



# **E Poole & Company Ltd**

## **Health and Safety Policy**



## RECORD OF POLICY REVIEWS

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**E Poole & Company Ltd**  
**Painting and Decorating Contractors**

**HEALTH AND SAFETY POLICY STATEMENT**

**1. Introduction**

This document contains the Policy Statement of **E Poole & Company Ltd**, Painting and Decorating Contractors, of Unit 17, Red Lion Business Centre, Red Lion Road, Surbiton, Surrey, KT6 7QD. It has been prepared after due consultation with those involved in its operation, and has the full backing and authority of the Directors.

**2. General Statement**

2.1 It is our policy to perform work in the safest practicable manner, consistent with good practice. The health, safety and welfare of our employees and all those likely to be affected by our operations is the responsibility of management, and as a priority it ranks equally with our business objectives. Adequate resources will be made available to ensure the success of this policy.

2.2 It is the duty of management to provide safe systems of work and do everything practicable to prevent injury and ill health by controlling the risks arising out of our work activities. Equally it is the duty of each employee to exercise personal responsibility for his or her own safety and that of others and co-operate with his or her employer in matters of health, safety and welfare.

2.3 The company will provide and maintain safe plant and equipment and ensure the safe handling and use of hazardous substances. Management will provide the necessary information, instruction and training and will ensure the competence of all employees and contractors.

2.4 All employees are to be aware that, in the event of any conflict between the demands of business and safety, they will receive management support if they reasonably choose the safety of employees or third parties as the priority.

2.5 It is our policy to adhere completely to the requirements of the Health and Safety at Work etc. Act 1974; the Electricity at Work Regulations 1989, the Management of Health and Safety at Work Regulations(Amendment) 2006; the CDM Regulations 2015 and all other Acts, Regulations and Codes of Practice, which affect our operations.

2.6 The attention of all employees is directed to this Safety Policy and its Appendices. Any revisions will be incorporated when necessary, and these will also be brought to the attention of all personnel.

2.7 The Company will endeavour to continually improve its performance in relation to Health and Safety.



Signed .....  
M. Drye  
Director

Dated 15/03/2020

## **ORGANISATION**

### **3. Responsibility**

3.1 Each Director is individually responsible for promoting health and safety in the Company. The day to day management of health and safety on premises, sites and elsewhere is delegated to the persons in charge of the work in accordance with our management structure which is set out at Appendix 1 in this Policy Statement. The responsibility for safe conduct of work cannot be delegated to others.

3.2 Mr M. Drye is responsible for health and safety matters in the Company. Where difficulties arise in the maintenance of safe working conditions, or practices, reference must be made to Mr M Drye who then has responsibility for ensuring that sufficient authority is given to enable safe conditions and practices to be maintained.

3.3 It is the responsibility of all our employees to use machinery, equipment, transport, hazardous substances and safety equipment in accordance with the training and instructions given.

3.4 Employees must inform Ms P. Day of any dangerous situations or shortcomings in the Company's health and safety arrangements so that any necessary remedial action may be taken.

3.5 The specific responsibilities of all levels of management are set out in Appendix 2 attached to this Policy Statement.

### **4. Health and safety advice**

4.1 In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, the Company has appointed Ms P. Day as the Company's Health and Safety Co-ordinator. She is nominated as competent person for the purpose of assisting the Company to undertake necessary measures to ensure compliance with statutory provisions.

4.2 In order to obtain specialist advice and up to date information on all health and safety matters the company retains Marshside Health and Safety Ltd as health and safety consultants. In addition to their advice, Marshside Health and Safety Ltd will also carry out site health and safety inspections and audits of the systems in use to confirm(or otherwise) that they are in full use and are appropriate to the company`s activities.

4.3 Any employee who is in doubt about safe working practices and procedures should contact Ms P. Day for advice.

## **5. Consultation**

5.1 In compliance with the Health and Safety (Consultation with Employees) Regulations 1996, it is company policy to consult with all employees on matters which may have an effect upon their health and safety. This particularly includes:

- any measure which is introduced which may have a substantial effect on employees' health and safety
- arrangements for engaging competent help
- information on the risks of any particular work activity and the steps to be taken to eliminate these risks or reduce them to an acceptable level
- arrangements for health and safety training
- any health and safety consequences of introducing new technology

5.2 Management will always consider suggestions or comments on ways in which our health and safety performance can be improved. Any such suggestions should be made to the relevant supervisor.

## **ARRANGEMENTS**

### **6. Safety policy monitoring and review**

6.1 The Health and Safety at Work etc. Act 1974 requires the Company to monitor the effectiveness of this Policy in terms of the use made of it by both management and work force. Review of the safety performance of the Company and the functioning of the Policy is the task of the Health and Safety Co-ordinator. Annually, she will review the contents of the Policy Statement in liaison with others as necessary, and indicate ways in which our safety performance can be improved.

6.2 Directors, contracts managers and the Health and Safety Co-ordinator may attend site meetings with clients' or other contractors' representatives where health, safety and welfare may be considered. Discussions could include their safety policies, risk assessments, working practices, safety performance or any other related matters covered by legislation.

6.3 Contracts managers, directors and Marshside Health and Safety Ltd will monitor health and safety standards on our sites to ensure compliance with this policy, current legislation and guidance. The frequency of site monitoring will depend on the size of the contract and the foreseen hazards. All Contracts Managers will be expected to carry out regular inspections of sites under their control. In addition to this the Health and Safety Advisor will carry out a programme of regular visits to a range of sites. The Health and Safety Advisor will carry out audits of the management of health and safety on site and adherence to the company Health and Safety Policy. Sites will also be inspected for compliance with published method statements and risk assessments, site rules and relevant legislation. Written reports will be completed and forwarded to the Health and Safety Co-ordinator for inclusion in the regular reviews of the health and safety management system(HSMS) and of the policy and its effectiveness.

### **7. Training and information**

7.1 It is the responsibility of the Health and Safety Co-ordinator to review the training needs at all levels within the Company at regular intervals. Suitable information, instruction and training will always be provided upon the introduction of new technology or working methods. She will ensure records of all health and safety training provided to employees are maintained.

7.2 The company's health and safety consultants will offer advice on safety training needs upon request. Safety training will be given to all employees as necessary.



7.3 The directors, the Health and Safety Co-ordinator and the contracts managers will ensure employees, contractors and sub-contractors have the necessary competency to carry out work for which they are engaged. They will also carry out formal vetting of contracting firms to establish competency in health and safety.

