Palmer Morris Interiors Limited

Health & Safety Manual

Part 2 - Arrangements

Document History

Date	Rev	Comments
07.02.12	01	Initial issue of Health and Safety Manual
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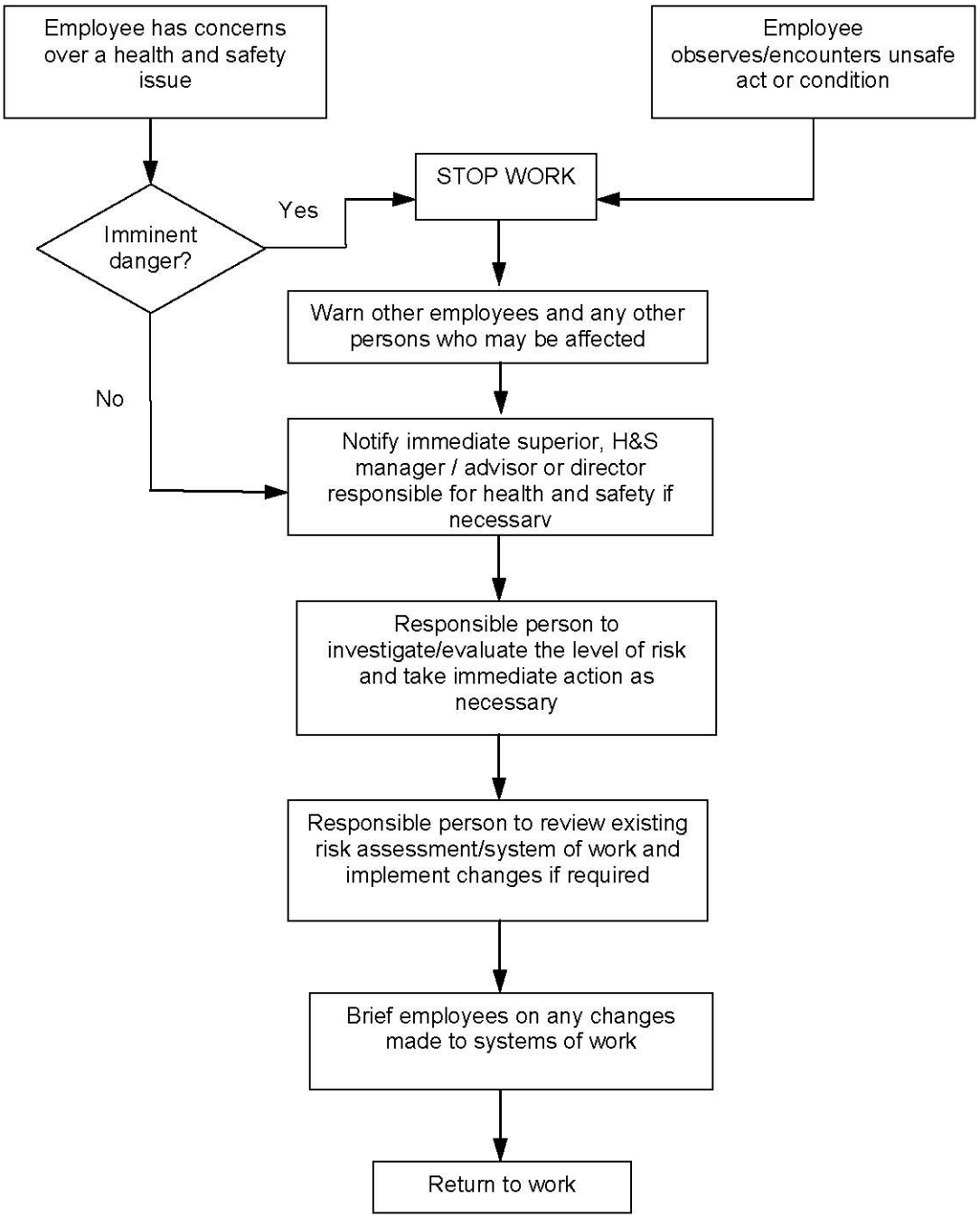
Arrangements for Concern over Health and Safety Issues

If any employee has any concern over health and safety issues they should tell their immediate superior or health and safety manager / advisor. If neither is available then they should tell the director to whom they report.

Concerns must be addressed quickly and no employee shall continue work until the working environment is safe.

Procedure for Concern over Health and Safety Issues



All employees are responsible for ensuring that any act or condition identified as unsafe, or any situation that introduces imminent danger into the workplace, is dealt with in the correct manner.

Imminent danger
Guidance on dealing with outbreaks of fire and on bomb threats can be found in section M of this manual.
Other categories of imminent danger may include:

- Development of a fault condition in machinery.
- Situations where machinery is likely to begin operating without warning to passers-by. There are two direct causes of accidents - unsafe acts and unsafe conditions. Unsafe acts may include:
- Using defective equipment.
- Using equipment incorrectly.
- Failing to use or incorrectly using personal protective equipment (PPE).
- Leaving equipment in a dangerous state.

Upon identifying an unsafe act it is the duty of every member of the workforce to stop the work being carried out, warn anyone who may be affected by the unsafe act and report the circumstances of the unsafe act to their immediate superior for action.
Unsafe conditions include:

- Poor underfoot conditions.
- Defective equipment.
- Excessive noise.
- Exposure to radiation or other pollutants.
- Fire hazards.
- Inadequate fire warning systems.
- Lack of or inadequate guarding.
- Poor housekeeping.
- Poor lighting or ventilation.

These lists are not exhaustive.

Upon identifying an unsafe condition it is the duty of every member of the workforce to stop the work in that area, warn anyone who may be affected by the unsafe condition and report the circumstances of the unsafe condition to their immediate superior for action.

Safety in the office requires that each person co-operates and that common sense prevails.
The main categories of serious injury to office workers are:

- Falls from a height, e.g. down a staircase or from overreaching.
- Contact with electricity, e.g. from damaged cables or badly wired repairs.
- Being struck by falling objects, e.g. goods from a shelf.
- Repetitive strain injuries.
- Contact with moving parts of office machinery, e.g. shredders, guillotines.

Associated forms & Guidance

Near Miss Report Form
HSEQ Suggestion Form

Section B

Arrangements for Managing Risks arising from Work Activities

The Directors and Site Managers are responsible for ensuring that Risk Assessments are carried out in a pro-active manner and prior to the commencement of any task and ensuring that the control measures are implemented and communicated to employees through their designated line manager.

Risk assessments will be undertaken by the Site Managers with the advice and any appointed sub contractors, and other competent persons as directed should it be requested. Any significant findings of risk assessments will be reported to the Directors.

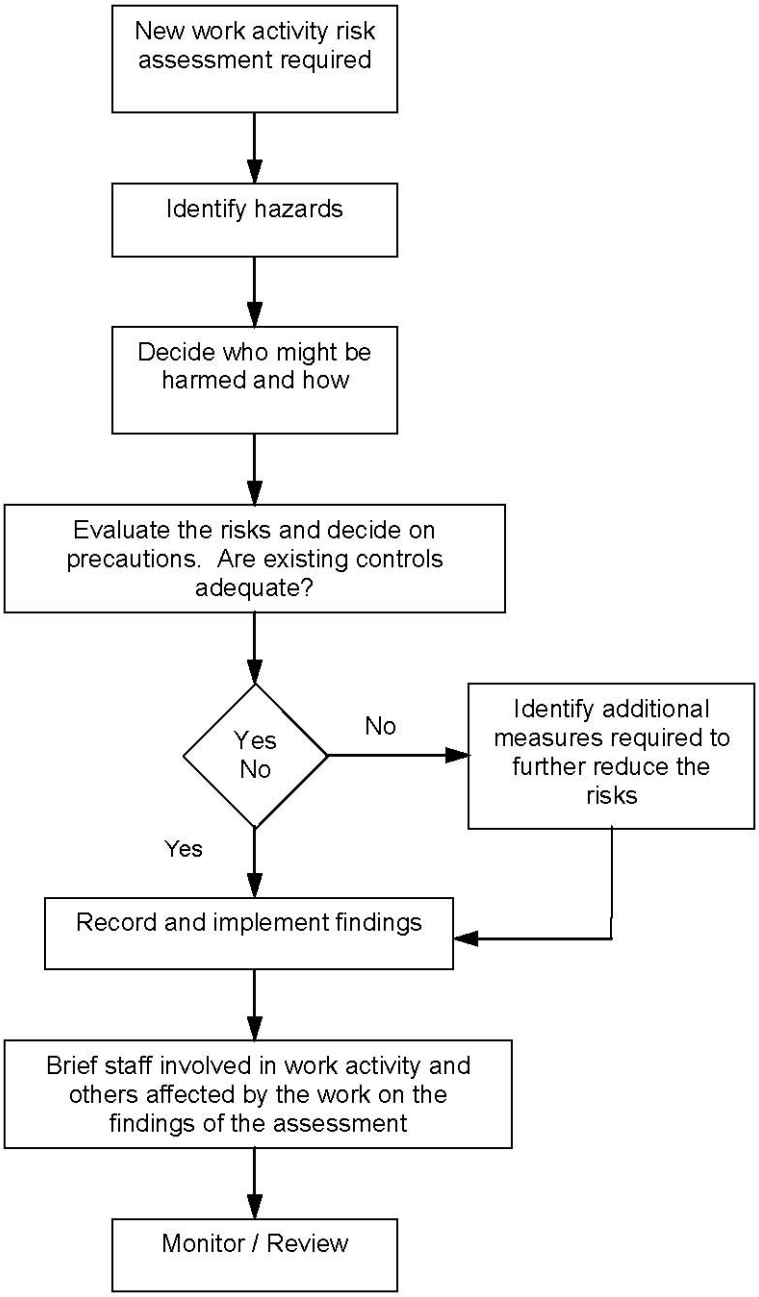
Gary Morris will be responsible for ensuring special risk assessment (see guidance below) is carried out for works to be undertaken by young persons i.e. those under the age of 18 years. Copies of written risk assessments are to be sent to the parents or guardian of the young person.

The Site Managers shall ensure that a regular review of the effectiveness of control measures introduced through the risk assessment process is carried out. In any case, they shall ensure that all risk assessments are reviewed at least annually or when the work activity changes, whichever is sooner.

Palmer Morris Interiors Ltd carries out a set of tasks which are frequently similar. To help control the risks of these tasks the company has produced a set of generic risk assessments, which are kept in a separate file. These are only to be considered valid if the reverse side, detailing specific site conditions, is completed by the Site Managers and any significant changes to the risk control procedure have been implemented and communicated to both the directors and the employees who will carry out the task.

For non-routine operations project / task specific assessments shall be conducted collectively by all operational staff involved in the project / task with all significant findings recorded and suitable control measures implemented accordingly.

Procedure for Managing Risks arising from Work Activities



Guidance for Managing Risks arising from Work Activities

Employers have a duty to assess the risks to the health and safety of their employees at work and of persons not in their employment who may be affected by their work and to eliminate those risks or control them to a level that is acceptable.

This duty is qualified by the legal term "so far as is reasonably practicable", which can be interpreted as meaning that the cost of measures necessary to avert a risk (whether in time, money or trouble) may be assessed against the degree of risk. In other words, an employer does not need to take a measure that is technically impossible or if the time, trouble or cost of the measure would be grossly disproportionate to the risk.

Risk assessment in itself is not complicated, but must be carried out and recorded to ensure that work being done does not impose an unacceptable risk. The purpose and function of risk assessment may be expressed as follows:

- To identify operations, tasks and processes which may foreseeably cause harm to employees or others, including members of the public (hazard);
- To identify the potential of the hazard being realised, and the potential consequences which might then occur (risk);
- To enable a risk assessment to be developed which will assist in eliminating or reducing the exposure of the population to the risk.

When an evaluation of the risk has been considered, the principles of prevention, control and protection should be applied. The hierarchy of risk control is as follows:

- Elimination of the hazard and associated risk
- Substitution (products, substances, processes)
- Engineering controls (remote technologies, guarding)
- Signage/warnings and/or administrative controls
- Personal Protective Equipment

Other considerations should include:

- Human behaviour, capabilities and other human factors which may influence the effective implementation of control measures
- The activities of others who may have access to the workplace

The Regulations make the following definitions, which must be clearly understood:

A "Hazard" is defined as something with the potential to cause harm. This includes injury and ill health, loss of production and damage to plant, goods, property or the environment.

"Risk" is the likelihood that the harm from a particular hazard is realised.
Risk is expressed as: Severity of the Hazard x Likelihood of Occurrence

Ranking risks
In order to ensure that the greatest risks are addressed first it is necessary to be able to rank those risks.

To do this takes a subjective judgement of both the likelihood of damage occurring (the likelihood) and the potential damage that would occur if the worst were to happen (the severity). By assigning a value to each task's likelihood and hazard and multiplying those together a risk value for that task is established.

LIKELIHOOD - Probable Frequency (taking into account whatever precautions are currently being taken):

Improbable Occurrence	Low
Possible Occurrence	Low
Occasional Occurrence	Medium
Frequent Occurrence	Medium
Regular Occurrence	High
Common Occurrence	High

SEVERITY of the hazard -:

Trivial injury	Low
Minor Injury	Low
Major injury to one person	Medium
Major injuries to several people	High
Death of one person	High
Multiple fatalities	High

RISK - The expression of the risk is then the sum of multiplying likelihood by severity as in the grid below:

		Likelihood		
		High	Medium	Low
Severity	High	High	High	High
	Medium	High	High	Medium
	Low	High	Medium	Low

The following issues should be considered in addition to the work activity information:
Number of personnel exposed;

- Frequency and duration of exposure to the hazard;
- Failure of services, failure of plant and machinery components and safety devices;
- Exposure to the elements;
- Protection afforded by personal protective equipment;
- Unsafe acts (unintended errors or intentional violations of procedures).

These subjective risk estimations should normally take into account all the people exposed to the hazard. Thus any given hazard is more serious if it affects a greater number of people. But some of the larger risks may be associated with an occasional task carried out by just one person.

The Risk Assessment Form

There is a need to assemble in one place all the pertinent information regarding the Risks and Hazards of the task being assessed. The Risk Assessment Form is used so that it can act as an aid to making the assessment and create a written record of that assessment process. It is largely self-explanatory.

The person carrying out the assessment should complete the various boxes (frequently there may be nothing to insert in some of them). Do not go into vast detail. Do not be concerned with the trivial. The whole picture of the real hazards of the task should then be clear.

Each hazard will then require a corresponding control measure that will realistically reduce the likelihood of that hazard causing harm.

Once each hazard has been controlled and the likelihood reduced, then you may assess that the risk is acceptable.

Risk Assessment is not an end in itself. It is simply a tool that allows the Company to evaluate dangers to the work force and consequently take suitable measures to protect them from these hazards.

Because the workplace is constantly moving it will be necessary to reassess whenever there is a change to any of the significant points of the assessment. This might be a change of personnel, location, equipment, supervision, weather and so on.

Young persons

Special risk assessments need to be carried out on any risks to young persons (under the age of 18 years) before they start work, or existing assessments will be reviewed where young persons are already in employment. The young persons risk assessments will follow the same procedure as that for other risk assessments, but will specifically take the following into account:

- The young person's inexperience, lack of perception of danger and immaturity;
- Their workplace and workstation;
- Any exposures to physical, chemical and/or biological agents;
- Any work equipment used;
- The work activities and processes to be undertaken;
- Any training provided, and any risks from specified agents, including ionising radiation, carcinogens, temperature extremes, noise or vibration; and processes.

Following the risk assessment, a copy of the form should be forwarded to the guardian of the young person and a detailed briefing on the detail of the risk assessment given to the young person by his manager.

Display screen equipment

The introduction of VDUs and other display screen equipment has been associated with a range of symptoms relating to the visual system and working posture, e.g.: fatigue and stress, upper limb pains and discomfort, etc. The workstation assessment form attached seeks to identify any potential problems relating to a persons workstation before harm to health and safety is realized.

The provision of good ergonomic and environmental conditions must be considered in the planning of the work station for VDUs.

Posture and Good Practice:

- Since each user is an individual size and shape the user must participate in the organization of their workstation:
- To find the best working position sit on your chair, then sit rigidly upright, and then relax a little. Now adjust your chair to support your back in this position.
- Use a foot rest if that helps.
- Adjust the height of the chair such that when your fingers are resting comfortably on the keyboard's "home keys" the elbow is at an angle of approximately 90 degrees.
- It is often more comfortable to have 100mm of workbench in front of the keyboard to rest the hands upon
- Arrange the VDU in such a manner that you do not face, or have a window as a background and so that the light sources do not reflect glare into your eyes.
- Adjust the screen height such that the top row of the characters on the screen is level with or just below your eye level.
- When copy typing use a copy holder or some other device which allows you to look from copy to screen without excessive head or neck movement. If the copy and screen are the same distance from your eyes then your eyes will not have to constantly change focus.

- Leave sufficient space to gain access to the VDU for any maintenance that may be needed.
- Cables must be kept tidy at all times and not cause an obstruction to the operator or others who may have cause to enter the work area.

Work Patterns
VDUs should not be used continually. It is not the length of break taken away from the VDU that is important but the frequency. Break up work patterns with other tasks so that you get a regular rest from the VDU.

Radiation
There is no medical evidence of any risk to unborn children from the radiation emitted by VDU's.
Eye and Eyesight Tests

According to the Guidance to the Regulations, there is no reliable evidence that work with display screen equipment causes any permanent damage to eyes or eyesight, but it may make users with pre-existing vision defects more aware of them. This (and/or poor working conditions) may give some users temporary visual fatigue or headaches. It is recognized that uncorrected vision defects can make work at display screens more tiring or stressful than it should be, and that correcting defects can improve comfort, job satisfaction and performance.

In accordance with the Health and Safety (Display Screen Equipment) Regulations and the Health and Safety (Miscellaneous Amendments) Regulations, this company will arrange for sight testing for users, or those who are to become users of display screen equipment, as defined in the regulations, who request such testing. For a person who is to become a user, testing should be carried out before that person becomes a user. This company will also ensure that at regular intervals, further sight testing for users is arranged as soon as is practicable after any such request.

Provision of Training
In accordance with the Health and Safety (Display Screen Equipment) Regulations, and the Health and Safety (Miscellaneous Amendments) Regulations, this company will ensure that new employees are provided with adequate Health and Safety training in the use of a workstation, before they are required to start work in such an undertaking, or where the duties of existing employees are changing in such a way that will make them become users of display screen equipment.

Formal Risk Assessment will require constant review to ensure identification of all hazards and implementation of suitable control measures to facilitate safe continuation of the task. Significant changes in hazard(s) will require reconsideration and revision of the formal assessment.

Noise assessments
In accordance with the Control of Noise at Work Regulations, we shall ensure that the risk from the exposure of our employees to noise is either eliminated at source or, where this is not reasonably practicable, reduced to as low a level as is reasonably practicable.

The levels of exposure averaged over a working day or week; and the maximum noise (peak sound pressure) to which employees are exposed in a working day, shall determine the actions we will take as an employer. The values are:

Lower Exposure Action Values:

- daily or weekly exposure of 80 dB;
- peak sound pressure of 135 dB;

Upper Exposure Action Values:

- daily or weekly exposure of 85 dB;
- peak sound pressure of 137 dB.

There are also levels of noise exposure which must not be exceeded:
Exposure Limit Values:

- daily or weekly exposure of 87 dB;
- peak sound pressure of 140 dB.

(Note: Exposure limit values take account of any reduction in exposure provided by hearing protection).

Exposure Assessment

If it is perceived that there may be a noise problem in our workplace, we will assess the risks and put in place a programme of noise controls as necessary. The risk assessment should help us to: Identify where there may be a risk from noise and who is likely to be affected;

- estimate our employees' exposure levels for comparison with the exposure action values and limit values (see above);
- identify what we need to do to comply with the law, e.g. whether noise-control measures and/or hearing protection are needed, and, if so, where and what type;
- identify any employees who need to be provided with health surveillance and whether any are at particular risk.

Our estimate of employees' exposure shall be based on reliable information, e.g. measurements in our workplaces, information from other workplaces similar to ours (where available), and/or data from suppliers of machinery. It shall specifically take account of:

- the work they do or are likely to do;
- the ways in which they do the work;
- how it might vary from one day to the next.

Assessment Records and Review
Risk assessments shall be recorded (see Noise Assessment form below) along with any recommendations in an action plan. The plan shall set out what we have done and what we are going to do, with appropriate timescales and who will be responsible for ensuring that those actions are carried out.

We shall review our risk assessment if circumstances in the workplace change which might affect noise exposures. We shall also regularly monitor and review the effectiveness of our actions to reduce our employees' exposure risk.

Competence to Assess
It is this company's policy to ensure that any risk assessment is carried out by a competent person. We may choose or need to seek advice and/or assistance from other competent sources, such as Derisk (H&S) LLP in order to fulfil our noise assessment procedures.

Actions and Control Measures

- Where assessment shows that our employees' noise exposure level is between the lower and upper exposure action values, we shall as a minimum:
- provide them with suitable hearing protection equipment if they ask for it;
- provide employees with adequate information, instruction and training, such that they understand the associated risks and the duties placed on employers and employees by the regulations;
- consider taking additional reasonably practicable actions to further reduce risks in line with good practice and recognized standards within our industry.

Where assessment shows that exposure level is likely to be at or above the upper exposure action values, we shall:

- provide employees with suitable hearing protection equipment and enforce the wearing of it to immediately reduce the exposure risk;
- identify if any areas of the workplace need to be designated as "Hearing Protection Zones (HPZs)";
- demarcate and identify HPZs by means of appropriate safety signage and restrict access where practicable to do so;
- implement a suitable health surveillance programme;
- establish and implement a programme of organisational and technical measures to reduce exposure to as low a level as is reasonably practicable, such that in the longer term it may be possible to eliminate or reduce the need for hearing protection equipment and hearing protection zones. These measures may include the:
- reduction of noise at source by use of quieter processes or equipment and through a low-noise purchasing policy for new equipment;
- isolation of the noise at source by use of engineering controls and/or changes to the design or layout of the workplace;
- reduction of time to which personnel are exposed to noise.

Employee Responsibilities

We shall endeavour to ensure that employees are made fully aware of their responsibilities under the Control of Noise at Work Regulations, through our policy of providing adequate information, instruction and training.

- In order to help us control their exposure to noise, employees must:
- co-operate with any proposed actions we take in order to protect their hearing;
- use any noise control devices (e.g. noise enclosures), and follow any working methods that are put in place;
- use any hearing protection they are given, wear it properly, and make sure they wear it all the time when doing noisy work within hearing protection zones;
- look after their hearing protection, check it remains in good condition and store it in designated areas where appropriate;
- report any problems with their hearing protection or noise control devices to their supervisor straight away;
- let their supervisor or line manager know immediately if they have any kind ear trouble or hearing problems.

Health Surveillance

Where assessment shows that our employees are or are likely to be regularly exposed to noise levels at or above the upper exposure action values, or are at risk for any reason, e.g. they already suffer from hearing loss or are particularly sensitive to damage, we shall provide suitable health surveillance programmes for individuals as required. For further details, refer to “Noise Exposure” in “Section O - Arrangements for Health Surveillance / Management of Occupational Illness”.

Associated Forms

- Fire Risk Assessment Form
- Risk Assessment Template
- DSE Assessment Form
- HAVS Checklist
- Lifting Operations Assessment Form
- Noise Assessment Form

Section C

Arrangements for Managing Health and Safety in Construction

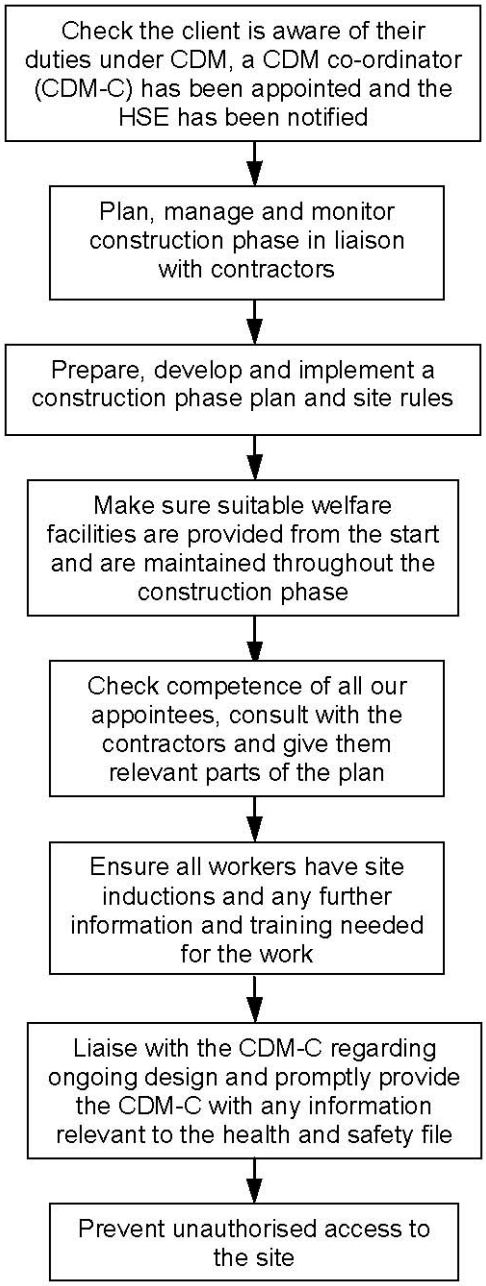
Palmer Morris Interiors Ltd may, during the course of its activities, assume roles and responsibilities under the Construction (Design and Management) Regulations (CDM).

In so doing, this company shall comply with its duties under the requirements of these regulations insofar as they relate to our work activities and our relations with other duty holders during the course of the works.

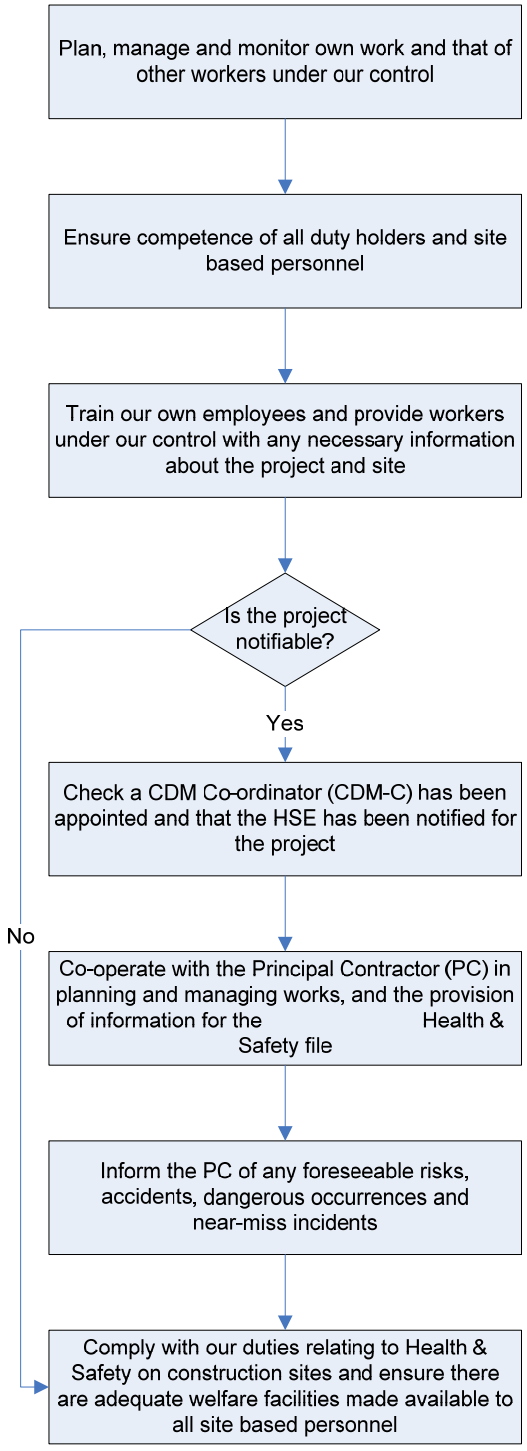
Palmer Morris Interiors Ltd may assume the following roles under CDM:

- Principal contractor.
- Contractor.

Procedure for the Role of Principal Contractor Notifiable Projects Only



Procedure for the Role of Contractor



Guidance on Managing Health and Safety in Construction

General management duties under the Construction (Design and Management) Regulations (CDM) apply to all construction projects, including those which are non-notifiable.

Additional management duties shall apply to "notifiable" projects, except where the project is for a domestic client. This includes the appointment of a CDM co-ordinator and a principal contractor, and a requirement for particular documents, e.g. a construction phase plan, which will assist with the management of health and safety from concept to completion.

Project notification
Except where the project is for a domestic client, the HSE shall be notified where construction work is expected to last more than 30 days or involve more than 500 person days, e.g. 50 people working for over 10 days.

Domestic clients
Domestic clients are people who have work done on their own home or the home of a family member that does not relate to a trade or business, whether for profit or not. Domestic clients have no client duties under CDM.

Below is a summary of our CDM duty holder responsibilities (where applicable). For further information refer to the guidance notes at the end of this section (C001).

Principal contractor responsibilities (notifiable projects only)
Where this company is appointed "principal contractor" we shall fulfil our role and responsibilities by:

- Ensuring that clients are aware of their duties, a CDM co-ordinator has been appointed and the HSE has been notified before we start work.
- Checking we are competent to address the health and safety issues likely to be involved in the management of the construction phase.
- Ensuring the construction phase is properly planned, managed and monitored, with adequately resourced, competent site management appropriate to the risk and activity.
- Ensuring every contractor who will work on the project is informed of the minimum amount of time which they will be allowed for planning and preparation before they begin work on site.
- Ensuring that all contractors are provided with the information about the project that they need to enable them to carry out their work safely and without risk to health.
- Ensuring co-ordination and co-operation between contractors.
- Preparing a suitable construction phase plan which is;
- Prepared before construction work begins;
- Developed in discussion with, and communicated to, contractors affected by it; implemented; kept up-to-date as the project progresses.
- Satisfying ourselves that the designers and contractors that we engage are competent and adequately resourced.

- Ensuring suitable welfare facilities are provided from the start of the construction phase. (See section Q for guidance on employee welfare, safety and health.)
- Taking reasonable steps to prevent unauthorised access to the site.
- Preparing and enforcing any necessary site rules.
- Providing copies of or access to relevant parts of the plan and other information to contractors, including the self-employed, in time for them to plan their work.
- Liaising with the CDM co-ordinator on design carried out during the construction phase, including design by specialist contractors, and its implications for the plan.
- Providing the CDM co-ordinator promptly with any information relevant to the health and safety file.
- Ensuring that all the workers have been provided with suitable health and safety induction information and training.
- Ensuring that the workforce is consulted about health and safety matters.
- Displaying the project notification on site.

Contractor responsibilities

Where this company is an appointed "contractor" on a construction project we shall fulfil our role and responsibilities by:

- Checking clients are aware of their duties.
- Satisfying ourselves that we and anyone we employ or engage are competent and adequately resourced.
- Making sure that workers under our control are safe from the start of their work on site. (See the CDM compliance checklist below.)
- Ensuring that any contractor who we appoint or engage to work on the project is informed of the minimum amount of time which will be allowed for them to plan and prepare before starting work on site.
- Providing workers under our control (whether employed or self-employed) with any necessary information (including about relevant aspects of other contractors' work) and site induction (where not provided by a principal contractor), which they need to work safely, to report problems or to respond appropriately in an emergency.
- Ensuring that any design work we do complies with Regulation 11.
- Complying with any requirements listed in Schedule 2 and Part 4 of these regulations that apply to their work.
- Co-operating and co-ordinating our work with others working on the project.
- Ensuring the workforce is properly consulted on matters affecting their health and safety.
- Obtaining specialist advice where necessary when planning high-risk work.

