



2023

HEALTH, SAFETY & WELLBEING

POLICY MANUAL



WARNING:

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DOCUMENT REVIEW:

To insure consistency of this Management Protocol and collaboration between disciplines, a document review period of 12 Months (from date of last issue) is to be enforced.

Therefore; if you are reading this document and the date stated below is in the past, please report the status of the document to the departmental lead:

Next Document Review Date: 11.10.2024

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AMENDMENTS

AMENDMENTS RECORD			
DATE	ITEM	BY	NOTES
10.02.2020	Updated Policy Statement	RS	Leadership change
12.06.2020	Updated Policy Statement	RS	Leadership change
17.11.2020	H&S Organisation Chart Updated on pg.6	RS	Removed George Mapp from the chart
15.01.2021	H&S Organisation Chart Updated on pg.6	RS	Removed Jay Cooper's name from the chart
01.06.2021	Update to the policy statement	RS	Full annual review carried out
01.04.2022	Update of leadership	RS	Update of leadership and policy statement
11.10.2022	Update of leadership	AR	Update of leadership and policy statement
09.11.2023	Review of document and updated to latest procedures	F.O 'R	Complete review of H & S policies and procedures

HEALTH & SAFETY POLICY STATEMENT

It is the objective of Structure Tone that the highest standards of health & safety will be achieved and maintained during the execution of all of our business activities.

All provisions of the Health and Safety at Work etc Act 1974 and other statutory requirements shall be complied with as a minimum standard. Structure Tone is committed to continual improvements in our health and safety standards and will take all effective measures, which add value to the standards, in sustaining these improvements.

Risks to the health and safety of our employees, members of the public and all other persons affected by our works shall be assessed and safe systems of work devised.

We shall provide working environments that are in a safe condition without risk to health, and that have a safe means of access to and egress from.

Appropriate arrangements for putting into effect the Health & Safety Policy will be implemented and all safe working procedures followed. This process is controlled by implementation of the Health and Safety management system, which has UKAS accredited certification to the internationally recognised ISO 45001 standard.

We will ensure adequate provision is made for First Aid, Welfare facilities and Fire Prevention.

The ultimate accountability for Health and Safety lies with the Board of Directors. In the event of difficulties arising from the implementation of this Policy reference must be made to the Board of Directors.

Implementation of this Policy is a line management responsibility at all levels, together with participation and commitment from all employees. Structure Tone have appointed a Competent Person to assist in the implementation and management of the Policy. Responsibilities will include monitoring compliance with its requirements.

The Policy will be communicated to all employees, contractors and other interested parties. All employees are expected to co-operate with us in achieving these objectives. A copy of our Health and Safety Policy Statement will be displayed prominently at all sites and workplaces.

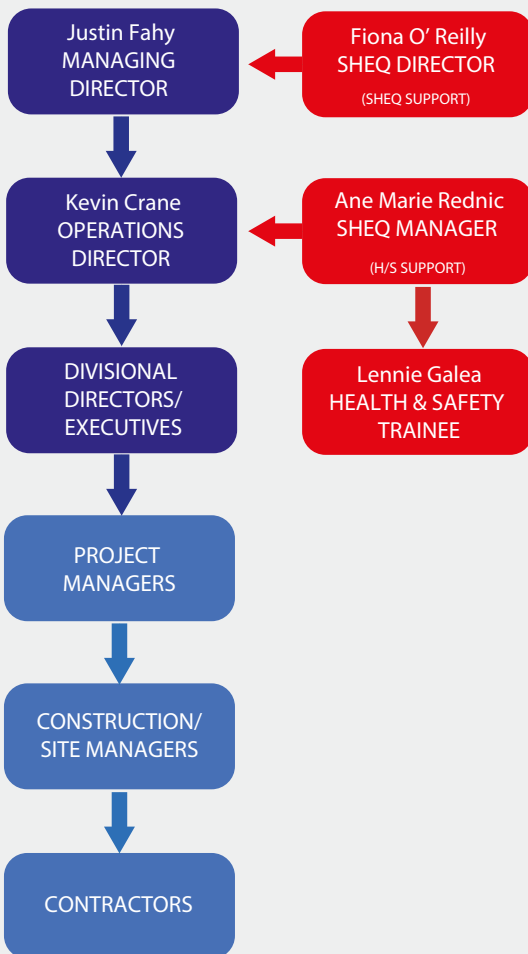
Each employee in the organisation will be given such information, instruction and training as is necessary to enable safe performance of their work activities. Adequate facilities and arrangements will be maintained to enable all employees to raise issues on health and safety and to facilitate two-way communication/consultation. Training needs will be identified via annual appraisal, contract requirements and regulatory requirements.



Justin Fahy
MANAGING DIRECTOR
APRIL 2023

ORGANISATION & RESPONSIBILITIES

3.1 ORGANISATION CHART



3.2 RESPONSIBILITIES

ALL PERSONNEL

- Understand and comply with the Company Policy for Health, Safety and Welfare.
- Set a personal example by wearing appropriate 5 point PPE protective clothing/personal protective equipment when on site.
- Work in a safe manner at all times and follow their safe system of work.
- In respect of Health, Safety and Welfare assist the company in achieving "Company Standards". Individuals who are considered to consistently ignore this aim will be subject to disciplinary action.

ORGANISATION & RESPONSIBILITIES

All DIRECTORS

- It will be the responsibility of all Directors to ensure the wellbeing of all persons employed by Structure Tone.
 - Provide the organisation, finances and resources necessary for the implementation of the Structure Tone Policy for Health, Safety and Welfare.
 - Be aware of the statutory requirements affecting Company operations and seek further advice when necessary.
 - Ensure that staff at all levels receives appropriate training.
 - Monitor the safety performance of sites through the and take appropriate action whenever a site's SHEQ performance is not up to Company Standards. (Below SHEQ Audit score of 80%).
 - Actively promote at all levels the Company's commitment to effective safety management.
 - Ensure that all new staff is issued with a copy of the Company Policy for Health, Safety and Welfare. This is given during new starters induction.
 - Set a personal example by wearing appropriate 5 point PPE protective clothing/personal protective equipment when on site.
 - The Board of Directors will ensure that decisions made reflect the Company's Health and Safety intentions as identified in the Policy Statement.
- The US Board of Directors have nominated the Managing Director (Justin Fahy) as having overall responsibility and being fully accountable for Health and Safety within the Company for UK Operations. The duties of the Director Responsible for Health and Safety will include:
 - › Understanding the statutory requirements affecting the company's operations and keeping the board informed.
 - › Ensuring that, where the Company commissions any "construction work" as a "client" or acts as an agent for another organisation for such work the requirements of the Construction (Design and Management) Regulations 2015(CDM) are complied with, in particular the appointment of a Principal Designer and Principal Contractor.
 - › Ensure that there is a system in place to provide staff with the required training appropriate to their job functions and the training needs of individuals are regularly reviewed against job requirements. Ensure that records are maintained.
 - › Ensure all projects have sufficient first aid cover.
 - › Reprimand any member of staff failing to discharge their duties in accordance with Company standards.
 - › Lead by personal example.
 - › Arrange for regular meetings with senior management to discuss; Company health and safety standards, accident investigations, safety performance and areas for improvement.
 - › Annually review the Company's Health & Safety performance with the board of Directors.

ORGANISATION & RESPONSIBILITIES

DIVISIONAL DIRECTORS/PROJECT DIRECTORS/ SENIOR PROJECT MANAGERS/PROJECT MANAGERS

- Identify the role and responsibility of Structure Tone in respect of the CDM Regulations, for each project.
- Ensure that the Project Team prepares a Construction Phase Health and Safety Plan at the start of the contract, and that they operate in accordance with it.
- Undertake risk assessment of relevant site activities when developing the Health & Safety Plan.
- Ensure that the regular progress meetings include safety as an agenda item, regular director safety audits are carried out quarterly, and weekly site managers safety checks take place on site every week, in accordance with company policy.
- Monitor the overall safety performance of sites and ensure that action is taken whenever sites fail to meet Company Safety Standards.
- Ensure there is involved at pre-contract stage on all new contracts if required.
- Ensure there is informed about remedial and contract maintenance works.
- When placing sub-contract orders, ensure that the Selection and Control of Sub-Contractors Procedure(procedure number) is followed.
- Discuss safety matters with site management teams at regular site management meetings
- Plan safety into work activities and ensure the site teams have adequate time, resources, information, skills and training to carry out the operations to Company Standards.
- Ensure that the overall safety performance of sites is discussed at regular intervals with all supervision, including sub-contractors in regards to risk controls.
- Report any problems or improvements to this policy to the appropriate Director or Health & Safety representative.
- Actively promote at all levels the Company's commitment to effective safety management.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.

ORGANISATION & RESPONSIBILITIES

SITE CONSTRUCTION MANAGER/SITE MANAGER/ TECHNICAL SERVICES MANAGER

- Ensure that all site supervisors/gangers are aware of their responsibilities.
- Understand the roles and responsibilities of Structure Tone in respect of the CDM Regulations for that particular site.
- Prepare a Construction Phase Plan(CPP) at the start of the contract and ensure that the project team operates in accordance with it.
- Ensure ALL new employees, including sub-contract employees, are instructed on Structure Tone safety requirements, including project specific requirements.
- When placing sub-contract orders, ensure that the Selection and Control of Sub-Contractors Procedure is followed.
- Organise and plan sites so that work is carried out to Company Standards with minimum risk to employees, other contractors, and members of the public, equipment, materials and the environment. Bring to the attention of the Project and/or Construction Manager and any improvement required or problems being encountered.
- Plan safety into site operations; in particular by effective use of the progress meetings, where safety is an agenda item, supervisor's meetings and safety briefings.
- Ensure that adequate supplies of personal protective equipment are available on site.
- Make full use of the services of Structure Tone SHEQ Representative and ensure that all recommendations are actioned. Report immediately any dangerous occurrences, reportable accidents, disciplinary action or HSE visits.
- Ensure that all sub-contractors are made aware of their responsibilities for health, safety and wellbeing on your contract.
- Actively promote at all levels the Company's commitment to effective safety management.
- Ensure that all hazards and health and safety risks are effectively monitored, reviewed and documented on site.
- Identify the requirements for method statements, and ensure they are produced and approved on time. Identify required distribution (e.g. Foremen, Supervisors, Operatives, Client, and Professionals) and ensure it is strictly followed and controlled.
- Appoint a responsible person to induct all staff in respect of safety within the site offices.
- Lead by example and promote good health and safety standards at all times whilst on site. Always wear the correct 5 point personal protective equipment. (Eye protection must be reviewed for every task ensuring correct protection is in place prior to the task being undertaken).

ORGANISATION & RESPONSIBILITIES

SITE SUPERVISORS/GANGER

- In conjunction with the Construction Manager, ensure all new employees, including sub-contractors, are instructed on Structure Tone Safety Instructions and written records kept.
- When method statements are produced ensure that all affected persons are briefed as to the contents and monitor operatives for compliance, including sub-contract operatives.
- Ensure that an adequate supply of personal protective equipment is kept on your site and implement disciplinary procedures against any employee who does not make full use of this equipment.
- In conjunction with the Site Construction Manager plan safety into work activities.
- In conjunction with the Site Construction Manager discuss safety with all supervision, including Sub-Contractors, on a regular basis, and record any findings.
- Ensure all statutory and company specific inspections are carried out as prescribed in the CPP.
- Make full use of the services of Structure Tone SHEQ department and co-operate with them to achieve Company Standards on site and advise them of all disciplinary measures taken on site.
- Do not allow horseplay, and discipline those who consistently fail to consider their own or others' safety.
- Follow Company Procedures and report any problems in achieving these standards to the Site Manager and Health and Safety Representative.
- Actively promote at all levels the Company's commitment to effective safety management.
- Ensure that the requirements of all applicable UK health & safety law is brought to the attention of a operatives involved.
- Ensure that when permits to work are issued all operatives involved in the work operations understand them.
- Actively encourage employees to report Health, Safety and Welfare problems.