7.4 The directors will ensure that all new employees and apprentices are provided with suitable induction training to ensure that they have sufficient information and instruction to comply with the Company's health and safety policy and procedures.

7.5 The principal contractor or the relevant supervisor will provide new employees and those transferring from job to job with suitable site induction training, which will include any hazards and specific health and safety rules applicable to the work to be carried out before putting the person to work.

7.6 The Health and Safety Co-ordinator will carry out induction training required for young persons. She will ensure that the person in charge of the work is made aware of the necessary training and level of supervision required for young persons, as detailed in the Management of Health and Safety at Work Regulations 1999.

7.7 The company recognises that there is an increasing prevalence of non-English speaking workers in the UK and that this may have an effect on their and other's health and safety. This may particularly include the provision of adequate information and instruction. The company undertakes to ensure that suitable measures will be put in place to ensure that all relevant information and instruction is interpreted, both verbally and where appropriate in writing for any non-English speaking workers or contractor whose services the company may employ. The Health and Safety Co-ordinator will ensure that suitable arrangements are put in place where necessary.

## **8. Accidents**

8.1 **Accident** details, however trivial they may appear to be, must always be entered in the Accident Book, which is held by the relevant foreman.

8.2 The Reporting of Injuries, Diseases and Dangerous Occurrences (Amendment) Regulations 2013 (**RIDDOR**), require specified injury accidents, dangerous occurrences, diseases and conditions to be reported to the Health and Safety Executive (HSE). Ms P. Day is nominated as the "responsible person" in accordance with the Regulations to make these reports.

8.3 The person in charge of the work must report ALL injury accidents or dangerous occurrences to Ms Day by telephone.

8.4 Where required by the RIDDOR regulations, Ms P Day will report the accident/incident to the RIDDOR reporting centre in Caerphilly by completing form F2508 and submitting it on line. Where the accident /incident is major or fatal (see RIDDOR regulations for definitions), she will report by telephone on **0845 300923**

8.5 Ms P. Day will hold **documentation** for accidents, dangerous occurrences and notifiable diseases and conditions. The revised RIDDOR regulations require that records are kept of over 3 day injuries. Accident book records are deemed acceptable for this purpose, but the length of incapacitation will be specifically recorded.

Copies of all notifications made on behalf of the Company will be kept for record purposes.

8.6 The Health and Safety Co-ordinator and, if necessary our insurers will carry out **investigations** of serious accidents and dangerous occurrences. Where appropriate the services of health and safety consultants will be engaged to carry out an independent investigation.

## **9. Welfare and First-Aid Facilities**

9.1 Welfare and sanitary facilities provided at the company's premises are to the standards required under the Workplace (Health, Safety and Welfare) Regulations 1992 and the CDM Regulations 2015. On sites the Contracts Manager or director responsible for the job, or the Health and Safety Coordinator will ensure that adequate facilities are available and, where necessary, will make arrangements for our employees to use the client's or principal contractors facilities.

9.2 To comply with the Health and Safety (First-Aid) Regulations 1981, Ms P. Day will supply the office premises and company vehicles with adequate first-aid equipment.

9.3 The Contracts Manager or director responsible for the job will make arrangements for site facilities to be shared with the client or principal contractor as appropriate.

9.4 Where facilities cannot be shared with the client or principal contractor the Health and Safety Co-ordinator will provide adequate first aid equipment to site.

9.5 The names of those persons trained and certified in first-aid will be displayed within the Office and on each site.

9.6 In the absence of trained first-aid personnel the company will nominate an 'appointed person' to take charge of the first-aid equipment and facilities, to replace missing or defective items and to summon assistance if required.

9.7 The arrangements for nominated 'appointed persons' for the purposes of the regulations are as follows: -

- Ms P. Day is the 'appointed person' for the Office facilities.
- The Supervisor will carry out this function on sites where first-aid facilities are not shared with either the client or principal contractor.
- The driver will carry out this function in any of the company vans.
- Appointed persons will receive training appropriate to their role.

## **10. Safety Rules.**

10.1 The Company safety rules are designed to provide basic guidance for safe operating practices and procedures that form the Company Policy, and must be strictly adhered to by all employees. Wilful disregard by any employee of any Company safety rules may be considered sufficient cause for immediate dismissal.

10.2 Safety rules and advice covering specific work areas and/or systems of work will be attached as Appendices to this policy statement as follows: -

Appendix 1 Company health and safety management structure

Appendix 2 Responsibilities

Appendix 3 Company Safety Rules

Appendix 4 Office Safety Rules

## **11. Work Equipment**

11.1 The Company will ensure that all tools and equipment provided for use at work will comply with the requirements of the Provision and Use of Work Equipment Regulations 1998.

11.2 The Health and Safety Co-ordinator will ensure that all users of products and articles supplied or hired for use at work are provided with relevant information which may be provided by a manufacturer/supplier in order to comply with their obligations under Section 6 of the Health and Safety at Work etc. Act 1974.

11.3 It is the responsibility of the Directors and the Health and Safety Coordinator to ensure all work equipment hired or purchased for use by our employees is suitable for the purpose for which it is to be used.

11.4 The Health and Safety Co-ordinator will ensure the users of new plant and equipment provided by the company will be given sufficient instruction, information and training in order that any such plant or equipment may be used safely.

11.5 Where tools or equipment are issued to employees for their personal use, those employees are responsible for ensuring that the item is kept in good

working order and that any defects are reported to the Supervisor in charge of the work.

11.6 The Health and Safety Co-ordinator, will ensure that all portable and transportable electrical equipment is maintained, tested and inspected in accordance with HSE guidance HSG 107 "*Maintaining portable and transportable electrical equipment*". She will also ensure that adequate records of formal inspection and testing are kept.

11.7 Portable and transportable electrical equipment is described as any electrical equipment, which can potentially result in a risk of fatal electric shock (i.e. more than 50v ac or 120v dc). Such equipment is not part of a fixed installation but is, or is intended to be, connected to a fixed installation or generator by means of a flexible cable and either a plug or socket or a spur box, or similar means.

11.8 The Health and Safety Co-ordinator will ensure that fixed electrical installations and wiring are inspected in accordance with the requirements of the Institute of Electrical Engineers Wiring Regulations, 17<sup>th</sup> Edition.

11.9 The Health and Safety Co-ordinator will ensure that all work equipment is properly maintained and that records of servicing, inspection, calibration and statutory tests/examinations are available. Examples of records required are:

- Ladders and access equipment maintenance
- Calibration of test equipment
- Statutory examination/test of lifting equipment.