Additionally, where the construction work is notifiable (see above) we shall also:

- Check that a CDM co-ordinator has been appointed and the HSE has been notified before we start work.
- Co-operate with the principal contractor, CDM co-ordinator and others working on the project or adjacent sites.
- Tell the principal contractor about risks to others created by their work.
- Provide details to the principal contractor of any contractor who we engage in connection with carrying out the work.
- Comply with any reasonable directions from the principal contractor and with any relevant rules in the construction phase plan.
- Inform the principal contractor of any problems with the plan or risks identified during their work that have significant implications for the management of the project.
- Tell the principal contractor about accidents and dangerous occurrences.
- Provide information to the CDM-C for inclusion within the health and safety file.

Section D

Arrangements for Consultation with Employees

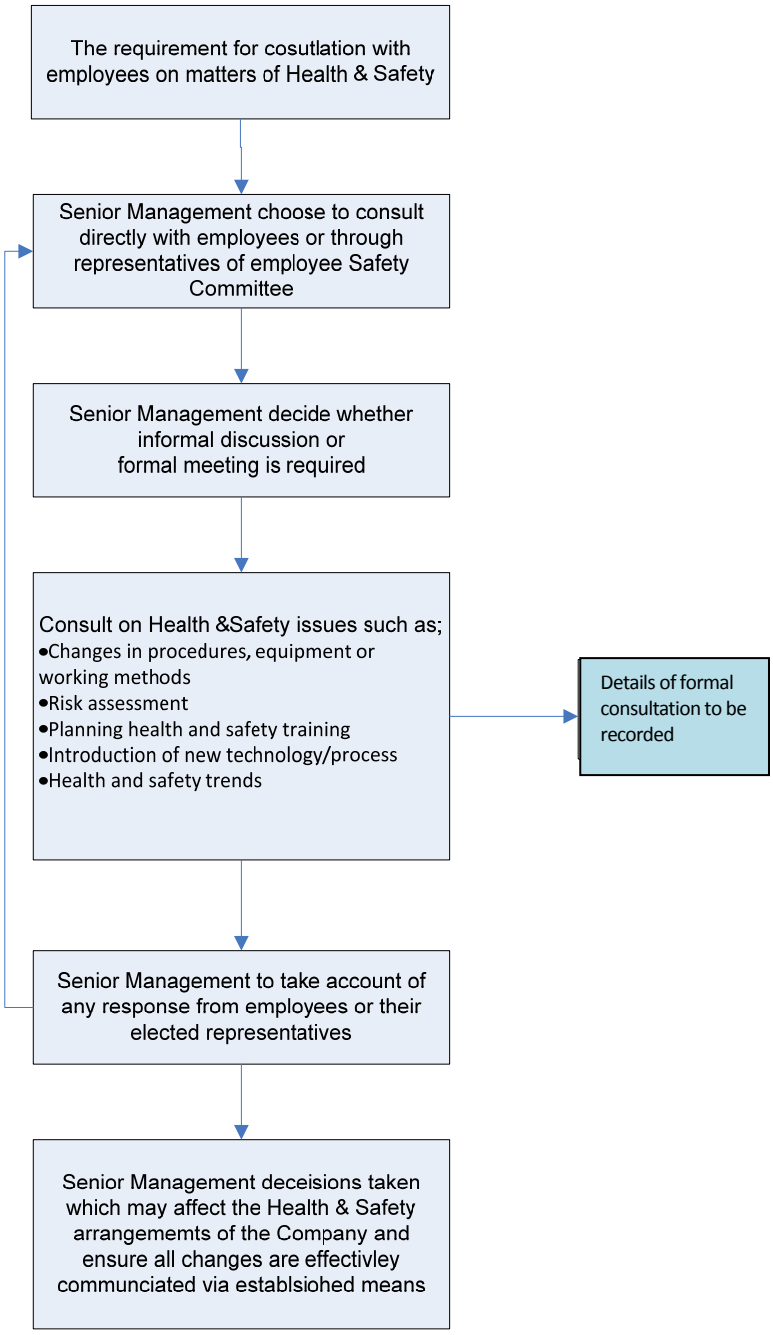
Consultation shall be carried out on all matters to do with the health and safety of our employees at work including:

- Any proposed change which may substantially affect their health and safety at work, e.g. changing a work procedure.
- Appointing a competent person to help Palmer Morris Interiors Ltd to comply with health and safety laws.
- When introducing new technology, tools or working processes.
- When planning health and safety training.
- Informing employees of the likely risks and dangers arising from their work, measures to remove or reduce these risks and what they should do if they have to deal with a risk or danger.

Gary Morris will consult the following representatives of employee safety who have been elected by the workforce to represent them on matters relating to their health, safety and welfare:

- Stephen Walker (Site Manager)

Procedure for Consultation with Employees



Guidance on Consultation with Employees

We will involve our employees in discussions regarding any of the following circumstances:
Any change which may substantially affect their health and safety at work

We will Consult on health and safety issues such as:

- Changes in procedures, equipment or working methods
- Risk assessment
- Planning health and safety training
- Introduction of new technology/process
- Health and safety trends

The company's arrangements for appointing competent people to help it satisfy health and safety laws. The information that employees must be given on the likely risks and dangers arising from their work, measures to reduce or eliminate these risks and what they should do if they have to deal with a risk or danger. The planning of health and safety training, and the health and safety consequences of introducing new technology.

These discussions will be by the most convenient manner for both parties but will at least involve a letter delivered to all of our staff to ask if they have any input on these matters.

Representatives of employee safety

Where elected, representatives of employee safety have the following functions:

- To make representations to the employer regarding possible risks and dangerous events in the workplace that may affect employees they represent.
- To make representations to the employer regarding general matters affecting the health and safety of the employees they represent.
- To represent the employees who elected them in consultation with an enforcing authority.

Availability of health and safety documentation at the workplace
It is a company requirement that all necessary health and safety documentation be in place and made available to our employees prior to any works commencing. This will include, as the case may be, the company health and safety policy, relevant method statements, plans of work, safe systems of work and risk assessments, as well as any other health and safety documentation which it is reasonable for company management to obtain for those works and which have a bearing on health and safety issues for that place of work.

General communication media
Health and safety information may also be transmitted by management to employees by way of memos, notice boards on company or site premises, minutes of meetings, site safety booklets and other media where deemed appropriate. It will be the responsibility of the managing director, or their representative, to decide how to transmit health and safety information to the company's employees.

Section E

Arrangements for Induction Training

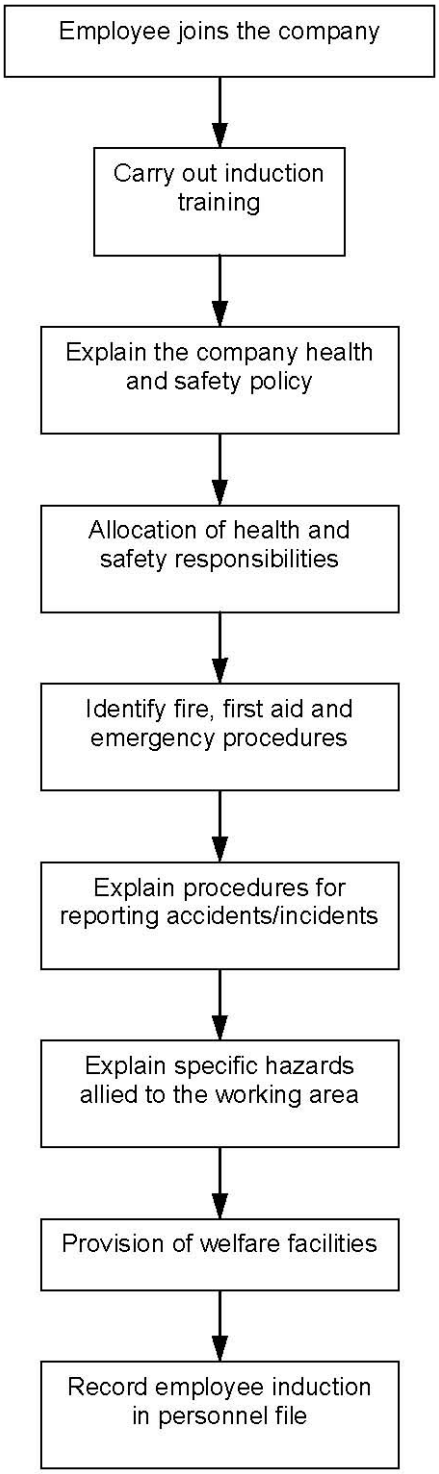
Palmer Morris Interiors Ltd expects its employees to undergo specific induction training (which may be provided by the company or others) prior to works starting, in order that we may address the health and safety hazards associated with that particular area.

The Gary Morris and the Site Managers will ensure that all employees undergo company induction training.

The Site Managers shall ensure that site operatives and sub contractors undergo site induction training and that records of this training are kept on site, together with any certificates from off-site courses attended by employees.

Records of company induction training will be held at head office by the Office Manager.

Procedure for Induction Training



Guidance on Induction Training

All new members of staff should receive health and safety induction training as part of their general induction to the organisation. This should take place as soon as possible after they start, ideally upon arrival. The objective of the training is to ensure that new members of staff are familiar with all fundamental aspects of health and safety which relate to their employment and the contribution that they can make to a safe working environment.

Scope of training

Areas to be covered:

- The individual's reporting lines, job title, duties and responsibilities.
- The company's health and safety policy including:
    - The organisation's commitment to health and safety in the workplace;
    - Legislative background to the health and safety policy;
    - The general statement of policy and its importance;
    - How to get access to the health and safety policy;
    - The organisational structure for managing health and safety;
    - The employee consultation process on health and safety issues;
    - Management and staff responsibilities and rules;
    - Arrangements and procedures;
    - Fire safety and emergency evacuation procedures, raising the alarm, escape routes and assembly points;
    - How the accident and incident reporting system works;
    - First aid arrangements;
    - Disciplinary procedures following breach of staff rules.
- Prohibited and hazardous areas and smoking arrangements.
- Where to find individuals with special health and safety functions, e.g. health and safety advisers/coordinators, first aiders, fire wardens and safety and employee representatives.
- Details of any traffic controls and restrictions.
- Location of specific safety issues.
- Job-specific safety issues and access to relevant risk assessments, work procedures, control measures, etc.
- Details of any further training to be provided.
- The company's "smoke-free" policy
- First aid notices.
- Location and job-specific requirements.
- Guidance relevant to the individual's work.
- Relevant specific/detailed risk assessments.

It can be helpful for any individuals with health and safety responsibilities to be present during induction training.

Employee health and safety charter

Introduction

Palmer Morris Interiors Ltd is endeavouring to make continual improvements to the overall Health & Safety performance of all our projects. It is our aim to eliminate unsafe working practices and to minimise accidents and ill health. The Palmer Morris Interiors Ltd board of directors has recognised this can only be achieved by building relationships with like minded employees who pay the management of Health & Safety its due regard.

Training & Competence
All site supervisors and operatives working on this project shall have received adequate training for the tasks they are expected to undertake. Every operative undertaking work at height, slinging/signalling, erecting access equipment, operating plant, using hazardous tools, etc…

Plan of Work / Method Statement
All personnel shall demonstrate knowledge and understanding of the Plan of Work / Method Statement, and all personnel shall ensure that the works are being undertaken in accordance with the safe systems of work defined in the Plan of Work / Method Statement.

Palmer Morris Interiors Ltd shall provide detailed site-specific plans of work / method statements for all activities. All method statements and risk assessments for activities shall be communicated to the workforce and signatures obtained to confirm their understanding of the control measures to be implemented which will reduce risk to as low as is reasonably practicable.

Communication
Weekly toolbox talks shall also be undertaken by the supervisors explaining current site issues. Tool box talks can also be used for communicating method statements and risk assessments. All operatives shall understand the information being communicated.

Environmental Issues
All personnel will be expected to comply with all relevant environmental legislation and the Palmer Morris Interiors Ltd environmental policy and procedures. Copies of all waste transfer notes, Certificate of Registration for Waste Carriers and Waste Management Licences for the Waste Transfer Stations shall be available for on site inspection / auditing.

Fencing, Barriers and Hazard Warning Tape
Palmer Morris Interiors Ltd shall ensure that control and hazard-warning measures are implemented as required with the appropriate signage erected as necessary to supplement the execution of these works and to warn other trades, where practicable physical barriers shall be used in preference to hazard warning tape.

Plant and Equipment
All plant or equipment shall be in good order, fit for its purpose and accompanied by the appropriate documentation, plant or equipment such as NPU's and Personnel RPE shall require a daily recorded inspection which shall be available on site for review.

Noise
Palmer Morris Interiors Ltd shall identify hearing protection zones as required, and shall adhere to any local authority agreement regarding sections 61/60.

COSHH
Palmer Morris Interiors Ltd shall maintain a comprehensive list of all hazardous substances and the relevant CoSHH assessments. Information from the CoSHH assessments and relevant data sheets shall be communicated to the operatives prior to handling the substances/material.

Working Platforms / Mobile Towers
Any working platforms erected by the personnel representing Palmer Morris Interiors Ltd, shall comply with the Construction (Health, Safety & Welfare) Regulations and the relevant British Standards.

Stepladders/Ladders
All such equipment shall be fit for its purpose. Stepladders should only be used where it is not reasonably practicable to use a working platform. No heavy/prolonged works is to be undertaken from the above equipment; in addition to this a task specific risk assessment shall be undertaken and effectively communicated to all personnel working from steps/ladders.

Manual Handling
Palmer Morris Interiors Ltd shall minimise the risk to operatives at all times by supplying mechanical aids or trolleys when possible. For any manual lifting task a manual handling assessment will be required and operatives shall receive training, this can be undertaken in the form of a tool box talk delivered by a competent person.

Hand/Arm Vibration (HAV)
Palmer Morris Interiors Ltd shall implement control measures to minimise risk of HAV to their operatives during any works with vibrating tools. This will include suitable risk assessments outlining the proposed control measures. When the need for task rotation is required a sign off/on sheet shall be retained as evidence that this process has being undertaken.

Electrical Equipment
Palmer Morris Interiors Ltd shall ensure all electrical plant/equipment is in good condition, fit for its purpose and provide proof of recent testing as required.

Fall Arrest Harnesses
Harnesses shall only be used as a last resort. All operatives shall have received formal instruction in their use and a written register of visual checks will be required by Palmer Morris Interiors Ltd, in addition to the statutory certification. Where harnesses are required they will be subject to "Zero Tolerance", and personnel not adhering to the requirements at all times will be removed from site.

Storage of Flammable Gases/Liquids
Palmer Morris Interiors Ltd shall provide suitable cages/trolleys for all liquefied and compressed gases. Liquid fuels etc. shall be stored in bunded (110% capacity)/double skinned containers, away from drains.

Storage of Materials
Palmer Morris Interiors Ltd should minimise the amount of materials stored on site at all times. These shall be stored in designated areas ensuring safe access/egress at all times.

PPE
Hard Hats: Shall be worn at all times. Chin straps provided as necessary. Steel toe boots: Mandatory, shall be worn at all times. Goggles/Eye Protection: Shall be worn at all times. Hand Protection: Mandatory, shall be worn at all times and suitable for the task being carried out.

Fire Extinguishers
Palmer Morris Interiors Ltd shall provide the appropriate fire extinguishers for any hot works being undertaken and instruction is given in their use.

Registers/Statutory Inspections
Palmer Morris Interiors Ltd shall inspect all plant, equipment and working places in accordance with current legislation and provide copies of registers etc…

Health & Safety signage
Palmer Morris Interiors Ltd shall provide and display the appropriate hazard warning signage for all applicable activities. All signage shall be legislation compliant and be pictorial when possible.

Permit to work
Palmer Morris Interiors Ltd personnel shall comply with all permits to work systems implemented on an individual project basis.

First Aid
Palmer Morris Interiors Ltd shall provide a suitable number of trained first aiders and appointed persons.

Accident reporting
All accidents, listed dangerous occurrences and near misses shall be reported to the Palmer Morris Interiors Ltd site management team. Palmer Morris Interiors Ltd will inform the Health and Safety Executive (HSE) of any reportable incidents involving their operatives. All reportable accidents will be investigated by the Palmer Morris Interiors Ltd Director responsible for Health and Safety, assisted when required by our appointed Health and Safety consultants.

Palmer Morris Interiors Ltd Health and Safety Rules

1. Palmer Morris Interiors Ltd will apply the following rules and take all measures to ensure that they are observed and complied with by employees at all times.

2. All personnel will undertake their works in accordance with legislation, industry best practice and the Palmer Morris Interiors Ltd Health & Safety Policy

3. Whilst at work all personnel will wear all PPE identified in the site specific method statement in addition to the mandatory wearing of Hard Hat, Safety Boots, Hi-visibility vest and gloves

4. All personnel shall will be fully familiar with the method statement & risk assessment that applies to the task being undertaken

5. No personnel shall report to work under the influence of either alcohol or drugs

6. All personnel will not smoke outside of designated smoking areas

7. Lone working is not permitted without prior authority from a Director of Palmer Morris Interiors Ltd

8. All personnel will act in a professional manner at all time's abusive language and/or violence will not be tolerated and could result in your dismissal

9. All unsafe conditions shall be reported to your immediate supervisor

10. Any person found damaging or vandalising plant, material, welfare facilities or any Safety equipment will be subject to disciplinary action

11. All personnel are to set good personnel example at all times

Acceptance of Health and Safety Conditions

I confirm that I have received and understood the above Health & Safety control measures specified by Palmer Morris Interiors Ltd and agree to abide by them.

Palmer Morris Interiors Ltd shall ensure that all employees and sub-contractors working under their auspices will do everything reasonable practicable to comply with all the above requirements.

Name:

Signed: Date:

Position/Job Title:

Associated Forms

- HSEQ Induction Template
- Health Screening Questionnaire
- Record of site induction register

Section F

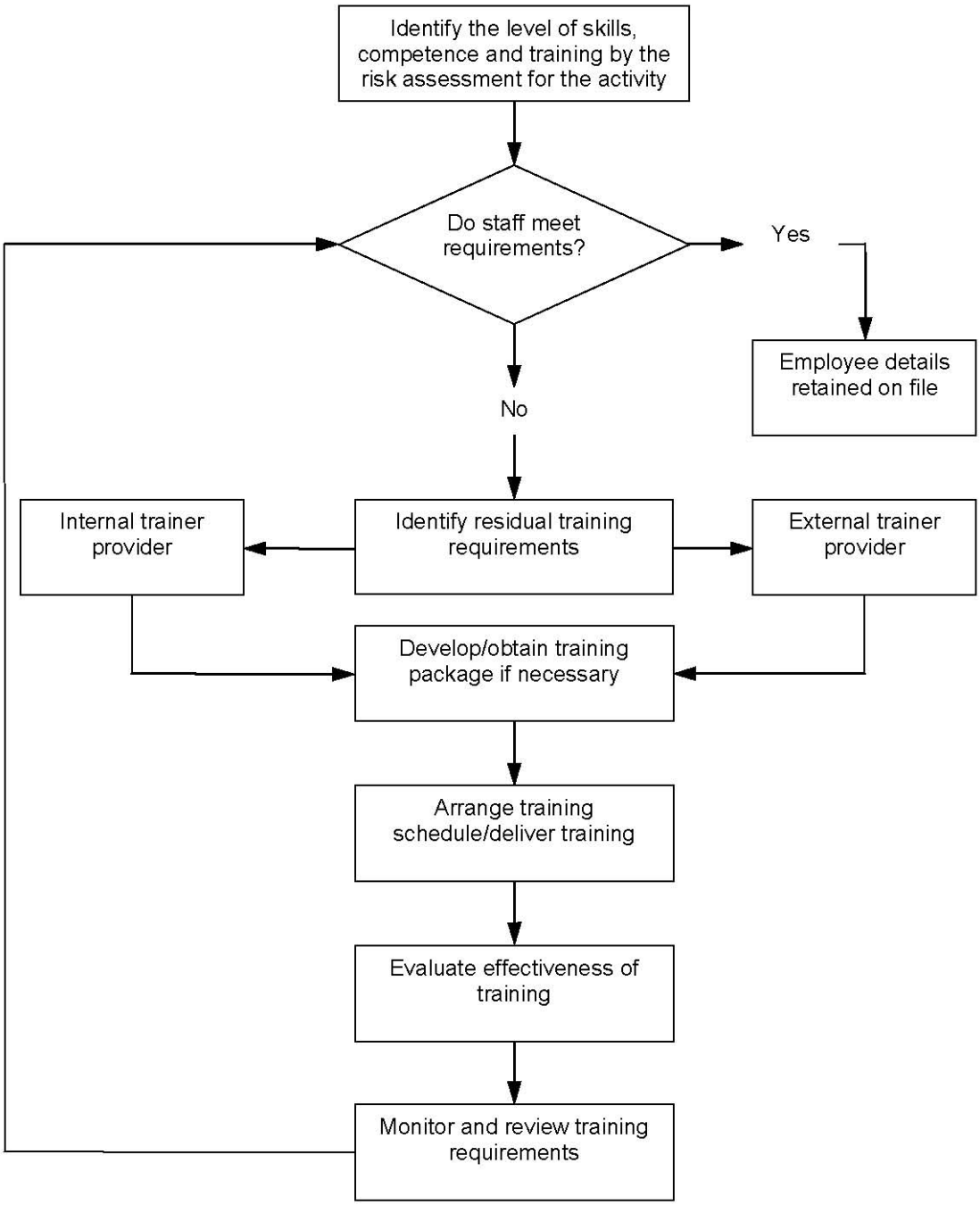
Arrangements for Training

Gary Morris will ensure that all members of staff receive training on health and safety to assist them in undertaking their tasks safely and efficiently. External courses on specific subjects may be utilised along with internal training.

Although the Director responsible for Health and Safety has a major role to play within the company's health and safety policy, each member of staff in a supervisory role is responsible for ensuring that their subordinates receive appropriate training and instruction and shall, therefore, liaise with the Director responsible for Health and Safety regarding training needs.

Copies of all training records will be held at our head office in both electronic and hard copy.

Procedure for Training



See guidance section for details

Guidance on Training

Training is about providing employees with the skills, knowledge, attitudes and understanding to carry out their jobs effectively. Training is an essential part of any safe system of work; control measures will not work unless employees know how to use them properly and understand the need for them.

Legal requirements
There is a general requirement on all employers under the Health and Safety at Work etc. Act 1974 to provide employees with adequate information, instruction, training and supervision. Under the Management of Health and Safety at Work Regulations training must take place during working hours. If this is not possible, the time taken for training must be regarded as an extension to the employee's time at work. This means that, if the employee normally gets paid overtime, the time they spend after hours on training courses for health and safety should be remunerated in the same way as if they were working.

Employee competence
Employers must take account of employees' capabilities, level of training, knowledge and experience when allocating work.

Competence is a combination of the following:

- Training.
- Knowledge.
- Experience.
- Skill.

Employers must decide the level of competence, i.e. the combination of these four elements, needed to carry out a job safely. There are also specific legal requirements for competence in certain areas of work, e.g. providing health and safety assistance, and working on electrical equipment and systems.

Training needs
Before adequate training can be provided it is necessary to identify individual training needs. General induction training must be given to all employees but, in addition to this, each new and existing worker is likely to require more detailed training to meet the specific needs of their job. Training needs should be identified when a person first begins a job and should be reviewed regularly. In between reviews training needs may become apparent, e.g. if a manager or supervisor notices an employee using work equipment incorrectly.
Training needs may be influenced by:

- Previous experience and training.
- The individual's capability and capacity for learning.
- The level of expertise and competence required for the job.

The training requirements of each particular job should be identified by the risk assessment for the particular activity and should be included in the job specification. Employers must provide employees with adequate safety training if they change jobs or responsibilities and if new equipment or technology is introduced or existing equipment is modified significantly.

Methods of training

There are a variety of different training methods including:

- Training courses – used for briefings, technical training, large audiences, covering new subject areas and general principles.
- Demonstrations – used for demonstrating how to carry out specific activities or methods.
- Toolbox talks – used for passing on information on working procedures to groups of employees.
- On-the-job training – used for teaching an individual how to carry out the tasks they are responsible for.
- Workshops – used for encouraging participation during training courses.

Training may be given by:

- In-house personnel, e.g. line managers or employees with specific competence.
- External trainers delivering a tailored in-house course in the workplace.
- External trainers at an external venue.

Training requirements

Management and supervisory staff should be trained in:

- The requirements of health and safety law in relation to their areas of responsibility.
- The health and safety policy.
- Safety rules, procedures, control measures, monitoring and checking arrangements, etc. relevant to their areas of responsibility.
- Communication with their staff and their managers.
- How to supervise staff in relation to safety procedures, etc.
- Incident investigation.
- Identification of problems or improvements in health and safety arrangements.
- How and when to take disciplinary action against staff breaching safety rules, etc.
- Effective recruitment.
- Recognition of personal limitations in relation to health and safety knowledge.
- How and when to seek specialist advice.

Toolbox talks

Toolbox talks are an effective way of communicating health and safety information to employees on a regular basis. It is expected that such talks will be presented to employees by company management or their authorised representatives at a frequency to be determined by this company. An example of the form used by this company to record toolbox talks is attached.

Refresher training

Refresher training is necessary to help refresh employees' memories on a particular subject area and to update them on changes in legislation, practice and policy. Competence will generally decline if skills are not used regularly. Refresher training is usually specific to a topic and is particularly relevant to some groups of workers, including the following:

- Those working with asbestos and hazardous substances.
- Machine operators
- Slinger / Signallers

- Qualified first aiders and appointed persons
- Safety advisers and co-ordinators
- Management staff

The frequency of refresher training will depend on the complexity of the subject, how rapidly it changes and the ability of the individual to retain the information. In order to remember when the individual is due for fixed frequency refresher training, e.g. every 3 years for qualified first aiders, a written reminder should be included in the individual's training records.

Work / Role authorisation process for new staff
Personnel employed in roles defined as safety critical (machine operators & slinger/signallers) and those employed to undertake the removal of asbestos are required to undergo formal assessment by their line manager and/or other nominated responsible person prior to full authorisation to undertake the role being granted by the Company.

These assessments will focus on ensuring that the individual can competently undertake tasks allocated to them, where possible documentary evidence such as witness statements or photographs should be collated to support this authorisation.

Section G

Arrangements for Safe Equipment and Plant

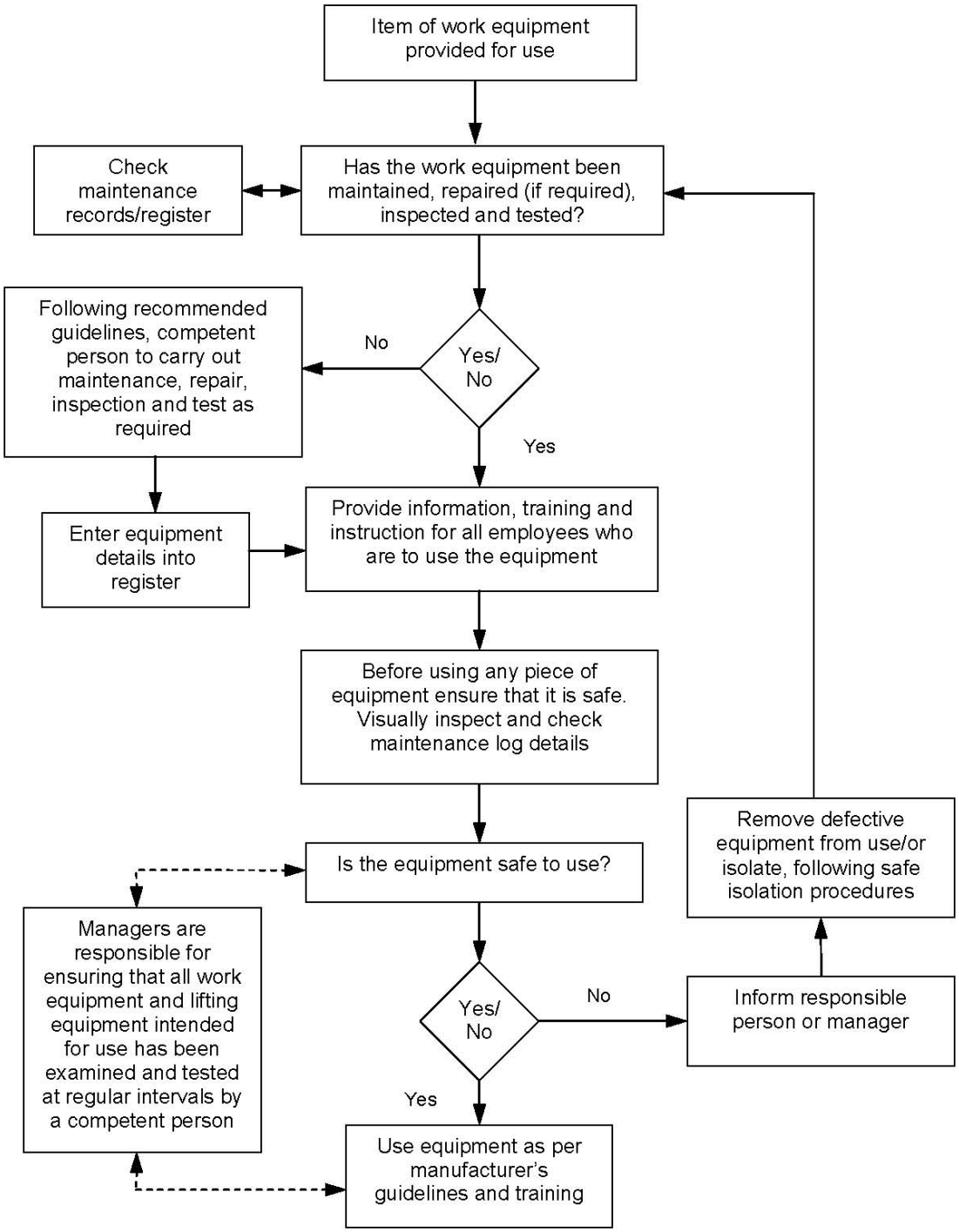
Gary Morris will ensure that new plant and equipment is suitable for the intended use and meets the safety requirements as laid down in the Provision and Use of Work Equipment Regulations before it is purchased.

Gary Morris and the Site Managers will be responsible for appointing competent persons to check inspect and examine all plant and equipment in accordance with the requirements of relevant legislation and industry best practice.

Gary Morris will be responsible for ensuring that effective procedures for the maintenance of plant and equipment are drawn up and implemented (including testing of portable tools and appliances, i.e. PAT testing).

Faulty plant and equipment should be reported to the Manager / person / organisation responsible for maintaining that item of plant.

Procedure for Safe Equipment and Plant



Guidance on Safe Equipment and Plant

The Provision and Use of Work Equipment Regulations (PUWER) apply to all items of "work equipment" provided for "use" or "used", either by employees or the self-employed.
The following definitions are relevant:

Work equipment covers all machinery and tools from a major item of plant to a screwdriver. Use includes its cleaning, repair, modification, maintenance and servicing.