ORGANISATION & RESPONSIBILITIES

OPERATIVES (Including Sub Contract Labour)

- Read and understand the company health and safety policy and carry out your work in accordance with its requirements and those of any Health and Safety Plan developed for the site on which you are working. (The site Health and Safety Plan is a requirement of the Construction (Design and Management) Regulations 2015 (CDM).
- Ensure that you have received induction instructions for the site you are working on from Structure Tone supervision.
- Ensure that you follow the instructions given to you at the Induction, and all subsequent safety briefings (e.g. Ten-point plans, method statements, risk assessments, manual handling, toolbox talks, etc.) and that you act in a responsible manner.
- Actively participate in the management of Safety by reporting all incidents, accidents and near misses.
- Do not lift anything that you are not physically capable of lifting comfortably. Understand the techniques required to lift safely.
- If in doubt of any risk associated with your work, ask you supervisor.
- Always wear the PPE identified, or displayed on signage, and ensure it is worn correctly.
- Do not use plant or equipment for work for which it was not intended or if you are not trained or experienced to use it. Use the correct tools and equipment for the job. Keep tools in good condition. Report immediately to supervision any defects in plant or equipment.
- Work in a safe manner at all times. Do not take unnecessary risks which could endanger yourself or others. If possible, remove site hazards yourself, e.g. remove or flatten nails sticking out of timber, tie unsecured access ladders, etc.
- Report to supervision any person seen abusing the welfare facilities provided.

ORGANISATION & RESPONSIBILITIES

COMMERCIAL AND SITE SUPPORT STAFF

- Ensure persons under your control work in a safe manner.
- Assist the Construction Management in achieving Company Safety Standards on site, by reporting unsafe operations and conditions.
- Suggest ways of improving overall safety performance.
- When placing sub-contract orders, ensure that the Selection and Control of Sub-Contractors Procedure is followed.
- Ensure the provision of Support Services in no way compromises Site Safety.
- Set a personal example by wearing appropriate 5 point protective clothing/personal protective equipment when on site. (Eye protection must be reviewed for every task ensuring correct protection is in place prior to the task being undertaken).

VISITORS TO SITE

- Visitors to site, including Structure Tone personnel, must ensure that they receive a visitor's induction on their first visit to a site. All visitors will be accompanied on site.
- Visitors shall ensure that they follow the instructions given in the induction, and act in a responsible manner.
- If visitors to the site need to go onto the designated work areas, they are expected to wear the appropriate 5 point personal protection equipment at all times.
- (Eye protection must be reviewed for every task ensuring correct protection is in place prior to the task being undertaken).

ORGANISATION & RESPONSIBILITIES

SHEQ DIRECTOR/SHEQ MANAGER/SHEQ ADVISOR

- Advise in Identifying the roles and responsibility of Structure Tone in respect of the CDM Regulations for each project and agree a course of action with the Project/Construction Manager and Site Manager to satisfy these requirements via the CPP.
- Advise the Site/Project management in preparing the Construction Phase Plan, prior to the contract commencing.
- Identify areas/operations which require specific safety/environmental instructions and organise and assist with this instruction on site using visual aids etc., as required.
- Provide information in the form of Instruction's, Best Practice Guidance notes, Codes of Practice, Safety Information Sheets etc., and inform the site management of group accidents/incidents/visits from the Health and Safety Executive and Environment Agency.
- Audit induction instructions on site regularly.
- Advise on high-risk contractors' method statements were required.
- Ensure by Instructions/advice, information and training that contracts are being carried out to Company Standards.
- Advise the Site/Project Manager if their contract is not achieving Company Safety Standards, and further advise the Project/Construction Manager and Director Responsible for Safety.
- Communicate effectively with the Directors who have signed this policy, regarding the Policy and inspections, accidents and incidents, ensuring that accidents and dangerous occurrences are reported promptly and any legislation requirements and any changes.
- Investigate accidents/incidents as required by RIDDOR. Make known and discuss all findings/recommendations throughout the Company.
- Assist in regard to health and safety standards and assist in advising and guiding the project teams in their day to day health, safety and wellbeing requirements.
- Carry out inspections and monitor close out of corrective actions.
- Ensure all of the site team is involved in the safety and environmental management of the contract by discussion, briefings, training sessions and effective communication. This will be conducted via toolbox talks and on-site audits.
- Monitor the effective running of the progress meetings, where safety is an agenda item, and monitor that items requiring attention are actioned.
- Advice and audit site offices to ensure they meet the requirements of the Health and Safety at Work etc., Act 1974. Ensure that office-based personnel receive appropriate health safety and environmental training and instructions.

ORGANISATION & RESPONSIBILITIES

OFFICE BASED STAFF

- Read and understand the company's safety policy and carry out your work in accordance with its requirements.
- Office based staff are expected to follow all instructions given at Induction and act in a responsible. In general employees must:
 - › Ensure all projects have sufficient first aid cover.
 - › Take reasonable care for the health and safety of themselves and others whilst at work.
 - › Co-operate with management to enable compliance.
 - › Do not intentionally or recklessly interfere with or misuse anything provided for the purposes of health and safety.
- Set a personal example by wearing appropriate protective clothing/personal protective equipment when on site.
- Report any safety issues to their line manager or the Health & Safety Representative.
- Where additional hazards are introduced in your working area or an adjacent area, such as construction work, make sure you comply with the health and safety requirements brought to your attention by your supervisor.
- Do not try to use, repair or maintain any office equipment or machinery, or carry out any work activity which may be hazardous to your health and safety, for which you have not received full instructions or training.
- Report any defects in office equipment or machinery immediately to your supervisor.
- Ensure that you know the position of the first aid box and who the first aider is.
- Ensure that you know the procedure in the event of a fire, or other emergency and comply with its requirement. Do not use fire-fighting equipment unless you have been trained in its specific use.
- Report any accident or damage, however minor, to your supervisor.
- It is your responsibility to maintain your work area keeping it tidy.
- Ensure that corridors, office floors, doorways, etc. are kept clear and free from obstruction, trailing wires, drawing pins, open desk or filing cabinet drawers or doors.
- Do not attempt to lift or move, on your own, articles or materials which you feel exceeds for individually capability as likely to cause injury.
- Do not attempt to reach items on high shelves unless using steps or a properly designated hop-up, do not improvise or climb.
- Suggest ways of eliminating hazards and improving working methods.
- Do not smoke in designated "No Smoking" areas and dispose of spent matches, cigarette ends, etc. properly.

ORGANISATION & RESPONSIBILITIES

- Ensure that when using chemical substances such as cleaners or detergents you make sure you comply with the requirements of any assessment made for its safe use.
- If in doubt check with your supervisor.
- When Office personnel visit site they must ensure that they receive a visitor's induction.
- All visitors will be accompanied on site.

ORGANISATION & RESPONSIBILITIES

CODE OF CONDUCT

STO Building Group's Code of Conduct and Business Ethics (the "Code"), available [here](#), is the keystone to our commitment to ethical conduct. It provides guidance on upholding STO Building Group's core values and helps employees and business partners understand the legal and ethical principles that govern the way we conduct business.

The Code applies to all STO Building Group employees, and to members of the board of directors, agents, consultants, contracted labor, and others when they are acting for or on behalf of STOBG. This Code also applies to the company's vendors, subcontractors, suppliers, and other business partners.

The Code is an indispensable resource, but it cannot address every situation that may arise. We rely on you to exercise common sense and good judgment in applying the principles contained in the Code, and to ask for help when you need it. These key principles include:

- Maintaining compliance with the letter and spirit of all applicable laws and regulations
- Upholding our commitment to maintaining a respectful workplace, free from discrimination and harassment, and to fair employment practices providing business opportunities to minority, women-owned, and disadvantaged business enterprises (M/W/DBEs)
- Avoiding conflicts of interest—actual, potential, and perceived

ORGANISATION & RESPONSIBILITIES

- Promoting fair competition and making business decisions exclusively on the basis of price, service, and the ability to meet the company's and clients' needs
- Operating in a fair and transparent fashion and disclosing material terms and conditions of our engagements
- Keeping accurate company documents and records

As a member of the STOBG family, you also have a duty to let the company know about any potential misconduct. Managers have a duty to act and to ensure that reports of potential misconduct made to them are promptly escalated and handled in accordance with the Code. You can report potential misconduct to or seek guidance from any of the following company resources:

- Your manager, a more senior manager, or your business unit leader

- A member of STOBG executive management
- Your compliance liaison or the Compliance & Ethics Department, which can be reached by email at: compliance@stobuildinggroup.com
- The Human Resources Department
- The Legal Department

You may also report potential misconduct anonymously through our 24/7 helpline, operated by a third party unaffiliated with STOBG, by calling the below toll-free numbers or visiting the online portal.

Call toll-free:

800.461.9330 in the United States

1.800.235.6302 in Canada

0808.189.1053 in the United Kingdom

1800.904.177 in Ireland

Online: compliancehelpcenter.com

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.1 MONITOR AND REVIEW

In order to comply with Section 2(3) of the Health and Safety at Work etc. Act 1974 and Regulation 4 of the Management of Health and Safety at Work Regulations this policy must be monitored, evaluated and reviewed as appropriate to ensure it effectively meets the Statutory Requirements related to the Company's activities and reflects best practice in safely achieving work objectives.

Progressive improvement in health and safety performance can only be achieved through constant development of policy approaches to its implementation and techniques of risk control.

The outcomes of the monitoring, evaluation and review processes is to secure:

- The maintenance and development of an effective health and safety policy.
- The maintenance and development of an effective organisation to ensure that the policy is implemented.
- The maintenance and development of improving performance standards.
- The implementation of remedial action by responsible person(s) when failures or gaps in policy are identified.

To achieve these outcomes all supervisors and employees must constantly evaluate their work activities in relation to the policy and bring to the notice of the company through its management system and/or safety co-ordinating arrangements any areas where this policy is inadequate or ineffective.

The company will make arrangements for the to visit the Company's sites and premises at regular intervals to identify and report on any hazards, lack of control measures, defects or breaches of regulations. A report of the inspection will be left on site and a copy of this report will be sent to the Project Management team and the Director Responsible for that project so that it can be established where the appropriate procedures in Company Policy have not been complied with or are deficient and action can be taken to ensure similar problems do not recur on Company sites.

In adopting a pro-active approach to ensure that this safety policy is being effectively implemented, managers have the responsibility to undertake routine safety inspections, assisted by the Director if appropriate, of their management area.

The safety inspection undertaken for each major activity under the manager's control should examine current performance, adherence to requirements and where deficiencies are identified to take practical action to improve standards and/or modify the safety policy. A formal report on the safety audit will be submitted to the relevant director for a review of its findings and recommendations. Such safety inspections should be undertaken

ARRANGEMENTS FOR POLICY IMPLEMENTATION

on a regular basis, or at specified intervals as appropriate to the risk environment managed by the individual Manager. (SHEQ Audits Monthly, SHE Inspections weekly/two weekly).