11.10 **Statutory inspection results** must be recorded for all scaffolding before first use and at suitable intervals thereafter. Scaffolding in excess of 2m in height is to be inspected before first use and at intervals not exceeding seven days thereafter. Additionally, in the case of mobile scaffold towers they must not be used unless they have been inspected after first- erection or reerection and **on site** within the previous seven days. The responsibility for ensuring that these inspections are carried out and recorded rests with the relevant Supervisor on site. Erection and inspection must be carried out by a person who holds a valid PASMA certificate.

## 12. General hazards, risk assessment and controls, safe methods of work

12.1 The Management of Health and Safety at Work(Amended) Regulations 2006 and other Regulations require that risk assessments are to be carried out by employers and that the significant findings from the assessments are brought to the attention of those at risk.

12.2 The Company will use the IOSH recommended 5x5 matrix method of assessing risk. The consequence (severity) and likelihood of hazardous events will be evaluated on a scale of 1 to 5(1 lowest 5 highest) to produce a risk rating

with existing controls. Additional controls will be identified in order to lower the consequence or the likelihood (or both) so that the risk rating is at an acceptable level subject to a suitable monitoring regime being in place. All personnel responsible for producing risk assessments will receive training in this technique so that they are competent to carry out the task.

12.3 The Health and Safety Co-ordinator will carry out an ongoing assessment of the risks as required by the Regulations. Where significant risks have been identified on work to be carried out by the Company a written generic assessment will be available.

12.4 The Contracts Manager responsible for the work will make the assessment site-specific, taking into account local risk factors. When appropriate, risk assessments will consider additional risks to any young person who may be employed. Operatives will be briefed on the risk assessments and acknowledge their understanding prior to work commencing

12.5 Where it is deemed necessary, the Contracts Manager will produce, on a site specific basis, a safe method of working known as a method statement (in the format laid down in the HSMS unless requested in a different format by a Principal Contractor). This will identify a sequence of operations which will allow the work to be carried out in a safe manner. The method statement will refer to the individual risk assessments that are relevant to the sequence of works and the materials to be used. Where a method statement has been produced, operatives will be briefed on the methodology to be used and the specific risks associated with the task. They will sign a register to confirm their understanding of the briefing before commencing work.

12.5 Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or their significant findings, together with details of the method of work to be followed.

12.6 The Health and Safety Co-ordinator will review generic risk assessments made and kept by the Company at annual intervals or whenever it is suspected that they may no longer be valid.

12.7 Training will be given to employees where a need is identified by the risk assessment. Employees will be made aware of the findings of the assessments and the required control measures.

12.8 Any necessary plant, equipment, monitoring, hygiene and welfare facilities, and protective clothing and equipment specified in the risk assessment must be present at the relevant location before the task is carried out.

12.9 Risk assessments will always be taken into account when negotiating, or tendering for work.

12.10 Risk assessments may identify the need for medical examinations, or health surveillance. Whenever this is the case the records of any health surveillance, medical or other individual health record which may be required will be kept securely in personnel files held by the Company, and will be kept for 40 years after the date of the last entry as required by law.

### **13. Office work and display screen equipment.**

13.1 The Health and Safety Co-ordinator is responsible for risk assessments of office work, including those for display screen equipment in the Office.

### **14. Manual handling operations**

14.1 All manual handling operations having a risk of injury which are carried out by Company employees will be identified and recorded by the Health and Safety Co-ordinator. Where these operations cannot be avoided, specific assessments will be made in accordance with the Manual Handling Regulations 1992(as amended) supported by L23 guidance notes and indg383 assessment charts. Procedures will be developed to minimise the risks. Selection of appropriately capable staff will then take place, followed by any necessary training, information and instruction.

All employees will receive training on the principles of kinetic lifting and how these should be applied to their manual handling tasks. Employees will receive such training on a regular basis from the retained health and safety advisor who will issue certificates to confirm the training.

All employees are encouraged to discuss potential manual handling problems not so identified with the person in charge of the work, together with any work involving repetitive motion.

### **15. Personal protective equipment (*including RPE*)**

15.1 The provision of personal protective equipment (PPE) is only acceptable when the hazard cannot be controlled by other means. An assessment will be carried out by the Health and Safety Co-ordinator to ensure that any PPE provided is suitable and provides adequate protection against any hazard identified.

15.2 The supervisor in charge of the work will ensure that employees are given sufficient training, which will include the selection, use and maintenance of personal protective clothing and equipment where it is required.

15.3 The foreman in charge of the work will ensure that suitable arrangements are provided for the storage of PPE.

15.4 Where RPE is required selection of the correct equipment will be made using the HSE guidance leaflet HSG53.

## 16. Control of substances hazardous to health (COSHH).

16.1 It is the policy of the company to adhere to the principles of good practice for the control of exposure to substances hazardous to health as set out in Schedule 2 of the Control of Substances Hazardous to Health Regulations 2002 (as amended). Namely:

- design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- take into account all relevant routes of exposure (inhalation, skin absorption and ingestion) when developing control measure
- control exposure by measures that are proportionate to the health risk
- choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- check and review regularly all elements of control measures for their continuing effectiveness
- inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks
- ensure that the introduction of control measures does not increase the overall risk to health and safety

16.2 Manufacturers` Safety Data Sheet (MSDS) information on materials used in the Company's work will be obtained from the manufacturer or supplier, or from the client, as appropriate. Monitoring of the working atmosphere may be required and will be indicated on the relevant COSHH assessment. The Health and Safety Co-ordinator will produce COSHH assessments for the Company's work with applicable substances. She will review them annually at the time of the Policy review, or whenever it is suspected that they may no longer be valid. The Director or Contracts Manager responsible for the job, or the Health and Safety Co-ordinator, will then make the assessments site-specific.

16.3 The implementation of control measures for hazardous substances used at work will be considered in the following order of precedence:

- **Hazard elimination** using alternative working methods
- **Substitution** replace substance with a non or less hazardous substance
- **Segregation** automation or enclosure of process/operator
- **Use of procedures** use of engineering controls and other safe systems of work e.g. mechanical ventilation
- **Use of warning systems** warning notices, proper labelling of containers and instructions

- **Use of Personal Protective Equipment** must be adequate and used as last resort if other controls are impractical or cannot be implemented

16.4 Any necessary work with new materials or substances rated as hazardous must not commence until the necessary MSDS information has been obtained, or the material has been analysed, and an assessment made of the risks involved in the operation. Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or its significant findings, together with details of the method of work to be followed.