General requirements and duties

- Employers have a duty to ensure that equipment provided for employees and self-employed persons working for the employer complies with the regulations.
- It is the duty of any self-employed person working for a company to ensure that any equipment they provide complies with the regulations.
- When company employees are permitted to provide their own equipment this equipment must also comply with the regulations.
- In construction, items of work equipment are often used by a number of different contractors and it is essential that they co-operate with each other and that their activities are coordinated, as required by the Management of Health & Safety at Work Regulations. It is the company's policy that the provision and use of shared work equipment on construction sites shall be co-ordinated by the principal contractor.
- This company shall ensure that equipment selected shall be suitable for the particular work it is provided to do, both for the operation concerned and for the conditions under which it will be used, and that equipment shall be maintained in safe working order and in good repair.
- The extent of maintenance required may vary with the complexity of the equipment but even the simplest hand tools shall be subject to a daily visual check by the user for defects before use. Complex equipment is likely to require routine maintenance and planned preventative maintenance, which shall be carried out in accordance with manufacturers' recommendations.
- A maintenance log may be required or be considered appropriate for some items of plant or potentially hazardous equipment. All maintenance records are to be kept up-to-date.

Information and instruction

All relevant health and safety information and written instructions on the use of work equipment shall be made available to the workforce at all levels.

The information and written instructions shall cover all the health and safety aspects of use that are likely to arise and any limitations on these uses, together with any foreseeable difficulties that could arise, and the methods to deal with them.

Information may be verbal or in writing but, whichever method is chosen, the company shall ensure that the workforce properly understands the instruction.

Adequate training in the use of work equipment shall be given, both to "users" and to their supervisors and managers. The company shall assess what training is adequate.

Specific requirements for dangerous parts of machinery
PUWER replaces most of the previous legal requirements for the guarding of machinery and requires effective measures to prevent contact with dangerous parts of machinery. Such measures must prevent access to the dangerous part or stop the movement of the dangerous part before access is gained.

If the dangerous part of the machine is in a place that cannot foreseeably be reached by anybody, no further measures are necessary as that part is said to be "safe by design or position". However, in such cases access may be needed for maintenance or repair and, if no guards or other devices are in place, a suitable system of work or permit-to-work system shall be implemented. Three levels of effective measures are laid down:

- Fixed, enclosing guards (barriers).
- Other guards or protection devices (trip devices, safety mats, etc).
- Protection appliances (jigs, holders, push sticks, etc).

In many cases a combination of measures will be needed.
Additionally, employers must provide such information, instruction and supervision as is necessary.
All guards and protection devices must:

- Be suitable for the purpose, i.e. for the nature and use of the machine and the severity of the risks presented. They should also conform to all recognised standards.
- Be of good construction, sound material and adequate strength.
- Be maintained in an efficient state, in efficient working order and in good repair.
- Not give rise to any increased risk to health or safety themselves.
- Not easily be disabled or by-passed.
- Be situated at a sufficient distance from the danger zone they are protecting.
- Not unduly restrict any necessary view of the operation concerned.
- Be constructed or adapted so that they permit necessary routine repair or maintenance work.

Protection against specific hazards

Subject to the note below, work equipment must incorporate protection or steps must be taken to reduce the risk against certain specific hazards:

- Material falling from equipment, e.g. a loose board falling from scaffolding.
- Material held in the equipment being unexpectedly thrown out, e.g. swarf ejected from a machine tool.
- Parts of the equipment breaking off and being thrown out, e.g. a burst abrasive wheel.
- Parts of the equipment coming apart e.g. collapse of falsework or scaffolding.
- Overheating or fire, e.g. due to bearings running hot or ignition by welding torch.
- Explosion of equipment, e.g. due to failure of a pressure relief valve, or unexpected blockage of pipe work.
- Explosion of a substance in the equipment, e.g. due to exothermic reaction, unplanned ignition of a flammable gas or vapour, or welding work on a container with flammable residues.

The risk assessment made under the Management of Health and Safety at Work Regulations shall identify any of the above hazards and assess the associated risks. Emphasis shall be placed on reducing the risks by minimising the chance of failure of work equipment and by mitigating the effect of any failures that occur. Personal protective equipment may be appropriate where there is a need to provide further protection against risk. Training, supervision and provision of information also have important roles to play.

Note that the protection against specific hazards in respect of any risk to a person's health or safety may be covered by measures as stated in specific regulations and as such would override PUWER. These regulations include:

- The Control of Lead at Work Regulations.
- The Ionising Radiations Regulations.
- The Control of Asbestos Regulations.
- The Control of Substances Hazardous to Health Regulations (COSHH).
- The Control of Noise at Work Regulations.
- The Construction (Head Protection) Regulations.

For example, COSHH would apply to leakage of a toxic substance or the discharge of coolant mist from a machine tool. PUWER would apply in the case of ejected swarf.

High or very low temperatures

The company shall ensure that protection is provided where there is a risk of contact with accessible surfaces of hot or very cold work equipment. Engineering measures, such as insulation, screens or barriers, shall be adopted in preference to personal protective equipment.

Controls and control systems
The company shall ensure that the following requirements are met for powered work equipment: When starting or changing operating conditions:

- One or more controls shall be provided, where appropriate, to start equipment and starting shall only be possible by using a control;
- A change in operating conditions, e.g. speed or pressure, shall only be possible by use of a control;
- Controls shall be designed and/or positioned so as to prevent accidental operation and must not be capable of operating themselves due to gravity, vibration, etc.;
- The stop control, or controls, shall be readily accessible and bring the equipment to a safe condition, in a safe manner. It does not necessarily have to be instantaneous or to bring all moving parts to a halt.

Emergencies
An emergency stop control shall be provided if other safeguards are not adequate to prevent risk when some unplanned event occurs, e.g. someone becoming exposed to a hazard or a dangerous malfunction of the machine;

Emergency stop controls, where appropriate, shall be provided at every control point and, where necessary, at other locations around the equipment so that action may be taken quickly. They shall be positioned so as to be easily reached and operated.

General
The intended purpose of each control shall be easily recognisable by wording or symbols and, where appropriate, by colour, shape and position;

Normal operating controls shall not be placed where anyone using them might be placed at risk. So far as is reasonably practicable, controls shall be positioned so that the operators of the equipment are able to see that no other person is at risk from anything they set going. If this is not reasonably practicable a safe system of work shall be introduced to ensure the health and safety of others;

Where appropriate, e.g. in the case of a detonator, an audible, visual, or other suitable warning shall be given whenever work equipment is about to start. The warning shall allow sufficient time for those at risk to get clear or to prevent the equipment from starting.

Control Systems
The company shall ensure that failure of any part of a control system or its power supply shall lead to a "fail-safe" condition and not impede the operation of the "stop" or "emergency stop" controls.

Isolation from sources of energy
Where appropriate, work equipment shall be provided with a clearly identifiable and readily accessible means of isolating the equipment from all its sources of energy. Reconnection of any energy source shall not expose a user to risk.

Isolation of equipment from its energy source is often necessary for maintenance or when an unsafe condition develops. Isolation means establishing a break in the energy supply in a secure manner, i.e. so that unintentional reconnection is not possible. The procedure will normally involve some form of permit-to-work system.

Stability
Precautions shall be taken to ensure that items of work equipment are "stabilised", e.g. the use of outriggers with mobile cranes, where appropriate.

Lighting
The company shall ensure that all places where work equipment is used are suitably and sufficiently lit. The need to provide additional or special lighting shall be assessed, taking due account of the circumstances and types of task to be performed.

Maintenance operations
Where there is any risk to health or safety measures shall be taken, as far as is reasonably practicable, to ensure that work equipment can be maintained whilst it is shut down. If this is not reasonably practicable precautions shall be taken to prevent risks to the health or safety of those carrying out maintenance work. In this context "maintenance" includes cleaning and repair. On construction sites the need to carry out maintenance on moving machinery is unlikely to arise.

Markings and warnings
The company shall ensure that, where necessary, all work equipment is marked with the appropriate health and safety warning signs and notices. Examples of markings are:

- The maximum rotational speed of an abrasive wheel.
- The maximum safe working load on lifting equipment.
- Identification of gas cylinders by colour.
- Hazard symbols on dangerous substances.

Warnings are normally in the form of notices or signs. The latter shall conform to the Health and Safety (Safety Signs and Signals) Regulations. Warning devices, e.g. reversing alarms on vehicles, shall be clear and easily understood.

Inspection requirements
An inspection is required for work equipment whenever it has been installed or assembled in a new location to ensure that it has been installed correctly and is safe to operate. All other work equipment must be assessed to determine if an inspection is needed and how often.

The minimum inspection regime for work equipment shall be set by the company based on manufacturers' information and other statutory obligations. Additional inspection requirements may be identified taking into account the work being carried out, any site specific risks that may affect the condition of the equipment and the intensity of use of the equipment.
Certain types of equipment are required to be inspected under specific regulations, e.g. working platforms under the Work at Height Regulations. Other regulations lay down specific items to be examined. These specific regulations take precedence over the requirements in PUWER.

Responsibility for inspection
A number of parties will have responsibilities for ensuring that work equipment is safe to use and that it has been inspected in accordance with the inspection regime. Hire companies must ensure that equipment they hire out complies with PUWER. Employers and self-employed persons have a duty to ensure that equipment they use or provide for use complies with PUWER and that includes ensuring that inspections are carried out by a competent person. If employees use equipment provided by another contractor the company has a duty to ensure that the equipment is safe to use.

If equipment is provided on site for common use, e.g. a compressor or abrasive wheel, the company shall establish who will take responsibility for the equipment and ensure it complies with PUWER. As an employer, the company shall establish that it is safe for use by employees. If hired equipment is used the company shall come to an agreement with the hire company as to who will carry out the inspections and when they will be carried out.

Visual inspections
Low-risk equipment used for low-risk activities will not require a formal inspection. Visual checks may be required by the user before each use to ensure the equipment is in good condition, e.g. it should be checked that the head on a hammer is not loose, a ladder should be checked for broken rungs, split stiles and other defects. The person carrying out these checks must be competent. There is no need to record the results of the visual check by the operative.

In circumstances where additional hazards exist, low-risk equipment may need a more detailed check, e.g. a screwdriver used for work on a live electric supply or a torch that is taken into a confined space.

Equipment that is of a higher risk and equipment with moving parts should have a visual check before each use and may require a more formal check at specified intervals. This must be carried out by a competent person in addition to the daily checks carried out by the operator. Inspection of equipment that poses a significant risk, e.g. dumpers, ride-on rollers, etc, will be carried out by a competent person in accordance with the company's inspection regime. These inspections are in addition to the daily checks carried out by the operator.

For the majority of equipment the formal inspection will be undertaken weekly. Some equipment will require more frequent inspections, e.g. equipment used in confined spaces may require an inspection before each shift.

Recording inspections
Records of inspections must be made and kept. Examples of inspection registers can be found at the end of this section. Records can be attached to the equipment itself or stored electronically in a tamper-proof form. They are to be easily accessible by those who use the equipment or otherwise need the information.

If the company uses equipment acquired from another user or provides equipment for use by another user and it is subject to an inspection regime that equipment must be accompanied by physical evidence of the last inspection.

It is the company's practice to keep all records of inspection and maintenance for future reference.

Marking
A CE marking stamped upon equipment indicates that there is a European product directive and that the equipment has been manufactured to a certain standard. However, it does not guarantee that the equipment complies with UK health and safety standards. Therefore, the company shall ensure that all equipment, whether CE marked or not, complies with UK health and safety requirements and is safe to use.

Mobile work equipment
Any work equipment which is intended to travel between different locations for the purpose of carrying out work whilst it is travelling or carrying out work when at its new location is classed as mobile work equipment. Examples include dumpers, forklift trucks, mobile cranes, land rovers, ride-on rollers, remote-controlled rollers, concrete wagons, etc.

Equipment that requires manual effort to power it is not considered mobile work equipment, e.g. pallet trucks, sack barrows, wheelbarrows and bogeys. Portable work equipment that is moved from one place to another but used in a static position is also not considered to be mobile work equipment, e.g. compressors, concrete pumps and cranes that do not have pick-and-carry duties.

However, some equipment not considered to be mobile work equipment can become classed as mobile if it is towed, e.g. man-riding cars used in tunnelling. The requirements in Part III of PUWER apply to this type of equipment when it is towed and, in each case, the company shall consider whether towing this equipment creates an additional risk to the operator and any passengers and shall implement any control measures detailed below that may be necessary.

Employees carried by work equipment
The company is committed to preventing employees falling out of work equipment, whether it is moving or stationary. To this end, provision of the following shall be considered:

- Cabs.
- Work platforms.
- Seating and restraining systems, such as safety belts or handholds.

Where risk assessment shows that there is a need to protect employees from falling objects whilst being carried by work equipment the company shall ensure that cabs or falling object protection structures (FOPS) are fitted. The need for this type of protection will depend on the environment and the activities carried out.

Restraining systems
Where possible, full-body seat belts, lap belts or a purpose-designed restraining system shall be fitted to all work equipment that requires a restraining system. However, some work equipment will not be suitable for the fixing of restraining systems as there may not be adequate fixing points on the body of the vehicle or the operators may be doing an activity that will increase in risk should they wear a restraining belt.

Road transport vehicles that are also used to transport people around site are considered to be work equipment. The driver and front seat passengers must wear seat belts at all times. Passengers in the back of a van sitting in front-facing seats must wear seat belts if provided. It is considered unsafe to fix seat belts for those sitting in bench seats along the length of the van. Drivers are to ensure that vehicles fitted with this type of seat travel at restricted speeds when carrying passengers.

Roll-over protection
If equipment that travels whilst being used as work equipment could roll over and injure the operator or passengers or if it can roll more than 90 degrees the need to fit a roll-over protection (ROP) structure shall be assessed in order to ensure protection for the operator and passengers. If it is reasonably practicable to comply with the requirement for ROP, and the situation requires it, then the company shall do so. Once the type of ROP most appropriate for the equipment has been determined the remaining risk to anyone carried by the equipment shall be established. If there is the chance of them being crushed by the equipment rolling over then a suitable restraining system shall be fitted.

If equipment cannot be fitted with roll-over protection, as it was not designed for this purpose, the company shall ensure that an engineering analysis is carried out by a competent person to determine what control measures can be taken. If the fitting of ROP would increase the risk to safety, i.e. it would destabilise the equipment or affect the integrity of the equipment, then the company does not have to comply with this requirement.

Similarly, if it would not be reasonably practicable to operate the mobile work equipment because of the ROP structure the company does not have to comply with this requirement. In areas where limited headroom would prevent the use of a ROP structure on a standard machine a smaller machine or specialist equipment shall be considered before a decision is taken to remove the roll-over protection.

If the equipment is stationary whilst carrying out the work the ROP requirement does not apply. However, if the equipment moves around on site between operations the risks to employees shall be assessed. Company owned vehicles driving on the road are work equipment and precedence shall be given to road traffic laws when the vehicles are used on the public highway.

Self-propelled work equipment
The following requirements apply to mobile work equipment that is propelled by its own motor when in use, e.g. dumpers, forklift trucks, rollers, etc.

The company shall ensure that an unauthorised person cannot start up this type of equipment. All such equipment shall require a key or other starter device and only authorised persons shall have access to them.

Effective devices for braking and stopping shall be fitted to all self-propelled equipment. In the event of the main braking device failing, there shall be a secondary facility that is easily accessible or an automatic system to prevent the equipment from running away.

Operators of self-propelled mobile plant must have a good direct field of vision from their operating position. If there are blind areas then consideration shall be given to using mirrors, avoiding reversing, using a banksman and fitting reversing alarms where appropriate.

Where equipment is used in the dark it shall be equipped with suitable and sufficient lighting.

Fire fighting equipment shall be provided if the work equipment is carrying something that is a fire hazard.

Hand-arm and whole-body vibration

The Control of Vibration at Work Regulations require employers to take action to prevent their employees from developing adverse health conditions caused by exposure to vibration at work from equipment, vehicles and machines.

Two distinct types of vibration hazard exist: hand-arm vibration and whole-body vibration.

Hand-arm vibration
Most likely to affect those who use hand-held or hand-guided power tools and those workers holding materials that vibrate when fed into machines. Regular and frequent exposure can have permanent and disabling health effects often referred to as hand-arm vibration syndrome (HAVS)

HAVS conditions include:

- Impaired blood circulation and blanching of affected fingers and parts of the hand, generally known as vibration white finger (VWF)'.
- Neurological and muscular damage leading to numbness and tingling in the fingers and hands, reduced grip strength and dexterity, and reduced sensitivity, both to touch and to temperature. Other kinds of damage leading to pain and stiffness in the hands and joints of the wrists, elbows and shoulders.

The main symptoms of HAVS are:

- Tingling and/or numbness in the fingers.
- Loss of sensation and manual dexterity.
- Finger blanching.
- Aching digits and limbs.

There is no treatment or recovery from the sensory symptoms (numbness, etc). However, vascular symptoms (blanching, etc.) can exhibit some long-term improvements for mild cases in younger people after removal from exposure.

Whole-body vibration
Whole-body vibration is the shaking or jolting of the human body through a supporting surface (usually a seat or the floor), e.g. when sitting or standing on industrial machines which are impacting or vibrating, or driving moving vehicles (especially off-road). Exposure to whole-body vibration is likely to increase the risk of the operator suffering back pain.

Duties on the employer
This company recognises that, in accordance with the Control of Vibration at Work Regulations, it has a duty to protect employees, and any other person who may be affected by that work, against risks to their health and safety arising from exposure to vibration at work.

The following procedures shall be carried out in respect of the above:

- Assessment of the vibration risk to persons affected.
- Where the daily exposure action value (EAV) is likely to be exceeded:
    - A programme of controls to eliminate or reduce exposure to as low a level as is reasonably practicable shall be introduced;

- Health surveillance shall be provided to those employees who continue to be regularly exposed to levels above the action value.
- Where the daily exposure limit value (ELV) is likely to be exceeded immediate action shall be taken to reduce their exposure below the limit value.
- Provide information and training on health risks and controls to employees at risk.
- Records of risk assessment and control actions shall be kept for future reference.
- Health records for employees under health surveillance shall also be kept.
- Regular reviews and updates of risk assessments shall be undertaken.

Note: The regulations allow a transitional period for the ELV until July 2010 (or until 2014 for agricultural or forestry sectors). This only applies to work equipment already supplied and in use before July 2007. The limit value may be exceeded during this period as long as this company complies with all the other requirements of the regulations and takes all reasonably practicable actions to reduce exposure levels.

Employee's role in controlling the risks

Employees should:

- Ensure work tools are in good condition, adequately maintained and free from defect.
- Ensure that cutting tools are kept sharp.
- Report defects to supervisors and request an immediate suitable replacement.
- Refer to the task method statement to ensure that the right tool for the job is being used. "Making do" with the wrong tools can result in increased vibration levels.
- Keep warm at work, especially the hands. Wear warm gloves and extra clothing if working in cold conditions.
- Not smoke, or at least cut down, just before and while at work. Smoking adversely affects blood circulation.
- Exercise and massage hands and fingers during work breaks to improve the blood flow.
- Store tools correctly so that their handles are not very cold when next used.
- Refer to the operating instructions for tools to ensure that no more force than necessary is imposed when operating tools.
- Avoid gripping or forcing tools harder than necessary.
- Reduce continuous exposure time by doing other tasks between sessions of using vibrating tools.
- Not ignore symptoms – if there is a suspicion that fingers or hands could be affected by vibration, this should be reported to a supervisor who will arrange for a medical examination to be carried out.

Exposure action value

The exposure action value (EAV) is a daily amount of vibration above which employers are required to take action to control exposure:

- Hand-arm vibration EAV is a daily exposure of 2.5m/s2 A(8).
- Whole-body vibration EAV is a daily exposure of 0.5m/s2 A(8).

Exposure limit value

The exposure limit value (ELV) is the maximum amount of vibration an employee may be exposed to in a single day:

- Hand-arm vibration the ELV is a daily exposure of 5m/s2 A(8).
- Whole-body vibration the ELV is a daily exposure of 1.15m/s2 A(8). Note: A(8) is the exposure adjusted over a standard reference period of 8 hours.

Average tool vibration (m/s^2)	1.8	2.5	3.5	5	7	10
Time to reach EAV (hours)	16	8	4	2	1	0.5
Time to reach ELV (hours)	>24	>24	16	8	4	2

Average tool vibration (m/s^2)	3	4	5	6	7	10	12	15
Points per hour (approximate)	20	30	50	70	100	200	300	450

Estimating hand-arm vibration exposure

The damage caused by vibration depends on its frequency. Low frequency motion from 520Hz is potentially more damaging than higher frequency motion. Vibration at frequencies below 2Hz and above 1500Hz is not thought to cause damage. Therefore, a "weighting" system has been developed which adjusts vibration levels according to the frequency, taking more account of the more harmful frequencies and less account of the less harmful frequencies.

Measurements of personal vibration exposure should therefore be taken and expressed as weighted values. The following table indicates the vibration magnitudes and durations required for exposures to reach hand-arm vibration EAV and ELV of 2.5m/s2 and 5m/s2 respectively.

Alternatively, daily exposure can be estimated by using the "exposure points" system in the following table. Multiply the points assigned to the tool vibration by the number of hours of daily "trigger time" for the tool(s) and then compare the total with the EAV and ELV points.

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100 Points per day = Hand-arm vibration EAV. 400 Points per day = Hand-arm vibration ELV.

Health surveillance

Potential employees to jobs which have been identified as involving significant risk of exposure to vibration shall be assessed by the use of an initial screening questionnaire, backed up by a basic medical examination by suitably qualified medical personnel.

Those employees in jobs which have been identified as involving significant risk of exposure to vibration shall be examined annually by suitably qualified medical personnel. In order to ensure that symptoms are effectively identified, examinations are to be carried out during the colder

months - between October and April. New employees shall be examined 6 months after commencement of employment and annually thereafter. Reference should be made to the arrangements and guidance regarding health surveillance/management of occupational illness in section O of this policy document.

Personal protective equipment
Various types of gloves are available but they are not usually effective in reducing the amount of vibration reaching an operator's hands. They will usually provide little or no protection against hand-arm vibration at the most damaging frequencies and poorly selected gloves might even increase the vibration transmitted to the wearer's hands. However, gloves are useful for their ability to keep hands warm and provide physical protection; they will be provided as required.

Equipment maintenance
The company considers it essential to ensure that all vibration-generating equipment, vehicles and machines are regularly inspected and serviced in order to minimise vibration levels. Measurements may need to be made to check that vibration levels are not increasing to an unacceptable level. Suitable records shall be kept of the maintenance and of the vibration measurements where possible.

Where equipment is hired from external suppliers, evidence of inspection, testing and servicing shall be obtained from the supplier before the equipment is accepted for use.

Working at height

Definition of terms
The following are definitions of some of the terms used in the Work at Height Regulations:

- "Access and egress" includes ascent and descent.
- "Fragile surface" means a surface which would be liable to fail if any reasonably foreseeable loading were to be applied to it.
- "Personal fall protection system" means a fall prevention, work restraint, work positioning, fall arrest or rescue system, other than a system in which the only safeguards are collective safeguards. The term includes rope access and positioning techniques.
- "Work at height" means work in any place where a person could fall a distance liable to cause personal injury, including a place at or below ground level, and obtaining access to or egress from such a place while at work, except by a staircase in a permanent workplace.
- "Working platform" means any platform used as a place of work or as a means of access to or egress from a place of work and includes any scaffold, suspended scaffold, cradle, mobile platform, trestle, gangway, run, gantry and stairway which is so used.

Application
With certain specific exclusions, the Work at Height Regulations imposes requirements on employers, the self-employed and those who control persons at work.

Duties are also placed upon people who are working under the control of another person to report to that person any activity or defect relating to work at height which they know is likely to

endanger the safety of themselves or another person and to use any work equipment or safety device provided to them for work at height by their employer (or by another person under whose control they work) in accordance with any training or instructions in its use that they may have received.

Organisation and planning
Work at height must be properly planned, including planning for emergencies and rescue, appropriately supervised and, so far as is reasonably practicable, carried out in a safe manner. Work at height must only be carried out when weather conditions do not jeopardise the health or safety of persons involved in the work.

Work at height must only be organised, planned, supervised and carried out by people who are competent to do so or, if being trained, being supervised by a competent person.

Avoidance of risks from work at height
In order to identify the measures required to avoid the risks from working at height a site-specific risk assessment will always need to be carried out. Where it is reasonably practicable to carry out the work safely otherwise than at height then work at height must be avoided.

Where work is carried out at height, suitable and sufficient measures must be taken to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury. These measures are to include ensuring that, where it is reasonably practicable to carry it out safely and under appropriate ergonomic conditions, the work is carried out from an existing place of work or, in the case of obtaining access or egress, using an existing means. Where this is not reasonably practicable sufficient work equipment must be provided to prevent a fall occurring.

Where the risk of a fall occurring cannot be eliminated, sufficient work equipment must be provided to minimise both the distance and the consequences of a fall. Where it is not reasonably practicable to minimise the distance, sufficient work equipment must be provided to minimise the consequences of a fall.

Where the risk of a fall occurring cannot be eliminated, additional training and instruction or other additional measures must be taken to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.

Selection of work equipment for work at height
Work equipment for use in work at height must give priority to collective protection measures over personal protective measures and, additionally, take account of:

- The working conditions and the risks to the safety of persons at the place where the work equipment is to be used.
- In the case of work equipment for access and egress, the distance to be negotiated.
- The distance and consequences of a potential fall.
- The duration and frequency of use.
- The need for easy and timely evacuation and rescue in an emergency.
- Any additional risk posed by the use, installation or removal of that work equipment or by evacuation and rescue from it.

Only work equipment which has characteristics, including dimensions, which are appropriate to the nature of the work to be performed and the foreseeable loadings, allow passage without risk and is in other respects the most suitable work equipment is to be selected for work at height.

Requirements for particular work equipment

Means of Protection
Where a person could be liable to fall a distance likely to cause personal injury, suitable and sufficient means of protection shall be provided that shall be:

- Of sufficient dimensions, strength and rigidity for the purposes for which they are being used and otherwise be suitable.
- Be so placed, secured and used as to ensure, so far as is reasonably practicable, that they do not become accidentally displaced.
- Be so placed as to prevent, as far as is reasonably practicable, the fall of any person or of any material or object from any place of work.

In relation to work at height involved in construction work the top guardrail must be fixed at a height of at least 950mm above the edge from which any person is liable to fall. Toe-boards must be suitable and sufficient to prevent the fall of any person or any material or object and there must not be an unprotected gap exceeding 470mm between any guardrail, toe-board or other similar means of protection.

Any structure or part of a structure which supports means of protection, or to which means of protection are attached, must be of sufficient strength and suitable for the purpose of such support or attachment.

Except at a point of access to a ladder or stairway where an opening is necessary, there must not be any lateral opening in means of protection. Means of protection must be removed only for the time and to the extent necessary in order to gain access or egress, or where it is necessary for the performance of a particular task, and must be replaced as soon as practicable.

While means of protection are removed the task must not be performed unless effective compensatory safety measures are in place.

Working Platforms
Working Platforms - stability a working platform must:

- Be suitable and of sufficient strength and rigidity for the purpose for which it is intended to be used or is being used.
- Be so erected and used as to ensure that its components do not become accidentally displaced so as to endanger any person.
- When altered or modified be so altered or modified as to ensure that it remains stable.
- Be dismantled in such a way as to prevent accidental displacement.

Working Platforms – stability of supporting structure In this context “supporting structure” means any structure used for the purpose of supporting a working platform and includes any plant used for that purpose.

A supporting structure must:

- Be suitable and of sufficient strength and rigidity for the purpose for which it is being used.
- In the case of a wheeled structure, be prevented by appropriate devices from moving inadvertently during work at height.
- In other cases, be prevented from slipping by secure attachment to the bearing surface or to another structure, by provision of an effective anti-slip device or by other means of equivalent effectiveness.
- Be stable whilst being erected, used and dismantled.
- When altered or modified be so altered or modified as to ensure that it remains stable.

Working Platforms – safety a working platform must:

- Be of sufficient dimensions to permit the safe passage of persons and the safe use of any plant or materials required to be used and to provide a safe working area having regard to the work being carried out there.
- Possess a suitable surface and, in particular, be so constructed that the surface of the working platform has no gap through which a person could fall, through which any material or object could fall and injure a person, or giving rise to other risk of injury to any person unless measures have been taken to protect persons against such risk.
- Be so erected and used, and maintained in such condition, as to prevent, so far as is reasonably practicable, the risk of slipping or tripping, or of any person being caught between the working platform and any adjacent structure.
- Working Platforms – loading Working platforms and supporting structures are not to be loaded so as to give rise to a risk of collapse or to any deformation which could affect their safe use.
- Scaffolding

The following additional requirements for scaffolding are to be noted.
Strength and stability calculations are to be carried out for scaffolding unless a note of the calculations covering the structural arrangements contemplated is available or it is assembled in conformity with a generally recognised standard configuration.

An assembly, use and dismantling plan is to be drawn up by a competent person for all scaffolding. Depending on the complexity of the scaffolding selected, this plan may be in the form of a standard plan supplemented by items relating to specific details of the scaffolding in question. A copy of this plan is to be kept available for the use of persons concerned in the assembly, use, dismantling or alteration of scaffolding until it has been dismantled.

The dimensions, form and layout of scaffolding decks must be appropriate to the nature of the work to be performed, suitable for the loads to be carried, and permit work and passage in safety. While a scaffold is not available for use (including during its assembly, dismantling or alteration) it is to be marked with general warning signs and be suitably delineated by physical means preventing access to the danger zone.

Scaffolding may be assembled, dismantled or significantly altered only under the supervision of a competent person and by persons who have received appropriate and specific training in the operations envisaged which addresses specific risks which the operations may entail and precautions to be taken, particularly:

- Understanding of the plan for the assembly, dismantling or alteration of the scaffolding concerned.
- Safety during the assembly, dismantling or alteration of the scaffolding concerned.
- Measures to prevent the risk of persons, materials or objects falling.
- Safety measures in the event of changing weather conditions which could adversely affect the safety of the scaffolding concerned.
- Permissible loadings.
- Any other risks which the assembly, dismantling or alteration of the scaffolding may entail.

Collective Fall Arrest Systems

A collective safeguard for arresting falls, e.g. a net, mat or inflated device designed to catch a falling person, is to be used in preference to personal fall protection systems. However, such a safeguard is only to be used if:

- A risk assessment shows that, so far as is reasonably practicable, work can be performed safely while using it and without affecting its effectiveness.
- The use of other, safer work equipment is not reasonably practicable.
- A sufficient number of available persons have received adequate training specific to the safeguard, including rescue procedures.

A safeguard must be suitable and of sufficient strength to arrest safely the fall of any person who is liable to fall. Where a safeguard is designed to be attached it must be securely attached to all the required anchors. Additionally, the anchors and the means of attachment thereto must be suitable and of sufficient strength and stability to safely support the foreseeable loading in arresting any fall and during any subsequent rescue.

- An airbag, landing mat or similar safeguard must be stable.
- A safeguard which distorts in arresting a fall must afford sufficient clearance.
- Suitable and sufficient steps must be taken to ensure, so far as is reasonably practicable, that the safeguard itself does not cause injury to any person involved in a fall.
- Personal Fall Protection Systems
- A personal fall protection system is only to be used if:
- A risk assessment shows that, so far as is reasonably practicable, work can be performed safely while using that system.
- The use of other, safer work equipment is not reasonably practicable.

- The user and a sufficient number of available persons have received adequate training specific to the operations envisaged, including rescue procedures.

A personal fall protection system must:

- Be suitable and of sufficient strength for the purpose for which it is being used having regard to the work being carried out and any foreseeable loading.
- Where necessary, fit the user.
- Be correctly fitted.
- Be designed to minimise injury to the user and, where necessary, be adjusted to prevent the user falling or slipping from it, should a fall occur.
- Be so designed, installed and used as to prevent unplanned or uncontrolled movement of the user.