A review of overall company performance in health and safety will be undertaken at annual intervals, or other intervals as arranged. The company's senior management will discuss safety performance over the preceding period reviewing accidents, compliance with policy, requirements for competence training and other issues relevant to improving this policy and performance.

A quarterly summary report will be submitted to the Board of Directors outlining Company Safety performance for that period. The report will compare progress measured against the yearly objectives and, where necessary, make recommendations to the board to improve performance.

4.2 PROJECT PLANNING PROCEDURES

INTRODUCTION

Our professional management philosophy is based upon principles, which have proved successful in the past. These are:

- Detailed forward planning.
- Good communication.
- Motivation of the team by the team.
- A strong sense of discipline.
- Training.
- Measurement and review of performance.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

EFFECTIVE PLANNING

Contract safety planning has three distinct phases.

a. PRE-TENDER:

Where known hazards are assessed and resources allocated accordingly. Information can be obtained from:

- › Tender Documents.
- › Meetings.
- › Site Visits.
- › Pre-construction information.

b. CONTRACT AWARD:

Where the key members of the Project Team meet to discuss and agree actions on all the potential health and safety hazards which are likely to be experienced throughout the contract. At this meeting the development of the Construction Phase Plan (CPP) will be formulated.

c. THROUGHOUT THE CONTRACT:

A progress meeting where safety is an agenda item will be held regularly to review all expected site activities for the forthcoming period and to discuss in detail the relevant method statements, risk assessments and agreed actions. Discussion will also include training requirements, employment of sub-contractors, utilisation of plant and materials, and the overall co-operation and co-ordination of all parties. The site team then agrees the current safety standard being achieved. This meeting will be recorded. If necessary the CPP will be amended.

This planning framework is intended to ensure that the appropriate safety procedures are followed on site and that safe systems of work are adopted.

KEY PHASES TO THE PLANNING PROCESS

TENDER STAGE:

Utilising the pre-construction information provided by the Client/Principal Designer (as appropriate) Structure Tone will assess the areas of significant risk and evaluate the resources required to either remove or reduce such risks and thereby enable management to control the activities with minimum residual risk to employees or those affected by the works. Such information may be presented in the form of an initial contract risk assessment detailing major global issues for the project and taking into account the design and construction processes including impact on the environment and the final maintainability of the structure.

Supporting documentation will be submitted with the tender along with any other additional information requested.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

UPON AWARD:

Prior to any works commencing on site the Project Team, and if required the where necessary, will initiate a pre-start safety meeting with the construction team to discuss and agree actions on all aspects of safety pertinent to the particular project including known hazards, environmental issues, use and control of plant, materials and labour and above all the allocation of their individual roles and responsibilities to ensure the successful management of the project – see Proforma for Pre Start meeting in the Construction Phase Health and Safety Plan. (Normally via a SHE Inspection).

This initial meeting will formulate the basic information to develop the SHE Plan for the project in conjunction with the pre-construction information provided by the Principal Designer. The Plan will be monitored, reviewed and updated via the regular site progress meetings. (Verbal communication meeting, actions are recorded on a SHE inspection if required).

The regular site progress meetings pulls together the management team for the project in order to review, discuss and ensure actions are initiated for the safe completion of the works. Safety will be an agenda item. The frequency of the meetings will be identified in the Construction Phase Plan.

The skills and experience of those present will identify the operations to be undertaken, materials and plant to be utilised, and therefore readily assess the risks. This enables the formulation of a practical method of working taking into account all elements and highlighting particular training requirements, level of supervision and inspection criteria.

The team will also review current activities, all site accidents and incidents, disciplinary action, visits by external professional bodies such as the HSE, company news pertinent to the works and finally staff resources ensuring roles and responsibilities are constantly updated to accommodate holidays and changes of personnel.

TEAM/SUB CONTRACTOR BRIEFINGS

The site team will convene a safety meeting for all subcontractors and operatives in order to review current activities, accidents and future risk activities, thus ensuring full consultation, co-operation and co-ordination by all parties and also providing a forum for feedback to senior site management of current affairs and suggestions for improvement to safe systems of work.

The minutes of these meetings will be formally recorded. The frequency of the meetings will be identified in the Construction Phase Plan. (Normally weekly/two weekly).

DOCUMENT MANAGEMENT

In order to effectively control and manage the flow of information, Structuretone has adopted the electric domestic management system (EDMS) Asite .

The EDMS platform allows all stakeholders to view, upload, comment and file key documents for the management of health and safety of construction activities in accordance with the CDM Regulations 2015.

The EDMS has been set out to allow each organization a filing structure to allow relevant information to be uploaded in the correct folder in accordance with the various regulations as set out of the Construction Design Management Regulations.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.3 CONSTRUCTION (DESIGN & MANAGEMENT) REGULATIONS 2015

SCOPE

The Construction (Design & Management) Regulations have been in force since 2015. They establish new roles and responsibilities for Clients, Principal Designers, Designers and Contractors throughout a project's life cycle ensuring that so far as is reasonably practicable risks are removed, reduced or at the very least managed by competent management resources.

Structure Tone Health and Safety Procedures cover planning, utilisation of competent personnel in a co-ordinated team approach, all requirements of the CDM Regulations, training and where necessary discipline. Following the procedures will therefore ensure that Structure Tone fulfil their duties as both Principal Contractor and, if necessary, Principal Designer.

When appointed as Principal Designer by the Client, the Health & Safety Department will be consulted.

PRINCIPAL DESIGNER - RESPONSIBILITIES

- Ensure that the design has adequate regard to avoid foreseeable risks.
- Ensure co-operation between all parties.
- Advise the client on the measures required to comply with the Regulations.
- Ensure that the contractor is issued with the pre-construction information. The Principal Designer retains responsibility for this until work starts on site at which point the responsibility passes to the Principal Contractor.
- Give adequate advice to Client and Contractor with respect to designers' competence.
- Advise the Client that a Construction Phase Plan has been prepared before works start on site.
- Give adequate advice to the Client with respect to Contractor's competency.
- Give notice of the project to the HSE on behalf of the client.
- Ensure that the Health and Safety File is prepared.
 - › Review and amend the Health and Safety File as work proceeds on site. (Supplied by Designers and Contractors).
 - › Deliver the Health and Safety File to the Client on project completion.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

PRINCIPAL CONTRACTOR - RESPONSIBILITIES

WHEN TENDERING

Make full allowance of TIME and RESOURCES demonstrating (with documentation) how the CPP will be developed to comply with all Health and Safety obligations.

WHEN APPOINTED

- Develop the CPP prior to commencing work on site, taking into consideration the work and materials of all subcontractors and suppliers.
- Discuss with and advise subcontractors on contents of the Plan, and give information of on-site risks to enable them to comply with Health and Safety obligations.
- Prevent unauthorised site access by fencing and posting of notices.
- Update the Plan throughout the life of the Contract.
- Provide the Principal Designer with all relevant information for the Health and Safety File.
- Provide site orientation training (training) for all site operatives, both subcontractors and employees, to ensure compliance with the relevant statutory provisions.
- Consider the risk to the safety, health and welfare of everyone on site taking into account the requirements of the COSHH, Noise at Work, Manual Handling and Personal Protective Equipment Regulations.
- Display notification to the HSE.
- Obtain and assess method statements.
- Measure Health and Safety performance.
- Ensure the consultation, co-operation and co-ordination of all parties who work within the site confines.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

ACTIONS TO PROTECT HEALTH, SAFETY AND WELFARE OF THOSE ON SITE

- Can we eliminate the potential danger?
- Can a substitute material be used?
- Can the work be carried out “off-site” or away from the problem area?
- Can we vary the design to reduce the risk?
- Ensure good working practices.
- Ensure all work areas are clean and tidy.
- Consider potential fire hazards.
- Minimise the use of materials that add to fire risk.
- Ensure that all operatives are aware of hazards and risks, and are properly protected with safety helmets, safety footwear, high visibility jackets and appropriate personal protective equipment i.e., gloves, goggles, ear defenders etc.

DESIGNERS - RESPONSIBILITIES

The designer is obliged (so far as is reasonably practicable) to ensure that the design includes adequate information about aspects of the design or of the materials specified which may affect the Health and Safety of those working on the project.

In determining what is “so far as is reasonably practicable” the risk to Health and Safety (“so far as

is reasonably practicable”) produced by a feature of the design has to be weighed against the cost of excluding that feature by:

- a. Designing to avoid risks to Health and Safety.
- b. Tackling the causes of risk at source; or if this is not possible.
- c. Reducing and controlling risks by protecting anyone at work who might be affected.
- d. Provide adequate record information for the health and safety file.

THE PRE-CONSTRUCTION INFORMATION

The pre-construction information is provided by the Principal Designer as part of the tender documentation providing tenderers with information about the project, and with details of potential risks to Health and Safety. Items in the plan will include:

- Name of the Client.
- Name of the Principal Designer.
- Details of the project (nature of construction work).
- Location
- Timescale for completion.
- Site environment and surrounding land (i.e., any planning restrictions).
- Existing services, overhead and underground.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

- Existing traffic systems and restrictions (i.e., bridge restrictions, limits on delivery times, limits on parking times etc.).
- Existing structures (e.g., presence of asbestos, fragile materials etc.).
- Ground conditions (i.e., contamination, instability, subsidence, presence of mineworking's, underground obstructions etc.).
- Project design.
- Hazardous construction details
- Heavy/difficult materials to be handled.
- Other information pertinent to the project with potential risks to safety, health and welfare.

The CPP is developed, prior to the commencement of works, to access the template for the Construction Phase Plan please look on the ISO T Drive.

THE "HEALTH AND SAFETY FILE"

The file will have the details of relevant information of risks to Health and Safety, or potential problem areas to assist in subsequent alterations, repairs, redecoration, cleaning or eventual demolition.

Information for the file is to be provided to the Principal Designer promptly to enable them to update, review or amend the file accordingly. This information is to be provided by our sub-

contractors and suppliers, to enable Structure Tone to fulfil our statutory duties. This is in addition to the information we have compiled for delivery to the Principal Designer.

The Principal Designer at the end of the project will give the completed Health and Safety file to the Client. If the Client disposes of their interest in the property, then they are required to deliver the file to the person who acquires the property.

The contents and required layout for the Health & Safety of the file should be included in the pre-construction information. However, the regulations specify the following items as the basic requirements of the File:

- Records/drawings/plans with details of design criteria.
- Details of construction methods and materials.
- Details of the equipment installed, and maintenance facilities.
- Maintenance procedures.
- Operation manuals for plant and equipment.
- Requirements & procedures for repairing & cleaning.
- The nature, details and location of all services and utilities.
- The location and details of all fire fighting measures and emergency procedures.
- "As-built" drawings.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.4 RISK ASSESSMENTS

The Management of Health and Safety at Work Regulations place duties on employers and the self-employed to take certain actions as summarised below:

1. Assess the risks to the health and safety of employees and any others who could be affected by work activities. This also includes contractors and temporary staff engaged for specific work. Relevant procedures must be specified to eliminate or minimise the risks. Generic assessments incorporated as arrangements within a safety policy document will be acceptable provided arrangements for identifying additional risks are in place.
2. Where the risk is considered to be significant, then this must be recorded in writing and, where relevant, identify those groups of employees being especially at risk.
3. Risk assessments should be reviewed and altered if they are no longer valid or circumstances have changed significantly.
4. Provide health surveillance where there is an identifiable disease or adverse health condition related to the work concerned and identified in the Control of Substances Hazardous to Health Regulations 2002, provided that it is able to be detected and there is a reasonable likelihood it may occur under working conditions.
5. Appoint one or more nominated competent persons to assist in complying with requirements.
6. Establish emergency procedures to be followed in the event of serious and imminent danger, and nominate sufficient competent persons to implement evacuation procedures.
7. Provide relevant information to employees on the identified risks, the control measures to be taken, emergency procedures, names of competent persons, and risks where work areas are shared with other employers.
8. Co-operate fully with other employers where work areas are shared, by exchanging information on the protective measures and risks associated with each other's activities, and subsequently pass such information to employees in those areas.
9. Provide relevant training to employees in respect of:
 - › Duties and tasks allocated to them.
 - › Induction on first being employed.
 - › When transferred to new work or given increased responsibility.
 - › When changes in work equipment or methods are introduced.