16.5 The following general precautions apply to the use, handling and transport of all substances. Specific precautions are detailed in the written assessments for specific materials and other substances likely to be encountered in the work environment.

- Protective clothing and equipment will be used to prevent the contact of hazardous substances with the eyes, skin and mucous membranes.
- Adequate ventilation or respiratory protective equipment will be provided as appropriate to prevent inhalation of hazardous dusts, gases or vapours.
- Hazardous substances should not be used in areas where food is being eaten.
- Good personal hygiene practices must be observed.
- Facilities for washing, cleaning and protecting the skin must be available including suitable cleansers and barrier creams.
- Chemical products and materials are to be stored in ventilated areas away from temperature and environmental extremes.
- Spillages must be cleaned up immediately, and waste and used containers disposed of properly.
- Read the data sheet, container labels and detailed health and safety information before using any chemical products.

## **17. Fire and emergency precautions.**

17.1 The Health and Safety Co-ordinator is responsible for fire and emergency precautions and assessments in the Company office. He will ensure that all reasonable steps have been taken to comply with the Regulatory Reform (Fire Safety) Order 2005. This will include:

- identification of potential fire hazards in the premises
- identification of people who may be at risk
- evaluation of the risk
- production of a written fire-emergency plan to remove, reduce or control the risks
- ensuring an adequate means of escape in the event of a fire
- ensuring that escape routes are kept clear
- sufficient fire fighting appliances are available and properly maintained



- an adequate means of warning in the case of a fire is available
- provide suitable information, instruction and training to staff
- review the assessment 6 monthly or when conditions change and revise as necessary.

17.2 The Contracts Manager responsible for the work will ensure that adequate fire fighting equipment is available on site. He will liaise with the client or Principal Contractor to ensure that adequate fire and emergency procedures are in place before the start of the contract.

## 18. Arrangements for Special Hazards.

18.1 There are a number of special hazards, which have potentially serious consequences, and which have been identified as 'high risk' in the Company's risk assessments. This section of the policy identifies these hazards and is in addition to normal risk assessment procedures in Section 12. They include:

- Work with asbestos-containing products (**see Arrangement section 19**)
- Work involving the removal of lead based paints(**see Arrangement section 20**)
- Work in noisy areas
- Vibration and the use of power tools
- Use of mobile scaffolding towers
- Use of ladders and steps
- Work on live electrical systems
- Use of mobile elevating working platforms
- Lone working
- Hot works
- Working in confined spaces
- Demolition work
- Work with fibre optics or lasers
- Working at height or on fragile/flat roofing
- Work in excavations
- Work in hospitals
- Work in petrol filling stations
- Work in refineries or chemical plants
- Work on sewage or waste disposal sites
- Work on school premises
- Working airside at airport sites

18.2 These activities will require a specific risk assessments to be made prior to the commencement of work. The Contracts Managers will have the responsibility for making these specific risk assessments. Further information on standard precautions is given below.

18.3 The client may operate a 'permit to work' system to govern our activities in situations where our work interfaces with his operations. This will need to be considered when we are carrying out risk assessments.

18.4 All those to be involved in the work will be made aware of the control measures for the identified risks and any procedures to be followed.

18.5 Noise at work is subject to the Control of Noise at Work Regulations 2005. Noise assessments will be made as required by the Regulations when the noise action levels are likely to be reached. Noise is not normally an issue when carrying out normal type of work. It is not considered that noise levels will exceed the first action level during a normal working day. When excessive noise levels are encountered they are usually either of short duration or client generated. We have never undertaken work that has necessitated detailed noise assessment however our employees are issued with suitable hearing protection to BS EN 352-1 and noise is considered when carrying out any risk assessment for work being undertaken. Instructions for safeguarding hearing will be given to employees as appropriate by the Health and Safety Coordinator.

18.6 Mobile Scaffold Towers, are only to be erected, altered, or dismantled by competent persons and in accordance with the manufacturer's instructions. In this instance possession of a valid PASMA certificate will be the only acceptable proof of competence. The relevant Supervisor must inspect all towers after they have been erected or adapted and before first use to ensure that they are suitable for the work to be carried out. No mobile tower may be used unless it has been inspected on site after being erected and within the previous seven days. A record is to be made by the relevant Supervisor in accordance with the Work at Height Regulations. Mobile towers are not to be used in the vicinity of overhead electric lines.

18.7 Ladders and Step Ladders will only be used as working platforms for work of short duration and low risk, or where there are existing site features that cannot be altered to permit the use of other means of access. Steps and ladders will be used in accordance with the guidance found in HSE Guidance *HSG 150 – Health and Safety in Construction, and INDG402 Safe use of ladders* and only after the risks and suitability for the operation have been assessed.

18.8 Mobile Elevating Working Platforms (MEWP's) may only be operated by suitably trained and competent persons. In this instance possession of a valid and appropriate IPAF certificate plus familiarisation training on the machine in use will be the only acceptable proof of competence. Manufacturer's instructions must always be followed. MEWP's must have been subject to a thorough examination during the previous six months, and must be inspected at least every seven days while in use. Before use the ground upon which a MEWP is to operate must be checked for suitability. MEWP's are not to be used in the vicinity of overhead electric lines.

18.9 Lone working will only be allowed after a risk assessment has been carried out to assess the nature of the work, the workplace and the specific risks

to the lone worker. Where it is not possible for the work to be done safely by one person, arrangements will be made to provide back up and assistance. All employees who work alone will be given instruction and training on recognising the risks, the precautions to be taken and the procedure for requesting assistance. Lone working will not be allowed where there is any significant risk of exposure to live conductors.

18.10 Work at height and work on flat roofs will only be carried out where it is not reasonably practicable to carry out the work otherwise than at height. Specific risk assessments will be carried out for all such work and will only be undertaken by competent people. The work must be properly planned and supervised to ensure that it is carried out in a safe manner. Work equipment enabling work at height to be carried out will always be selected on the basis that collective protection measures will be given priority over personal protection measures and account will be taken of any other relevant factors that may affect safety such as the location of the work, ease of access, consequences of a potential fall, the duration and frequency of use, emergency rescue/evacuation and any additional risks posed by the selection of a particular item of work equipment. Edge protection will always be provided where practicable when there is a risk of personal injury as a result of falling. Where it is not reasonably practicable to provide edge protection, other collective protective measures such as soft-landing systems will be used. Finally, where these are not practicable personal fall arrest and or restraint equipment must be used. The advice of the Health and Safety Co-ordinator should be obtained before work starts if there is any doubt about the precautions required in particular circumstances. Roof work will be carried out in accordance with the guidance contained in HSG 33 – *Health and Safety in Roofwork*.