Where a personal fall protection system is designed for use with an anchor it must be securely attached to at least one anchor. Each anchor and the means of attachment thereto must be suitable and of sufficient strength and stability to safely support any foreseeable loading. Suitable and sufficient steps must be taken to prevent any person falling or slipping from a personal fall protection system.

Work Positioning Systems

A work positioning system is only to be used if the system either includes a suitable back-up system for preventing or arresting a fall and, where the system includes a line as a back-up system, the user is connected to it or, where this is not reasonably practicable, all practicable measures are taken to ensure that the work positioning system does not fail.

Rope Access and Positioning Techniques

A rope access or positioning technique is only to be used if:

- It involves a system comprising at least two separately anchored lines, of which one ("the working line") is used as a means of access, egress and support and the other is the safety line. However, where a risk assessment shows that the use of a second line would entail higher risk to persons, and appropriate measures have been taken to ensure safety, the system may comprise a single rope.
- The user is provided with a suitable safety harness and is connected by it to the working line and the safety line.
- The working line is equipped with safe means of ascent and descent and has a self-locking system to prevent the user falling should they lose control of their movements.
- The safely line is equipped with a mobile fall protection system which is connected to, and travels with, the user of the system.

Taking the risk assessment into account, and depending in particular on the duration of the job and the ergonomic constraints, provision must be made for a seat with appropriate accessories.

Fall Arrest Systems

- A fall arrest system must incorporate a suitable means of absorbing energy and limiting the forces applied to the user's body.
- A fall arrest system must not be used in a manner which involves the risk of a line being cut, where its safe use requires a clear zone which cannot be made available, or which otherwise inhibits its performance or renders its use unsafe.

Work Restraint Systems

A work restraint system must be so designed that, if used correctly, it prevents the user from getting into a position in which a fall can occur. Work restraint systems must be used correctly.

Ladders

A ladder is only to be used for work at height if a risk assessment shows that the use of more suitable work equipment is not justified because of the low risk, together with the short duration of use or existing features on site which cannot be altered.

A ladder is only to be used where the surface on which it rests is stable, firm, of sufficient strength and of suitable composition to support the ladder and any loading intended to be placed on it safely, so that its rungs or steps remain horizontal.

To ensure its stability during use, a portable ladder should always be placed at the correct angle, which is about 75o (roughly 1.0 metre out for every 4.0 metres up).

A suspended ladder must be attached in a secure manner so that it (with the exception of a flexible ladder) cannot be displaced and swinging is prevented.

The options for securing a ladder are as follows:

- Tie the ladder to a suitable point making sure both stiles are tied.
- Where this is not practical, use a safe, unsecured ladder or a ladder supplemented with an effective ladder stability device.
- If this is not possible, securely wedge the ladder, e.g. against a wall.
- If none of the above can be achieved, foot the ladder. Footing is the last resort and should be avoided, where reasonably practicable, by the use of other access equipment.

A ladder used for access must be long enough to protrude sufficiently above the place of landing to provide a handhold, unless a firm handhold has been provided by other measures.
An interlocking or extension ladder must only be used if its sections can be prevented from moving relative to each other while the ladder is in use.

A mobile ladder must be prevented from moving before it is stepped on.
Where a ladder or run of ladders rises a vertical distance of 9.0 metres or more above its base at least one safe landing area or rest platform must be provided, where reasonably practicable.

As a guide, only use a ladder or stepladder:

- In one position for a maximum of 30 minutes.
- For “light work” - they are not suitable for strenuous or heavy work. If a task involves a worker carrying a load weighing more than 10kg up the ladder or steps it will need to be justified by a detailed manual handling assessment.
- Where a handhold is available on the ladder or stepladder.
- Where you can maintain three points of contact (hands and feet) at the working position. On a ladder where you cannot maintain a handhold, other than for a brief period of time, other measures will be needed to prevent a fall or reduce the consequences of one. On stepladders where a handhold is not practicable a risk assessment will have to justify whether it is safe or not.

Fragile surfaces

You must ensure that no one working under your control goes onto or near a fragile surface unless that is the only reasonably practicable way for the worker to carry out the work safely, having regard to the demands of the task, equipment or working environment.
If anyone does work on or near a fragile surface you must:

- Ensure, as far as it is reasonably practicable, that suitable platforms, coverings, guardrails and the like are provided and used to minimise the risk.
- If any risk of a fall remains, do all that is reasonably practicable to minimise the distance and effect of a fall.

If anyone working under your control may go onto or near a fragile surface you must do all that is reasonably practicable to make them aware of the danger, preferably by prominent warning notices fixed at the approaches to the danger zone.

Falling objects

Suitable and sufficient steps must be taken to prevent, so far as is reasonably practicable, materials or objects from falling and causing injury to any person. If it is not reasonably practicable to prevent materials falling precautions must be taken to prevent people being struck. Materials or objects must not be thrown from a height if they could injure someone. All materials and equipment are to be stored safely so as to prevent their collapse, overturning or unintended movement causing risk to any person.

Danger areas

Where a workplace contains an area in which there is a risk of any person at work being injured by falling a distance or being struck by a falling object the workplace is, so far as is reasonably practicable, to be equipped with devices preventing unauthorised persons from entering that area and that area must be clearly indicated.

Inspection of work equipment
In addition to any pre-use operator checks, equipment provided for work at height requires regular formal inspection to ensure that it is safe to use. In this context, equipment provided for work at height includes:

- Guardrails, toe-boards, barriers or other similar collective means of protection.
- Working platforms.
- Scaffolding.
- Nets, airbags or other similar collective safeguards for arresting falls.
- Personal fall protection systems, work positioning systems, rope access and positioning techniques, fall arrest systems or work restraint systems.

Ladders
For most equipment, the nature, frequency and extent of any inspection will be determined by a competent person. However, the following specific requirements apply: Where the safety of work equipment depends on how it is installed or assembled it must not be used after installation or assembly in any position until it has been inspected in that position by a competent person. Where work equipment is exposed to conditions causing deterioration that is liable to result in dangerous situations it must be inspected by a competent person at suitable intervals and each time that exceptional circumstances that are liable to jeopardise the safety of the work equipment have occurred.

A working platform that is used for access and from which a person could fall 2.0 metres or more must be inspected at least every 7 days (this includes a mobile working platform).

With the exception of lifting equipment, which is covered by the requirements of the Lifting Operations and Lifting Equipment Regulations, all work equipment that leaves one company for use by another company must be accompanied by physical evidence that the last required inspection has been carried out.

Any person who carries out an inspection under Regulation 12 of the Work at Height Regulations shall prepare a report before the end of the working period during which the inspection is completed. A copy of this report must be provided to the person requesting the inspection within 24 hours.

A copy of this report must also be held on site throughout the duration of the work and, after the work at that site is complete, at the company head office for at least 3 months after the work was completed.
The report must be made available, at reasonable times, for inspection by Her Majesty's Inspector of Health and Safety.
The report must incorporate the following particulars:

- The name and address of the person on whose behalf the inspection was carried out.
- The location of the work equipment inspected.
- A description of the work equipment inspected.
- The date and time of the inspection.
- Details of any matter identified that could give rise to a risk to the health and safety of any person.
- Details of any action taken as a result of any matter identified.

- Details of any further action considered necessary.
- The name and position of the person making the report.

Inspection of places of work at height

So far as is reasonably practicable, in order to identify any obvious defects a competent person must check the surface conditions and every parapet, permanent rail or other fall protection measure of every place of work at height on each occasion before work starts. These checks do not have to be recorded.

Associated Forms and Guidance

- Plant / Equipment Defect Report Form
- PUWER Inspection Register
- Daily Access Equipment Inspection Record

Section H

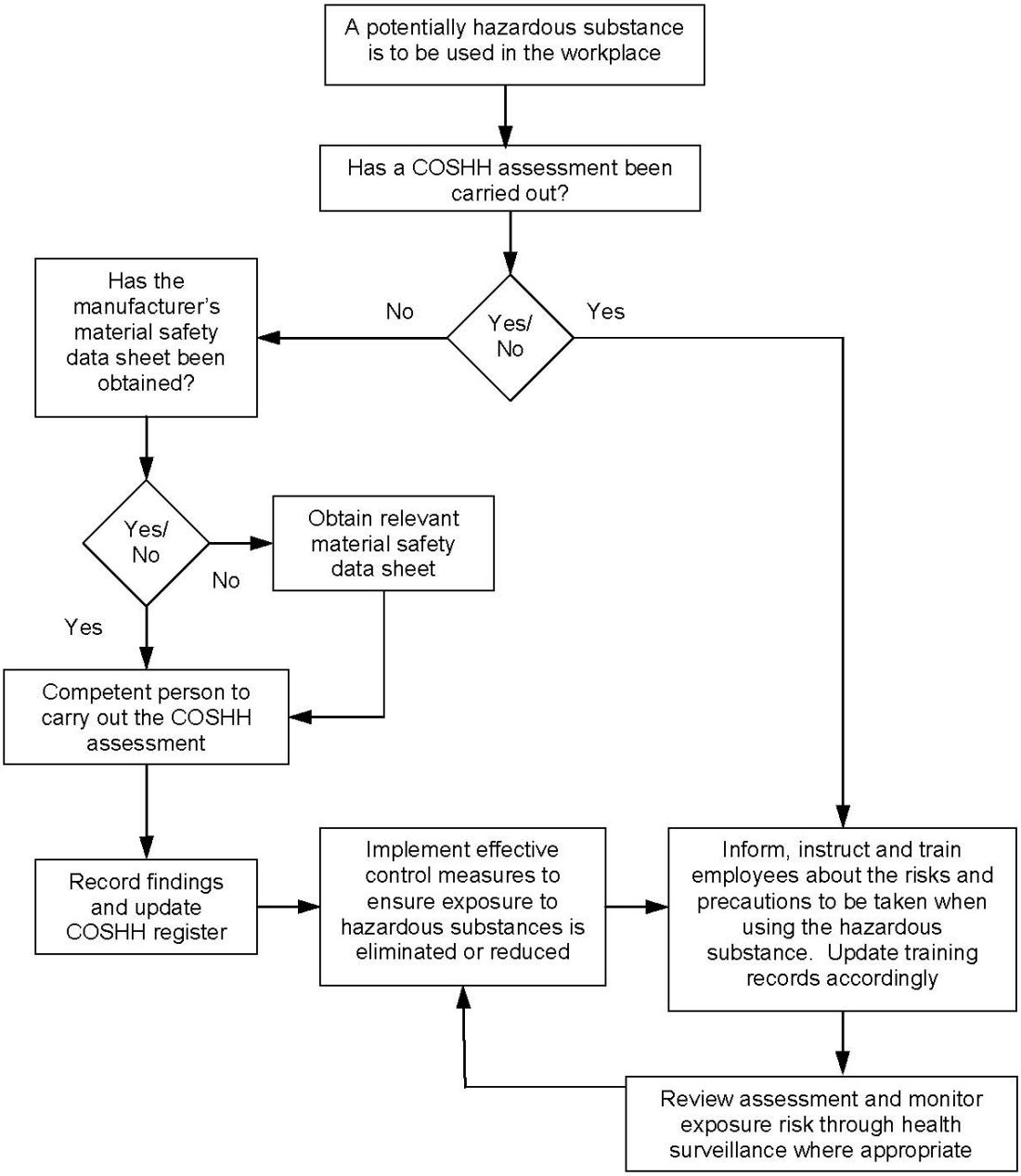
Arrangements for the Safe Handling and Use of Substances

Gar Morris and the Site Managers will be responsible for identifying all substances that require a COSHH assessment and for checking that new substances can be used safely before they are purchased.

Gary Morris will be responsible for undertaking COSHH assessments, or they may, at their discretion, delegate this responsibility to another competent employee.

The Gary Morris and the Site Managers will be responsible for ensuring that all actions identified in the COSHH assessments are implemented, that all relevant employees are informed about the significant findings, and that assessments will be reviewed every year or when the work activity changes, whichever is sooner.

Procedure for the Safe Handling and Use of Substances



Guidance on the Safe Handling and Use of Substances

Regulation 6 of the COSHH Regulations requires an employer to formally assess all operations and/or processes which are liable to cause exposure to hazardous substances.

This section provides a logical, step-by-step approach to the carrying out of the assessment and the evaluation of the risks to health caused by exposure to hazardous substances. The objective of the assessment is to ensure that the correct decisions are made on the control of hazardous substances in the workplace.

The assessment also demonstrates that the company has considered all the factors relevant to the work and that informed judgements have been made with regard to the risk, the actions necessary to achieve and maintain adequate control of the risk, the requirements for monitoring exposure to the substances, and health surveillance of employees who may be at risk.

In order for the assessment to be considered suitable and adequate, the detail and expertise with which it was carried out must reflect the nature and degree of risk arising out of the work being assessed, as well as the complexity and variability of the processes involved.

Survey and data sheets
The first process is to survey the site for substances. Once this is done, obtain the material safety data sheet (MSDS) for each substance and formally assess the use of those substances which are hazardous in use. The safety data sheet has the following purposes:

- It acts as a formal system of approval for substances being introduced into the workplace, in that only substances which have a safety data sheet should be purchased or used.
- It provides all the information on a hazardous substance that the employer is required to provide to their employees under Regulation 12 in a standard and rational format.
- It provides all the essential information necessary to carry out the formal assessments as required under Regulation 6.

When the assessment is completed, the sheet should be filed in a COSHH safety data sheet file and be updated if and when the supplier provides further information or there are alterations to the information.

Classification of substances
Once the data sheets on substances in the workplace have been gathered, it is necessary to classify each substance that has been identified as hazardous to health under the COSHH Regulations. This can be achieved by scrutinising the information gained on the substance using the criteria set out below.

For the purpose of the COSHH Regulations a hazardous substance is defined as any substance, including any mixture, which is:

- A substance listed in Part 1 of the approved supply list as dangerous for supply within the meaning of the CHIP Regulations and for which the general nature of the risk is given as very toxic, toxic, harmful, corrosive or irritant. This information should be displayed on the labelling on the container of all such substances introduced to the work area.
- A substance which has been assigned a workplace exposure limit (WEL) by the Health and Safety Commission and published in the HSE guidance note EH40 - Occupational Exposure Limits.
- A biological agent which creates a hazard to the health of any person.
- Dust of any kind, except dust which is a substance within paragraph 1 or 2 above, when present at a substantial concentration in the air.
- A substance, other than those already given, which creates a hazard to the health of any person because of its chemical or toxicological properties and the way it is used or is present in the workplace.

Following consultation of the above it may be possible to reach a decision as to the hazardous nature of the substance using your existing knowledge of exposure experience, process, etc. In other cases it may be necessary to draw upon the experience of others such as a competent occupational hygienist, health adviser or toxicologist.

Substances to be assessed
Once the classification of substances has been carried out, all substances identified as hazardous will need to be formally assessed in accordance with Regulation 6.

Competency to assess
The assessment must be carried out by the person with the duty delegated to them in their responsibilities. Each assessment is required to be done competently, in order to comply with the regulations. Therefore, the decision as to who should carry out that assessment will depend on the knowledge and experience required for the particular assessment and the complexity of the operation and/or process.

In order to carry out a correct assessment, the assessor should have a thorough practical understanding of what occurs, or what might occur, in the workplace. Managers may have this understanding and it is usual for them to do the assessments. Should the decision be taken to seek assistance with the assessment then it should be carried out with a combination of both in-house and outside expertise.

Personnel given the task of carrying out the assessment and any works arising from it will need to be provided with the necessary facilities and authority to do so competently. They will be given sufficient time and authority to gather the necessary information, talk to the appropriate persons, examine any records and inspect the workplace.

The assessor must have an understanding of the COSHH Regulations and their aims, and should have read and understood this manual.

Procedure

In order to carry out a competent assessment the following procedure is to be followed:
Review the information - A review of the information available on the operation/process/substance should be carried out. This should comprise the supplier's safety data sheets, records of any tests and examinations carried out on control measures and the results of any exposure monitoring and health surveillance previously carried out.

Study the operation and/or process - Having reviewed the information in above, the operation and/or process itself must be closely studied. It is important to understand exactly what happens during the operation and/or process and to ask questions of those involved in order to appreciate the hazards involved. The supervisor and operator of the operation/process should be in attendance during this study to ensure that all the relevant details are established.

Evaluate the risk - In order to evaluate the risks to health, the following must be considered:

- The hazardous properties of the substance (the information reviewed above, should supply this.) Information on health effects provided by the supplier, including information contained in any relevant safety data sheet.
- The level, type and likely duration of exposure.
- The circumstances of the work, including the amount of the substance involved.
- Activities, such as maintenance, where there is potential for a high level of exposure.
- The effect of preventative and control measures, which have been or will be taken in
- accordance with Regulation 7.
- Conclusions regarding the risk.
- These factors are dealt with in more detail below.
- The possibility of exposure can be broken down into five areas:
- Risk of exposure - Whether it is reasonably foreseeable that an accidental leakage, spillage or discharge of the substance could occur.
- Frequency of exposure - If it is reasonably foreseeable that exposure could occur, how often is that exposure like to be? This can normally be ascertained from past experience and general knowledge.
- People at risk - There is a need to identify the people at risk of exposure to the substance, whether they are exposed by working directly with it or are in the vicinity of the work, or areas, where the substance is handled, transported, processed, collected, packaged, stored, disposed of, or discharged. This includes members of the public and other non-employees.
- Routes of entry into the body - Whether the hazard of exposure is due to inhalation, swallowing, absorption through or contamination of the skin.
- The quantity to which people are likely to be exposed - It is necessary to evaluate and assess the quantities to which people are likely to be exposed. The concentration of the substance can, sometimes, be evaluated with the use of indicator tubes, dust lamps, etc. However, detailed measurements may need to be carried out to confidently establish these levels. Whenever levels are monitored or measured they should always take into account the circumstances that could be expected to give rise to the highest levels of exposure.

- The likely duration and concentration of the exposure must always be known precisely in any of the following situations, where:
- Exposure routinely and frequently occurs.
- A high level of exposure can be foreseen.
- The substance has been assigned a workplace exposure limit (WEL).
- The substance is known to be particularly hazardous.
- Where the magnitude or significance of the exposure is uncertain, detailed measurements will normally be required to enable the requirements for the prevention or adequate control of exposure to be assessed. The likely duration of exposure can normally be ascertained from past experience and general knowledge.

Conclusions regarding the risk
Once all the information has been gathered and collated it should be possible to reach conclusions regarding the risks to health resulting in exposure to the hazardous substance. If it is felt that there is still insufficient information to reach reasonable and valid conclusions further information and advice should be sought.

Where the risk assessment indicates that health monitoring is required for ensuring the maintenance of adequate control of the exposure of employees to substances hazardous to health, or otherwise requisite for protecting the health of employees, it will be necessary to introduce a system of monitoring the exposure of employees to substances hazardous to health.

Records of this monitoring must be kept for at least 40 years where the record is representative of the personal exposures of identifiable employees, or for at least 5 years in any other case from the date of the last entry.

Exposure judged not to be a risk to health
The following examples are considered reasonable grounds for reaching the conclusion that the substance does not present a risk to health:

- The process and/or operation is carried out to the same or better standard as the Health and Safety Executive, Industrial Advisory Committee or trade association guidance on good practice, which give assurance of insignificant exposure.
- The quantities of substances or rate of use are too small to constitute a risk to health under foreseeable circumstances, even if all the control measures fail.
- Measurements have previously been taken of the process and/or operation, including in a “maximum exposure” situation, which have confirmed that exposure is not a risk to health at any time and that the conditions of the process, operation and substances are demonstrably the same.
- The process and/or operation is performed strictly in conformance with well-documented procedures, information and the conditions as detailed by the suppliers of the plant and/or substance in which they give valid assurance that the operation, process and/or substance will not give rise to risks to health.

Risks should not be judged as negligible unless there is certain and valid evidence to back up this judgement. Where this is not available the risks must be identified and precautions instituted to protect the health of those exposed.

Exposure judged to be a risk to health
Where exposure is either known, or found to be occurring, in situations where prevention is reasonably practicable the risk must be considered unacceptable.

Exposure - prevention or control
Regulation 7 requires that exposure to hazardous substances must be either prevented or, where this is not reasonably practicable, adequately controlled.

This section of the manual is concerned with explaining what is considered to be "adequate control" and the approach to be followed in order to achieve it.

Control of Exposure
Workplace exposure limits (WELs) are occupational exposure limits set under the Control of Substances Hazardous to Health Regulations. These limits are set to help protect the health of workers. WELs are concentrations of hazardous substances in the air averaged over a specific period of time referred to as a time-weighted average (TWA) . Two time periods are used: long-term exposure limit (LTEL) of 8 hours and short-term exposure limit (STEL) of 15 minutes. STELs are set to help prevent effects, such as eye irritation, which may occur following a few minutes' exposure.

If the exposure to a substance assigned a WEL, as listed in Table 1 of the HSE guidance note EH40,, is reduced as far as is reasonably practicable and is in any case below that WEL, it shall be considered to be adequately controlled.

When considering how far the exposure should be reduced below the WEL the nature of the risk likely to be caused by the substance must be weighed against the cost, the amount of time needed and the trouble required in taking the measures necessary to reduce that risk.
The non-assignment of a WEL does not necessarily signify that the substance is safe and without risk to health.

The routes of exposure to substances include inhalation, ingestion or absorption through the skin or mucous membranes.

In any of the above, exposure should be controlled to a standard where the level of exposure is such that nearly all the population could be repeatedly exposed daily without any adverse effect. The information necessary to set this standard may be available from a variety of sources, such as the manufacturer or supplier of the substance, occupational health publications or industrial and trade associations.

Prevention and Control Measures

The initial approach to the prevention and control of exposure to harmful substances should always explore the utilisation of operational, process and engineering measures. If it is found that these measures are not reasonably practicable or cannot adequately prevent or control exposure then the provision and use of personal protective equipment should be considered. The provision and use of personal protective equipment should be considered as a last option for achieving the required levels of control.

The measures necessary for the prevention or control of any exposure could be any combination of the following and should be considered in the order given:

1. Prevention of exposure:
    - The elimination of the substance, removing the risk in total;
    - The substitution of the substance with a less hazardous substance, a less hazardous form of the substance or dilution of the substance.

2. Control of exposure:
    - The total enclosure of the operation and/or process;
    - The alteration, modification or replacement of the plant, process and/or operation, or safe system of work to minimise the generation of, or suppress or contain, hazardous substances and to restrict the area of contamination in the event of any spills or releases, both routine and accidental, of those substances;
    - The provision of local exhaust ventilation to totally remove the airborne hazardous substance at source and dispose of it safely;
    - The provision of partial local exhaust ventilation to reduce the exposure to airborne hazardous substances;
    - The provision of sufficient general ventilation to reduce the exposure to airborne
    - hazardous substances;
    - The reduction of the number of persons exposed;
    - The reduction of the length of exposure;
    - The prohibition of smoking, eating or drinking in the workplace;
    - The provision and use of suitable personal protective equipment;
    - The provision of adequate facilities for the cleaning, maintenance and repair of
    - personal protective equipment;
    - The provision of adequate welfare facilities as already outlined;
    - The regular and effective cleaning of the workplace and/or plant to remove contamination;
    - The provision of suitable arrangements for the safe storage and safe disposal of hazardous substances.

Existing Control Measures
The control measures already in existence are to be re-examined and re-evaluated on a regular basis. If these control measures are then considered inadequate consideration will be given to improving, extending or replacing them to ensure that adequate control measures are achieved and maintained.

Company control measures include, but are not restricted to, the following:

- Hygiene Facilities - Adequate washing facilities are provided for use by all persons likely to be exposed to hazardous substances. The facilities reflect the nature and the likely levels of any exposure and are sufficient to permit the user to achieve a standard of personal hygiene commensurate with the adequate control of the exposure and the need to prevent the spread of the substance. Eye wash facilities may need to be provided in case of an emergency.
- Personal Protective Equipment - Where protective clothing is used or there is a risk of contamination of personal clothing and effects then accommodation for that clothing and personal effects, and changing facilities, will be provided. Changing facilities are designed to ensure that personal clothing does not become contaminated with hazardous substances from the workplace, the risk of cross contamination between contaminated clothing and clean clothing is minimised and that they can be easily and effectively cleaned.
- Eating, Drinking and Smoking - Personnel are prohibited from eating, chewing, drinking or smoking in any area which is likely to be contaminated with any harmful substance.
- Eating and Drinking Facilities - Where it is necessary to reduce the risk of exposure by prohibiting the consumption of food or drink in the workplace facilities for this will be provided outside the contaminated area. These facilities will be conveniently placed in relation to the workplace and the hygiene facilities and will be so designed as to ensure that they will not become contaminated with substances emanating from the workplace and can be easily and effectively cleaned.

Maintenance of Personal Protective Equipment
The company undertakes to ensure that personal protective equipment, including protective clothing, is properly stored, checked at suitable intervals, and when discovered to be defective, repaired or replaced before further use.

PPE which may be contaminated by a substance hazardous to health must be removed and kept apart from uncontaminated clothing and equipment and it must be ensured that contaminated clothing is decontaminated and cleaned or, if necessary, destroyed.

Section I

Arrangements for Providing Information, Instruction and Supervision

The health and safety law poster is displayed at all fixed company workplaces and should also be displayed at each temporary site within the common welfare areas. The health and safety law poster contains the following information:

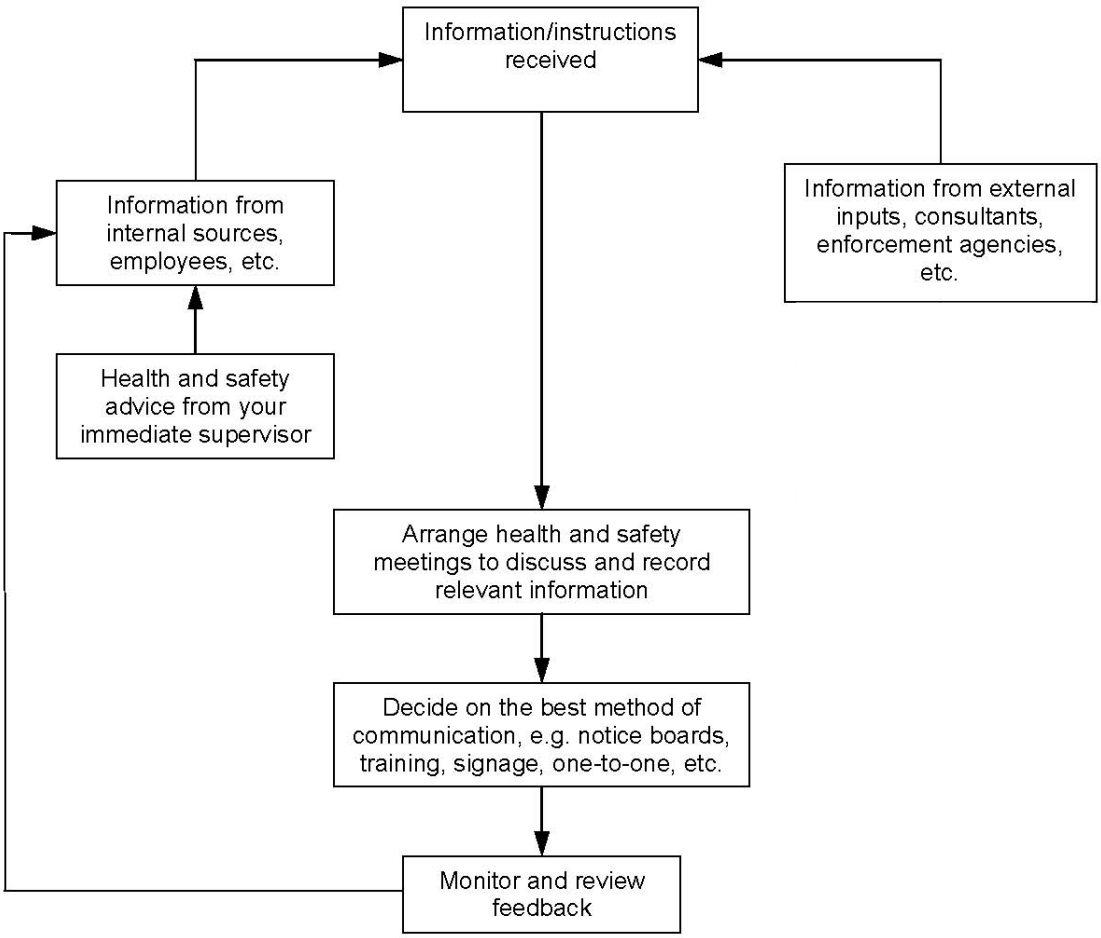
- Names and locations of trade unions or other safety representatives and groups they represent.
- Management of health and safety appointed person(s) health and safety responsibilities.
- Name and address of enforcing authority whose health and safety inspectors cover this workplace (e.g. the HSE or your local authority's environmental health department).

Gary Morris shall ensure that adequate supervision of trainee workers is provided. Day-to-day supervision shall be carried out by the relevant workplace manager or supervisor.

Gary Morris shall ensure that adequate supervision of young workers is provided. Day-today supervision shall be carried out by the relevant workplace manager or supervisor.

Gary Morris and the Site Managers are responsible for ensuring that our employees working at locations under the control of other employers are given relevant health and safety information.

Procedure for Providing Information, Instruction and Supervision



Guidance for Providing Information, Instruction and Supervision

Safety signs and signals

The Health and Safety (Safety Signs and Signals) Regulations apply to all work premises and activities but do not apply to signs relating to the supply of dangerous substances, the transport of dangerous goods by road or rail, or to signs regulating road or rail traffic.

The regulations cover the provision and use of safety signs and signals which are required to be displayed or used when a risk assessment shows that, in spite of protective measures, the risk cannot be eliminated or sufficiently reduced and a significant risk remains.

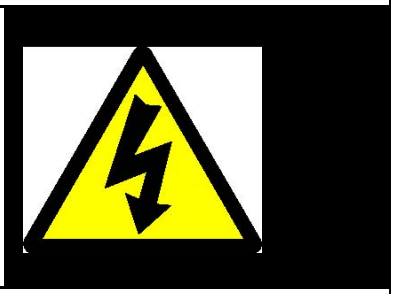
Safety Signs
Safety signs must conform to the requirements overleaf. Signs should be illuminated where appropriate and must be kept clean and properly maintained.
Signals
These include:

- Acoustic signals and/or verbal communication to signal danger, e.g. to call for emergency evacuation. Such signals shall be tested at frequent intervals.
- Hand-signals or verbal communication to guide persons carrying out hazardous or dangerous manoeuvres, e.g. reversing vehicles.

Training
Employees shall be given sufficient information, instruction and training about the meaning of safety signs and signals and on the relevant action that must be taken.

Further Guidance
Further information is given in the HSE booklet L64 “Safety Signs and Signals: Guidance on Regulations”.

Safety Signage – Types and Examples

TYPE OF SIGN	SHAPE	SYMBOL/COLOUR	
Prohibitory: (e.g. "NO SMOKING")	Round	Black pictogram on white background, red edging and diagonal line	
Warning: (e.g. "ELECTRICAL RISK")	Triangular	Black pictogram on yellow background with black edging	
Mandatory: (e.g. "EAR PROTECTION MUST BE WORN")	Round	White pictogram on blue background	
Emergency escape or first aid:	Rectangular or square	White pictogram on green background	
Fire fighting: (e.g. "EMERGENCY FIRE HOSE")	Rectangular or square	White pictogram on red background	

Smokefree workplaces
The "smokefree" law applies to virtually all "enclosed" and "substantially-enclosed" public places and workplaces, including both permanent and temporary structures.