The training must be repeated periodically and take account of changes, and also take place during working hours.
10. Assess the risks to health and safety of young workers new or expectant mothers at work and undertake measures to avoid such risks. [The Management of Health and Safety at Work (Amendment) Regulations.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

EMPLOYEES ALSO HAVE DUTIES AS FOLLOWS:

1. Use anything provided by the employer in accordance with the instructions and training given. This includes machinery, equipment, dangerous substances, means of transport, plant and safety equipment etc.
2. Inform the employer (or nominated person) of any dangerous work situation or any matter that is considered to be a shortcoming in his employer's health and safety protection arrangements.

DEFINITIONS:

- Hazard - this is the potential for harm.
- Risk - this is the likelihood that actual harm will occur.
- Assessment of risk will take into account the severity of the hazard, the number of people likely to be exposed and the possible consequences.

GENERAL PROCEDURE:

1. Identify the hazards and activities.
2. Assess the risks, i.e. what is the nature and extent of the risk?
3. Are existing control measures or precautions adequate?
4. Is there full compliance with the law?
5. Are any further precautions required?
6. Record the findings, and arrangements to be implemented if necessary.

Where the risks are generic the procedures laid down in the Sub Contractor documentation or in Structure Tone's Safe Working Procedures Manual may be sufficient to cover the activity. However the Site Management will need to review the activity and the proposed method of work and confirm the risks have been addressed. Documentation should be available on site for review and audit purposes.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

Standard Form Risk Assessment will be used when undertaking risk assessments on site. The form uses a quotative method to identify the level of risk exposure and the residual risk being accepted by the person undertaking the assessment. The following steps are used to complete the form:

1. Identify the Project.
2. Identify the Task being assessed.
3. Identify the Hazards (something with the potential to cause harm) and the considered Risks (exposure to the hazard) of undertaking the task.
4. Who is exposed to the risk (Operatives, Members of the Public etc.)?
5. The Control Measures that will be in place to: eliminate, reduce or control the risk.
6. Identify any training or health surveillance required.
7. Review the risk with the Control Measures in place and consider: (a) What now is the likelihood of encountering an incident when undertaking the task? and (b) If an incident were to happen what are the likely consequences? Use the grid to evaluate the Residual Risk.
8. Once the residual risks are identified if the values are LOW or below then the work can proceed as described. If the risk is MEDIUM then additional procedures are required before work commences to reduce the likelihood of an incident occurring, and/or minimise its impact if it did occur. If the residual risk is HIGH or above NO WORK MUST START until the risk has been re-evaluated.
9. Only site based Managers or the Health & Safety rep can sign off risks of High or above after a re-evaluation.
10. Identify the sources of information used to undertake the risk assessment.
11. The risk assessment should be signed by the individual undertaking it, dated and the persons it will be issued to identified on the form. In the event of a re-evaluated High Risk it should be only a status A.

HIGH RISK OPERATIONS AND METHOD STATEMENTS

High risk operations will be identified at the contract pre-start meeting and a plan of action agreed, including identification and use of approved sub-contractors, arrangement of pre-start safety meetings in accordance with the company policy, and where possible utilisation of alternative methods/materials in order to reduce the risks likely to be encountered. (Note, not all projects have recorded minutes).

Once Site Management have reviewed the method statement and verified it using Standard status check Form, their controlling supervisor will brief the operatives and written records kept on site, after which work will commence.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

The method statement must be adhered to at all times and if the situation on site changes such that the conditions cannot be complied with then work will cease until an agreed amended method of working is formulated and the personnel involved re-briefed.

Typical High Risk Activities include:

- Deep Drainage.
- Steel Erection.
- Roofing and Cladding.
- Falsework and Scaffolding.
- Confined Space Working.
- Demolition Work.
- Contaminated Ground.
- Asbestos Removal.

- Handling of Dangerous Substances.
- Work in Public Places.
- Traffic Management.
- Cranework / lifting operations.
- Temporary Works

On certain High Risk Activities the SHEQ Director/ Manager/Advisor should be consulted to assist with the review of the proposed method of work.

NOTE

Reference should also be made to the procedures for complying with the Construction (Design and Management) Regulations 2015 in the section above as they are linked to our procedures for Risk Assessments.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.5 PERMIT TO WORK PROCEDURES

Permits to work have been formulated for the following activities:

- All excavations - "Permit to Dig".
- General "General Permit to Work" including step ladders.
- Confined spaces - "Permit to Enter".
- Burning / Welding / Grinding and other work where there is a fire risk - "Hot Work Permit".
- Electrical Works - "Electrical Permit to Work" (see below).
- Testing - "Permit to Test".
- Crane operations - "Permit to Operate Crane".
- "Lone Working Permit".

Copies of all permits can be found in Public Folders: ISO T DRIVE Health and Safety, Permits.

Permits will be completed by the nominated member of staff, who will be suitably trained and knowledgeable on the particular area of work, and then issued to the relevant Supervisor who will be responsible for briefing his operatives on the precautions to be taken and ensuring sufficient equipment is provided and maintained throughout the works.

The works in progress will be monitored for compliance with the permit and method statement by Structure Tone Site Management.

In addition to permits being found within the ISO T Drive, Structure Tone have implemented a digital permit system through the Snag R. The mobile application allows the construction management team to manage the permit process digitally with the supply chain.

ELECTRICAL PERMIT PROCEDURE

Where work is required under an Electrical Permit to Work it must be issued by an authorised person and all precautions applied as stipulated on the permit and, detailed within the works Method Statement.

The Electrical permit is defined as:

"A form of declaration signed and given by a senior authorised person to a person in charge of work to be carried out on any earthed extra high or high voltage apparatus, for the purpose of making known to such persons exactly what apparatus is dead, isolated from all live conductors, has been discharged, is connected to earth and on which it is safe to work."

A Senior Authorised Person is:

"A competent person over 18 years old, adequately trained and possessing technical knowledge and appointed in writing by his Manager to carry out specific operations and/or work on the system, including authority to issue and cancel electrical permits to work." A Senior Authorised Person may be either directly employed or sub-contract personnel.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

PLANT & EQUIPMENT

All plant and equipment items to be worked on that could be made potentially live shall be identified on the Permit to Work and the appropriate key removed from the key cabinet and the key placed in a separate secure box. The key number should be identified on the permit.

All active permits to work shall be displayed in a clearly visible location in the site office. The requirement for an electrical permit to work shall be identified on the general permit.

An electrical permit shall be issued to remove a lock from each individual MCC isolator. Each lock and key set shall be numbered and identified on the key list to an individual device. Electrical permits to be issued to sub-contractor by authorised personnel only.

When an electrical permit is issued, the following procedure shall be followed:

- Crane operations.
- The permit shall be filled in and signed on behalf of Structure Tone by the authorised Electrical Supervisor.
- The permit shall be read and signed by the applicant.
- Both parties shall witness lock removed from the isolator, and responsibility for safety of the equipment shall be the responsibility of the sub-contractor.
- The lock, key and original permit shall be kept together in a visible location in the site office.
- General permits to be signed off at the end of each day.
- Electrical permits are to be kept open and signed off on completion of the work described. The sub-contractor shall ensure that equipment is left in a safe condition at the end of each day, and should report status to the Electrical Supervisor.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.6 TRAINING POLICY AND PROCEDURES

There are many hazards that arise from using incompetent and poorly trained personnel to undertake work activities. Many accidents at work stem from a mis-match between an individual's capability and training to perform the work activities required by his job. Examples include incorrect use/misuse of hand and powered tools, personal protective equipment, access and egress etc.

Structure Tone has developed a training matrix for each key role within the business for those based on site or in the office. The directors will oversee the ongoing training of staff in line with the training matrix.

AT THE PLANNING STAGE

When planning all work activities there is a requirement to undertake risk and other assessments related to the work. One element that must be considered in such assessments, and in meeting the requirements of any SHE plan developed for the work, is the competence of the personnel who will undertake the work.

In planning work the Project Manager/Construction Manager will ensure that the personnel detailed to undertake it meets the competence requirements specified in the assessment/plan. Where personnel are not competent then arrangements must be made to:

In undertaking the allocation of work to each person there should be a clear common understanding of what is expected of each individual in terms of the range of tasks and the standards to which they are to be performed.

The standards not only include the quality of the work affected, but also the health and safety conditions and performance required whilst the work is being executed.

These competence requirements are not static and training needs will be generated by the requirements to:

- Acquire fresh skills, knowledge and experience.
- Understand and apply new techniques or work in an unfamiliar environment.
- Handle a new set of problems and decisions.
- Develop new competence in the shortest possible time.
- Adopt different approaches to work and meet new standards of quality.
- Improve flexibility and meet requirements for enhanced competence, for example, at Supervisor level.
- Meet changes in manpower resources as personnel leave and are recruited to the Company.
- Undertake the raising of skill levels and knowledge of new entrants to the levels required for full job competence.
- Develop through training the required competence in individuals prior to the work commencing. AND/OR
- Sub-contract the work activities to a contract organisation whose personnel do have the
- Necessary competence. (This must be established prior to the contract being let as part of the contractor appointment procedure).

ARRANGEMENTS FOR POLICY IMPLEMENTATION

MONITORING TRAINING NEEDS

The Project Manager must:

Ensure that only competent personnel undertake the work activities under his control. Where individuals display incompetence in the way the work is being executed then he must take steps to rectify the situation by:

- Removal of the individual from the work activity until their competence level can be developed through training and experience to the level required.
- Improve the level of direct supervision of the individual by competent personnel experienced in the work activity detailing the limits of the individual's involvement in the work.

Ensure that where new systems of work or changed techniques are being implemented then the required information and training is undertaken prior to the work activity commencing.

Ensure that, where appropriate, refresher training is undertaken prior to executing work activities not regularly encountered. This will ensure those involved raise their competence level to that required by the work.

Ensure that where personnel deputise for others that they are sufficiently competent to undertake the changed activities.

CONTROL MEASURES

Before entrusting work activities to individuals assess their capability to perform the work to the health and safety standards and other criteria required. Further guidance can be found in the Guidance Procedures.

Ensure that where deficiencies in competence are identified these are addressed by the provision of adequate training, development experiences and, where appropriate, the required level of supervision.

Ensure that appropriate refresher and re-training is undertaken to meet the needs of individuals and requirements of changing systems of work, new techniques and changing risk environments.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

LEGAL REFERENCES

Structure Tone has engaged the services of Red-on-Line legal register. Red-on-Line identifies all current legislation relevant to our organisation and allows its services enables Structure Tone's compliance to key legal clauses within the management system.

