precaution will be taken to ensure that hazardous substances are not released into the environment. A description of the nature of regulated waste will be given to those responsible for disposal. Every effort will be made to reduce the amount of waste produced and to make best advantage of recycling programmes.

Oils, paints, thinners, and other hazardous wastes shall only be disposed of by the use of a licensed waste carrier.

21. Employees Working As Contractors

Before commencing work the Director or Manager responsible for the contract has the responsibility for ensuring that all hazards associated with the work have been identified and the results of risk assessments, and method statements communicated to all employees and others working on the project.

The Director or Manager responsible for the contract has the responsibility for ensuring that the Company's Health and Safety Policy is fully implemented and that legal and client site rules and regulations are complied with. Our representative on site will be required to contact the clients Site

Safety Officer or Engineer to obtain authorisation prior to commencing work.

All required personal protective equipment will be issued to company personnel and any sub contractors

engaged will be required to comply with our Safety Rules for Sub Contractors.

22. Working on Site – Construction Design and Management Regulations (CDM)

Where these regulations apply it is the Company policy to fully comply with its duties and responsibilities within these Regulations and to liaise with clients, principal designers, principal contractors and other contractors working on site as necessary.

In particular the Company will:

- a) Give full consideration to the Management of Health and Safety and to systematically plan and control the work it undertakes stage by stage.
- b) Involve all personnel, organisations and advising bodies that can contribute to Health and Safety of the work project undertaken and to communicate and share information with all the parties involved.
- c) To maintain records and information for future use.
- d) Give full consideration to the avoidance reduction and control of risks forced by the Company's activities including maintenance, repair, renovation, demolition or any other construction work within the regulations and similar characteristics.

In order to comply with the CDM Regulations the Company will define the procedures for writing method statements and carrying out Risk Assessment.

FHI are contractors under the CDM regulations and will work with the principal contractor and the construction phase plan to ensure our responsibilities are met.

Staff welfare

Wherever possible, arrangements will be made with the Client and/or the Principal Contractor for the use of welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site

Where these facilities are not provided by the Client or Principal Contractor, the company will provide suitable welfare facilities.

Site supervisors have the authority to request suitable welfare arrangements, if these are not provided they will escalate the issue to their contract co-ordinator to make suitable arrangements for work to proceed.

The workplace (Health, Safety and Welfare) regulations will be taken into account when assessing the need for welfare facilities at company premises. Suitable accommodation. Conveniences, eating, drinking and washing facilities will be provided.

23. Use of Sub Contractors

Sub contractors will be selected upon their technical ability and their ability to undertake work safely. Prior to the initial use of a sub contractor they will be required to complete and return a safety questionnaire together with documentation to support their ability to manage safety effectively.

The information will be reviewed as to its suitability for the task employed by the HSQE Manager and Contract Manager. Any non-conformance of technical ability and or poor safety practices will result in the

removal from the approved contractor list and will no longer be eligible for sub contractor work. A sub contractor engaged by Franklin Hodge will not be allowed to further sub contract the work without permission

24. New Plant and Equipment

Prior to any work equipment being purchased, new or second hand, consideration will be given to the effect on health and safety of employees and others. Items purchased will meet all current legal and legislative requirements and purchased on the basis that it will give the least risk to the safety of employees and others. Managers will be encouraged to seek the advice of the Safety Officer prior to the purchase of major plant or equipment.

The company will, by assessment, evaluate and prioritise the risk to any employee's health and safety and take preventative measures to control or prevent the risks.

All work equipment will be fitted with approved guards, on and off switches. All equipment will be tested and inspected to ensure its safe operation.

All machinery purchased and brought on to site for use by the Company will comply to the requirements of The Supply of Machinery (Safety) Regulations and carry CE markings and other relevant information.

25. Hazardous Machinery

Machinery such as power presses, press Brakes and guillotines will be adequately guarded to prevent operatives from being injured by moving parts. Daily and Weekly inspections will be carried out to ensure the effectiveness of guarding systems.

Employees will be suitably trained in the safe use of such equipment.

26. Asbestos

If work requires the removal or cutting of asbestos then the Company will ensure it is only carried out by an approved licensed sub-contractor.

If during work the presence of asbestos is suspected, then the work will be suspended immediately until a survey is carried out by a competent person to assess the risk.

Asbestos awareness training will be provided to all site operatives.

27. Driving

All employees who drive on company business are required to comply with the measures contained within the Drivers Handbook.

Employees who drive vehicles on company business must:

- a) Comply with traffic regulations and the Highway Code at all times
- b) Never consume substances that could place themselves and others at risk whilst driving.
- c) Only use a telephone or other communication devices from a vehicle in a manner which is legal and never affects the ability to drive safely.
- d) Never drive a vehicle if tiredness affects the ability to drive safely.
- e) Always ensure the vehicle being driven is legal, roadworthy and routinely maintained in accordance with the manufacturers recommendations.

- f) Always report traffic accidents to their immediate manager.

28. Lone Working

Staff working alone in isolated areas will ensure that they have reported to the site representative who knows of their location and expected time of departure.

For longer periods of lone working then someone will be requested to call them at regular intervals. The method of communication will be determined at the outset i.e. mobile phones (if safe to use) two way radios etc.

29. Policy Review and Safety Monitoring

This policy will be kept up to date, to ensure this, the policy and the way in which it has been implemented will be reviewed every year.

A full audit of the safety management system is undertaken on an annual basis and site safety inspections at regular intervals by supervisors and company safety personnel.

Accident details are recorded, investigated and corrective actions implemented, safety actions resulting from the investigations are discussed the monthly operation meetings and action will be taken to address any adverse trends.

FRANKLIN HODGE HEALTH & SAFETY REPORTING STRUCTURE