Premises are considered enclosed if they have a ceiling or roof and (except for doors, windows or passageways) are wholly enclosed either on a permanent or temporary basis. Premises are considered substantially-enclosed if they have a ceiling or roof but have an opening in the walls which is less than half the total area of the walls.

Smokefree vehicles
Work vehicles must be smokefree if they are used in the course of paid or voluntary work by more than one person, regardless of whether they are in the vehicle at the same time.

Smokefree home working
Any part of a private dwelling used solely for work purposes must be smokefree if:

- It is used by more than one person who does not live at the dwelling.
- Members of the public attend to deliver or to receive goods and/or services.

Smokefree signage
"No smoking" signs need to be displayed in a prominent position at every entrance to smokefree premises. Signs must meet the following minimum requirements:

- At least one must be a minimum of A5 in area (210mm x 148mm) and display the words
- "No Smoking - It is against the law to smoke in these premises".
- Each must display the international no smoking symbol at least 70mm in diameter.
- Smokefree vehicles need to display a "no smoking" sign in each compartment of the vehicle in which people can be carried. It must show the international no smoking symbol illustrated opposite.

Smokefree law enforcement
Failure to comply with the smokefree law is a criminal offence. Local councils are responsible for enforcing the smokefree law in England and have the legal power to enter premises or board vehicles to determine if anyone is breaking the law.

Employers who control or manage smokefree premises and vehicles have a legal responsibility to prevent people from smoking in them and to ensure that the required "no smoking" signs are in place. Employers should ensure that their employees are aware of the law and that they now work in a smokefree environment.

Notwithstanding the requirements of the smokefree law, employers retain a general duty of care under the Health and Safety at Work Act to protect their employees from the effects of second-hand smoke where exposure to it may be considered unavoidable in their workplace.

For further information on the smokefree law visit the Department of Health website: www.smokefreeengland.co.uk.

Workplace documentation

Notices
The following notices will be displayed in a prominent position on site:

- Health and safety law placard.
- A copy of your company's employers liability insurance.
- F10 (as appropriate).
- Copy of the organisation's health and safety policy statement.

It is also recommended that the following are displayed:

- The Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) - abstract (in areas where highly flammable liquids or LPG is used).
- Any other abstracts of regulations that are relative to works being carried out on site.

Prescribed Registers
Weekly record of inspection as required by the Construction (Design and Management) Regulations (CDM) for:

- Excavations;
- Cofferdams;
- Caissons.
- Weekly record of inspection as required by the Work at Height Regulations (WAHR) for:
- Scaffolds.
- Record of inspection and/or thorough examination as required by The Provision and Use of Work Equipment Regulations (PUWER) or The Lifting Operations and Lifting Equipment Regulations (LOLER) for all other equipment.
- Accident book – record of injuries incurred on site.

Documents
Health and safety plan.
Method statements for all tasks where there is a foreseeable risk.
Assessments required:

- Risk;
- COSHH;
- Environmental;
- Noise;
- Manual handling;
- Confined space;
- Specialist, e.g. asbestos, RPE.
- Evidence/certificates of competence (including training) for any equipment used/tasks carried out.

Workplace rules
This section details the rules and standards that relate to all employees at work, contractors and visitors. It is the responsibility of all to obey these rules and to behave in a safe manner whilst at work.

Deliberate contravention of these rules shall be considered a break in an employee's contract of employment or a breach of contract from that employee's employer. It should also be borne in mind that contravention of health and safety legislation is a criminal offence and that a prosecution can be taken against an individual by the Health and Safety Executive.

Working practices
It is the responsibility of all employees, contractors and visitors to ensure that:

- No machine or item of plant or equipment is operated by any person unless they have been trained and are authorised to do so.
- All machine guarding is in place and correctly adjusted prior to machinery being used.
- Any fault, defect (including damage) or malfunction in any item of machinery, plant, equipment, tool or guard is reported immediately.
- No machine, or item of plant or equipment is left unattended or cleaned whilst in motion, unless the operator is authorised to do so.
- No repairs, maintenance or adjustments to machines, or items of plant or equipment are carried out, unless the operator is authorised to do so.
- All substances are used only in accordance with the written instructions.
- All substances are stored in accordance with the written instructions and are returned to storage after use.
- All hazard notices or warning signs displayed on the premises are obeyed.
- All notices displayed in the workplace are read and operatives understand their instructions.
- All safety equipment and facilities provided are used and are not misused or wilfully damaged.
- The work area is kept clean and tidy at all times.
- All waste is disposed of in the correct container.
- All liquid spills are cleaned up immediately.
- All emergency procedures relevant to their work area are obeyed.
- Emergency exits and equipment are not obstructed.
- Any use of or damage to firefighting equipment is reported immediately.
- Prompt medical assistance is sought for any injury received at work and the injury is reported as soon as possible.

Misconduct

Any person on site found to have acted in any one of the following ways shall be liable to disciplinary procedures:

- Wilfully breaching the company's safety rules or health and safety policy.
- Removing any guard or protective device without permission.
- Operating any machine, plant or equipment without authority.
- Misusing items provided for first aid.
- Recklessly interfering with or misusing anything provided in the interest of health, safety or welfare at work.
- Defacing or removing notices, signs, labels or any other warning device.
- Misusing any chemical, flammable substance, toxic material, etc.
- Smoking in designated "no smoking" areas or whilst using flammable substances.
- Taking part in horseplay or practical jokes.
- Making false declarations or interfering with evidence following an accident or dangerous occurrence.
- Misusing compressed-air, electric or pneumatic equipment.
- Overloading lifting equipment.

Administrative arrangements

Notification

The following written notifications may be required. The responsibility for making these notifications should be established prior to any notification being given.

To the Health and Safety Executive:

- Form OSR1 prior to occupation of offices, which are to be used for more than 6 weeks if fixed or 6 months if mobile and in which persons are employed for more than 21 man hours per month.
- Form F10 where construction is expected to last more than 30 days or involve more than 500 person days.
- Where radiography is to be carried out 28 days' notice may be required. (Where radiography is carried out the relevant section of the manual shall be provided.)
- Where asbestos is being removed a licence may be necessary and work notified in accordance with that licence or 14 days' notice given. (Where work with asbestos is carried out the relevant section of the manual shall be provided.)

To the local authority:

- Notification of intended demolition.
- Application for consent to carry out any activity creating noise under Section 61 of the Control of Pollution Act.
- Notification to dispose of wastes, in particular specified wastes.
- Application to erect scaffolding or other structures on the public highway.

To the statutory undertakings:

- Requests for the location of underground services.
- Request for the isolation of overhead or underground services.
- Request for the provision of temporary site services.

Documentation

Arrangements shall be made for the provision of:

- Statutory documentation;
- Company documentation as required.

Arrangements with other contractors

The principal contractor will normally be responsible for appointing a health and safety co-ordinator who will ensure safe co-ordination, co-operation and the exchange of information between all contractors on site (as is required by the Management of Health and Safety at Work Regulations).

Section J

Arrangements for Company Staff Visiting Hazardous Areas/Sites

If company employees are required to work in/visit external work sites or parts of the company's premises that are deemed to be hazardous then there will either be a specific risk assessment or safe system of work which might incorporate a permit-to-work system to ensure their safety.

It will be for Gar Morris to ensure that a safe working procedure is generated and adhered to.

Employees are required to comply with the requirements of that safe working procedure.

Procedure for Company Staff Visiting Hazardous Areas/Sites

Guidance for Company Staff Visiting Hazardous Areas and Sites

"Hazardous areas" in the context of this section relates to areas within the company premises or on external work sites, e.g. construction sites, where company employees are required to work/visit on company business.

It is the policy of this company that in the event of any of our company employees being required to periodically work at or visit external work sites, or parts of the company's premises that are deemed to be hazardous, the following health and safety rules and procedures shall be put into effect:

Hazardous areas within this company's premises
The manager/supervisor in control of the hazardous area(s) must ensure that:

- Written procedures are in place for the effective monitoring and/or supervision of company staff required to work in or visit hazardous or restricted areas.
- A risk assessment is made of the hazardous area in question to identify company staff at risk and control measures required to reduce that risk. The risk assessment must be recorded and be readily available for inspection purposes and must take the provision of first aid into account.
- Company staff at risk are made aware of hazardous or restricted areas on the company premises through provision of information, instruction or training (this may include induction training as the case may be), before entering such areas.
- The area is adequately signed to indicate the nature and severity of the hazard and the precautionary measures required (this may include display of a safe system of work for the area, symbolic safety signs requiring personal protective equipment to be worn in the affected area, etc.).
- There is an adequate provision of personal protective equipment readily available for use by company staff before entering the hazardous area and that such staff are aware of where that equipment is located.
- A suitable and effective emergency and evacuation system is in place for the area concerned, which is tested at regular intervals.

In the case of external personnel (e.g. cleaners, members of public, visitors, etc.) entering the hazardous area the precautions above must still be taken as if that person were an employee of this company.

Hazardous external sites
Where it is necessary for company employees to visit or work at external sites that present a significant risk to their health and/or safety the following procedures must be in place prior to any works being carried out:

Company employees must be made aware of the significant risks to health and safety of the site concerned (such information may be in the form of induction training and should be provided either by the client or by this company), as well as arrangements in place/required to be taken to adequately reduce such risks to the lowest levels. Where the degree of hazard or risk warrants such action, risk assessments and/or safe systems of work must be drawn up, be put in place and be made available to company employees. The responsibility for determining the level of risk, the appropriate action to be taken and liaison to help determine risk will be a management function of this company.

Any personal protective equipment required to be worn on site must be provided (either by the client or this company as the case may be) and worn before entering the hazardous area.

All safety rules and instructions relating to the hazard/s or risk which are displayed or provided by the client/this company must be complied with at all times (in certain cases this may include a permit-to-work system).

Section K

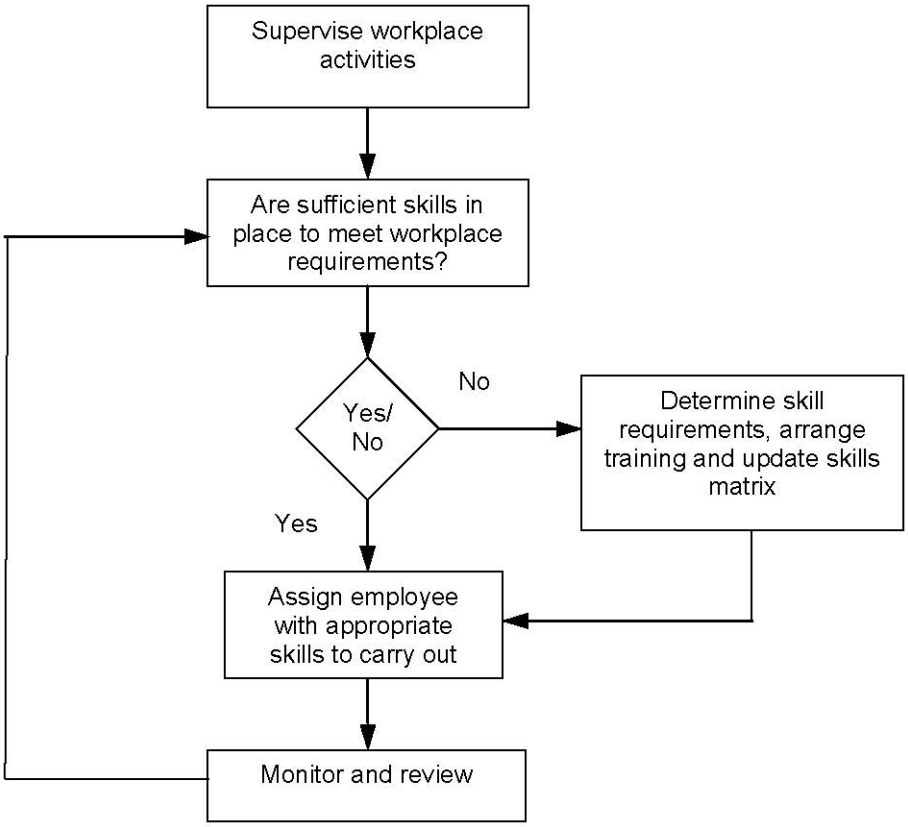
Arrangements to Assess Employee Competency for Tasks and Training

Gary Morris will deem who is competent to carry out the following tasks on behalf of the Company:

- Supervising and monitoring workplace activities.
- Advising on risk assessment.
- Equipment maintenance and repair.
- Administering first aid.
- Working at height.
- Operating plant and/or machinery.
- Controlling lifting operations.

Gary Morris will identify, arrange and monitor training provided either in-house or by external providers.

Procedure for Assessing Employee Competency for Tasks and Training



Guidance on Assessing Employee Competency

Frequently there is a need to deem competence to carry out a task or oversee a task and convey authority to use a particular piece of equipment. Competence is not defined precisely in any current regulation or act. The nearest we get is from the Management of Health and Safety at Work Regulations:

"A person shall be regarded as competent … where he has sufficient training and experience or knowledge and other qualities to enable him properly to assist in undertaking the measures." When in doubt a judge would often turn to a renowned dictionary.

From the Cambridge International Dictionary of English:
"- competence, competency noun the ability to do something to a level that is acceptable."

Modern regulations insist that it is for the employer to deem competency and so to be able to carry out a (dangerous) task to a level that is acceptable we need to demonstrate that the individual has "training and experience or knowledge and other qualities" to enable them to carry out that task safely.

In some circumstances there is a qualification that helps. Generally we accept that the person who has passed a driving test and holds a driving licence is competent to drive. Or a training course, e.g. attendance at a safety awareness course, may be sufficient to think that a person is competent to be in a certain area and not cause harm to themselves or others.

In other circumstances the knowledge that the operative has carried out this task safely for the last 10 years, without danger, may be sufficient to deem competence. Where there is a legal requirement for training, e.g. driving a forklift truck, then satisfying that requirement will be a necessary part but perhaps not the whole reason for deeming competence.

Where a person is deemed competent or given authority to carry out a task then it would be wise to record that fact. Competence may be required in overseeing or supervising, advising on safety-critical matters, using particular equipment or working in certain environments.
An incomplete guide list follows:

- Overseeing or Supervising:
- Supervising site personnel;
- Supervising on-site activities;
- Supervising use of machinery;
- Supervising young persons or trainees.
- Advising on Safety-Critical Matters:
- Advising on risk assessment;
- Carrying out occupational health monitoring;
- Carrying out equipment maintenance/repair;
- Operating plant or machinery;

Section L

Arrangements for Manual Handling Operations

Manual handling means any transporting or supporting of a load including lifting, putting down, pushing, pulling, carrying or moving by hand or by bodily force.

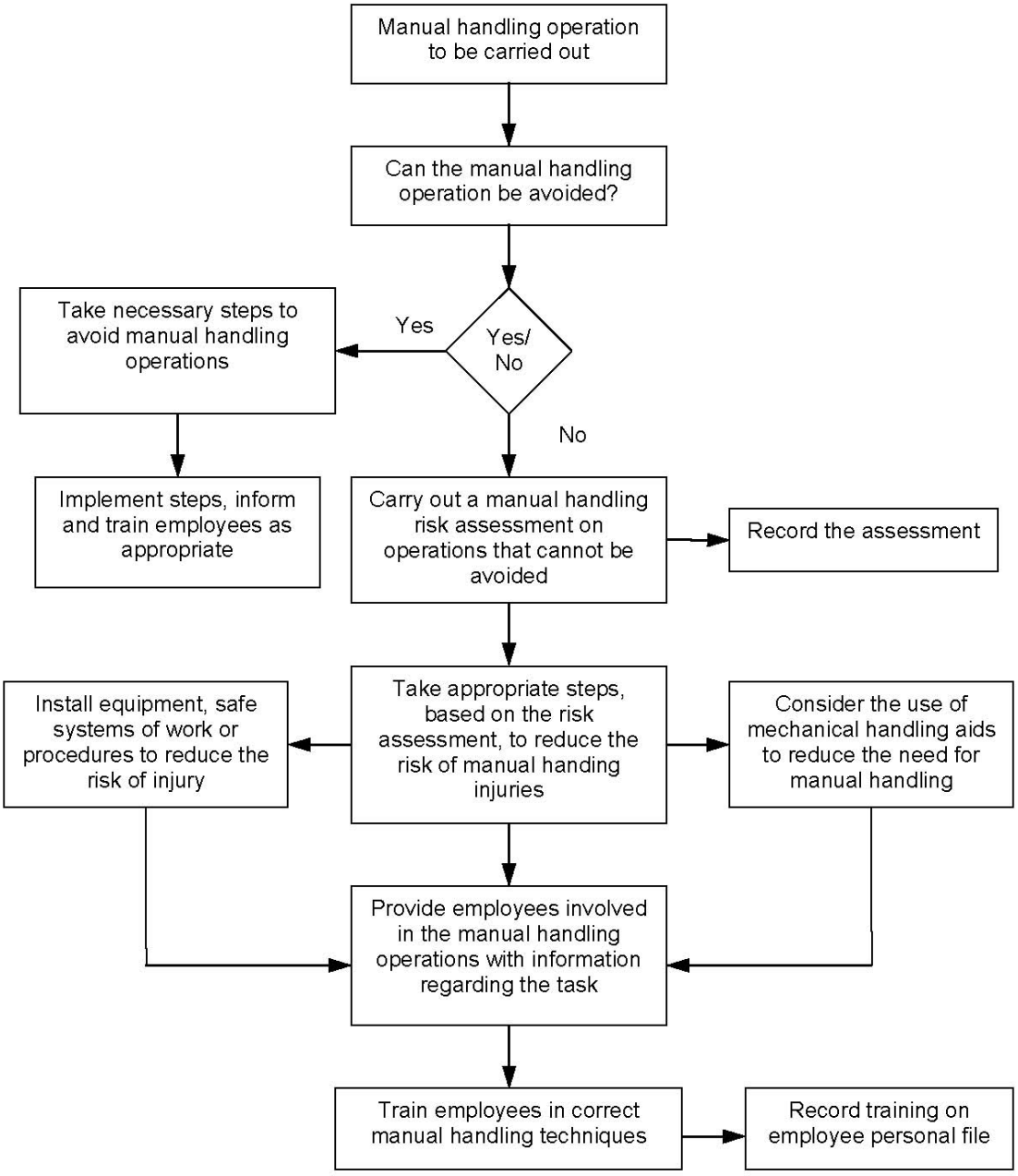
In accordance with the Manual Handling Operations Regulations the company will endeavour to avoid the need for employees to undertake manual handling operations that involve a risk of injury. If this is not reasonably practicable then the company will make a suitable and sufficient assessment of the task and reduce the risk to the lowest level that is reasonably practicable.

This will include, where possible, the provision of information and general indications on the weight of each load and the heaviest side of any load whose centre of gravity is not positioned centrally.

Assessment will be recorded and reviewed if no longer valid or there is significant change in the matter to which it relates.

The requirement that the employee has a duty to make full and proper use of any system of work provided by this company (as their employer) to alleviate or reduce the risk of manual handling operations will be communicated to the company's employees.

Procedure for Manual Handling Operations



Guidance on Manual Handling Operations

The Manual Handling Operations Regulations apply to any manual handling operation that may cause injury at work. These operations will be identified by the risk assessment carried out under the Management of Health and Safety at Work Regulations.

They will include not only lifting but also lowering, pushing, pulling, carrying or moving loads by hand or other bodily force.

As an employer, the company is required to take three key steps:

- Avoid hazardous manual handling operations where reasonably practicable.
- Adequately assess any hazardous operations that cannot be avoided. Ergonomic assessment looks at the weight, shape and size of the load, the handler's posture, the working environment and the individual's capability. Unless the assessment is very simple, a written record will be needed.
- Reduce the risk of injury as far as is reasonably practicable.

Principles

The correct method of lifting makes the job easier, less tiring and is less likely to lead to back injuries. Lifting is to be done using the correct muscles - back and abdominal muscles are weak, the leg and thigh muscles are strong. A good posture at the start of the lift is essential; slight bending of the back, hips and knees is preferable to fully flexing the back (stooping) or fully flexing the hips and knees (squatting). If the load can be kept close to the body a person can act as a human elevator - resulting in far heavier loads being lifted with far less effort.

There are six significant points in manual handling:

- Grip - A good grip makes maximum use of the palm of the hand, the ball of the thumb and the base of the fingers. Considerable damage can be caused by using the sensitive fingertips; continued use of them leads to strained fingers and forearms.
- Back - The back should be slightly bent, as should the hips and knees, in order to get close to the load and then to raise it, pushing upwards with the leg muscles. The back should not be flexed any further while lifting, as can happen if the legs begin to straighten before starting to raise the load. Avoid twisting the back or leaning sideways, especially when the back is bent.
- Head - Keep the head up when handling. Once the load is held securely, look ahead, not down at the load.
- Feet - The correct position of the feet is approximately the width of the hips apart, with one foot slightly in front of the other in order to maintain balance. This position provides a stable base as the load is lifted. Be prepared to move the feet during the lift to maintain stability - turning by moving the feet is better than twisting and lifting at the same time.
- Arms - Where possible, the load should be hugged as close to the body as possible so that the body does not become unbalanced.
- Body - Keep the load close to the body for as long as possible while lifting and keep the heaviest side of the load next to the body.

Other precautions

- A person should always be able to see where they are going.
- It is good practice to look over the route before lifting to ensure that there are no obstructions or obstacles in the way.
- Stacking is only to be as high as it is possible to go with the elbows still tucked into the sides.
- Hand hooks or other lifting aids are to be used if loads are unwieldy or irregular in shape.
- If there is uncertainty as to the weight of the object to be lifted, or the person who is to do the lifting is unsure of their capabilities, help is to be sought.

Associated Forms & Guidance

- Manual Handling Assessment Form

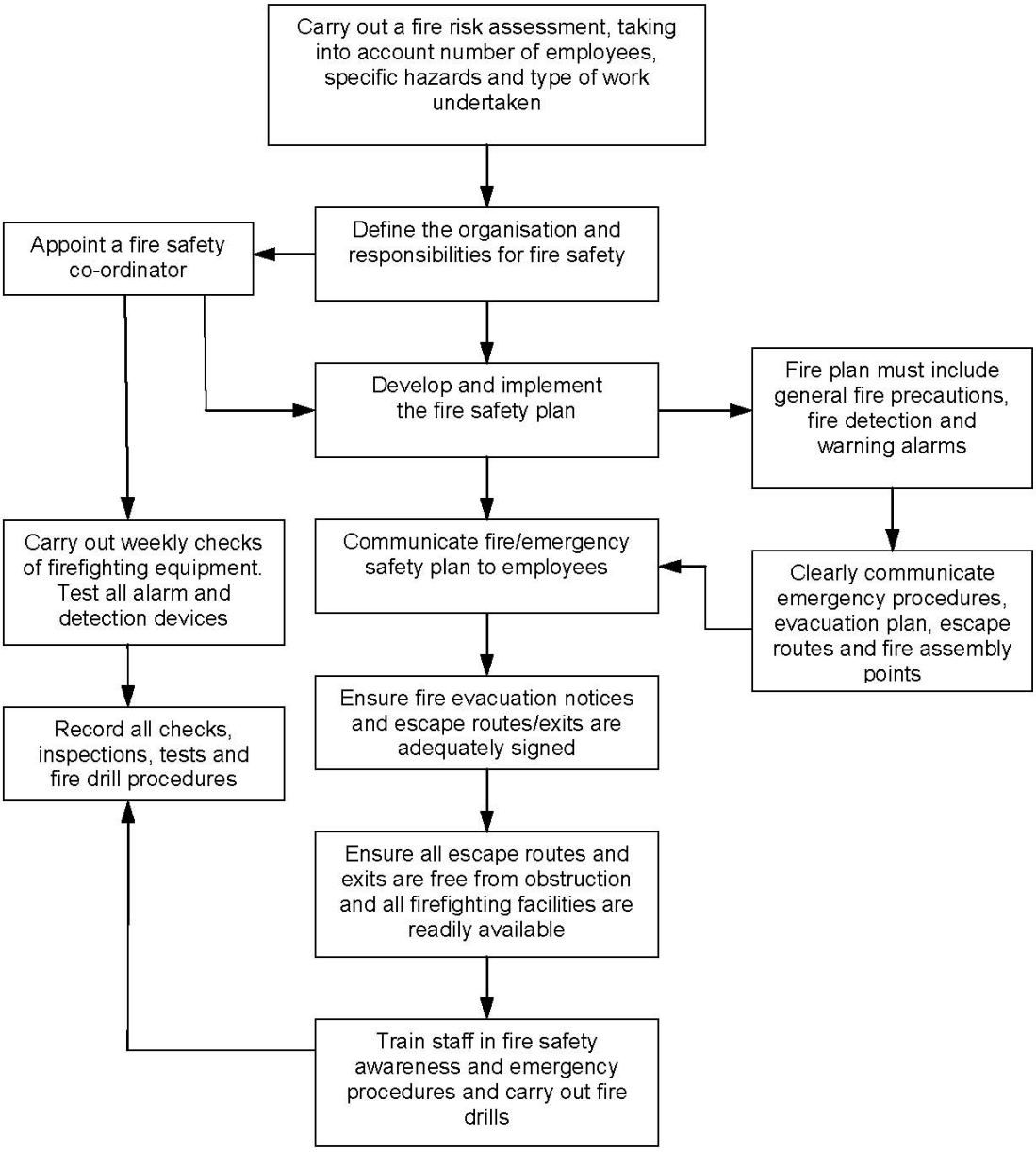
Section M

Arrangements for Fire and Emergencies on Company Premises

It is the policy of this company that suitable and sufficient fire and emergency procedures be in place at the company premises in order to facilitate effective evacuation or other appropriate action, and to ensure that employees' personal health and safety is not put at risk unduly during the course of such action.

Gary Morris will ensure that the procedures are put in place, implemented and maintained.

Procedure for Fire and Emergencies on Company Premises



Guidance for Fire and Emergencies on Company Premises

Suitable and sufficient fire and emergency procedures should be in place at the company premises in order to facilitate effective evacuation or other appropriate action and to ensure that employees' health and safety is not put at risk unduly during the course of such action.

Fire precautions
Gary Morris is to ensure that:

- Sufficient firefighting equipment is available on the premises and that it is serviced/maintained at least once a year.
- Training and instruction are given to staff in respect of means of escape, the use of the firefighting equipment and the fire drill procedure.
- The fire drill procedure is tested periodically.
- Records are kept of items 1 to 3 above.
- The following check is made of the premises, either personally or by a designated member of staff, when work ceases:
- Electric, gas and oil equipment not required to operate overnight is switched off;
- Equipment in use overnight is safe;
- No cigarettes are left smouldering;
- Fire doors and smoke stop doors are closed;
- Windows are closed, outside doors locked and the premises are secure against intruders.

Fire/emergency action
(To be displayed at all places of work)
The fire alarm device for these premises consists of: Break Glass Call Points. Alarm call points are located: At the Escape Routes.

The Office assembly point is located: In Beak Street where it meets Carnaby street Opposite the Building, each site will have a muster / assembly point identified during site induction .

Action in the event of a fire or explosion:

The following action is to be taken in the event of a fire or explosion occurring:
Raise the alarm. If you are not near an alarm device shout "FIRE" and give the location.
Inform Tracy Palmer (office) & Site Manager (Site) who will alert the Fire Brigade by telephone and inform anyone else in the building.

Put the fire out if that is possible without putting yourself in danger/report your presence to Tracy Palmer (Office) / Site Manager (Site) at the assembly point.

Full details of the incident are to be passed to Gary Morris / Barry Palmer as soon as possible.

Summoning the Fire Brigade:
The information that shall be required is: (office)

Palmer Morris Interiors Ltd
Units 1-3 Wyvern Estate
Beverley Way
New Malden
London KT3 4PH
Tel: 020 8942 6461

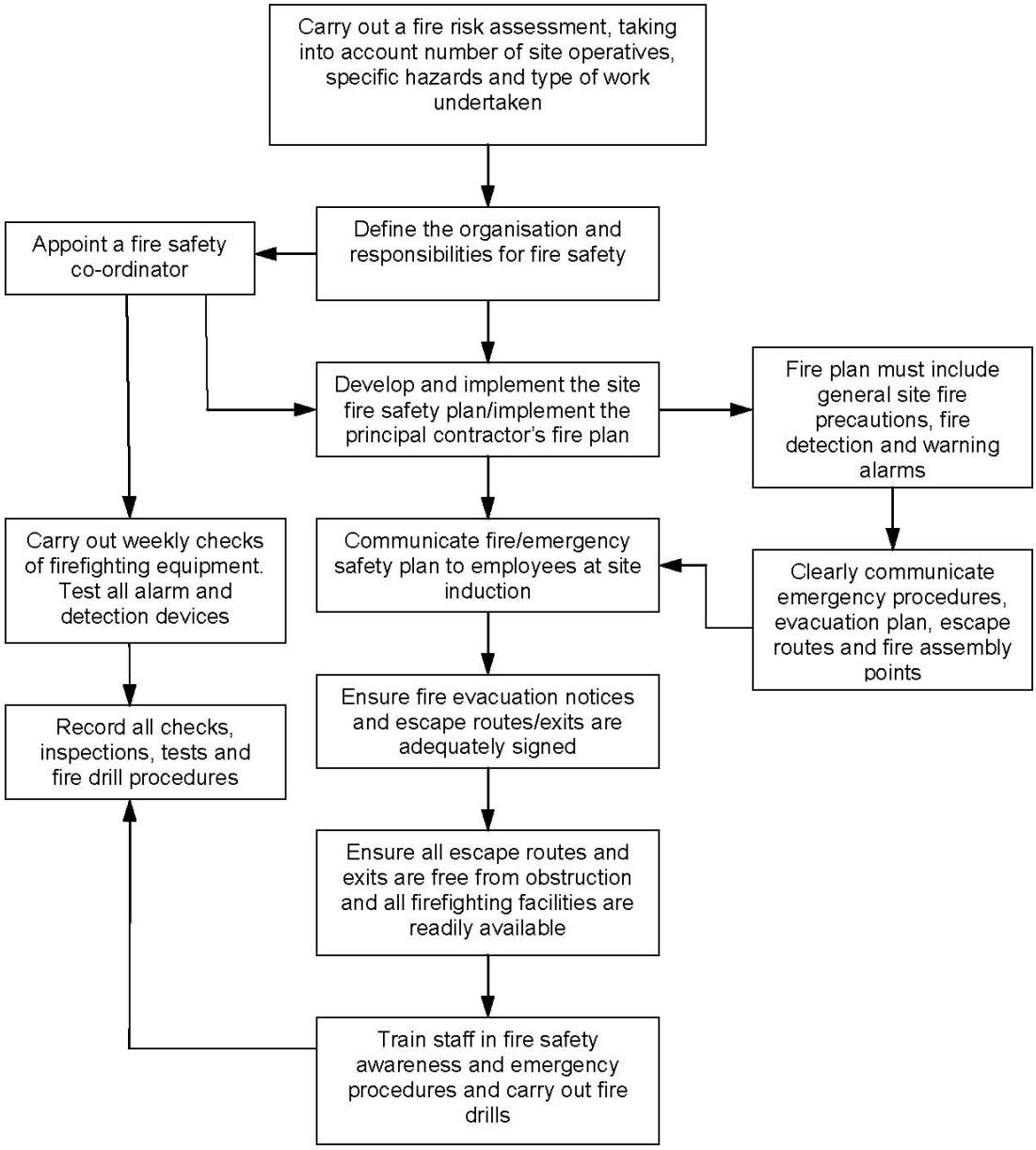
BRIEF DETAILS OF THE EMERGENCY, e.g. FIRE IN THE GROUND FLOOR

If calling from site state the site address

Fire/Emergency Action Sign
Fire wardens:

- Names of fire wardens and areas they control:
- Due to the nature of the premises it will not always be possible to have a designated fire warden in each area. It is imperative, therefore, that each member of staff ensures that their area is evacuated and that everyone, including visitors, is alerted and cleared from the premises. That information should be reported to the senior person in charge at the fire assembly point.