- The Health and Safety at Work etc. Act 1974.
- The Management of Health and Safety at Work Regulations 1999.
- The Personal Protective Equipment at Work Regulations 2002.
- The Provision and Use of Work Equipment Regulations 1998.
- The Control of Substances Hazardous to Health Regulations 2002.
- The Manual Handling Operations Regulations 1999.
- The Construction (Design and Management) Regulations 2015.
- Reporting of injuries, Diseases and Dangerous regulations occurrences Regulations 2013.
- Control of Asbestos Regulations 2012.
- The Lifting Operations and Lifting Equipment Regulations 1998.
- The Health and Safety (Consultation with Employees) Regulations 1996.
- The Health and Safety (First Aid) Regulations 1981
- Health and Safety Executive Approved Code of Practice, Confined Spaces Regulation, provides information on the hazards involved, precautions and procedures required.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.7 ACCIDENT/INCIDENT MANAGEMENT PROCEDURE

INTRODUCTION

All personnel employed on any Structure Tone Project will be encouraged to report all incidents that occur on their sites in a no blame culture. Such reports will be analysed to identify trends and improve working conditions with the overall objective of eliminating risk and reoccurrence of incidents of a similar nature.

All injuries, damage or near miss incidents, however minor, will be reported to the SHEQ Director, Fiona O'Reilly, and the Managing Director, Justin Fahy, Ane Marie Rednic SHEQ Manager and Kevin Crane Operations Director on Standard Form Located in the ISO T Drive. This applies to incidents involving sub-contractors, visitors to the site, and members of the public or any other persons affected by our works.

REPORTING

All Site/Project Managers shall be responsible for immediately reporting the following occurrences using Standard Form.

- Any injury reportable under RIDDOR 2013 (Death, Major Injury or Over 7 Day Injury).
- Any Dangerous Occurrence Reportable under RIDDOR 2013.
- Any injury or ill health resulting from work activities.
- Any injury resulting in lost time.
- Any injury requiring First Aid treatment.
- Any property damage including Company vehicle damage.
- Any Environmental Incident including those reportable under legislation.
- Any near miss which had the potential to cause one of the above.
- Any hazard that may have the potential to cause one of the above.

Any Reportable Incident under RIDDOR 2013 will be reported immediately to the SHEQ Director, SHEQ Manager, the Managing Director and the Operations Director.

It shall be the responsibility of all employees and contractors working for Structure Tone to report all incidents immediately to their Line Manager.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

STATUTORY REPORTING

The following incidents, as defined by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR 2013), require the Health & Safety Executive (HSE) to be notified using an F2508 form.

- Any fatality.
- Major Injury (See appendix for definition of a Major Injury).
- Injury to Member of the Public requiring hospital treatment.
- Injury to Employee that results in them unable to resume work for more than 7 days.
- A Dangerous Occurrence (See appendix for definition of a Dangerous Occurrence).
- Reportable Disease (See appendix for definition of a Reportable Disease).

Fatalities, Major Injuries and Injuries to Members of the Public:

A fatality, major injury or injury to member of the public will also require the HSE to be informed by the quickest means practical within 24hrs, normally by telephone. It shall be the responsibility of the Director responsible to inform the local Health & Safety Executive.

The SHEQ Department will check that the HSE have been informed of fatalities, major injury or injury to member of the public incidents and will ensure written confirmation is submitted within 10 days on Form F2508.

If an employee dies as a result of any injury sustained at work within a year of the accident the company will inform the HSE in writing.

Over 7 Day Injuries:

The SHEQ Director will ensure a Form F2508 is submitted for Over 7 Day Injuries within 15 days. (via the sub contractor).

Diseases and Dangerous Occurrences:

The SHEQ Director will be notified immediately of any Dangerous Occurrence or Disease incident, who will then ensure the HSE are informed in accordance with RIDDOR 2013. In the case of a suspected disease a medical certificate or other written diagnosis from a doctor will be required before notification is made. Notification will be made using Form F2508A.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

INVESTIGATION

Any investigation report is privileged information and must not be issued to any other person without permission of the Managing Director.

Responsibilities

When an incident occurs it is important to gather information that will enable us to establish the root cause of the incident, the consequences and, where necessary, take action to prevent a recurrence. The following staff will have specific responsibilities under this procedure in addition to the responsibilities identified above: (Root cause).

Site Management

- For all First Aid injuries ensure the Accident Book is completed.
 - Take photographs of the incident location.
 - On Reportable Incidents where possible preserve the incident location until the SHEQ Director has been informed.
 - Retain any items of plant or equipment etc, that were involved in the incident.
 - Identify all documentation relating to the incident. (i.e. Risk Assessments, Method Statements, Permits etc).
 - Identify any witnesses to the incident and ensure they complete a Whiteness report is completed in the second section of the HAS01 form. Where there is a reportable incident involving a sub-contractor ensure they complete the F2508.
 - Assist the SHEQ Director with his investigation. This includes closing out any actions identified in reports to prevent a recurrence.
 - Where necessary inform the client or client's representative.
- Make the site safe and deal with any immediate risks.
 - Ensure an injured person receives treatment.
 - Report any fatality, major injury or injury to a member of the public requiring hospital treatment to the HSE by the quickest mean practical within 24hrs.(Director responsible).
 - Complete Accident form in full and return to the SHEQ Director within 3 days.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

SHEQ Director/SHEQ Manager

- Ensure any reportable incident has been notified to the HSE.
- Complete the F2508(A) and send to the HSE. (Only for direct staff, contractors will complete for their employees).
- Instigate a written formal investigation of all reportable incidents.
- Distribute copies of a formal investigation report to the senior Management team identifying the root cause.
- Ensure any actions are closed out within the specified time scales.
- Assist the HSE with any investigations they wish to undertake.
- Produce statistical analysis of accident and incident trends. Where necessary suggest action plans to tackle problem areas.
- Inform the Board of Directors of the Company's Accident/Incident Performance.
- Policy signed Directors.
- Review reportable incidents at board meetings.
- Review accident/incident performance and where necessary ensure resources are made available to tackle problem areas.
- Ensure formal investigation reports are closed out by site management within the specified time scales.

ACCIDENT BOOKS

All injury incidents must also be recorded in the Accident Book that will be kept in the site and main offices. The Site/Project Manager will be responsible for ensuring all injuries are recorded in the Accident Book and duly signed off.

The completed Accident Report Form from the Accident Book will be returned to the SHEQ Director with an Accident/Incident Report Form (if required), immediately after the incident. The SHEQ Director will make arrangements to keep all Accident Book Records for 3 years from the date of the entry.

REFERENCES

Reporting of Injuries Diseases & Dangerous Occurrences Regulations.

Accident form HAS01.

Accident flow chart located in Construction Phase Plan.

Appendix A – RIDDOR Definitions.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.8 SELECTION AND CONTROL OF SUB CONTRACTORS

OBJECTIVE

To define how Structure Tone selects and controls sub-contractors to be employed on our projects.

SUB-CONTRACT SELECTION

- Only sub-contractors that are on our Approved Supplier List can be employed to undertake work on our behalf unless written dispensation is sought from a Director.
- Sub-Contractors used on our projects will be approved in terms of the standard of their health and safety competence.
- To achieve approval they must complete and return in full Standard Form Sub-Contractors Health and Safety Competence Questionnaire to the SHEQ Department to demonstrate their ability to meet our safety standards.
- The purpose of the questionnaire and requested information is to ensure Sub-Contractors are aware of and understand all current health and safety legislation

relevant to the work they are undertaking.

- Sub-Contractors will receive written notification of their Approval Status. A written response will be issued to any sub-contractor who has failed detailing the reasons and providing the opportunity to resubmit their application.
- Any Sub-Contractor removed from our Approved Supplier List will be required to resubmit an application.
- Sub-Contractors will be issued with Structure Tone's "Sub-Contractor Responsibilities" and will be expected to comply with them in full when carrying out their works.
- In addition to being on the Approved Supplier List Sub-Contractors may be required to demonstrate competence for a specific project or task in accordance with the requirements of the Construction (Design & Management) Regulations 2015.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

SUB-CONTRACT CONTROL

- All Sub-Contractors are to be informed that they are responsible for the health and safety of all aspects of their operations and must ensure that their management, employees, contractors and others acting on their behalf comply fully with Structure Tone's current policy, responsibilities and arrangements.
- Sub-Contractors are required to submit risk assessments, method statements and any other relevant paperwork (such as training certificates and equipment certificates) in advance to Structure Tone's Site Management for verification.
- Sub-Contractors will be required to comply with the requirements of the Construction (Design & Management) Regulations 2015. In particular:
 - › To co-operate with the Principal Contractor,
 - › Pass the Principal Contractor information which will affect health and safety or is relevant to the health & safety file or is relevant to RIDDOR 2013,
 - › Comply with the directions of the Principal Contractor and the rules in the health & safety plan, provide information and training to employees, and
 - › To ensure that when arranging for any contractors to carry out construction work they are competent and have made adequate provision for health and safety.
- Site Management have a responsibility to ensure Sub-Contractors undertake their work in accordance with our requirements and as detailed in their risk assessments and method statements. We must ensure that persons identified to undertake work are competent to do so and that where necessary the required certification is held. Copies of all relevant certification will be kept in the Health & Safety Manual.
- Sub-Contractors are required to provide evidence that plant and equipment brought to site is in good order, fully tested in accordance with current legislation and that any plant operators are competent and trained.
- Sub-Contractors operations will be included in Structure Tone's health and safety inspections and audits carried out by Site Management and the SHEQ Director. A consistent failure to operate in accordance with our standards will trigger a Non-Compliance review by the Health & Safety Department.
- Where it is felt that a Sub-Contractor cannot demonstrate an ability to achieve to our health and safety standards they will be removed from the Approved Supplier List. They will receive written notification of this decision.
- Sub-Contractors must inform Structure Tone on same day of any accident/incident or near miss associated with their works on our projects.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

- Structure Tone must ensure Sub-Contractors receive the relevant health and safety information in advance to enable them to assess their work so that they can allocate sufficient time and resource to undertake their work safely.
- At the end of each project the performance of the Sub-Contractors will be reviewed and the Approved Suppliers List will be updated if required.

Responsibilities

- Project Managers
- Site Management
- Quantity Surveyors

REFERENCES

Construction (Design and Management) Regulations 2015.

Sub-Contractors Health and Safety Competence Questionnaire.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.9 COMMUNICATION AND CONSULTATION

COMMUNICATION, MOTIVATION & DISCIPLINE

Structure Tone systems are designed to ensure that all personnel on site have a clear understanding of what is expected what role individuals play and what happens if individuals do not co-operate. This is an essential part of any safety management plan.

A. New Employees:

This procedure is to be carried out by the site/ workplace supervisor/line manager of the site/ workplace where the new employee will be required to work.

1. Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible.
2. Show the new employee where the company safety policy is kept, explain its purpose and ensure that the employee is aware of his/ her responsibility. Explaining requirements of the site Health and Safety Plan. (Note - The Health and Safety Plan is a requirement of the Construction (Design and Management) Regulations 2015).
3. As certain if the new employee has any disability, ill health or illness which could prevent him/her carrying out certain operations safely or require additional protective measures
4. Show the new employee where copies of Regulations and the site Health and Safety Plan are kept.
5. Undertake or arrange for the site induction training to be given to the new employee(s) and ascertain their existing competence level(s) identifying any immediate training needs required to be met before work tasks can be allowed. Cover items 6-10 inclusive, below.
6. Warn new employee of any potential dangerous areas of operation on site or in the workplace.
7. Warn the new employee of any prohibited actions on site or in the workplace, e.g. entering specific areas without a safety helmet, operating plant unless authorised etc.
8. If there is any training or instruction required, inform management, e.g. abrasive wheels, cartridge tools, face fit, scaffold inspection, etc.
9. Issue to the new employee any protective clothing or equipment necessary, e.g., safety helmet, goggles, ear defenders, wet weather clothing etc., and obtain their signature for the items issued if applicable. Ensure that the new employees understand how to use and wear the equipment / clothing correctly.
10. Show the new employee the location of the first aid box and explain the procedure in the event of an accident, the necessity to record all accidents, however trivial it may appear at the time.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

Additional Procedures for New Employees Under 18 Years Old.

The Supervisor must undertake a specific Risk Assessment for any new employee or trainee under 18 years old and record the findings. This information will be available for the parent or guardian to review if required. The Assessment will be held in a lockable file.

If the individual is to work on site then the following additional precautions are required:

1. Inform employees that they must not operate any plant (including dumpers), give signals to any crane driver, use any power tools or equipment unless being trained and under the direct supervision of a competent person.

B. Site Inductions:

All site personnel must attend a site-specific Safety Induction. Refer to the Construction Phase Health & Safety Plan for details of inductions.

C. Supervisors:

All first line supervisors are made aware of their roles and responsibilities and their major contribution to the management of safety, by the provision of appropriate clear instructions to the personnel under their control.

Such instructions may include:

- Identification of job-specific risks.
- Methods of work.
- Handling and storage of materials.
- Use of works equipment.
- Use of personal protective equipment.
- Structure Tone disciplinary procedure.

Additionally, the first line supervisors on the contract attend a supervisors safety meeting on site to discuss, as a minimum, the following:

- Site safety issues arising.
- Future operations.
- Co-ordination of operations within the works.
- Means of maintaining Company Standards of Health, Safety and Welfare Management.

Items above may form part of other site meetings where safety is an agenda item.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

D. Noticeboards:

Safety notice boards will be established in both the office area and the canteen, which will display relevant information for the contract, i.e.

- Company Safety/Environment/Quality Policy.
- F10 (rev) Notification to Health and Safety Executive.
- First aid info and fire warden.
- Logistics plan.
- Fire & Emergency Procedures/plan.
- Relevant Insurance Certificates.
- Any Other Relevant Statutory Notices.
- All relevant in-house health and safety information.
- HSE Law poster.

E. Compliance:

There is a formal procedure to be followed where disciplinary action is required as a result of failure to comply with the Structure Tone Management System. This system utilises a Improvement Notice (Yellow card) will be served upon a site, individual, or sub-contractor/partner where it is the opinion of Site Management that there is a failure to comply with the Structure Tone Management System without reasonable grounds.

The Improvement Notice will state; the issuer, the recipient, the shortcomings and recommendations for compliance, and copies held by the recipient, Safety Department, Project Manager and/or Construction Manager.

A Prohibition Notice (Red card) can be issued to; an individual, or sub-contractor/partner where it is the opinion of Site Management that there is a contravention of the Structure Tone Management System, and that failure involves, or will involve, a risk of serious personal injury.

If a Prohibition Notice is issued then that task and associated operations will cease until a safe method of work has been submitted to and agreed by the issuing person(s).

ARRANGEMENTS FOR POLICY IMPLEMENTATION

The Prohibition Notice will state the issuer, recipient, contravention, and possible remedial actions. In addition, the Prohibition must be signed by the Issuer and Recipient, or Witness, as proof of receipt. (Email tracking) The Notice remains in force until relevant actions are taken and submitted, in writing, for approval by the issuer. Only after the issuer has signed the completed Notice as acknowledgement of actions taken, may the conditions of the Prohibition Notice be removed, and related operations re-commence.(Email tracking is suitable means of acceptance).

The Safety Department, as evidence of past performance, will hold records of Improvement Notices and Prohibition Notices. Any Sub Contractor who consistently accrues Improvement Notices will be issued a letter of warning from the Safety Department requesting details of actions taken to improve their performance. Failure to comply with Structure Tone's procedures will mean removal from the Approved Suppliers List (discussed in the SHEQ Quarterly meetings/reports and Operations meetings).

CONSULTATION

It is a requirement of the Health and Safety (Consultation with Employees) Regulations for employers to consult with employees on matters relating to health and safety, and came into effect on 1 October 1996. These regulations complement the Safety Representatives and Safety Committees Regulations, which place duties on employers to consult with safety representatives who have officially been appointed as such by the trade unions.(Monthly meetings as a group and weekly meetings on site's).

Who is to be Consulted?

Consultation must be with either:

- The employees directly, or
- Employees elected by a group of employees to act as their "representative of employee safety". [Note the use of this phrase to differentiate from trade union appointed "Safety Representative"].

Where "representative(s) of employee safety" are appointed, the employer must notify relevant employees of those names.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

Employers Duties

Where employees are NOT represented by a Safety Representative, then employers must consult those employees in good time on health and safety matters, and in particular:

- When introducing measures which may affect health, safety and wellbeing;
- The appointment of competent person(s) [MHSW regulations];
- The provision of statutory health and safety information;
- Any statutory health and safety training detail;
- The health and safety consequences of new technologies.

The employer must provide such information to employees or representatives to enable their full and effective participation in the process, and to carry out their function as representative, where appointed. (Minutes and reports are completed in the operations meetings).

Information may only be withheld if:

- It is against national security;
- Such disclosure is in contravention of any prohibition by an enactment;
- It is of a personal (personnel) nature, unless consented;
- It is of significant commercial/confidential importance that its disclosure could cause injury to the business;
- It has been obtained for use in legal proceedings; or
- It is not related to health and safety.

Employers must also:

- Provide reasonable training to representatives of employee safety in respect of those functions, including travel and subsistence costs, if appropriate;
- Allow representatives time off with pay during working hours to fulfil the functions; and
- Provide representatives with reasonable facilities to fulfil their functions.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

Functions of Representatives of Employee Safety

- Bring to the attention of employers any potential hazards and dangerous occurrences which could affect the group of employees being represented.
- Discuss with the employer general health and safety matters, and any information provided by the employer under these regulations.
- Represent the group of employees in consultation with HSE (or other Enforcing Authority) Inspectors.

Objection on Safety Grounds

Section 7 of the Health and Safety at Work etc Act 1974 and Regulations 11 and 12 of the Management of Health and Safety at Work Regulations require employees to take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions at work. In addition, employees must not undertake activities for which they are not adequately trained and experienced.

Where such situations arise, the employee has a duty to notify any shortcomings in health and safety arrangements, even when no immediate danger exists, to his employer and this could give rise to an objection on safety grounds to undertaking the work.

Objection on safety grounds to undertaking work instructions should, where possible, be resolved between the parties concerned so that they can comply with their respective statutory duties.

If there is failure to resolve the problem between the parties concerned then the matter should be discussed with the immediate manager and, if appropriate, the company's Health and Safety Representative.

If there is failure to agree at the working level then the matter should be referred to a senior manager/director whose responsibility is to achieve a solution to the objection and comply with statutory requirements.

During discussions of this objection it may be pertinent to involve the safety adviser and the local safety representative.

References

Management of Health and Safety at Work Regulations.

Provision and Use of Personal Protective Equipment Regulations.

Construction (Design and Management) Regulations 2015.

Health and Safety (Consultation with Employees) Regulations.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.10 COMPANY OFFICES (NOT INCLUDING SITE OFFICES)

OFFICE MANAGER AND DEPARTMENT HEADS

The Office Manager or Department Head will be responsible for inducting all office-based staff on their roles and responsibilities in relation to office safety including fire precautions, work station assessments, manual handling assessments and use of equipment if required.

The Office Manager or Department Head in conjunction with the Health and Safety representative will ensure there is an adequate Fire Plan for the Head Office. The plan will be reviewed annually. The fire risk assessment will also require review.

WELFARE ARRANGEMENTS

The Office Manager, in conjunction with the Health and Safety rep, will ensure there is adequate provision made for Welfare. These requirements shall include:

- Ensuring there is adequate ventilation, heating and/or cooling and lighting.
- Ensuring there is adequate sanitary conveniences for male, female and disabled persons.(Note no on-site facilities on the 1st floor for disabled persons, other arrangements will be made on appointment by the organizer of the meeting).
- Welfare facilities will have adequate washing facilities.
- Suitable drinking water will be made available.
- Facilities are available for rest, eating meals and changing clothing.
- Head Office is a 'No Smoking' environment.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

FIRST AID ARRANGEMENTS

The Office Manager, in conjunction with the SHEQ department, will ensure there is adequate provision made for First Aid. These requirements shall include:

- The nomination of trained and certificated persons sufficient to provide the correct level of cover for the Head Office. The level of cover must for all times there is work undertaken in the office, and will consider cover during holidays and sickness. There will be a minimum of 1 first aider per 50 staff.
- Means of communicating the arrangements made, to all employees, visitors, and contractors with reference to the emergency plan (fire and evacuation) where appropriate.
- A place or room set aside for the administration of simple first aid procedures (see below).
- A means of recording on a suitable form the first aid treatment given. This should include patient's name/address, patient's occupation, date of entry, date/time of accident, place/circumstances of the accident, injury details and treatment given, signature of person making the entry.
- The maintenance of first aid materials at appropriate levels.
- First aid boxes located strategically throughout the workplace, particularly near to high risk areas. Such boxes should be maintained and as a guide to include:
 - › A guidance card.
 - › 20 individually wrapped sterile adhesive dressings (assorted sizes) appropriate to the work environment.
 - › 2 sterile eye pads, with attachment.
 - › 6 individually wrapped triangular bandages (preferably sterile).
 - › 6 safety pins.
 - › 6 medium individually wrapped sterile un-medicated wound dressings (approx. 12cm x 12cm).
 - › 2 large individually wrapped sterile un-medicated wound dressings (approx. 18cm x 18cm).
 - › 1 pair of disposable gloves.

Where mains tap water is not readily available for eye irrigation, sterile water or sterile normal saline (0.9%) in sealed disposable containers should be provided. Each container should hold at least 300ml and should not be re-used once the sterile seal is broken. At least 1 litre should be provided.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

EYE BATHS/EYE CUPS/REFILLABLE CONTAINERS SHOULD NOT BE USED FOR EYE IRRIGATION

A place or room identified as a first aid room should meet the following criteria:

- Be situated adjacent to sanitary facilities and on the ground floor (if practicable) to allow access for a stretcher, wheelchair or carrying chair. If possible, be fitted with some form of emergency lighting.
- Nominated first aiders should ensure that the place or room is kept stocked to the required standard and that it is at all times clean and ready for immediate use.
- The following facilities and equipment should be provided in first-aid rooms if you have one in place:
 - › Sink with running hot and cold water always available.
 - › Drinking water when not available on tap, and disposable cups.
 - › Soap.
 - › Paper towels.
 - › Smooth-topped working surfaces.
 - › A suitable store for first-aid materials.
 - › First-aid equipment equivalent in range and standard and quantities to those listed for a first aid box.
 - › Suitable foot-operated refuse containers lined with a disposable yellow clinical waste bags or a container suitable for safe disposal of clinical waste (if required).
 - › A couch (with a waterproof protection) and clean pillow and blankets.
 - › Clean protective garments for use by first-aiders.
 - › A chair.
 - › An appropriate record book.
 - › A bowl.
 - › A telephone or other communication equipment.