18.11 Work in Hospitals is to be carried out in strict accordance with risk assessments, safety plans and hospital rules. Hospital rules relating to the use of mobile phones and other equipment will be observed at all times. Where our work can affect the functioning of the hospital, the client's requirements are to be complied with, and their permit to work system will be followed. Priority must be given to hospital work, restrictions on access are to be respected, and a co-operative and polite attitude is to be maintained.

18.12 Work in schools is to be carried out in strict accordance with risk assessments, safety plans and school rules. No work is to commence until the liaison officer for the school has been contacted and the content and sequence of work has been agreed. Where work is other than of short duration, regular liaison meetings are to be programmed with the school liaison officer to coordinate the work. All work is to be carried out bearing in mind the additional risks, which exist by virtue of pupils' immaturity and lack of understanding. In particular all work is to be carried out in a tidy and workmanlike manner and no incomplete work or any equipment is to be left unattended at any time.

18.13 Working airside presents risks to those working for the Company or on our instructions and also to other parties engaged in the conduct or management of air operations. Working airside will always be subject to specific risk

assessment before work commences. The risk assessment will identify work methods and procedures that comply with the rules of the airport authorities. No work is to be carried out without the appropriate authorisation from the airport authorities and their procedures and rules are to be obeyed at all times. Rules regarding vehicle safety and work equipment safety and operation, and use of personal protective equipment are to be followed without exception.

18.14 Vibration at Work is subject to the Control of Vibration at Work Regulations 2005. Where mechanical equipment generating vibration is in use, information will be obtained from the manufacturers on the vibration emitted by the equipment (as required under Supply of Machinery Regs 2011). This information will be fed into the HSE HAVS calculator and the HSE ready reckoner to evaluate the “exposure points”.

Where the calculator indicated that the action value may be exceeded, work will be managed to ensure that any exposure is minimised. This will include work rotation. Records will be maintained for all activities and operatives where it is identified that HAVS is an issue. Under no circumstances will work above the action value take place without a management plan to minimise exposure. This plan will adequately demonstrate that exposure will be minimised and that the limit value will not be reached.

## **19. Asbestos**

The Company recognises that the nature of its work means that it will frequently be working in non-domestic premises that are subject to the Control of Asbestos at Work Regulations 2012. The Company will ensure, therefore, that:

- All employees will receive asbestos awareness training in accordance with the Control of Asbestos at Work Regulations 2012 ACOP- Regulation 10 Information, Instruction and Training.
- After the initial asbestos awareness training, refresher and update training will be provided on a regular basis-at least annually.
- A safe system of work is in place prior to any works commencing. A precursor to this will be to ensure that the duty holder has had the appropriate level of survey carried out as part of the pre-construction information plan and that E Poole Ltd have been provided with the results of that survey.
- Employees will be instructed that work is not to commence until they have received instruction on and confirmed their understanding of the safe system of work.
- During training specific attention will be given to the recognition of asbestos containing products and what actions to take if asbestos or suspected asbestos products are discovered during the course of their works.

## **20 Lead**

The company recognises that there may be circumstances where removal of lead-based paints is an integral part of a contract. These activities will be covered by the Control of Lead at Work (CLAW) Regulations 2002 and its accompanying ACOP.

In order to ensure its compliance with the regulations and the ACOP the company will

- Ensure all employees who are likely to be involved in lead paint removal receive a copy of the HSE leaflet INDG305-Lead and You
- Ensure that regular blood samples from each individual who may be involved with work involving removal of lead-based paints are taken and the results monitored and placed on their file
- Ensure that any employee whose analysis shows a level above the “suspension” levels detailed in the CLAW Regulations is not allowed to work in an area where removal of lead-based paints is required.
- Ensure that a suitable and sufficient risk assessment is carried out in accordance with regulation 5 of the regulations by competent persons
- Ensure that only persons engaged in removal of the lead-based paints are in the working area
- Ensure that the removal process used minimises the risk of exposure
- Ensure that sufficient supplies of appropriate PPE are available to operatives and that, where necessary, laundry facilities are provided
- Ensure that, where necessary, suitable RPE is provided. This RPE will be selected using the HSE guidance note HSG53-RPE at Work
- Ensure that suitable washing facilities are available to minimise the risk of ingestion through a high standard of hygiene.

**21 Health Surveillance** The company recognises its duty under regulation 6 of the Management of Health and Safety at Work Regulations 1999 to provide its employees with such health surveillance as is appropriate to the risk to their health and safety when at work.

The company will evaluate its health surveillance requirements using the recommendations provided in the HSE guidance note HSG61.

In this regard the risk assessments carried out by the company will identify:

- If there is an identifiable disease or adverse health condition related to the work concerned.
- If valid detection techniques are available to detect indications of the disease
- There is a reasonable likelihood that the disease or condition may occur under the particular conditions of work
- If surveillance is likely to further the protection of the health and safety of the employees to be covered.

All employees will complete a Tier 1 baseline health and Safety assessment via a self-completed questionnaire. This questionnaire will be placed on their confidential personnel record.

Thereafter a Tier 2 annual health and safety questionnaire will be completed by each employee and the record placed on their personnel file.

During the time between the completion of the tier 1 assessment and the tier 2 assessment each employee will be visited by the company safety advisor who

will conduct a confidential interview to establish whether there have been any changes to the information supplied in the tier 1 assessment specifically related to work activities.

Where required by the results of the questionnaire, tier 3 surveillance by an appropriately qualified medical person will be instigated.

Those employees concerned, plus their safety or other representatives, will be given an explanation of the nature and frequency of such health surveillance by a Responsible Person appointed by the Company.

They will also be afforded the opportunity to comment and, where required, have access to an appropriately qualified practitioner for advice.

Where health surveillance is appropriate it will be maintained throughout the employee's employment.

A copy of the health surveillance assessment will form part of each employee's employment record and be retained for a period of 40 years.

## **22. Stress.**

22.1 The Health and Safety Executive defines stress as *"the adverse reaction people have to excessive pressure or other types of demand placed on them"*. The company recognises that workplace stress can affect the health and safety of all employees and also recognises the need to identify and reduce the potential for workplace stressors occurring as a result of workplace and other influences. All employees are encouraged to raise issues of concern about stress with the Health and Safety Co-ordinator who will take all such matters seriously and arrange for the appropriate support as circumstances dictate.