Procedure for Fire and Emergencies on Site



Guidance for Fire and Emergencies on Site
Suitable and sufficient fire and emergency procedures should be in place at each site in order to facilitate effective evacuation or other appropriate action and to ensure that operatives' health and safety is not put at risk unduly during the course of such action.

The following is an example of the type of procedures that would be put in place at the site, although it is possible that these procedures may be more detailed or complicated depending on the nature, extent and complexity of the site, and if there are any existing emergency/fire procedures in place for the site.

Fire precautions

- The site manager is to ensure that:
- Sufficient fire fighting equipment is available on the site and that it is serviced/ maintained at least once a year.
- Training and instruction are given to staff in respect of means of escape, the use of the fire fighting equipment and the fire drill procedure.
- The fire drill procedure is tested periodically.
- Records are kept of items 1 to 3 above.
- The following check is made of the site, either personally or by a designated member of staff, when work ceases:
- Electric, gas and oil equipment not required to operate overnight is switched off;
- Equipment in use overnight is safe;
- Fire doors and smoke stop doors are closed;
- Windows are closed, outside doors locked and the premises are secure against intruders.

This will require that a fire patrol is carried out 1 hour after the end of any hot-works.
A suitable fire assembly area will be designated in compliance with routine orders issued by the company representative or defined in the health and safety plan.

Underground services
In the event that any underground services are struck contact is to be made with the organisation to which the underground services belong. All work in the area is to cease until such time as the services have been examined and the area is made safe. A list of the relevant organisations is to be retained on site.

Temporary accommodation
Site accommodation presents a series of hazards that vary with usage. Temporary site huts see service as offices, workshops, canteens, drying rooms, tool stores, rest rooms and other uses. Frequently they are many of these things at the same time and the site manager should ensure that:

- Fire exits are conspicuously marked, easily and immediately able to be opened from the inside and have unobstructed access and a suitable means of escape.
- Adequate fire fighting equipment is available.
- Temporary buildings should be at least 10.0 metres away from the permanent structure to create a fire gap. Where the break is less than 6.0 metres then the temporary building should not add to the spread of fire or the creation of smoke/toxic fume. In order to ensure this the following standards apply: Internal ceiling and all wall surfaces to BS 476 part 7.
- External roof surface to BS 476 part 3.
- Walls and roof 30 minute fire resistance to BS 476 parts 20 and 22.
- Doors and windows 30 minute fire resistance to BS 476 parts 20 and 22.
- Supporting members 30 minute fire resistance to BS 476 parts 20 and 21.
- Metal tread staircases to be used (SFRP).
- Where the temporary building is located within another building, fire access and escape routes should be clearly marked.

Fire/emergency action
(To be displayed at all places of work)
Action in the event of a fire or explosion:

- The following action is to be taken in the event of a fire or explosion occurring on site:
- Raise the alarm. If you are not near an alarm device shout “FIRE” and give the location.
- Inform the site manager or their deputy who will alert the Fire Brigade by telephone and inform anyone else in the building/on site.
- Put the fire out if that is possible without putting yourself in danger.
- Report to the senior person at the assembly point.

The site manager or their deputy is to ensure that full details of the incident are to be passed to the contracts manager as soon as possible.

Action in the event of discovering a bomb (real or hoax):
The following action is to be taken in the event of a bomb (real or hoax) being discovered or threatened:

- Raise the alarm. If you are not near an alarm device shout “FIRE”.
- Inform the site manager or their deputy who will summon the Police by telephone and inform anyone else in the building/on site.
- Report to the senior person at the assembly point.

The site manager or their deputy is to ensure that full details of the incident are to be passed to the contracts manager as soon as possible.

Action on hearing the alarm:

- On hearing the emergency alarm the following action is to be taken:
- Evacuate the premises quickly and quietly. Do not wait to finish a phone call or to collect personal belongings.
- Report to the senior person at the assembly point.
- Do not re-enter the site until the senior fire officer declares that it is safe to do so.

THE ASSEMBLY POINT IS LOCATED:_____

Summoning the Fire Brigade:

The information that shall be required is:

COMPANY NAME: _____

LOCATION OF THE FIRE (SITE ADDRESS): _____

BRIEF DETAILS OF THE EMERGENCY, e.g. FIRE IN THE GROUND FLOOR

- Fire/Emergency Action Sign
- Fire wardens
- Names of fire wardens and areas they control:
- Due to the nature of the premises/site it will not always be possible to have a designated fire warden in each area. It is imperative therefore that each member of staff ensures that their area is evacuated and that everyone, including visitors, is alerted and cleared from the premises. That information should be reported to the senior person in charge at the fire assembly point.

Associated Forms

Fire Risk Assessment Form

Section N

Arrangements for First Aid, Medical Emergencies, Accidents/Incidents

First aid
Gary Morris will ensure that there are sufficient first aiders available both at head office and on all sites. First aid kits are kept at the following locations:

- In the Kitchen or the Site Office (if no site office available, the first aid kit will kept in a location that is clearly identified during site induction)
- The responsibility for ensuring they are kept fully stocked at all times rests with the first aiders/appointed persons:

Medical emergencies
In the event of an injury or sudden illness on site the following action is to be taken:

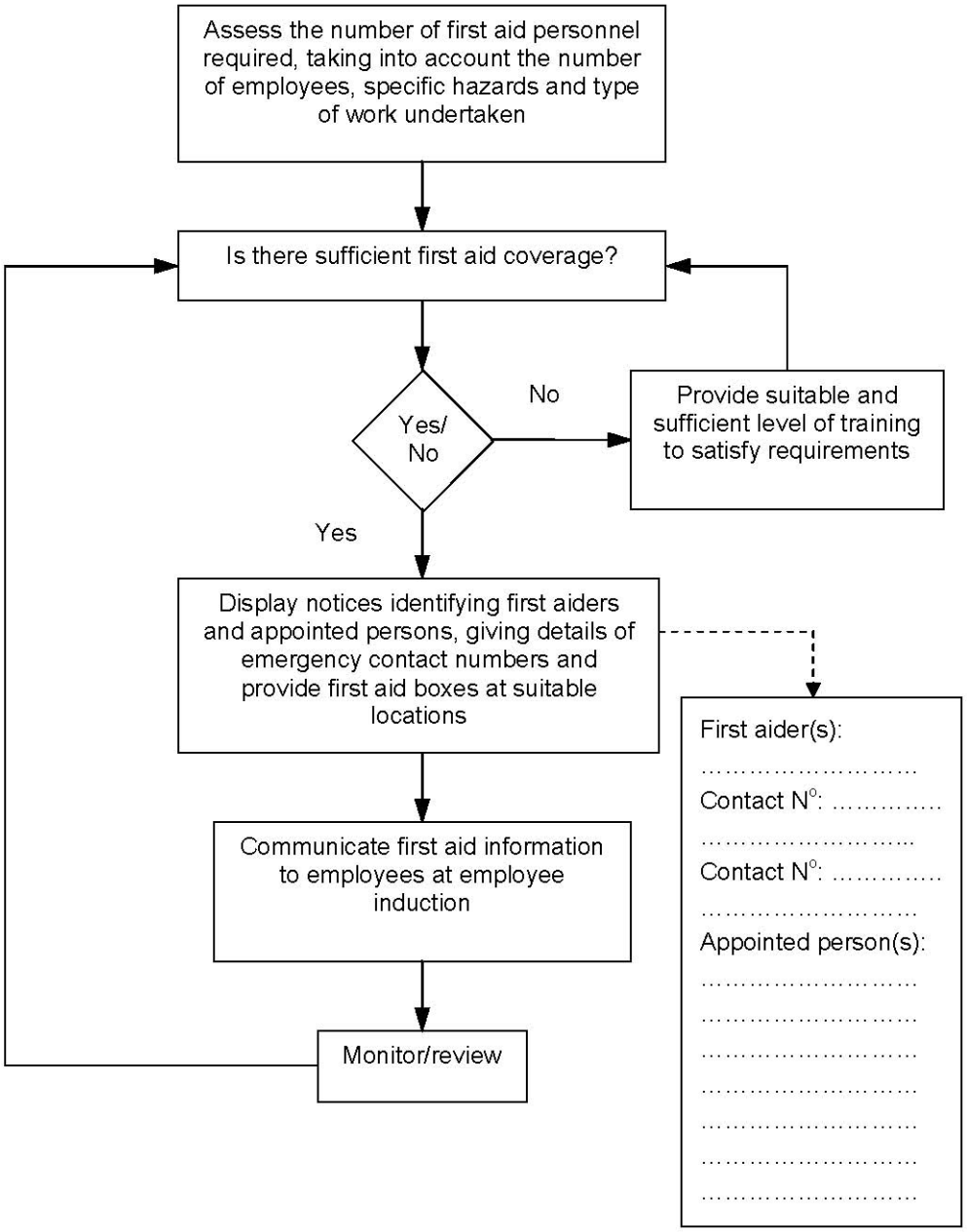
- First aid assistance is to be obtained, if appropriate.
- The injured or ill person is to be conveyed to hospital by the quickest possible means, or an ambulance is to be summoned, ensuring that the address is given accurately.
- The full details of the injured or ill person and the details of the injuries or illness are to be passed to the site foreman and the Gary Morris as soon as possible.

Accidents/incidents
All accidents and cases of work-related ill-health are to be recorded in the accident book, which is located in a secure location by the SHEQ Director or on-site in a secure location by the Site Manager to ensure data protection is maintained.

Gary Morris is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority if necessary.

Gary Morris is responsible for investigating accidents/incidents, ill health and dangerous occurrences.

Procedure for Assessing First Aid Requirements



Guidance for Assessing First Aid Requirements

In accordance with the Approved Code of Practice (ACoP) relating to first aid provision, this company recognises that numbers of first aiders and their skills level will only be adequately addressed if a suitable assessment is carried out on the first aid requirements of the company.

The ACoP states that if the assessment identifies a need for first aiders then employers should ensure that they are provided in "sufficient numbers at appropriate locations". It is recognised by this company that the assessments carried out need not be recorded but, as employers may have to justify their decisions, it should look at the following:

Aspects to consider impact of first aid provision

1. What are the risks of injury and ill Health?

2. Are there any specified hazards that must be considered? i.e.
   - High risk work activities (construction)?
   - Hazardous substances?
   - Dangerous tools?
   - Dangerous machinery?
   - Dangerous loads
   - Lifting operations
   - Confined Space Working

3. Examine records of previous accidents and cases of ill Health and learn the lessons resulting from the investigation

4. Are there inexperienced workers involved in the task or process or staff with specific health problems or disabilities?

5. Are the premises spread out, will first aid provision be made in each location or centrally

6. is there shift work or out-of-hours working, and will suitable first aid provision be available at all times?

7. Is the workplace remote from Local medical services?

8. Are special arrangements with the emergency services required?

Table of suggested numbers of first aid trained persons

Where there are special circumstances, such as remoteness from emergency medical services, shift working or sites with several separate buildings, there may be a need for more trained first aid personnel than set out below. Increased provision will be necessary to cover for absences.

CATEGORY OF RISK	NUMBERS EMPLOYED AT ANY LOCATION	SUGGESTED NUMBER OF FIRST AID PERSONNEL
Lower risk e.g. shops, offices, libraries	Fewer than 50	At least one appointed person
	50-100	At least one full first aider
	More than 100	One additional first aider for every 100 employed
Medium risk e.g. light engineering and assembly work, food processing, warehousing	Fewer than 20	At least one appointed person
	20-100	At least one first aider for every 50 employed (or part thereof)
	More than 100	One additional first aider for every 100 employed
Higher risk e.g. most	Fewer than 5	At least one appointed person
construction work,	5-50	At least one first aider
slaughterhouse, chemical manufacture, extensive work	More than 50	One additional first aider for every 50 employed
with dangerous machinery or sharp instruments	Where there are hazards for which additional first aid skills are necessary	In addition, at least one first aider trained in the specific emergency action

It must be noted that most construction work is in the high-risk category and that specific hazard training is no longer approved by the Health and Safety Executive (HSE).

First aid assessment checklist

The minimum first aid provision for each work site is:

- A suitably stocked first aid container.
- A person to take charge of first aid arrangements.
- Information for employees on first aid arrangements.

First aid materials, equipment and facilities

When the assessment of first aid requirements has been completed, this company will provide the materials, equipment and facilities needed to ensure that the level of first aid cover identified as necessary will be provided for all staff at all relevant times. This will include ensuring that first aid equipment, suitably marked and easily accessible, is available in all places where working conditions require it.

First aid containers

The minimum level of first aid equipment is a suitably stocked and properly identified first aid container. There will be at least one first aid container supplied with a sufficient quantity of first aid materials at each work site, suitable for the particular circumstances.

It will be ensured that first aid containers are easily accessible and placed, if possible, near to hand washing facilities. First aid containers should protect first aid items from dust and damp and should only be stocked with items useful for giving first aid.

***Tablets and other medication should not be kept in the first aid box or administered by a First Aider.**

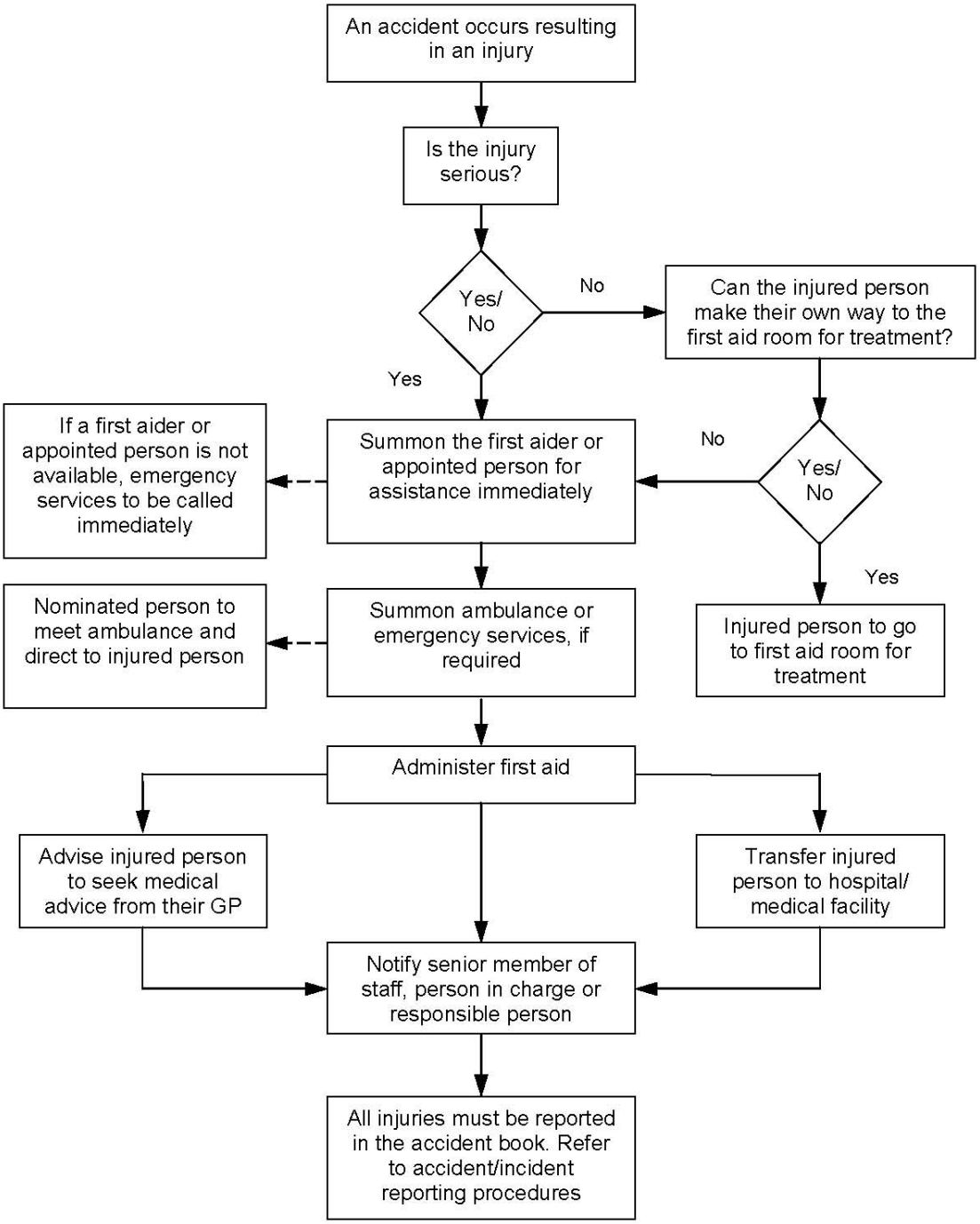
As there is no mandatory list of items that should be included in a first aid container this company will decide what to include from information gathered during our assessment of first aid needs. As a guide, where no special risk arises in the workplace a minimum stock of first aid items would normally include:

- A leaflet giving general guidance on first aid, e.g. the HSE leaflet “Basic Advice on First Aid at Work”.
- Individually wrapped sterile adhesive dressings in assorted sizes, appropriate to the type of work (dressings may be of a detectable type for food handlers).
- Two sterile eye pads.
- Four individually wrapped triangular bandages (preferably sterile).
- Six safety pins.
- Six medium-sized individually wrapped sterile unmedicated wound dressings - approximately 12cm x 12cm.
- Two large sterile individually wrapped unmedicated wound dressings - approximately 13cm x 13cm.
- One pair of disposable gloves.

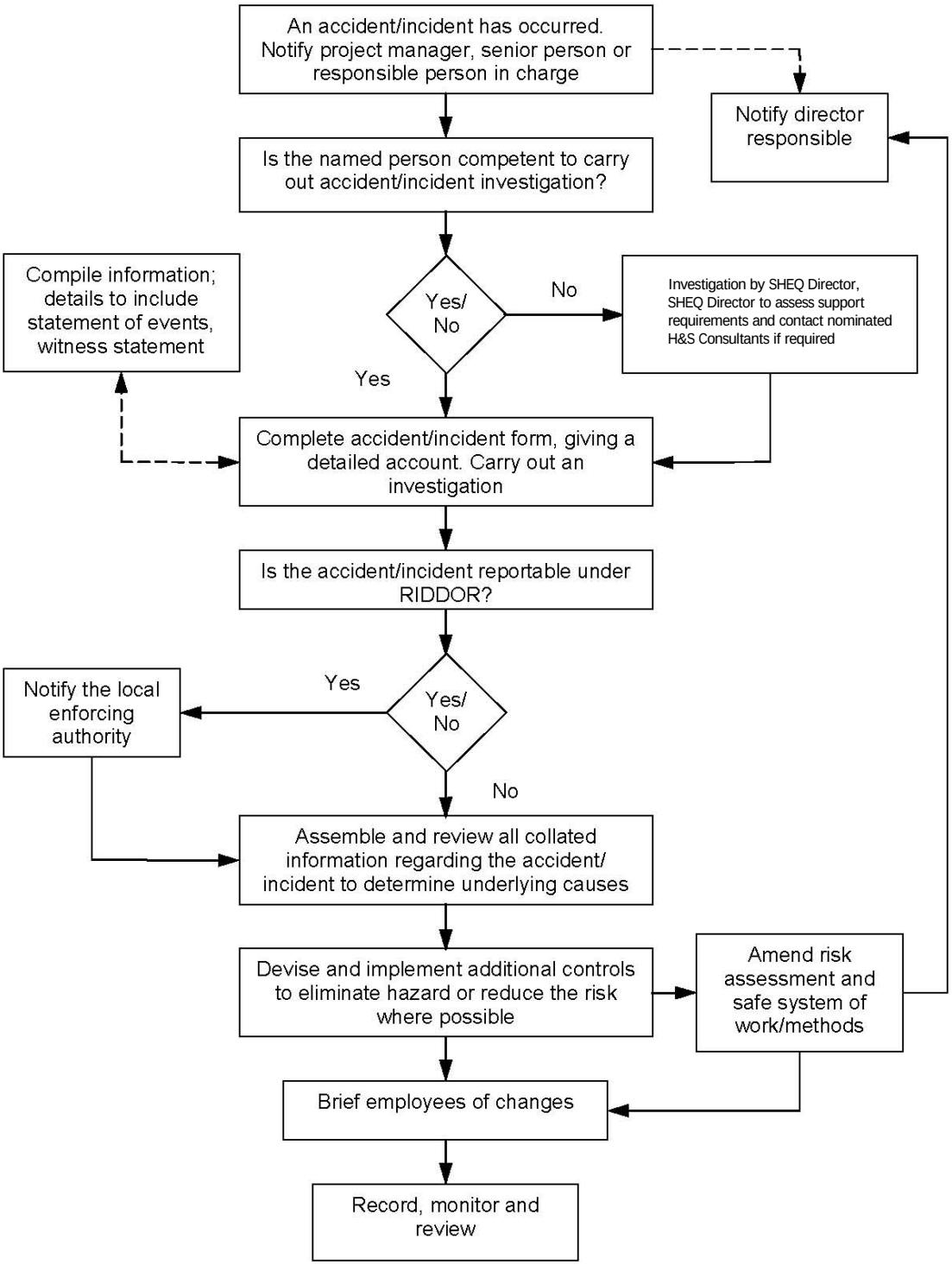
As this is a suggested contents list only, equivalent but different items will be considered acceptable.

Where mains tap water is not readily available for eye irrigation at least 1 litre of sterile normal saline in sealed, disposable containers will be provided.

Procedure for Dealing with Medical Emergencies



Procedure for Accident/Incident Investigation and Reporting



Guidance for Accident/Incident Investigation and Reporting

In the event of an employee of this company suffering any of the following:

- Fatal injury.
- Major injury (including fractures, amputations, loss of eyesight, hospitalisation for a period of 24 hours or more, etc.).
- An injury resulting in the employee being absent from work for more than 3 days.
- Occupational illness or disease (including dermatitis, occupational deafness, vibration white finger, etc.).
- Any other accident resulting in damage to property or injury to employees and/or members of public.

Certain procedures must be followed as described below.

Initially the accident must be reported to your supervisor as soon as possible and be reported in the company accident book held on the premises. Those working on sites away from company premises are to ensure that the accident is reported to head office for entry in the company accident book.

The details that must be recorded in the accident book are:

- Name of the person suffering the injury.
- Date and time of the injury.
- Name of person reporting the injury.
- Cause of the injury.
- Any action taken as a result of the injury.
- Whether or not the injury is reportable to the enforcing authority (the Health and Safety Executive or local authority).
- Nature of the injury (e.g. part of the body affected).

The supervisor is required to report the incident to company management who will decide if it is reportable to the enforcing authority. If it is, an appointed member of management will fill in the details required on the official reporting form: F2508 or F2508A (F2508RA or F2508RB for Railwork) and send it to the enforcing authority within the time period specified by law.

Details of the accident reporting telephone line are given overleaf. Over three-day injuries must be reported within 10 days to the HSE office (or the local authority environmental health department) that serves the location of the accident. Serious incidents, which are reportable immediately, should be reported by the quickest possible means, then must be followed up by the official reporting form within 10 days unless reported to the Incident Contact Centre by phone or via the Internet.

Management will take the appropriate steps to ensure that the incident is investigated as soon as possible, that the results of that investigation are recorded on the company's internal accident investigation form and that remedial measures are put into place to prevent a recurrence.

If there is no supervisor in the area at the time of the incident then the employee suffering the injury must report the accident in the accident book and to management as soon as possible. A work colleague can undertake this responsibility if the injured person is unable to do this themselves.

If a member of the public (or other person who is not an employee of this company) is injured as a result of a work activity by one of our employees and that member of the public is taken to hospital for treatment the accident/injury must be reported to company management without delay.

Where an incident has occurred that is classified as a dangerous occurrence it must be reported to management without delay - even if no one was injured.

Accident reporting telephone line
On 1st April 2001 the Health and Safety Executive (HSE) launched a national accident reporting system that provides all employers in England, Scotland and Wales with a single telephone number and address for reporting workplace accidents and cases of ill-health under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR).

The Incident Contact Centre allows employers to report accidents, cases of ill-health and dangerous occurrences to the enforcing authorities by telephone without the need to follow up the report in writing. The centre also allows employers to report accidents to the enforcing authorities by email or via the Internet for the first time.

The move was designed to simplify the UK's existing accident reporting system by replacing the 500 different telephone numbers and addresses then used to report workplace accidents with a single Incident Contact Centre.

National number
Under this system, a single national telephone number and address was introduced for reporting RIDDOR incidents in England, Scotland and Wales. In addition to the telephone hotline, employers are able to report incidents by sending a completed RIDDOR incident report form by email, Internet, fax or post.

Telephone the Incident Contact Centre, Monday to Friday from 8.30 a.m. to 5.00 p.m. on: 0845 300 9923

Employers are also able to report RIDDOR incidents by email to: riddor@natbrit.com , by visiting the centre's website at: www.riddor.gov.uk, or by fax on: 0845 300 9924

In addition, employers are able to send postal reports to: Incident Contact Centre, Caerphilly Business Park, Caerphilly CF83 3GG.

Copies of the leaflet "RIDDOR Reporting: Information about the New Incident Centre" (MISC310) are available free from HSE books on: (Tel) 01787 881165.

Associated Forms

Accident / Incident Report Form

Section O

Arrangements for Health Surveillance/Management of Occupational Illness

Health surveillance is the application of systematic, regular and appropriate procedures to detect early signs of work-related ill-health in employees who are exposed to certain health risks and acting on the results. It provides information to allow for the detection of harmful health effects at an early stage and checks that control measures are working, highlighting what and where further action might be needed. It also provides an opportunity to train and instruct employees and gives employees the opportunity to raise any concerns.

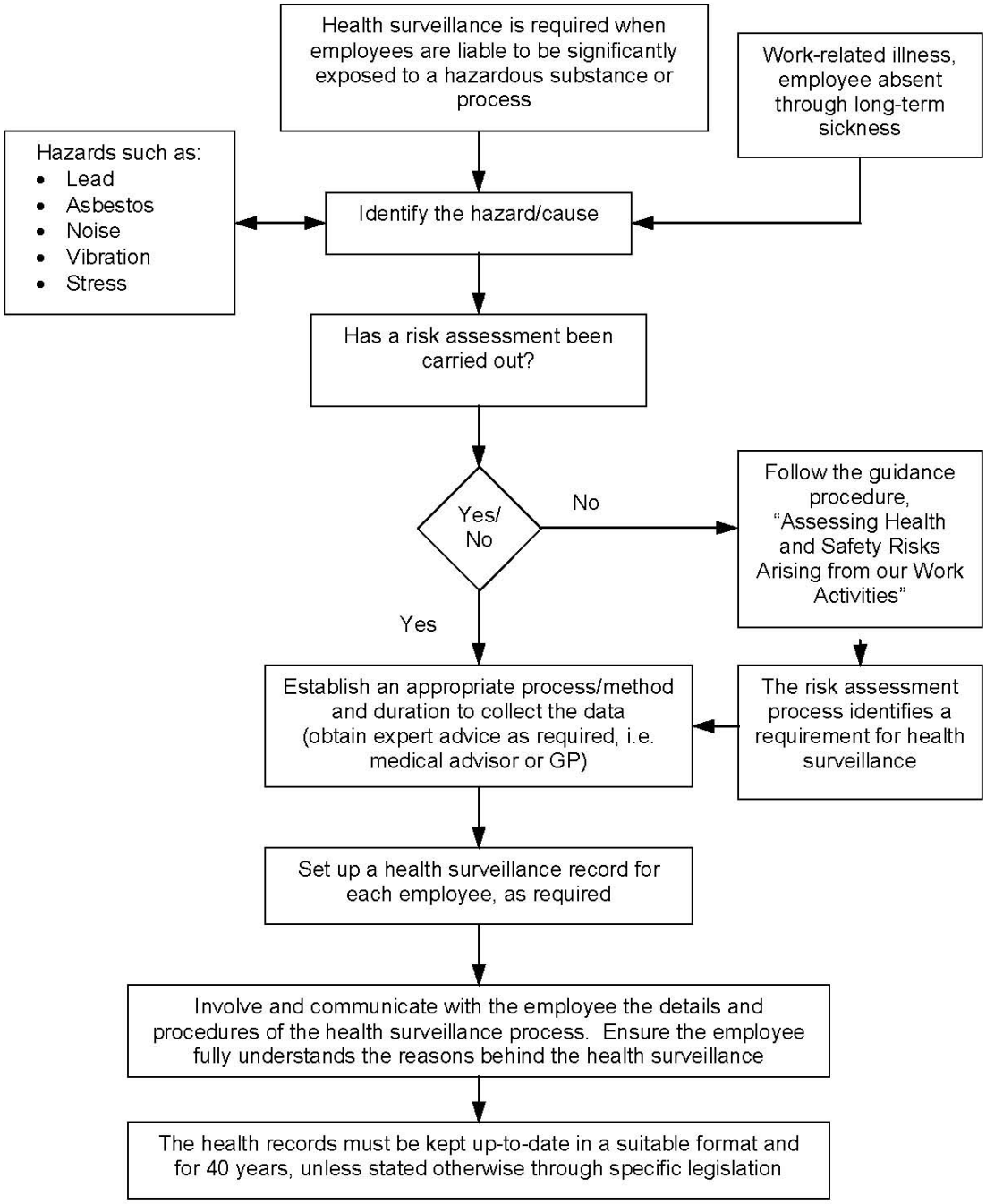
We shall consult with the employees concerned before introducing health surveillance, so that they understand the aims and the importance of their co-operation, in order to ensure that any health surveillance is to be effective.

Gary Morris and the Gary Morris will identify when one of those circumstances exists. They will then seek assistance from a competent individual or body, e.g. occupational nurse/doctor, the Employment Medical Advisory Service (EMAS) or other suitable occupational health service provider. They shall also consult our appointed Gary Morris for further advice on the levels of health surveillance required.

Gary Morris and the Gary Morris will keep all records generated as a result of health surveillance. Medical questionnaires will be treated as confidential and kept securely in personnel files.

Gary Morris are responsible for investigating work-related causes of sickness absences and are responsible for acting upon investigation findings to prevent a recurrence.

Procedures for Health Surveillance/Management of Occupational Illness



Guidance for Health Surveillance/Management of Occupational Illness

Health surveillance includes:

- Collecting, maintaining and reviewing health records for individual employees (personal information about individual employees shall be kept confidential).
- Checks for signs of readily detectable conditions by a responsible person, e.g. a specially trained supervisor or first aider.
- Enquiries, inspections and examinations by a qualified person such as an occupational health nurse or appointed doctor.
- Medical surveillance under the supervision of a doctor. In certain cases the doctor must be an employment medical adviser or a "relevant" doctor.

The Control of Substances Hazardous to Health Regulations require health surveillance to be undertaken where employees are exposed to substances hazardous to health, there is an identifiable disease or adverse health effect related to the exposure and there are valid techniques for detecting indications of the disease or the effect.

The Control of Asbestos Regulations require employers to ensure that health records are kept for employees who undertake licensable work and that adequate medical surveillance is provided through a relevant doctor.