Where special first-aid equipment is needed, this equipment may also be stored in the first-aid room. (ground floor area is the nominated area).

ARRANGEMENTS FOR POLICY IMPLEMENTATION

REQUIREMENTS OF STAFF WHEN WORKING IN OUR OFFICES

Generally all personnel in the office will ensure that:

- Access ways are kept clear of tripping / slipping hazards.
- Fire escape routes are kept free from obstructions.
- Electrical fittings equipment are in good working order, free of obvious defects and are readily identified with a current test / examination tag.
- Waste materials are not allowed to accumulate leading to a possible fire hazard.
- All kitchen areas are kept in a clean condition.
- All problems are reported to the responsible persons, details of who will be on office notice boards.
- They do not attempt to move heavy / unmanageable items unassisted. Ask your Supervisor for the risk assessment detailing how much objects are to be moved.

REFERENCES

Management of Health and Safety at Work Regulations.

The Workplace (Health, Safety and Welfare) Regulations specify standards to be applied to all workplaces (except construction sites), and also repeals certain sections of the Factories Act and the Offices, Shops and Railway Premises Act.

The Health and Safety (First Aid) Regulations together with Approved Code of Practice and Guidance Note specify the first aid equipment, facilities and personnel required, depending on the type of work and numbers of personnel affected at each workplace.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.11 SITE OFFICES

Where applicable, site offices will comply with the requirements of The Workplace (Health, Safety and Welfare) Regulations (except on construction sites where the site area is clearly fenced off from surrounding premises etc).

GENERAL REQUIREMENTS

1. The Construction/Project Manager will ensure all fire precautions in accordance with the The Regulatory Reform (Fire Safety) Order 2005 shall be supplied and maintained.
2. All fire equipment shall comply with the relevant British Standard and will be serviced and maintained at regular intervals. Training will be provided to members of staff in the use of the equipment.
3. The Construction Manager will ensure that all offices are cleaned out daily.
4. Any liquefied petroleum gas heating appliances shall be used in accordance with the requirements of company policy.
5. Any electrical installation shall be to the requirements of the IEE Regulations (British Standard) and shall be installed, tested, altered and maintained by qualified electricians only.
6. The Construction Manager will ensure that any office machinery is installed safely and that it is maintained and serviced in accordance with manufacturer's recommendations.
7. Training will be provided in the use of office machinery and no person may operate or service any machinery unless authorised to do so.

WELFARE REQUIREMENTS

PLANNING

All work will be tendered for taking into account the requirements of all the relevant Regulations and other statutory requirements.

The welfare requirements for the site should be detailed in the Construction Phase Health and Safety Plan.

Welfare requirements should be established as soon as possible, certainly before any demolition or construction work commences.

The provision of Schedule 2 of the Construction (Design and Management) Regulations 2015 must be met in respect of welfare facilities.

Where welfare facilities are to be shared between different contract organisations, arrangements and procedures for the proper use and maintenance of those Facilities must be developed and communicated to all parties sharing the facilities, and recorded in the Construction Phase Health and Safety Plan.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

MONITORING

The Construction Manager will ensure that all planned welfare facilities required for the site are provided and that they are maintained to the required standard.

Where the company has arranged to use facilities provided by another contractor, the Construction Manager must ensure that they comply with statutory requirements, and will also report to the contractor's management any deficiencies or failures to maintain them to the required standard.

SITE WELFARE FACILITIES

Wherever 'construction work' as specified in the Construction (Design and Management) Regulations 2015 is undertaken, then there is a statutory requirement to provide welfare facilities. Schedule 2 of these Regulations specify the requirements. Part of Schedule 2 is reproduced to the right:

SCHEDULE 2

WELFARE FACILITIES

SANITARY CONVENIENCES

1. Rooms containing sanitary conveniences shall be adequately ventilated and lit.
2. Sanitary conveniences and the rooms containing them shall be kept in a clean and orderly condition.
3. 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

4. Washing facilities shall be provided:
 - a. In the immediate vicinity of every sanitary convenience, whether or not provided elsewhere; and
 - b. In the vicinity of any changing rooms required by paragraph (14) whether or not provided elsewhere
5. Washing facilities shall include:
 - a. A supply of clean hot and cold, or warm water, (which shall be running water so far as is reasonably practicable); and
 - b. Soap or other suitable means of cleaning; and
 - c. Towels or other suitable means of drying
 - d. Rooms containing washing facilities shall be sufficiently ventilated and lit.
5. Washing facilities and the rooms containing them shall be kept in a clean and orderly condition.
6. Subject to item 9 below, separate washing facilities shall be provided for men and women, except where and so far as they are provided in a room the door of which is capable of being secured from inside and the facilities in each such room are intended to be used by only one person at a time.
7. Item 8 above shall not apply to facilities which are provided for washing hands, forearms and face only.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

DRINKING WATER

8. Every supply of drinking water shall be conspicuously marked by an appropriate sign where necessary for reasons of health and safety.
9. 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.

ACCOMMODATION FOR CLOTHING

10. Accommodation for clothing shall include or allow for drying clothes.

FACILITIES FOR CHANGING CLOTHING

11. The facilities for changing clothing shall be separate facilities for, or separate use facilities by, men and women where necessary for reasons of propriety.

FACILITIES FOR REST

Rest facilities shall:

- a. Include rest facilities provided in one or more rest rooms or rest areas;
- b. Include rest rooms or rest areas with suitable arrangements to protect non-smokers from discomfort caused by tobacco smoke;
- c. Where necessary, include suitable facilities for any person at work who is a pregnant woman or nursing mother to rest;
- d. Include suitable arrangements to ensure that meals can be prepared and eaten; and
 - a. Include the means for boiling water.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

The following table shows the minimum number of toilets and washbasins that should be provided:

Table 1: Number of Toilets and Washbasins for mixed use (or women only).

No. of People at Work	No. of Toilets	No. of Washbasins
1 – 5	1	1
6 – 25	2	2
26 – 50	3	3
51 – 75	4	4
76 – 100	5	5

An additional water closet, and one additional washing station, should be provided for every 25 people above 100.

Table 2: Number of Toilets used by men only.

No. of People at Work	No. of Toilets	No. of Urinals
1 – 15	1	1
16 – 30	2	1
31 – 45	2	2
46 – 60	3	2
61 – 75	3	3
76 - 90	4	3
91 - 100	4	4

An additional water closet, urinal, and one additional washing station, should be provided for every 50 men above 100.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

SHORT DURATION SITE FACILITIES

Where short-term work is to be carried out on a site where the provision of huts or mobile units is not reasonably practicable, the minimum of equipment to be carried in vehicles is:

- Drinking water container.
- Means of boiling water (taking into account requirements for safety and ventilation if LPG is used - see section on LPG in this Policy if appropriate).
- Hand cleanser in dispenser.
- Paper towels or other suitable means of drying hands.
- Storage facilities for protective clothing.
- Adequate first aid equipment.

Before work commences, the Construction Manager must make arrangements for the use by operatives of convenient sanitary facilities throughout the duration of the work.

FIRST AID ARRANGEMENTS FOR SITES

PLANNING

There will be a minimum 1 No. First Aider for every 50 No. employees on every Structure Tone site. Additional first aid resources will be determined taking into account the nature of the work activities, number of employees, geographical spread of operations, and accessibility to accident and emergency services. This will ensure adequate and appropriate personnel and facilities to deal with emergencies as they occur.

In addition to this, the 11-50 man First Aid Kit will be on all sites, or multiples of these kits to meet the number of workforce present on site.

Dependent on the size of sites, it may also be necessary to have some site vehicles carrying vehicle first aid kits as an emergency response to any accident that may occur satellite to the main site offices.

The Construction/Project Manager will establish the necessary first aid arrangements for the site determined by the expected risk environment, employee/contractor population, available local hospital facilities, and the requirement of the Construction Health and Safety Plan. In order to meet the requirements of the Health and Safety (First Aid) Regulations for the provision of suitable person(s) to administer first aid, the Construction Manager/Superintendent must ensure when establishing the site staff, that sufficient numbers of trained and certificated 'suitable persons' are appointed to the site.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

Where the numbers of employees/contractors to be employed on the work is large, then consideration must be given to providing appropriate facilities to administer first aid such as a dedicated room in the office accommodation.

The Construction Manager will establish the necessary procedures and arrangements to:

- Communicate the first aid facilities to all persons on site through the site induction procedure;
- Communicate the names of suitable person(s) to all persons on site;
- Ensure that first aid materials are replenished when used;
- Ensure the first aid facilities are; adequately stocked and maintained in a suitable condition
- Arrange all necessary first aid equipment, with guidance from the safety adviser if needed. The safety adviser can arrange the supply of materials if required.

TRAINING REQUIREMENTS

Appropriate first aid/fire Marshal training and refresher training for personnel nominated as suitable person(s) will be provided to ensure that competence is established and maintained. If work processes require additional specialised first aid provision, then appropriate personnel must be trained for that requirement.

MONITORING

The Project team will ensure that all arrangements for first aid/fire arrangements are established and that they are used and maintained to the required standards.

All personnel appointed as suitable person(s) must ensure that their certification remains current and must highlight any requirements for refresher training.

(Where the company is utilising arrangements made by the principal contractor then any deficiencies in that provision must be reported to the principal contractor).

Arrangements made for the use of first aid facilities by visitors or other contract organisations must also be monitored to ensure that the required standards are being provided.

The use of first aid facilities and materials should be recorded, with a record maintained in the Construction Health and Safety Plan.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

FIRST AID ARRANGEMENTS – SHORT TERM SITES

Main Projects will comply with the same First Aid requirements as for the Head Office. The Project Manager will ensure that the site has adequate facilities necessary for the peak number of operatives working on the site.

Where short-term work is carried out moving from site to site, the following provision for first aid should be made.

- Adequate first aid equipment and materials should be carried in the vehicle. (See below).
- As a minimum, one member of each work team should be a nominated suitable person to administer first aid treatment. If dangerous equipment is being used, then at least 2 members should be nominated.
- Welfare facilities must include the provision for washing and drying hands and adequate drinking water.
- If working in remote areas, the supervisor should have readily available, details of the local hospital facilities for dealing with non-ambulance casualties.
- All members of the work team must be informed of the first aid arrangements.
- The use of first aid equipment/materials must be recorded as part of the company accident recording procedure. Used materials must be replenished as soon as possible to maintain the availability of the first aid provision.

TRAVELLING FIRST AID KITS

The contents of travelling first aid kits should be appropriate for the circumstances in which they are to be used. At least the following should be included:

- a. A guidance card.
- b. Individually wrapped sterile adhesive dressings (assorted sizes) appropriate to the work environment.
- c. Individually wrapped triangular bandages.
- d. Safety pins.
- e. Large individually wrapped sterile un-medicated wound dressing (approx. 18cm x 18cm).
- f. Individually wrapped cleansing wipes.
- g. Pair of disposable gloves.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

FIRE PRECAUTIONS

Every year there are numerous major fires on construction sites and in buildings undergoing refurbishment. All have serious consequences : people are injured; buildings, including those of historic interest, are destroyed. Plant and equipment is damaged, work is held up and completion dates are not met. The majority of fires can be prevented by designing out risks, taking simple precautions and by adopting safe working practices.