## **23. Company vehicles.**

23.1 The Company will maintain company vehicles at intervals recommended by the manufacturers. Drivers are responsible for reporting any defects that are hazardous to passengers or could render the vehicle not roadworthy. It is the driver's responsibility to ensure that loads are properly secured and the vehicle is not overloaded. Drivers of company vehicles are expected to drive in a safe and considerate manner. Drivers who fail to comply with the provisions of the Road Traffic Act will be subject to disciplinary action.

23.2 Under no circumstances must hand-held mobile telephones be used whilst driving a company vehicle. All drivers must pull over to the side of the road and switch off the engine before either answering or making calls. Hands-free kits may be used at the driver's discretion but calls should be kept as short as possible and drivers should not allow themselves to be distracted.

## **24. Smoking**

24.1 In accordance with The Health Act 2006, it is the policy of this company that all our employees have a right to work in a smoke-free environment.

24.2 Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace and in company vehicles.

24.3 It is expected that other employers or persons controlling premises where company employees may be working will comply with their duty in enforcing this legal requirement. Employees should contact the Health and Safety Co-ordinator or the Contracts Manager responsible for the work in a situation where the prohibition is not being observed.

## **25. Environmental impact.**

23.1 The Company recognises that its activities may have environmental implications, and therefore pursues a policy designed to minimise environmental damage. The Company's operations will be managed and organised so as to reduce so far as is reasonably practicable environmental damage caused by noise, dust and damage to groundwater and drainage systems. In pursuance of this policy, environmental considerations will be taken into account in tendering.

## **26. Information for employees and others.**

26.1 Other contractors and clients will be given a copy of this Policy Statement on request.

26.2 Employees will be asked to read this Policy Statement on joining the Company as part of their induction training. Their attention will also be drawn to the generic risk assessment system.

26.3 Employees will be advised by the foreman responsible for the work of risks drawn to the Company's attention by other employers sharing a particular workplace.

## **27. CDM compliance and Design safety.**

E Poole Ltd normally carries out the role of contractor when carrying out work under the CDM Regulations 2015. To ensure it complies with its duties the company will:

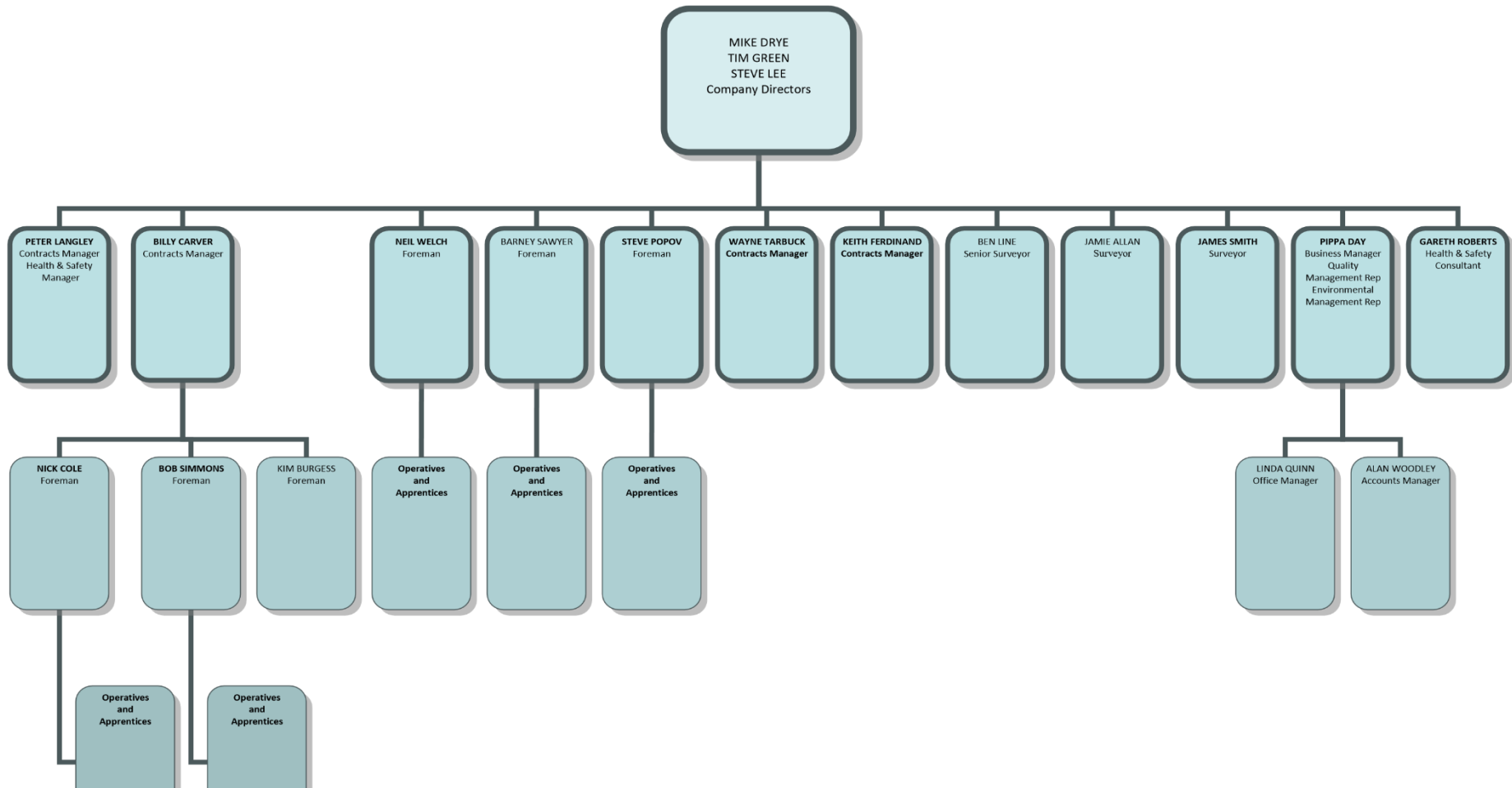
27.1 Ensure the client is aware of their duties and that a CDM Coordinator has been appointed.