The Control of Lead at Work Regulations requires that where exposure to lead is significant employees are to be under medical surveillance.

The Control of Vibration at Work Regulations require employers to provide health surveillance for all employees who are likely to be regularly exposed to vibration levels at or above the daily exposure action value or are considered to be at risk for any other reason.

The Control of Noise at Work Regulations require the provision of health surveillance for all employees who are likely to be regularly exposed to noise levels at or above daily upper exposure action values or are at risk for any other reason, e.g. they already suffer from hearing loss or are particularly sensitive to hearing damage.

Additionally, the Management of Health and Safety at Work Regulations require that employees are provided with such health surveillance as appropriate having regard to the risk to their health and safety as identified by risk assessments and may also be appropriate where there is a significant risk of:

- Sun burn/skin cancer from working in direct sunlight.
- Silicosis from working with silica based products.
- Asthma from working with respiratory sensitisers, e.g. adhesives, bitumen, solvents.
- Dermatitis from working with skin sensitisers, e.g. cement, bitumen, acids, alkalis.
- Cancer from working with carcinogenic materials, e.g. mineral oils, wood dusts.
- Stress (as defined by the HSE, i.e. "an adverse reaction people have to excessive pressure or other types of demands placed on them").

Asbestos exposure
In accordance with the Control of Asbestos Regulations this company shall keep a health record for any employee who undertakes licensable work.

Health records shall contain personal details, a record of the types of work carried out with asbestos and, where relevant, its location, start and end dates, the average duration of exposure in hours per week, exposure levels and details of any RPE used. Health records shall be kept in a safe place for 40 years or until that person reaches the age of 80.

The company shall ensure that any employee who undertakes licensable work will have been medically examined within the previous 2 years. Copies of the medical certificates shall be held for 40 years from the date of issue or until that person reaches the age of 80.

Where an employee is diagnosed with a condition related to exposure to asbestos this company will review the health of all other current employees similarly exposed and all relevant risk assessments/methods of work. Additionally, employees may be required to undergo a general fitness-for-work assessment following any such diagnosis.

Further information can be found in the HSE's Approved Code of Practice (L143) for work with materials containing asbestos and in asbestos-specific policy guidance notes.

Vibration exposure
In accordance with the requirements of the Control of Vibration at Work Regulations this company shall provide health surveillance for all employees who are likely to be regularly exposed to vibration levels at or above the daily exposure action value or are considered to be at risk for any other reason.

Hand-arm vibration syndrome (havs)
Our HAVS health surveillance programme aims to:

- Identify anyone exposed or about to be exposed to hand-arm vibration who may be at particular risk, e.g. people with blood circulatory diseases such as Raynaud's disease.
- Identify any vibration-related disease at an early stage in employees regularly exposed to hand-arm vibration.
- Help prevent disease progression and eventual disability thus helping our employees to stay in work.
- Enable us to monitor the effectiveness of existing vibration control measures.

Where possible, we shall start the health surveillance before people are exposed to vibration. New starters or those changing jobs shall initially complete a medical questionnaire to give a baseline; otherwise, it will be introduced at any time as necessary for employees already exposed to vibration.

Those employees identified as being at particular risk:

- Must report any further HAVS symptoms to their supervisor or manager without delay.
- May need to undergo a basic medical examination carried out by a suitably qualified person, such as an occupational health nurse or appointed doctor.
- Will be subject to ongoing checks and required to complete a medical questionnaire on at least an annual basis. This may need to be more frequent if any health problem is detected and/or is advised by a medical expert.

Where appropriate, this company shall:

- Keep health records for each employee (see note below).
- Ensure records are available to employees, an occupational health adviser or appointed doctor and to inspectors appointed by the relevant enforcing authority.
- Act upon any recommendations made by the occupational health service provider about employees' continued exposure to vibration.
- Use the results to review and, if necessary, revise our risk assessment and our plans to control risks.

Note: The Control of Vibration at Work Regulations does not specify a minimum period for which health records must be kept. Therefore, records are to be maintained and readily available for inspection during the employment period of any employee under medical surveillance. Health records shall subsequently be offered to the Health and Safety Executive should this company cease to trade.

Noise exposure

In accordance with the requirements of the Control of Noise at Work Regulations, this company shall provide health surveillance (hearing checks) for all employees who are likely to be regularly exposed to noise levels at or above the upper exposure action values, or who are at risk for any reason, e.g. they already suffer from hearing loss or are particularly sensitive to damage.

Our noise health surveillance programme aims to:

- Identify when employees might be suffering from early signs of hearing damage.
- Where necessary, do something to prevent the damage getting worse.
- Check that control measures are working.

Where possible, we shall start the health surveillance before employees are exposed to noise (i.e. for new starters or those changing jobs) to give a baseline; otherwise, it will be introduced at any time, as necessary, for employees already exposed to noise. This will be followed by a regular series of checks, usually annually for the first 2 years of employment and then at 3-yearly intervals (although this may need to be more frequent if any problem with hearing is detected or where the risk of hearing damage is high).

The hearing checks will be carried out by a competent person or organisation, e.g. an occupational health professional, a doctor or a nurse with appropriate training and experience.
Where appropriate, this company shall:

- Keep health records for each employee (see note below).
- Ensure records are available to employees, an occupational health adviser or appointed doctor and to inspectors appointed by the relevant enforcing authority.

- Act upon any recommendations made by the occupational health service provider about employees' continued exposure to noise.
- Use the results to review and, if necessary, revise our risk assessment and our plans to control risks.

Note: The Control of Noise at Work Regulations does not specify a minimum period for which health records must be kept. Therefore, records are to be maintained and readily available for inspection during the employment period of any employee under medical surveillance. Health records shall subsequently be offered to the Health and Safety Executive should this company cease to trade.

Silicosis
In accordance with the requirements of the Control of Substances Hazardous to Health Regulations (COSHH), and where exposure to respirable crystalline silica is such that there is a reasonable likelihood of employees developing silicosis, health surveillance for this condition will be provided by this company. In practice, this shall apply to those employees who are regularly exposed to respirable crystalline silica levels exceeding 0.1mg/m3 over an 8-hour time-weighted average (TWA) reference period.

The surveillance procedures shall include:
- A chest x-ray taken every 5 years during the first 20 years of exposure and thereafter at more frequent intervals (at least every 3 years) at the discretion of the medical adviser and dependent upon the level of exposure.
- The annual completion of a respiratory questionnaire (see below), so that trends may be studied.

Such measures should enable the onset of silicosis, and the increased susceptibility to respiratory infection, to be detected at an early stage so facilitating the removal of the worker from further silica exposure.

Where health surveillance is required a pre-employment assessment shall be undertaken (see also below) to assess the suitability for employment of those individuals who will be more vulnerable to the effects of respiratory infections and silicosis, e.g. those with chronic bronchitis and/or emphysema and those with asthma. Additionally, the possibility of reactivation of tuberculosis should also be considered at the pre-employment assessment of those with a previous history of this disease. Chest x-rays and measurements of lung function, i.e. forced expiratory volume (FEV) and forced ventilatory capacity (FVC), shall also be undertaken at this stage to assist in the assessment of an individual's suitability for employment and to provide a baseline for the evaluation of the subsequent results of health surveillance.

Health records shall be kept for 40 years as per the requirements under the COSHH Regulations.

Welding fume/gases
Welding fume is a mixture of airborne fine particles. Toxic gases may also be generated during welding and cutting.

More than 90% of the particulate fume arises from vaporisation of the consumable electrode, wire or rod as material is transferred across the arc or flame. The respirable fractions of particles

(especially less than 3µm) are potentially more harmful as they can penetrate to the innermost parts of the lung.

The potential hazards from breathing in particulate fume are that fine particles can cause dryness of the throat, tickling, coughing and, if the concentration is particularly high, tightness of the chest and difficulty in breathing.

Breathing in metal oxides such as zinc and copper can lead to an acute flu-like illness called “metal fume fever”. It most commonly occurs when welding galvanised steel. Symptoms usually begin several hours after exposure with a thirst, cough, headache, sweat, pain in the limbs and fever. Complete recovery usually occurs within 1-2 days of removal from the exposure, without any lasting effects.

The continued inhalation of welding fume over long periods of time can lead to the deposition of iron particles in the lung, giving rise to a benign condition called siderosis.

There is evidence that welders have a slightly greater risk of developing lung cancer than the general population. In certain welding situations there is potential for the fume to contain certain forms of chromium and/or nickel compounds - substances which have been associated with lung cancer in processes other than welding. As yet, no direct link has been clearly established. Nevertheless, as a sensible precaution and to minimise the risk, special attention should be paid to controlling fumes which may contain them.

A number of other specific substances known to be hazardous to health can be found in welding fume such as barium and fluorides, which do not originate from the metal. If the metal contains a surface coating there will also be a potential risk from any toxic substances generated by thermal degradation of the coating.

Health hazards from gases

The main potential hazard from breathing in gases during welding is irritation of the respiratory tract, Ozone can cause delayed irritation of the respiratory tract which may progress to bronchitis and occasionally pneumonia.

Nitrogen oxides can cause a dry irritating cough and chest tightness. Symptoms usually occur after a delay of 4-8 hours. In severe cases death can occur from pulmonary oedema (fluid on the lungs) or pneumonia.

Associated Forms & Guidance

- HAVS Exposure Record Form
- Health Screening Questionnaire

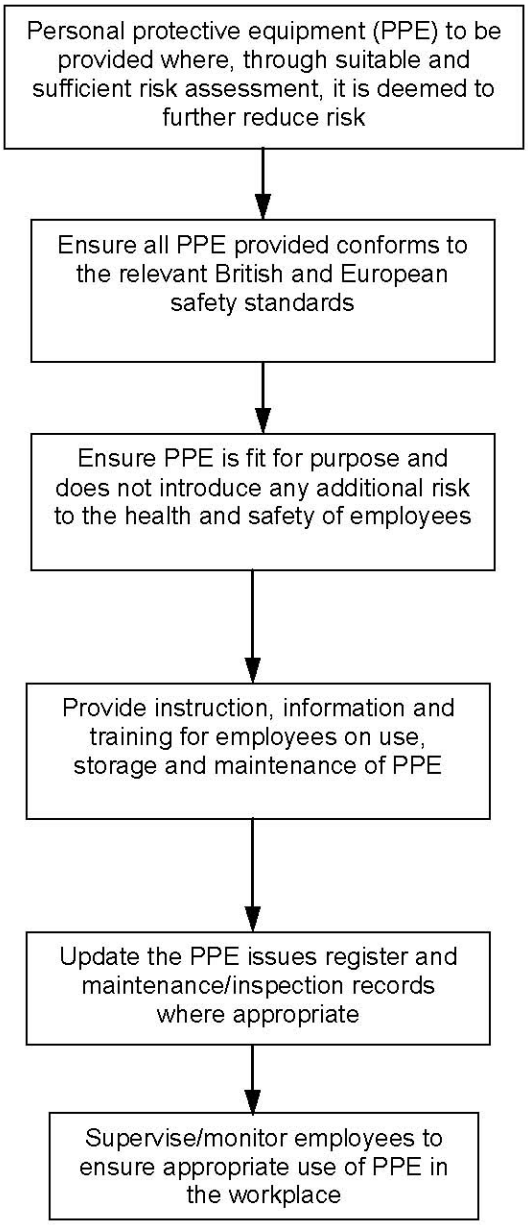
Section P

Arrangements for Personal Protective Equipment

Personal protective equipment (PPE) requirements will be defined by the risk assessment process. Whatever is defined will be communicated to employees and any PPE needed to make the task safe will be supplied to employees by the company, free of charge.

It will be for Site Managers to ensure that all employees have been shown how to use, store and check their PPE and that they actually use it.

Procedures for Personal Protective Equipment



Guidance on Personal Protective Equipment

The company is required by Section 2 of the Health and Safety at Work etc. Act to provide a safe place of work. The provision of personal protective equipment (PPE) may assist the company in attaining this requirement.

Under Section 7 of the same act employees are required to co-operate with the company and to look after their own health and safety. It is, therefore, a legal requirement that the employee uses the protective equipment provided by the company.

The need to utilise PPE will become apparent as part of the risk assessment process. Where a risk assessment defines the need for PPE this company will ensure that the PPE is suitable for the task, suitable for the operative to wear, is properly maintained and that the operative is properly trained to use it.

PPE is to be used as the last resort; all other practicable risk control measures are to be taken first. It should be noted that, although the company is not obliged to provide them with protective equipment, the self-employed and trade-contractors are also required to wear this equipment where and when designated.

Hard Hats
These must be worn where there is a risk of injury either from falling materials or from striking the head against projections. The only exception is in the case of Sikhs, whilst wearing turbans. It should be noted that, in this case, the company's liability for injuries is reduced. Hard hats shall comply with BS EN 397.

Ear Defenders
Hearing protection is to be worn whilst carrying out all noisy operations or in noisy areas. Selected equipment should comply with the specification in BS EN 352. For further guidance see the information regarding noise assessments in section B.

Eye Protection
To be used wherever there is a risk of contamination from chemicals, either by vapour or splashing, or risk from dust or any danger from flying particles. All eye protection shall comply with BS EN 166 except in the case of lens filters for welding, which shall comply with BS EN 169.

Respiratory Protection
Specialist operations will be covered in separate sections of the manual if tasks requiring respiratory protection are carried out.
Disposable dust masks shall be provided and are to be used whilst performing operations giving rise to nuisance dust.

Hand Protection
Gloves shall be provided for the handling of objects which may be sharp, rough, hot, cold, contaminated with either chemical or biological agents or liable to cause a hazard by breaking in the hand, e.g. glass. Barrier creams shall be provided for use when dealing with mildly irritant substances.

Foot Protection
Safety footwear is to be worn in all areas where there is a risk of injury to the feet from either materials or equipment crushing the feet or from materials penetrating the soles of the feet. In this circumstance steel toe-caps and mid-soles to BS EN 346 will be the requirement. In addition, if there is the risk of penetration by chemicals or water the footwear should be able to withstand that.

High-Visibility Clothing
This is made from PVC impregnated with fluorescent pigments. It must be worn by anyone working on or near the roadside; also by anyone else working in areas where it is important to be seen to be safe, e.g. banksmen; or when there is moving plant and poor visibility. All high-visibility clothing shall comply with BS EN 471; the flame retardant version shall meet BS EN 469.

Safety Harnesses
Harnesses should be used only if the use of other, safer work equipment is not reasonably practicable, the work can be performed safely while using a harness as a personal fall protection system and both the user and a sufficient number of available people have received adequate training specific to the planned operation, including rescue procedures.
Harnesses must always be secured to a safe anchorage when in use.
Harnesses are to be stored in a cool, dry and well-ventilated place away from direct sunlight and away from any materials that are likely to cause them damage.
All harnesses are to be examined by a competent person every 3 months and a record kept of the examination.

Associated Forms & Guidance

- PPE Issue Record

Item	Type	Standard	Comment
Eye protection	General purpose	BS EN 166S	
	Impact grade 1	BS EN 166B	Recommended
	Impact grade 2	BS EN 166F	for
	Chemical goggles	BS EN 166-3	construction
	Dust goggles	BS EN 166-4	
	Lens filters for welding	BS EN 169	
Hearing protection	All types	BS EN 352	Protection must also match the attenuation of the sound source
Foot protection	General purpose safety General purpose protective	BS EN ISO 20345 BS EN ISO 20346	Supersedes BS EN 345 Supersedes BS EN 346
Hand protection	General purpose industrial gloves	BS 1651	
	Rubber gloves for electrical purposes	BS EN 60903	
	Chemical resistant gloves	BS EN 464	
	Protective gloves for chainsaw users	BS EN 381	
	Heat resistant for welders/burners	BS 2653	
Protective clothing	General clothing	BS EN 340	
	High-visibility clothing	BS EN 471	
	Protective clothing for chainsaw users	BS EN 381	
	Protective clothing for welders	BS 2653	
	Personal buoyancy equipment	BS EN 384	
Head protection	Industrial hard hats - heavy duty	BS EN 397	
Respiratory protective equipment	Full-face masks	BS EN 136	
	Self-contained open-circuit compressed-air breathing apparatus	BS EN 137	
	Fresh-air hose breathing apparatus	BS EN 138	
	Compressed-air line breathing apparatus	BS EN 139	
	Half-masks and quarter-masks	BS EN 140	
	Gas filters and combined filters	BS EN 141	
	Particle filters Self-contained closed-circuit breathing apparatus Power-assisted filtering devices incorporating helmets or hoods Power-assisted filtering devices incorporating full-face, half- or quarter- masks	BS EN 143 BS EN 145 BS EN 146 BS EN 147	
	Filtering half-masks against particles Power-assisted fresh-air hose breathing apparatus incorporating a hood Compressed-air line breathing apparatus incorporating a hood Compressed-airline or power-assisted fresh-air hose breathing apparatus incorporating a hood	BS EN 149 BS EN 269 BS EN 270 BS EN 271	For use in abrasive blasting operations
Safety harnesses	Full body harness	BS EN 361	
	Pole belts	BS EN 358	
	Rescue harness	BS 3367	
	Retractable fall arrester	BS EN 360	e.g. Sala Block
	Guided type fall arrester	BS EN 353	
	Shock absorbers	BS EN 355	
	Lanyards	BS EN 354	

Section Q

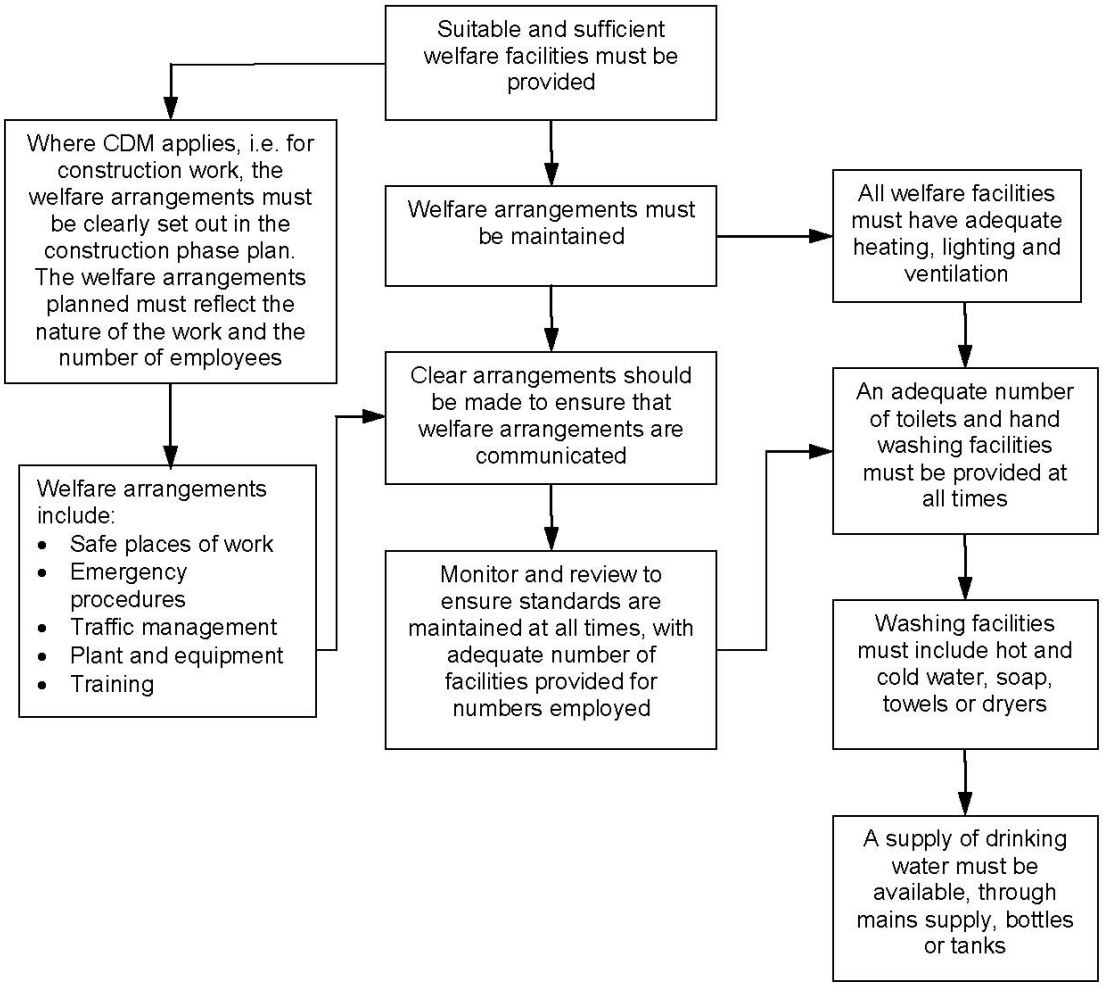
Arrangements for Employee Welfare, Safety and Health

Welfare facilities are provided for the use of employees. Gary Morris will be responsible for ensuring facilities on company premises comply with the requirements of the Workplace (Health, Safety and Welfare) Regulations and that a regular cleaning and maintenance regime is implemented.

Where appropriate, and in accordance with our duties under the Construction (Design and Management) Regulations, Gary Morris will be responsible for ensuring sufficient site welfare facilities are provided for all "notifiable" and "non-notifiable" construction projects.

Site Managers will be responsible for ensuring the necessary site specific arrangements are in place prior to deployment to site.

Procedure for Employee Welfare, Safety and Health



Guidance on Employee Welfare, Safety and Health

The workplace (health, safety and welfare) regulations

The Workplace (Health, Safety and Welfare) Regulations require, as far as is reasonably practicable, the following:

Maintenance of workplace, equipment, devices and systems
All equipment, devices and systems which fall under the scope of these regulations, including the workplace itself, will be maintained (including cleaned as appropriate) in an efficient condition and in a good state of working order and repair. Where appropriate this will include such items being subject to a suitable system of maintenance. Guidance on safe equipment and plant, including maintenance requirements and procedures is dealt with in section G of this manual.

VENTILATION
In order to comply with ventilation requirements, effective and suitable provision will be made to ensure that every enclosed workplace is ventilated by a sufficient quantity of fresh- or purified-air. For health and safety purposes any plant used to achieve this purpose will include an effective device to give visible or audible warning of any failure of the plant.

Temperature in indoor places
Although no values are accorded to temperatures in the regulations this company will ensure that, during working hours, the temperature inside buildings is reasonable, i.e. has achieved 16° within 1 hour of work commencing. However, in order to achieve a reasonable indoor temperature the company will not use a method of heating or cooling which results in the escape into the workplace of fumes, gas or vapour which could be injurious or offensive to any person. A provision under this section is that the company must provide a sufficient number of thermometers in the workplace to enable employees to determine the temperature inside the workplace.

Lighting
Every workplace inside the company's premises will have suitable and sufficient lighting. Such lighting will, as far as is reasonably practicable, be natural. Emergency lighting will be provided in any room in circumstances where employees would be exposed to dangers in the event of the failure of artificial lighting.

Cleanliness, floors, traffic routes and waste materials
It is a requirement of the regulations and company policy that every workplace and all furniture, furnishings and fittings be kept sufficiently clean. Surfaces of walls, floors and ceilings of all indoor workplaces will be capable of being kept sufficiently clean. As far as is reasonably practicable, waste materials will not be allowed to accumulate in a workplace except in suitable receptacles. The construction of all floors and traffic routes will be suitable for the purpose for which they are used, including the absence of unevenness, holes (unless suitably guarded to prevent falls), slopes (unless fitted with suitable handrails) and slippery surfaces that constitute a risk to health and safety. All floors will have an adequate means of drainage where necessary.
So far as is reasonably practicable, all floors and traffic routes will be free of obstructions, articles and substances that may cause a person to slip, trip or fall.

All traffic routes which are staircases will be fitted with suitable and sufficient handrails and (where appropriate) guardrails, unless a handrail cannot be provided without obstructing the traffic route.

Workstations and seating

Every workstation will be so arranged so that it is suitable both for the person undertaking the work and the work being performed.

Where a workstation is outdoors it will be, as far as is reasonably practicable, protected from adverse weather conditions in such a way that it can be evacuated swiftly in the event of an emergency and so that any person at the workstation is not liable to slip or fall.

A suitable seat will be provided for each person at work in the workplace whose work includes operations of a kind that the work (or a substantial part of it) can or must be done seated. A suitable footrest will be provided where necessary.

Falls or falling objects

So far as is reasonably practicable, suitable and effective measures will be taken to prevent either of the following events:

- Any person falling a distance liable to cause personal injury.
- Any person being struck by a falling object liable to cause personal injury.
- Any area where there is a risk to health and safety as a result of the above will be clearly indicated where appropriate.
- So far as is practicable, every tank, pit or structure where there is a risk of a person in the workplace falling into a dangerous substance in the tank, pit or structure will be securely covered or fenced. Any traffic route over, under or in an uncovered tank, pit or structure - as mentioned above - will be securely fenced. A “dangerous substance” in this context means:
- Any substance likely to scald or burn.
- Any poisonous substance.
- Any corrosive substance.
- Any fume, gas or vapour likely to overcome a person.
- Any granular or free-flowing solid substance or any viscous substance which, in any case, is of a nature or quantity which is liable to cause danger to any person.

Windows and transparent or translucent doors, gates and walls

Where necessary for reasons of health and safety, any window or other transparent or translucent surface in a door or gate will be of safety material or be protected against breakage, and be appropriately marked or incorporate features so as to make it apparent.

Windows, skylights and ventilators

It is the policy of this company to provide on its premises only windows, skylights or ventilators that can be opened, closed or adjusted in a manner which does not expose any person performing such an operation to a risk to their health or safety. Furthermore, no window, skylight or ventilator will be permitted to be in a position that, when open, exposes any person in the workplace to a risk to their health and safety.

It is the policy of this company to provide on its premises only windows and skylights that are designed and constructed so as to be able to be cleaned safely. Where this cannot be achieved alternative arrangements will be devised so as to render the window cleaning operation safe and without risks to health and safety.

Traffic routes
It is the policy of this company to organise every workplace in such a manner that pedestrians and vehicles can circulate in a safe manner. Traffic routes will, as far as is reasonably practicable, be suitable for the persons or vehicles using them (including taking into account the separation of pedestrians and traffic using the same routes, and distance of doors, gates and pedestrian access points leading to vehicular traffic routes), sufficient in number, in suitable positions and of sufficient size. All traffic routes will be suitably indicated where necessary for reasons of health and safety.

Doors and gates
Doors and gates will be suitably constructed (including being fitted with safety devices where appropriate) and the following devices or features will be included if required:

- Any sliding door or gate will be fitted with a device to prevent it coming off its track during use.
- Any upward opening door or gate will have a device to prevent it falling back.
- Any powered door or gate will have suitable and effective features to prevent it causing injury by trapping any person and, where necessary for reasons of health and safety, will be able to be operated manually unless it opens automatically in the event of a power failure.
- Any door or gate which is capable of opening by being pushed from either side will, when closed, have a built-in feature to enable a clear view of the space close to both sides.

Escalators and moving walkways
Where provided, such equipment will be equipped with any necessary safety devices and be fitted with one or more emergency stop controls, which are easily identifiable and readily accessible.

Sanitary conveniences
Suitable and sufficient sanitary conveniences will be provided at readily accessible places. The rooms containing the sanitary conveniences will be adequately ventilated and lit, and be kept in a clean and orderly condition. Separate rooms containing sanitary conveniences will be provided for men and women. In a situation where a part of or the whole workplace is not new, or is a modification or alteration, and was in existence prior to these regulations coming into force in 1993 (and thus fell under the provisions for sanitary facilities in the Factories Act 1961) then sanitary facilities will be deemed acceptable provided that there is at least one suitable water closet for every 25 females and one water closet for every 25 males.

Washing facilities
Suitable and sufficient washing facilities, including showers if appropriate, will be provided at readily accessible places if required by the nature of the work or for health reasons.
Such washing facilities will be sited in the immediate vicinity of every sanitary convenience and changing room. Facilities will include a supply of clean hot and cold running water, soap or other suitable means of cleaning as well as drying facilities (towels, paper dispenser or hot air dryer).

The rooms containing the washing facilities will be well-lit and ventilated and will be kept in a clean and orderly state.

Separate shower facilities will be provided for men and women unless the room is capable of being secured from the inside and the facilities inside the room are intended for the use of only one person at a time.

Drinking water
The company will ensure that an adequate supply of wholesome drinking water will be provided for all persons at work in the workplace. Such drinking water will be readily accessible at suitable places and be conspicuously marked by an appropriate sign where necessary for reasons of health and safety. Additionally, suitable and sufficient cups or other drinking vessels will be provided unless the supply of drinking water is in a jet from which persons can drink easily.

Accommodation for clothing
Suitable and sufficient accommodation will be provided in a suitable location for the clothing of any person at work which is not worn during working hours and for special clothing which is worn at work but which is not taken home. This will involve separate accommodation for clothing worn at work and for other clothing. Such accommodation will be secure. So far as is reasonably practicable, the accommodation will include facilities for the drying of clothing.

Facilities for changing clothing
Suitable and sufficient facilities will be provided for any person at work in the workplace to change clothing in all cases where the person has to wear special clothing for the purpose of work and that person cannot, for reasons of health or propriety, be expected to change in another room. Separate changing facilities for males and females will be provided as required.

Facilities for rest and to eat meals
Suitable, sufficient and readily accessible rest facilities shall be provided. Rest areas or rooms shall have sufficient tables and seats with backrests for the number of workers likely to use them at any time. They shall include suitable facilities to eat meals where meals are regularly eaten in the workplace and the food would otherwise be likely to become contaminated. Where provided, eating facilities shall include a facility for preparing or obtaining a hot drink and workers shall be provided with a means for heating their own food where hot food cannot be obtained in or reasonably near to the workplace.
Where required, rest facilities for pregnant women or nursing mothers shall be provided.

Documentation
Documentation required by health and safety legislation to be kept and/or displayed on the production facility/office premises will be as follows:

- Notices:
- Health and safety law placard.
- Fire and emergency plan.
- A copy of the company's employer's liability insurance certificate.
- A copy of the company's health and safety policy statement.
- Any other abstracts of regulations that are relative to works being carried out within the workplace will be displayed as applicable.
- Prescribed Registers:

- Record of inspection and/or thorough examination of equipment as required by PUWER or LOLER.
- Accident book – record of injuries occurring in the workplace.

Guidance on Employee Welfare for Construction Projects

The Construction (Design and Management) Regulations (CDM) apply to both "notifiable" and "non-notifiable" construction projects. These regulations require that welfare facilities sufficient to comply with the requirements of Schedule 2 are provided throughout the construction phase of all projects. Site welfare facilities should include:

Sanitary conveniences
Suitable and sufficient sanitary conveniences shall be provided or made available at readily accessible places. So far as is reasonably practicable, rooms containing sanitary conveniences shall be adequately ventilated and lit.

So far as is reasonably practicable, sanitary conveniences and the rooms containing them shall be kept in a clean and orderly condition.

Separate rooms containing sanitary conveniences shall be provided for men and women, except where and so far as each convenience is in a separate room, the door of which is capable of being secured from the inside.

Washing facilities
Suitable and sufficient washing facilities, including showers if required by the nature of the work or for health reasons, shall, so far as is reasonably practicable, be provided or made available at readily accessible places.
Washing facilities shall be provided:

- In the immediate vicinity of every sanitary convenience, whether or not provided elsewhere.
- In the vicinity of any changing rooms, whether or not provided elsewhere. (Further information regarding changing rooms and lockers is provided below.)