Structure Tone will therefore ensure that adequate detection and prevention measures are incorporated during the design and contract planning stage; and the work on site is undertaken to the highest standard of fire safety thereby affording the maximum level of protection to the building and its occupants.

Structure Tone will appoint in accordance with the CDM Regulations, a Fire Safety Co-ordinator who will be responsible for assessing the degree of fire risk and for formulating and regularly updating the Site/Office Fire Safety Plan. The plan will detail, as a minimum:

- The organisation of and responsibilities for Fire Safety.
- General site / office precautions, fire detection and warning alarms.
- The requirements for a Hot Works Permit regime.
- Site/office accommodation-location, construction and maintenance.
- Fire escape and communications (including an effective evacuation plan and procedures for calling the fire brigade).
- Fire brigade access, facilities and co-ordination.
- Fire drills and training(if the site is longer than six months).
- Effective security measures to minimise the risk of arson.
- A materials storage and waste control regime.
- When finished surfaces or fittings incorporated into a building are to be temporarily protected during construction or refurbishment then in selecting a protective covering material regard must always be paid to the relative fire load and the potential for fire growth and spread.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

REFERENCES

Structure Tone procedures for managing work in accordance with the Construction (Design and Management) Regulations 2015.

Construction (Design and Management) Regulations 2015.

Management of Health and Safety at Work Regulations.

The Health and Safety (First Aid) Regulations, together with approved code of practice and guidance note specify the first aid equipment, facilities and personnel required, depending on the type of work and numbers of personnel affected at each workplace.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

4.12 FOOD HYGIENE – KITCHENS & CANTEENS

The main hazards associated with the work and the areas involved are:

- Dangerous machinery/appliances - electricity, gas, steam, hot water, mincers, slicers, mixers etc.
- Use and safe storage of sharp knives etc.
- Manual handling of hot pans, vessels etc.
- Fire from hot fats/oils.
- Burns from hot surfaces.
- Food hygiene and personal cleanliness.

PLANNING

The workplace manager will ensure that registration of the premises is carried out, if relevant. This may also apply to canteens on construction sites where food is prepared/handled on the company's behalf.

Arrangements will be made for the training of staff concerned, not only for the use of dangerous machinery but also in food hygiene aspects, and relevant records will be kept.

Requirements of the relevant standards will need to be considered in respect of temperature control for food storage together with any other needs for protection from both mechanical and electrical hazards, and regular inspection procedures will be arranged.

Where contract staff are employed then allocation of responsibilities will be clearly defined.

MONITORING

Supervision will ensure that protective equipment is available and used, and that all relevant protective devices and machinery guards are in place and operating correctly.

Staff training will be provided and the supervisor will monitor work to ensure that only trained personnel carry out those operations for which training is required.

The supervisor will also monitor the regular inspections of the areas and ensure that good hygiene and safety precautions are observed.

The supervisor will ensure that the first aid and fire-fighting facilities are maintained and are appropriate for the work area, together with appropriate hygiene facilities.

TRAINING

Training will be provided to those staff required to use or clean machinery or equipment.

Training will also be provided to those staff who are required to prepare or handle food.

Records will be kept of all training given.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

CONTROLS

1. Ensure all machines have been fitted with relevant guards, and these are in place before work starts. Follow any instructions or notices. Ensure work areas are adequately lit and ventilated.
2. Ensure washing facilities with running hot and cold water are available and are equipped with soap, nail brush, hand dryers etc., and are separate from food/equipment washing facilities, but close to the preparation areas.
3. Machinery should be switched off and isolated before carrying out any cleaning or maintenance.
4. Ensure machinery and electrical equipment are regularly checked and maintained, and tested as required. This also includes the correct operation and temperature control of refrigerators, ovens etc.
5. Report any faults promptly and do not use equipment if it has any fault which could cause a risk to health and safety.
6. Report suspected gas leaks immediately, and switch off gas valves before leaving the area. (DO NOT OPERATE ELECTRICAL SWITCHES).
7. Keep the work area and machines, clean and tidy. Preparation and storage surfaces should be smooth, non-absorbent, easy to clean and pest proof.
8. Clear up spillages promptly.
9. Ensure that training has been given where the use of any hazardous chemicals e.g. cleaning materials, and relevant assessments are available. Do not mix different chemicals together unless it is known and agreed that they are able to be mixed safely.
10. Take special care with any equipment or utensils which have sharp blades. Use protective equipment and clothing provided.
11. Take special care when working near hot surfaces, equipment or food preparation. Ensure there is sufficient space for work to be carried out.
12. Use the correct equipment for the job, keep knives etc., stored in appropriate racks or sheaths.
13. Take care when using microwave ovens and follow cooking instructions carefully especially when using covered/sealed containers.
14. Ensure care is taken when using fat fryers and avoid splashes especially when working with food containing excess moisture/water.
15. Ensure first aid facilities, including clean, waterproof plasters (preferably blue in colour), are readily available and report accidents promptly.

ARRANGEMENTS FOR POLICY IMPLEMENTATION

REFERENCES

The following legislation will apply:

Health and Safety at Work Act 1974.

Electricity at Work Regulations 1989.

Food Safety Act, associated Food Hygiene Regulations and related Codes of Practice.

Workplace (Health, Safety and Welfare) Regulations 1992.

Further information may be obtained from the Health and Safety Executive in the form of Approved Codes of Practice and Guidance Notes, for example:

- Catering Safety.
- Health and Safety in Kitchens and Food Preparation Areas.
- Memorandum of Guidance on the Electricity at Work Regulations.
- First Aid at Work.

APPENDICES A

APPENDIX A

RIDDOR DEFINITIONS

REPORTING OF INJURIES, DISEASES AND DANGEROUS OCCURRENCES REGULATIONS 2013

KEY DEFINITIONS

Regulations 4 - 6 cover the reporting of work-related deaths and injuries other than for certain gas incidents RIDDOR requires deaths and injuries to be reported only when:

- There has been an accident which caused the injury.
- The accident was work-related.
- The injury is of a type which is reportable.

WHAT IS AN 'ACCIDENT'?

In relation to RIDDOR, an accident is a separate, identifiable, unintended incident, which causes physical injury. This specifically includes acts of non-consensual violence to people at work.

Injuries themselves, e.g. 'feeling a sharp twinge', are not accidents. There must be an identifiable external event that causes the injury, e.g. a falling object striking someone. Cumulative exposures to hazards, which eventually cause injury (e.g. repetitive lifting), are not classed as 'accidents' under RIDDOR.

WHAT IS MEANT BY 'WORK-RELATED'?

RIDDOR only requires you to report accidents if they happen 'out of or in connection with work'. The fact that there is an accident at work premises does not mean that the accident is work-related – the work activity itself must contribute to the accident. An accident is 'work-related' if any of the following played a significant role:

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

WHAT ARE 'REPORTABLE' INJURIES?

The following injuries are reportable under RIDDOR when they result from a work-related accident:

- The death of any person (Regulation 6).
- Specified Injuries to workers (Regulation 4).
- Injuries to workers which result in their incapacitation for more than 7 days (Regulation 4).
- Injuries to non-workers which result in them being taken directly to hospital for treatment, or specified injuries to non-workers which occur on hospital premises. (Regulation 5).

APPENDICES A

TYPES OF REPORTABLE INCIDENTS

DEATHS AND INJURIES

If someone has died or has been injured because of a work-related accident this may have to be reported. Not all accidents need to be reported, other than for certain gas incidents, a RIDDOR report is required only when:

- The accident is work-related.
- It results in an injury of a type which is reportable.

TYPES OF REPORTABLE INJURY

THE DEATH OF ANY PERSON

All deaths to workers and non-workers, with the exception of suicides, must be reported if they arise from a work-related accident, including an act of physical violence to a worker.

SPECIFIED INJURIES TO WORKERS

The list of 'specified injuries' in RIDDOR 2013 replaces the previous list of 'major injuries' in RIDDOR 1995. Specified injuries are (Regulation 4):

- Fractures, other than to fingers, thumbs and toes.
- Amputations.
- Any injury likely to lead to permanent loss of sight or reduction in sight.
- Any crush injury to the head or torso causing damage to the brain or internal organs.
- Serious burns (including scalding) which:
 - › Covers more than 10% of the body.
 - › Causes significant damage to the eyes, respiratory system or other vital organs.
- Any scalping requiring hospital treatment.
- Any loss of consciousness caused by head injury or asphyxia.
- Any other injury arising from working in an enclosed space which:
 - › Leads to hypothermia or heat-induced illness.
 - › Requires resuscitation or admittance to hospital for more than 24 hours.

For further guidance on specified injuries is available.

APPENDICES A

OVER-SEVEN-DAY INCAPACITATION OF A WORKER

Accidents must be reported where they result in an employee or self-employed person being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result of their injury. This seven day period does not include the day of the accident, but does include weekends and rest days. The report must be made within 15 days of the accident.

OVER-THREE-DAY INCAPACITATION

Accidents must be recorded, but not reported where they result in a worker being incapacitated for more than three consecutive days. If you are an employer, who must keep an accident book under the Social Security (Claims and Payments) Regulations, that record will be enough.

NON FATAL ACCIDENTS TO NON-WORKERS (E.G. MEMBERS OF THE PUBLIC)

Accidents to members of the public or others who are not at work must be reported if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to that injury. Examinations and diagnostic tests do not constitute 'treatment' in such circumstances.

There is no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.

If the accident occurred at a hospital, the report only needs to be made if the injury is a 'specified injury' (see above).

OCCUPATIONAL DISEASES

Employers and self-employed people must report diagnoses of certain occupational diseases, where these are likely to have been caused or made worse by their work: These diseases include (regulations 8 and 9):

- Carpal tunnel syndrome;
- Severe cramp of the hand or forearm;
- Occupational dermatitis;
- Hand-arm vibration syndrome;
- Occupational asthma;
- Tendonitis or tenosynovitis of the hand or forearm;
- Any occupational cancer;
- Any disease attributed to an occupational exposure to a biological agent.

Further guidance on occupational diseases is available.

Specific guidance is also available for:

- Occupational cancers.
- Diseases associated with biological agents.

For example mesothelioma or lung cancer in a person who is occupationally exposed to asbestos fibres.

Cancer of the nasal cavity or sinuses in a person who is occupationally exposed to wood dust.

APPENDICES A

DANGEROUS OCCURRENCES

Dangerous occurrences are certain, specified near-miss events. Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces, for example:

- The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment;
- Plant or equipment coming into contact with overhead power lines;
- The accidental release of any substance which could cause injury to any person.

Further guidance on these dangerous occurrences is available.

Additional categories of dangerous occurrences apply to mines, quarries, offshore workplaces and relevant transport systems (railways etc).

GAS INCIDENTS

Distributors, fillers, importers & suppliers of flammable gas must report incidents where someone has died, lost consciousness, or been taken to hospital for treatment to an injury arising in connection with that gas. Such incidents should be reported using the online form.

Registered gas engineers (under the Gas Safe Register,) must provide details of any gas appliances or fittings that they consider to be dangerous, to such an extent that people could die, lose consciousness or require hospital treatment. The danger could be due to the design, construction, installation, modification or servicing of that appliance or fitting, which could cause:

- An accidental leakage of gas;
- Incomplete combustion of gas or;
- Inadequate removal of products of the combustion of gas.

Unsafe gas appliances and fittings should be reported using the online form.



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