- 27.2 Satisfy themselves that they and anyone they employ are competent and adequately resourced. In this respect they will:
- maintain a training matrix for all employees
  - maintain a register of approved sub contractors who have demonstrated their competence in accordance with the requirements of the CDM Regulations 2015. In practice this means showing they have the required levels of skill, knowledge, training and experience.
- 27.3 Plan, manage and control their work so that workers under their control are safe from the start of their work on site.
- 27.4 Ensure any contractors they appoint are informed of the minimum amount of time which will be allowed for them to plan and prepare before starting work
- 27.5 Provide workers under their control (including self-employed) with any necessary information, including relevant aspects of other contractors work which they need to work safely, to report problems or to respond appropriately in an emergency. This may include an E Poole induction in addition to that provided by the Principal Contractor.
- 27.6 Ensure that the welfare requirements of the CDM Regulations schedule 2 are available to their employees and, if necessary, make appropriate representations to the Principal Contractor
- 27.7 Cooperate with others and coordinate their work with others on the project and comply with any reasonable request from the principal contractor and with any relevant rules in the construction phase plan.
- 27.8 inform the principal contractor of any problems with the plan or risks identified in their work that have significant implications for the management of the project.
- 27.9 tell the principal contractor about accidents and dangerous occurrences.
- 27.10 Provide information for the health and safety file.
- 27.11 Ensure the workforce is properly consulted on matters of their health and safety.
- 27.12 Obtain specialist advice when planning any high risk work



# E Poole & Company Ltd

## SAFETY POLICY STATEMENT



# E Poole & Company Ltd

## SAFETY POLICY STATEMENT

### APPENDIX 2

#### RESPONSIBILITIES

This Appendix to the Safety Policy details the responsibilities for safety at all levels of management and operatives. In all cases where responsibility is felt to be unclear, the advice of Mr M. Drye should be obtained.

- a) Mr M Drye **Managing Director as the Director with responsibility for health and safety** will:
  - i. initiate, administer and interpret the effective implementation of the Company Health and Safety Policy.
  - ii. arrange for funds and facilities to meet the requirements of the Policy.
  - iii. have an understanding of the application of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work(Amended) Regulations 2006, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2015, and relevant Regulations and Codes of Practice.
  - iv. be aware of changes in legislation which affect the Company.
  - v. promote the safe conduct of work generally, and review the performance of the Company in relation to its health and safety objectives and safety policy arrangements annually.
  - vi. ensure that the Company safety policy and all generic risk assessments including COSHH assessments are reviewed at annual intervals, or following receipt of information indicating that a review may be needed after a shorter period.
  - vii. take responsibility for the design function within the Company as it relates to health and safety issues and compliance with the Construction (Design and Management) Regulations 2015.
  - viii. set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site visits.
- b) Ms P Day, **as the Health and Safety Co-ordinator** will:

- i. have an understanding of the application of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2015, and other relevant Regulations and Codes of Practice.
- ii. co-ordinate health and safety information and disseminate such information throughout the Company, in her position as appointed competent person under the Management of Health and Safety at Work Regulation 1999.
- iii. respond to suggestions or comments on ways in which Company health and safety performance can be improved.
- iv. review training needs at all levels within the Company at regular intervals and ensure records of health and safety training are maintained.
- v. ensure employees, contractors and sub-contractors are competent and carry out formal vetting where necessary.
- vi. carry out induction training for young persons and ensure adequate levels of supervision and training.
- vii. hold all the company's health and safety documentation including those concerned with accidents, dangerous occurrences and notifiable diseases and conditions.
- viii. be responsible for making direct telephone and written notifications as above, and retaining copies on file.
- ix. investigate serious accidents and dangerous occurrences.
- x. ensure that the Office, vehicles and when necessary sites are supplied with necessary first-aid equipment and facilities.
- xi. ensure that all users of products and articles supplied or hired for use at work shall be made aware of any relevant information and instructions which may be provided by a manufacturer or supplier.
- xii. ensure that the company's fixed electrical installations and wiring are inspected in accordance with the requirements of the Institute of Electrical Engineers Wiring Regulations, 17<sup>th</sup> Edition
- xiii. ensure that all work equipment is properly maintained and appropriate records kept.

- xiv. carry out generic risk assessments as required by Regulations for general and specific risks and for manual handling operations to which Regulations apply, also being available to give advice on precautions and control measures necessary in particular circumstances such as work at heights, work with asbestos-containing materials, and work in noisy areas.
- xv. review the Company safety policy and all generic risk assessments including COSHH assessments at annual intervals, or following receipt of information indicating that a review may be needed after a shorter period and report to the Managing Director ways in which the Company's safety performance can be improved.
- xvi. ensure that all users of plant and equipment are given sufficient training to operate such plant and equipment safely.
- xvii. identify and record assessments of manual handling operations that have a risk of injury to company employees.
- xviii. be responsible for making risk assessments of work in the Office, including those for display screen equipment in the Office.
- xix. identify personal protective equipment needs and ensure that suitable equipment is provided and used as required by risk assessments.
- xx. carry out COSHH risk assessments as required by Regulations for products used by or generated as a result of Company work.
- xxi. carry out fire risk assessments and ensure adequate fire and emergency precautions are in place at the company offices.

c) **The Directors, Health and Safety Co-ordinator and Contracts Managers, when responsible for contracts will:**

- i. have an understanding of the application of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work 1999, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2015, and other relevant Regulations and Codes of Practice.
- ii. attend site meetings where health and safety matters are discussed, and organise sites so that work is carried out to the required standard of health and safety with minimum risk to persons, equipment and materials.
- iii. determine at the project planning stage and establish at the commencement of work:
  - the most appropriate order and method of working

- the provision of welfare and sanitation facilities
  - hazards which might arise, and complete risk assessments as required
  - allocation of responsibilities
  - necessary fire precautions
  - adequate first-aid facilities
- iv. together with Marshside Health and Safety Ltd monitor health and safety standards on our sites to ensure compliance with the policy, current legislation and guidance.
- v. ensure that new employees and apprentices are provided with suitable induction training covering the company's health and safety policy and procedures.
- vi. arrange for the availability of necessary first-aid facilities on site, including making appropriate arrangements with the client or main contractor.
- vii. carry out site specific risk assessments as required by Regulations for general and specific risks to which Regulations apply.
- viii. carry out site specific COSHH risk assessments as required by Regulations for products used by or generated as a result of Company work.
- ix. take steps to ensure the competence in health and safety of all employees and other persons or contractors to whom work is subcontracted.
- x. ensure that tenders are adequate to cover sound methods of working and the provision of the required welfare facilities.(Standard)
- xi. set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site visits.

d) **The Supervisor in charge of work on site will:**

- i. have an understanding of the application of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work 1999, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2015 and other relevant Regulations and Codes of Practice.
- ii. report all injury accidents or dangerous occurrences to Ms P Day.
- iii. carry out necessary statutory inspections of fixed or mobile scaffolding and record results where appropriate. .