Washing facilities shall include:

- A supply of clean hot and cold, or warm, water (to be running water so far as is reasonably practicable).
- Soap or other suitable means of cleaning.
- Towels or other suitable means of drying.
- Rooms containing washing facilities shall be sufficiently ventilated and lit.
- Washing facilities and the rooms containing them shall be kept in a clean and orderly condition.
- Separate washing facilities shall be provided for men and women, except where such facilities are provided in a room the door of which is capable of being secured from the inside and the facilities in each such room are intended to be used by only one person at a time. This proviso shall not apply to facilities which are provided for washing hands, forearms and the face only.

Drinking water
An adequate supply of wholesome drinking water will be provided or made available at readily accessible and suitable places.

Every supply of drinking water shall be conspicuously marked by an appropriate sign where necessary for reasons of health and safety.

Where a supply of drinking water is provided there shall also be provided a sufficient number of suitable cups or other drinking vessels unless the supply of drinking water is in a jet from which persons can drink easily.

CHANGING ROOMS AND LOCKERS
Suitable and sufficient changing rooms shall be provided or made available at readily accessible places if:

- A worker has to wear special clothing for the purposes of their work.
- They cannot, for reasons of health or propriety, be expected to change elsewhere.
- Where necessary for reasons of propriety, separate rooms or separate use of rooms by men and
- women shall be provided. Changing rooms shall:
- Be provided with seating.
- Include, where necessary, facilities to enable a person to dry any such special clothing, their own clothing and personal effects.
- Suitable and sufficient facilities shall, where necessary, be provided or made available at readily accessible places to enable persons to lock away:
- Any such special clothing which is not taken home.
- Their own clothing which is not worn during working hours.
- Their personal effects.

Facilities for rest
Suitable and sufficient rest rooms or rest areas shall be provided or made available at readily accessible places.
Rest rooms and rest areas shall:

- Be equipped with an adequate number of tables and adequate seating with backs for the number of persons at work likely to use them at any one time.
- Where necessary, include suitable facilities for any woman at work who is pregnant or a nursing mother to rest lying down.
- Include suitable arrangements to ensure that meals can be prepared and eaten.
- Include the means for boiling water.
- Be maintained at an appropriate temperature.

Working Time Regulations

The Working Time Regulations deal with workers' rights in relation to hours of work, night time working, breaks from work and paid holidays. Some of these rights can be amended if an employer comes to a "collective" or a "workforce" agreement with their workers.

A collective agreement is one that has been negotiated through a trade union.

A workforce agreement is one that has been agreed by the employer and their workers or workers' representatives.

In general, a worker is someone for whom an employer provides work, controls when and how the work is done, and pays tax and national insurance contributions. The majority of agency workers and freelance workers are likely to be "workers" but not the genuinely self-employed as they are paid on the basis of an invoice rather than with wages.

The regulations apply to trainees over school-leaving age engaged on work experience or on training for employment, other than that provided on courses run by educational institutions or training establishments. An adult worker is a worker who has attained the age of 18 years. A young worker is a worker who is older than the minimum school-leaving age but is under 18 years of age.

Hours of work
The company shall ensure that all reasonable steps are taken so that workers do not work more than an average of 48 hours a week (including overtime) in any reference period - which will normally be a period of 17 weeks. If a worker is absent from work on annual, sick or maternity leave during a reference period the calculation of average weekly hours for that period shall include the total number of hours worked immediately after the reference period during the number of working days which equals the number of days of absence.

An individual worker may agree with the company to work more than the 48-hour average weekly limit. Any agreement, which must be in writing, may relate to a specified period or apply indefinitely. A worker has the right to terminate any agreement they have made, but only after giving the company at least 7 days' written notice of their intention to do so. An agreement may specify the period of notice a worker is required to give the company if they wish to terminate the agreement. This period must not exceed 3 months.

However, under no circumstances must a young worker's working time exceed 8 hours a day or 40 hours a week.

Night-time working
The term "night-time" is defined in the regulations as meaning a period, determined by a collective or workforce agreement, of at least 7 hours including the period between midnight and 5.00 a.m. Where there is no agreement night-time means the period between 11.00 p.m. and 6.00 a.m.

A "night-worker" is a person who normally works at least 3 hours of their daily working time during night-time but this arrangement can be altered through a collective or workforce agreement.

The “restricted period" in relation to a worker means the period between 10.00 p.m. and 6.00 a.m. or, where the worker's contract provides for them to work after 10.00 p.m., the period between 11.00 p.m. and 7.00 a.m.

A night-worker's normal hours of work are not to exceed an average of 8 hours in each 24hour period over a 17-week period. Averaging is not permitted where a night-worker's work involves special hazards or heavy physical or mental strain. There is a limit of 8 hours on the worker's actual daily working time. The work of a night-worker shall be regarded as involving special hazards or heavy physical or mental strain if it is identified as such in a collective or workforce agreement or if it is recognised in a risk assessment as involving a significant risk. The night-time limits and the reference period may be modified or excluded by a collective or workforce agreement.

The company shall ensure that free health assessments are offered to any workers who are to become night-workers and night-workers shall also be given the opportunity to have further assessments at regular intervals. The frequency of repeat assessments will vary between individuals according to the type of night-work, its duration and the age and health of the individual worker.

Young workers shall be entitled to a health and capacities assessment if they work during the period between 10.00 p.m. and 6.00 a.m. Issues that shall be included in this assessment are physique, maturity and experience, and the type of work that is to be undertaken by the young person.

Rest periods
In each 24-hour period an adult worker is entitled to a rest period of at least 11 consecutive hours whilst a young worker is entitled to a rest period of at least 12 consecutive hours.
In addition to their daily rest periods, workers are entitled to weekly periods of rest. The company shall ensure that adult workers are able to take 24 hours uninterrupted rest in each 7-day period or, alternatively, either one 48-hour rest period or two 24-hour rest periods in each 14-day period. The company shall ensure that young workers are able to take rest periods of not-less-than 48 hours in each 7-day period.

Where an adult worker's daily working time exceeds 6 hours they are entitled to an uninterrupted rest break of at least 20 minutes. Young workers are entitled to a rest break of at least 30 minutes if their daily working time exceeds 4½ hours.

A collective or a workforce agreement may modify the rest breaks of adult workers. The rest breaks of young workers must not be modified.

Annual leave
The current minimum annual leave entitlement for full-time employees, i.e. those who work a 5-day week, is 4.8 weeks (24 days), calculated on the basis of one-twelfth of their annual entitlement for each complete month of service. As from April 2009, this will increase to 5.6 weeks (28 days).

There is no statutory entitlement to bank and public holidays. These are simply days on which a worker may receive leave under the terms of their contract. As with other contractual leave, these days may be used by the company as part of the leave it is required to provide under these

regulations. If a worker is paid for a public holiday that day may count towards their entitlement to annual leave.
Leave may be taken only in the leave year in which it is due. It may not be replaced by a payment in lieu, except where a worker's employment is terminated.

A collective or workforce agreement may contain the date on which the leave year begins. Where no such date is agreed a worker's leave year will begin on one of the following dates:
On 1st October if the worker started with the company on or before October 1st 1998.
On the date the worker started employment if that employment started after October 1st 1998.

Records
The company shall keep adequate records to show whether the limits on weekly hours of work and night-time work are being achieved for each of its workers.

Workers who have opted out of the 48-hour limit on their working week shall be identified. The terms on which they have opted out shall be recorded and the hours worked during each reference period specified. The company shall also keep, where appropriate, records showing that the requirements concerning health and capacity assessments are being complied with.

The company shall determine the form in which records are kept but all records must be maintained for 2 years from the date on which they are made.

Section R

Arrangements for managing Drugs and Alcohol misuse

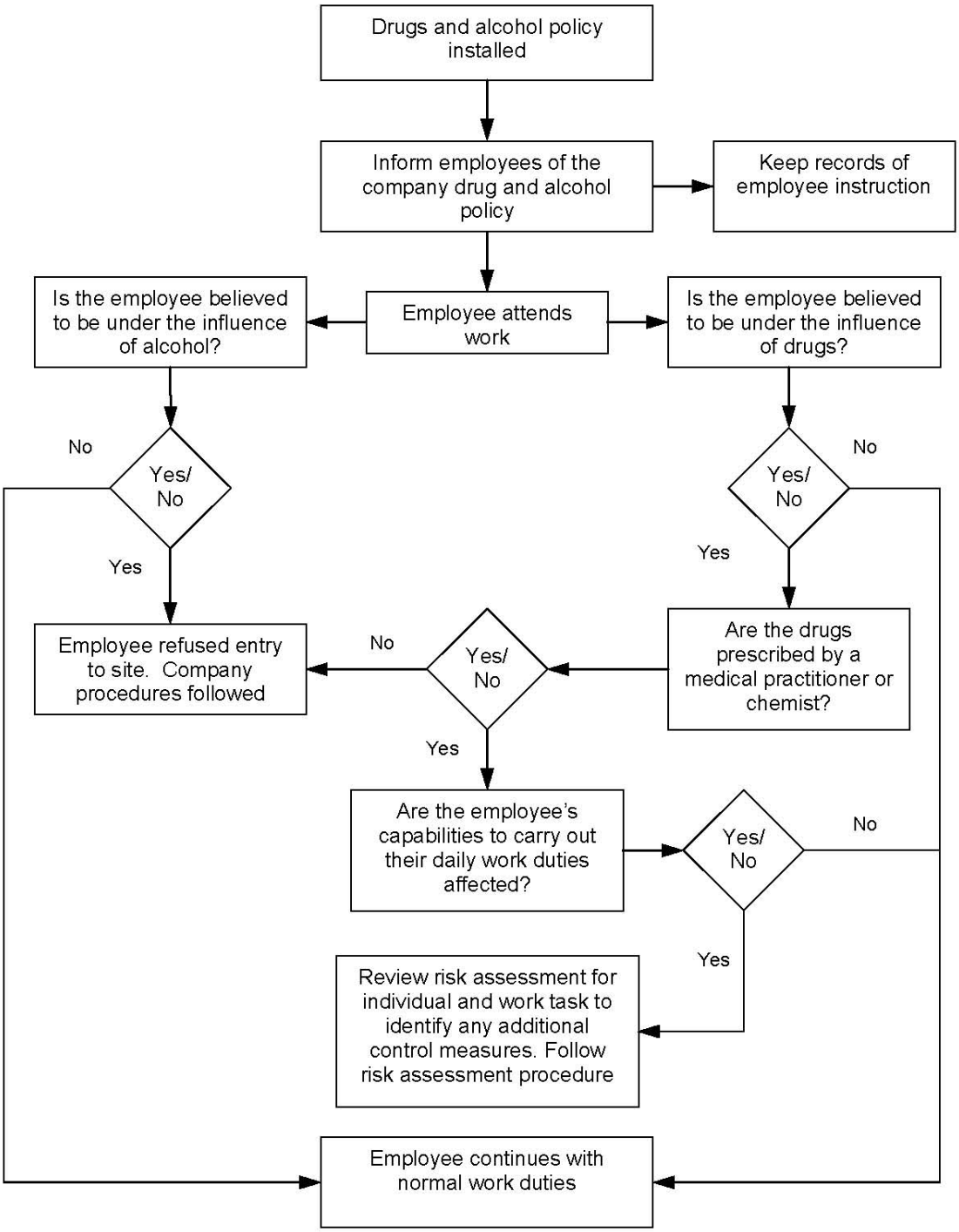
To assist in the safe performance of our duties, Palmer Morris Interiors Ltd operates a strict policy of no alcohol and no drugs in the workplace.

No alcohol or drugs will be tolerated in the workplace. Anyone who presents themselves for work under, or apparently under, the influence of drugs or alcohol will be refused entry to the workplace.

For their own safety, that of their workmates and members of the public, any member of staff believing that another member of staff is under the influence of drugs or alcohol should report this immediately to their direct manager.

Drugs supplied by a medical practitioner or chemist may still affect safety performance and the employee's direct manager must be informed of that circumstance.

Procedures for managing Drugs and Alcohol misuse



Guidance on Drugs and Alcohol

To assist in the safe performance of our duties, the consumption of alcohol or drugs will not be tolerated in the workplace. Anyone who presents themselves for work under, or apparently under, the influence of drugs or alcohol will be refused entry to the workplace.

For their own safety and for the safety of their workmates and members of the public, any member of staff believing that another member of staff is under the influence of drugs or alcohol should report this immediately to their direct manager.

Drugs supplied by a medical practitioner or chemist may still affect safety performance and the employee's direct manager must be informed of that circumstance.

Section S

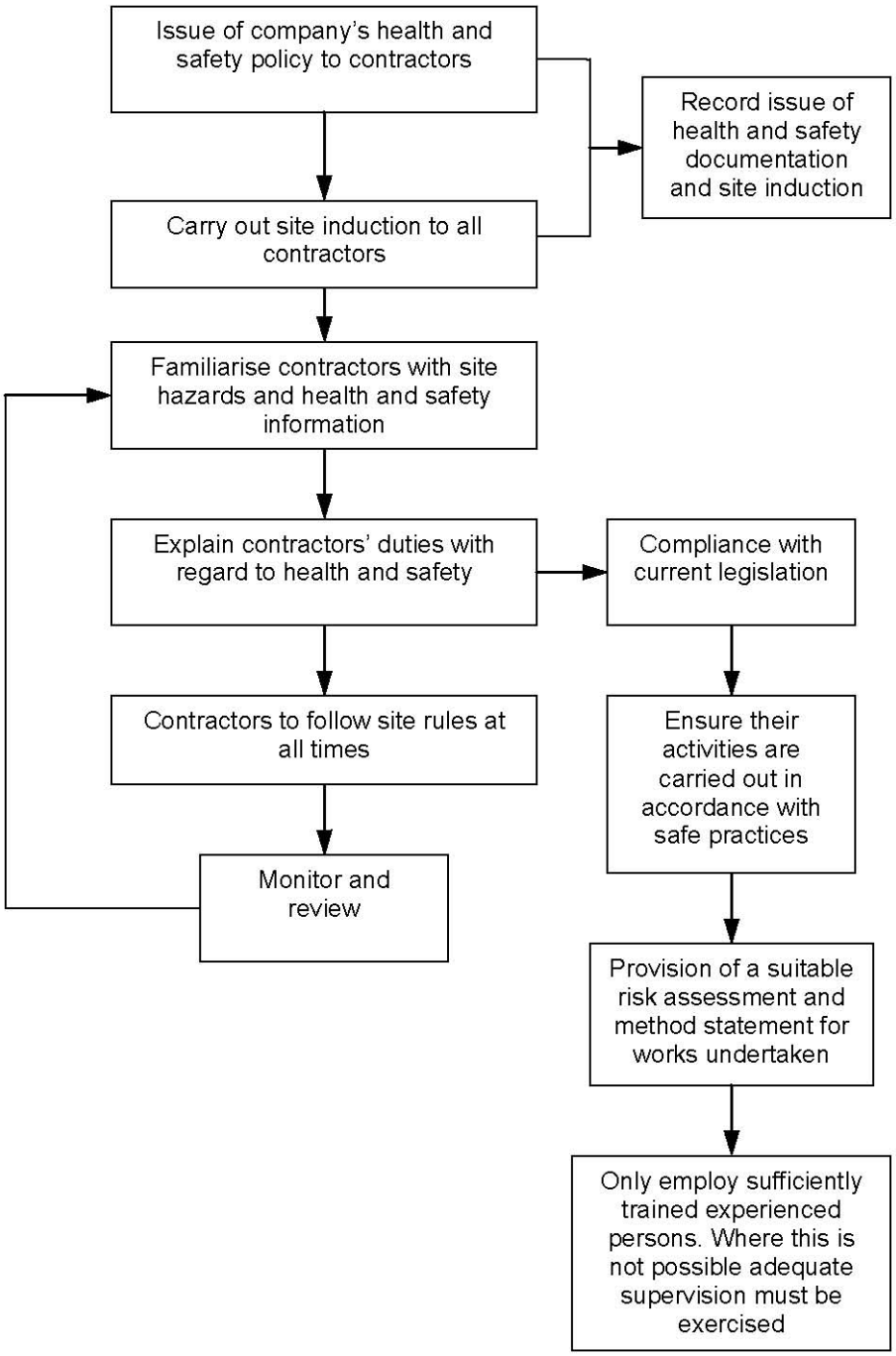
Arrangements Concerning Trade Contractors' Safety Information

Safety information, which forms an integral part of the company's health and safety policy, is applicable to all trade-contractors and persons under their control and forms part of the terms of contract. Trade-contractors are required to ensure that:

- They, and all persons under their control, familiarise themselves with the site and any hazards to be found on the site.
- Their activities are conducted in accordance with the safe practices as detailed in this policy, taking precautions to protect all employees and others who may be affected by their actions or failures to act.
- They comply with all the relevant legislation applicable to the workplace.
- They provide the correct protective equipment and clothing to their employees at the contractor's expense.
- Employees remain within the designated areas of their work.
- They only employ persons who are sufficiently trained and experienced in the performance of their duties. If persons under training are employed the contractor is to ensure that they are adequately supervised.

Nothing in the above information relieves trade contractors of their duties and obligations under statute or common law. Failure to comply with the Palmer Morris Interiors Ltd health and safety policy or any legal requirements will lead, at the discretion of Palmer Morris Interiors Ltd, to suspension of the contractor's work, at no cost to the employer, or to termination of the contract.

Procedures for Providing Trade Contractors' Safety Information



Guidance on Trade Contractors' Safety Information

Vetting health and safety competence
In order to assess whether a contractor has allocated adequate resources to fulfil their health and safety obligations in terms of health and safety law it will be necessary for the contractor to complete the company's vetting questionnaire.

The responses obtained from the contractor, and thorough evaluation and rating of this return will also serve to gauge the contractor's commitment to health and safety and adherence to recognised standards of competence.

Each contractor tendering for work with this company will be required to complete the vetting questionnaire and a decision will be taken by this company's management, based on the evaluation of the questionnaire responses, as to the suitability of the contractor and their proposed works for this company.

Vetting a smaller contractor's health and safety competence
Assessing a contractor who employs less than five people will not be as simple. Their legal requirement is to obey the legislation but without the burden of writing these things down. The questionnaire overleaf may assist.

The responses obtained from the contractor and thorough evaluation of this return will serve to gauge the contractor's commitment to health and safety and adherence to recognised standards of competence.

Each contractor tendering for work with this company will be required to complete the vetting questionnaire and a decision will be taken by this company's management, based on the evaluation of the questionnaire responses, as to the suitability of the contractor and their proposed works for this company.

Associated Forms & Guidance

Supplier / Sub contractor Pre-Qualification Questionnaire

Section T

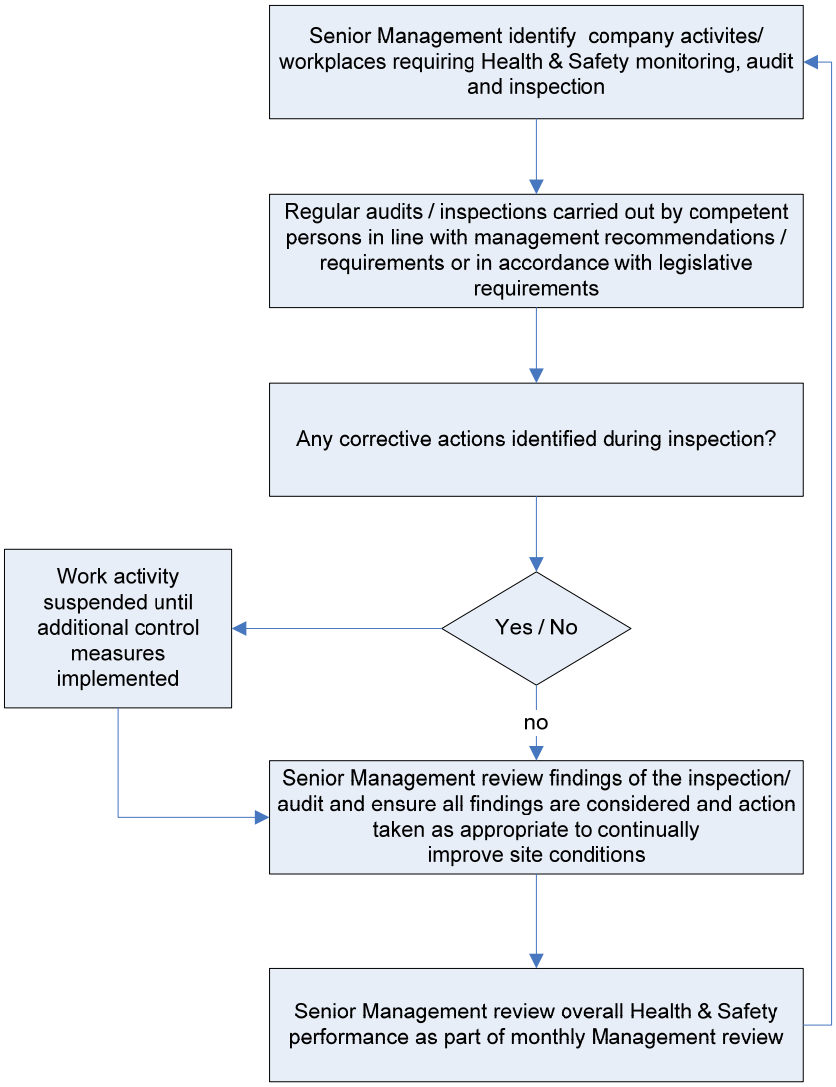
Arrangements for Safety Monitoring, Audit and Inspection

Progressive improvement in health and safety can only be achieved through the constant development of policy, approaches to implementation and techniques of risk control. Gary Morris will ensure that a systematic audit of all safety arrangements will be carried out on a regular basis.

Gary Morris will ensure that places of work are inspected regularly and in accordance with statutory requirements.

Records of safety inspections and audits will be kept in order that the directors of Palmer Morris Interiors Ltd can monitor the performance of the company and improve the overall safety culture within the workforce.

Procedure for Safety Monitoring, Audit and Inspection



Guidance on Safety Monitoring, Audit and Inspection

Workplace monitoring, and health and safety performance checks are key management responsibilities for ensuring ongoing health and safety standards within the workplace remain at an acceptable level. Regular workplace audits, inspections and management reviews go some way to help ensure those standards are maintained.

Workplace inspections
Inspections should only be carried out by a competent person, such as the company health and safety manager or an external safety advisor. Any issue posing a significant risk to health and safety requires immediate management action and should, where possible, be rectified there and then. All issues are to be recorded and reasonable timescales specified for rectifying/addressing any outstanding issues.

Where required, a formal report shall be completed before the end of the working period with a copy issued to the person for whom the inspection was carried out. The safety manager or appointed person shall regularly check that any outstanding issues have been suitably addressed and rectified.

Statutory inspection reports shall be kept at the workplace for at least 3 months after the date of the report.

Safety Audit Checklist, the following should be checked when carrying out an inspection:

- Company health and safety policy is being adhered to.
- Relevant documentation such as risk assessments, method statements, safety plans, etc. is specific to the works being carried out.
- Workplace inductions have been carried out for all personnel.
- All personnel are adequately trained to carry out their tasks safely.
- All protective clothing and equipment is in good order and is being used correctly.
- All plant and equipment is in good order, suitably guarded and inspected/maintained at the required intervals by a competent person.
- Any potentially hazardous substances used have been COSHH assessed, are being handled and stored correctly, and relevant safety information, where appropriate, is readily available.
- All places of work, including access routes, are safe and have been inspected in due time by a competent person.
- The provision of adequate lighting, including secondary lighting systems.
- The provision of adequate first aid facilities.
- The provision of adequate fire precautions.
- The provision of adequate welfare facilities.
- The provision of adequate emergency arrangements.
- The provision of safe pedestrian and vehicular traffic routes.
- That all statutory notices are displayed in the workplace.

Associated Forms & Guidance

Site Audit & Compliance Report Form

Section U

Arrangements for Waste Disposal

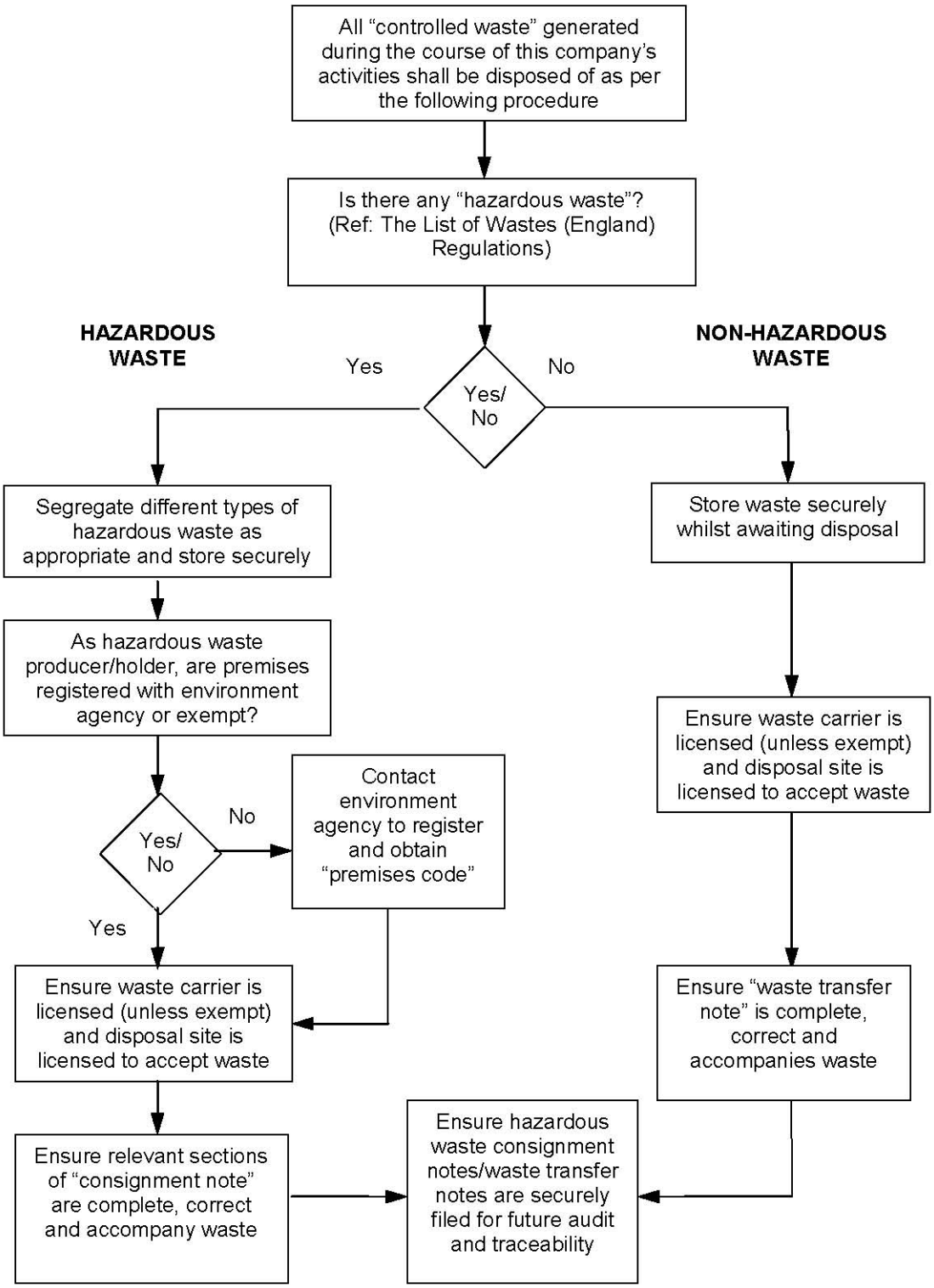
All waste generated during the course of this company's activities shall be deemed "controlled waste" and disposed of in a responsible manner in accordance with our duty of care under the Environmental Protection Act.

Gary Morris shall ensure that all waste materials are stored and disposed of in accordance with company procedures and relevant legislation.

Gary Morris and the Site Managers shall ensure that disposal of all "non-hazardous waste" is accompanied by and recorded through a system of signed "waste transfer notes".

Gary Morris and the Site Managers and the Supervisors shall ensure that disposal of all "hazardous waste" is accompanied and recorded through a system of signed "hazardous waste consignment notes".

Procedures for Waste Disposal



Guidance on Waste Disposal

Waste management duty of care
The duty of care applies to “controlled waste”. Waste is defined as "any substance or object which the producer or the person in possession of it discards or intends or is required to discard". Additionally, the duty of care applies to anyone who is the holder or carrier of such waste. The only exception to this is for occupiers of domestic property for the household waste generated from their home.

“Controlled waste” means waste from households, commerce or industry. A further subdivision can be made into “hazardous” and “non-hazardous” wastes depending on the effect of these wastes on health and the environment.

"Producer" means anyone whose activities produce waste or who carries out pre-processing, mixing or other operations resulting in a change in its nature or composition.

“Holder" means anyone who imports, produces, carries, keeps, treats or disposes of controlled waste or, as a broker, has control of it.

The Environmental Protection (Duty of Care) Regulations, the Controlled Waste Regulations and the Hazardous Waste Regulations place legal responsibilities on waste producers and holders to ensure that the disposal of all controlled waste is safely managed and that records are kept for audit by the relevant authorities.

Authorities and advisory bodies
The following authorities and advisory bodies should be consulted where appropriate:

- The Environment Agency (EA).
- The Scottish Environment Protection Agency (SEPA).
- The Health and Safety Executive (HSE).
- The Local Authority Environmental Health Department.
- The Local Authority Waste Disposal Department.
- The Interdepartmental Committee of the Redevelopment of Contaminated Land, Department of the Environment, 43 Marsha Street, London SW1 3PY.

Premises notification
Where more than 500kg of hazardous waste is produced at, or removed from, premises during any 12-month period there is a requirement to notify the premises to the EA or SEPA.

It must be noted that exemption from notification does not exempt the producer from any other aspect of the Hazardous Waste Regulations, e.g. an office disposing of small quantities of spent fluorescent light tubes (i.e. less than 500kg) must still prepare hazardous waste consignment notes.

Disposal controls

All waste processes must be regularly monitored. This should include weekly (or daily) checks on all waste collection areas, checks on the correct segregation of waste and checks on the contractors who remove the waste.

Appropriate documentation must be completed to provide an auditable trail for the waste. Carriers must be registered in order to collect waste, and the disposal and recovery facilities must be licensed to take the waste.

It must be remembered that the duty of care for waste continues all the way down the line to the point of final disposal. Thus, if an incompetent contractor allows waste to escape after collection then the responsibility may rest with the producer of the waste. It is therefore crucial that organisations select competent contractors to deal with their waste.

In summary, the following actions must be carried out:

- Notify the premises (unless exempt) to the EA or SEPA where hazardous waste is produced.
- Appoint a competent waste carrier, ensuring that they are registered and hold an appropriate license (this can be checked through the EA's website).
- Ensure that appropriate documentation is completed and accompanies waste:
- Waste transfer notes for non-hazardous waste;
- Hazardous waste consignment notes for hazardous waste (multi-part forms are available from the EA or SEPA).
- Ensure documents are securely filed (waste transfer notes must be kept for a minimum of 2 years and hazardous waste consignment notes for a minimum of 3 years).
- Ensure that the final disposal site is registered and has a license to accept specific types of waste.

It is strongly recommended that you also:

- Get references from other clients before you appoint a waste sub-contractor. It may also be appropriate to audit the contractor on issues such as staff training, equipment and vehicles, any previous convictions for waste offences, and policies and procedures.
- Visit the disposal or recovery facilities that finally deal with the waste. It may be appropriate to audit the facility to ensure compliance with your duty of care and legal obligations.