- iv. issue instructions to employees in their charge concerning identified needs for personal protective equipment to be worn, and ensure that suitable equipment is provided and training given in use, maintenance and storage.
- v. carry out site induction training for new employees and apprentices, and those transferring from job to job or site to site, covering specific hazards and rules relating to the work to be done.
- vi. ensure that all machinery, plant and other work equipment, including power and hand tools, is checked, that it is in good and safe condition, and that any defects are reported to the Plant Hire Company or owner.
- vii. ensure that suitable arrangements are provided for the storage of any PPE that may be necessary.
- viii. advise employees on site of any risks drawn to the Company's attention by other employers sharing a particular workplace, and distribute information contained in the site's safety plan where this is applicable under the Construction (Design and Management) Regulations 2015.
- ix. ensure that hazards from material stacking, positioning of plant and installation of electricity supply are eliminated.
- x. plan and maintain tidy work areas.
- xi. ensure that working methods established do not require or allow persons to take unnecessary risks.
- xii. ensure that appropriate fire-fighting appliances are maintained on site as necessary.
- xiii. ensure that adequate first-aid facilities are available during working hours.
- xiv. accompany Enforcement Officers on site visits.
- xv. review work hazards and methods with new or transferred employees.
- xvi. reprimand any employee failing to exercise their safety responsibilities.
- xvii. set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site.

e) **Employees** will:

- i. use the correct tools and equipment for the job, including safety equipment and protective clothing as necessary.

- ii. keep tools in good condition.
- iii. report to the person in charge of the work any defects in plant or equipment of which they become aware.
- iv. develop a personal concern for safety for themselves and for others, particularly newcomers and young people.
- v. avoid improvising which entails unnecessary risks.
- vi. refrain from horseplay and the abuse of welfare facilities.
- vii. report incidents which have led or may lead to injury.
- viii. suggest ways of eliminating hazards.
- ix. co-operate in the investigation of any accidents.
- x. comply with any health and safety rules imposed by the Client or Principal Contractor.
- xi. set a personal example.

# E Poole & Company Ltd

## SAFETY POLICY STATEMENT

### APPENDIX 3

#### **COMPANY SAFETY RULES**

This Appendix to the Company Safety Policy is the Company Safety Rules as described in Section 10 of the Safety Policy. Wilful disregard by any employee of any Company safety rules may be considered sufficient cause for immediate dismissal.

1. Personal protective equipment shall not be misused and shall be worn wherever necessary, as identified by risk assessments. The person in charge of the site will give instructions to operatives where this rule applies.
2. Safety helmets will be worn in accordance with the Construction (Head Protection) Regulations 1989 on sites or in work areas, which are designated as "hard hat" sites, or areas, or wherever else there are risks of head injury.
3. A safety helmet fitted with a chinstrap will be worn where the risk assessment showed it is required, or where the Principal Contractor includes the requirement in his site rules.
4. Safety boots or shoes must be worn at all times. No person may wear plimsolls, trainers or other soft-soled footwear, except within domestic premises.
5. Fire-fighting equipment is provided in all places of work. All employees must be aware of the location of fire extinguishers and of their method of operation.
6. All access equipment including ladders and stepladders must be kept in good repair. Mobile towers must only be erected by those trained to do so, and in accordance with the maker or supplier's instructions. MEWPs must only be operated by those in possession a valid IPAF certificate.
7. All injuries, no matter how slight, must be reported immediately.
8. Untidy areas and methods of working create unacceptable risks and must be avoided at all times.
9. Anyone found under the influence of drink or drugs will be immediately suspended from work and dealt with in accordance with the company's disciplinary procedures
10. The Company will comply with the requirements of the Working Time Regulations 1998. No one shall knowingly be permitted or required to work while his or her ability or alertness is impaired by fatigue, illness, temperature or other cause that might expose the individual or others to injury.



11. Horseplay, scuffling, and other acts which tend to endanger the safety or well being of employees are prohibited.
12. Portable tools must be kept and maintained in good condition for the tasks for which they will be used. Worn or broken tools must be replaced immediately, and it is the personal responsibility of each employee to ensure that this is done. The Company maintains records of the electrical testing of all portable electrical appliances.
13. Only persons who have been formally trained and hold a valid certificate which has been submitted to the Company may change abrasive wheels and cutting discs.

# E Poole & Company Ltd

## **SAFETY POLICY STATEMENT**

### **APPENDIX 4**

#### **OFFICE SAFETY RULES**

This Appendix to the Company Safety Policy, which is a supplement to the Safety Rules set out in Section 10 of the main Safety Policy document, sets out the safety rules which must be observed by all employees working in our offices. These have been derived from our risk assessment.

1. Furniture and equipment must be arranged so as to avoid injury from sharp corners.
2. Upper drawers of filing cabinets must not be overloaded, causing them to become top-heavy.
3. Only one drawer of a filing cabinet must be open at a time, so as to avoid a tipping hazard.
4. Wall storage racks must be securely anchored to prevent their movement or tipping, and must not be overloaded.
5. Access to high upper storage shelves must only be gained by using the steps or safe access provided.
6. Cables from electric fires, telephones and leads to office electrical equipment are not to be laid across the floors so as to cause a tripping hazard.
7. Floor coverings must be held down securely and kept flat and free from wear in places where a person could trip.
8. At the end of each working day or shift, non-essential electrical appliances are to be switched off and their wall socket plugs removed.
9. Any electrical faults must be reported to Ms P Day.
10. Paper guillotines are not to be operated with their guards removed.
11. Any simple adjustments to electrical equipment must be made with the power switched off.
12. Electrical heaters or fires may only be used if properly guarded in accordance with British Standards.

13. Only properly trained and authorised personnel are permitted to operate specialised machinery and equipment.
14. Good housekeeping must be maintained by keeping floors and working areas tidy, ensuring that fire exits and passageways are not blocked, and taking care when using extension cables so that they do not cause an obstruction.
15. Fire exits must be kept clear at all times.
16. Fire extinguishers are to be kept readily accessible and where possible are to be positioned on wall brackets. All employees must be aware of these locations, of the methods of operation of fire extinguishers, and of the fire drill procedure for evacuation. The office manager is responsible for ensuring all fire-fighting equipment is regularly serviced.
17. Persons handling chemicals must be made aware of the hazards associated with the handling, storage and use of such chemicals, together with the precautions to be observed and the first-aid measures to be adopted.