



Harley Façades Ltd Company Health and Safety Policy

**Harley House
Farningham Road
Crowborough
East Sussex
TN6 2JD**

Revision 3

April 2017



GENERAL STATEMENT OF SAFETY POLICY

The Directors of Harley Facades Limited recognise the importance of health and safety, welfare and the environment in the successful operation of its activities and recognise the requirements of the Health and Safety at Work Act and the Management of Health and Safety at Work Regulations. It requires the active participation of every member of the company in order to achieve and maintain the highest practicable standard of the elimination of risk and accident prevention.

Our activities will be conducted with due regard to statutory requirements, with appropriate safeguards and controls against exposing employees, other trade contractors and the public to risk to their health and safety from our work activities. We will provide and maintain plant, equipment and safe systems of work: ensure safe handling, storage and transport of articles and substances: provide sufficient information, instruction and supervision: ensure employees are competent to do their tasks and provide adequate training. We intend to eliminate hazards and risk, and if not fully possible, introduce preventive and protective measures to reduce accidents and work related ill health to the minimum. We shall maintain safe and healthy working conditions.

We will ensure that all employees, sub contractors and their employees are made aware of and conform to their statutory duties for their own health and safety and of those who may be affected by their actions and also ensure they are aware of the requirement to co-operate with legal duties and not to interfere with anything provided in the interests of health, safety and welfare.

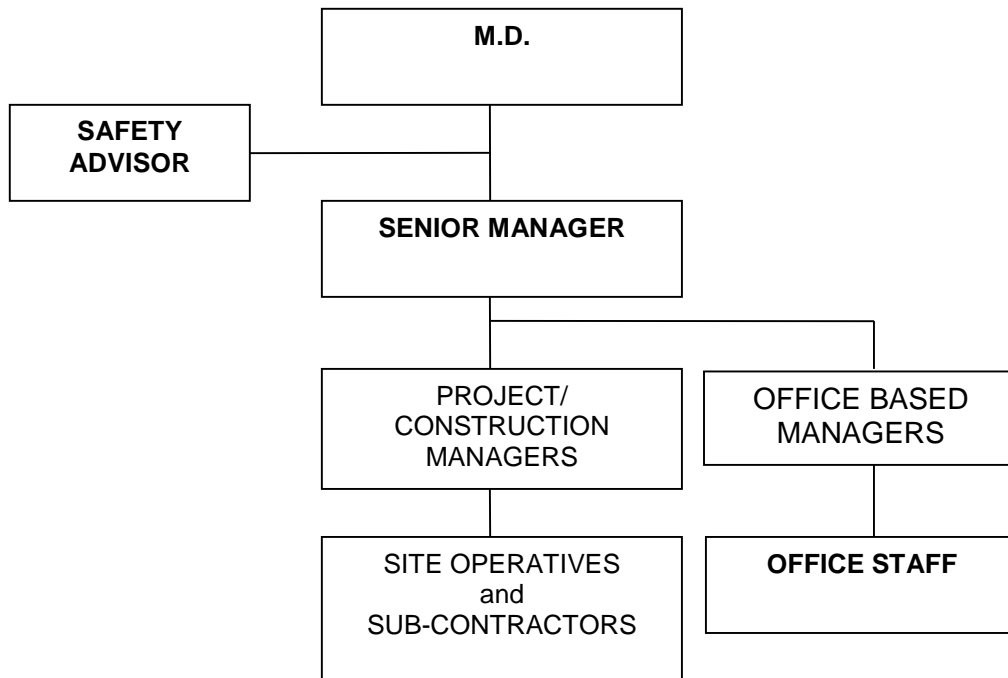
These aims will be achieved within the framework of the Company's organisation and arrangements for the promotion of health, safety, welfare and the environment, which are designed to satisfy its particular needs. As with other operational functions the board carries out its responsibilities for safety through its Construction Managers with day to day operations delegated to Site Managers and supervisors for whom safety is a vital part of their responsibilities.

Signed:

R. Bailey
Managing Director

April 2017

CORPORATE STRUCTURE CHART



STAFF STRUCTURE AND LINES OF RESPONSIBILITY

The Company recognises that health and safety is the responsibility of everyone and not just a function of management. The Managing Director has specific duties and responsibilities in order to comply with the law, along with all employees who have legal duties with regard to health and safety. Therefore, the Company actively promotes the involvement of employees in safety awareness and management.

Managing Director

Overall responsibility for Health and Safety in the Company lies with the Managing Director.

The Managing Director is responsible for the implementation and resourcing of all matters concerning safety in the company's offices, and on site from tender stage to completion. He is responsible for drawing up an overall strategy for the well being of all parties via this policy and associated documentation.

The Managing Director is responsible for administering Health and Safety in the Company offices.

The Managing Director and Senior Manager are jointly responsible for employee training, liaison and consultation, safety information provision and for discipline in cases of unsafe work practices by employees. They must observe and be mindful of the overall welfare of employees and be aware of poor attitude, performance or attendance which may be a sign of ill-health or stress. They are responsible to see records are kept on their employees to assist in the monitoring of their wellbeing and welfare.

The Managing Director must ensure regular liaison between himself and the all the Contracts Managers.

The Senior Manager

The Senior Manager is responsible for the correct setting up, assessment and implementation of safety matters and procedures on site and allocate the necessary labour and equipment to safely conduct the work. He must be fully conversant with the Company's safety policy. He will appoint a permanent site manager and Foreman or Supervisor to run each site. He should also oversee the following:

1. Providing the means to adequately protect members of the public, visitors and delivery drivers.
2. Notifying all statutory bodies of the existence of sites and that proper site safety records are prepared and kept as required by CDM regulations, i.e. safety plans if relevant, risk assessments and COSHH assessments. These should be passed to site employees and other parties to ensure they are observed, and that they are regularly reviewed and upgraded.
3. Investigate thoroughly any accidents, injuries or dangerous incidents arising from the works and take such procedural or disciplinary actions as are necessary to prevent a reoccurrence.

Persons managing contracts (Contracts Manager)

As senior line managers, they are responsible for the correct setting up, assessment and implementation of safety matters and procedures on site and allocate the necessary labour and equipment resources to safely conduct the work. They must be fully conversant with the Company's safety policy. They will appoint a permanent site based responsible person (Foreman or Supervisor) to run each site. They are responsible to:

1. Satisfy themselves that the site or sites in their charge are reasonably safe place(s) of work,.
2. Regularly liaise with the Director and Senior Managers to ensure the continual safety of the site and remedy any shortcomings.
3. Be aware of site rules and regulations, and that everyone working there has access to the Company safety policy.
4. Provide adequate protection arrangements for all site visitors, delivery drivers, and the general public.
5. Carry out safety checks on the required basis for scaffolding, plant and equipment or arrange for a suitably trained person to do so.
6. Arrange for the correct warning signs to be erected and maintained as he sees fit.
7. Arrange that the correct fire extinguishers and other safety equipment including adequate stocks of the correct PPE as defined in the method statement or contract documents are on site and regularly inspected.
8. Ensure that sufficient welfare facilities are on site, are correctly maintained and take steps to rectify any shortcomings.
9. Find out and ensure only qualified operatives use plant, equipment and machines.
10. Check that the site is kept in a clean and tidy state, with hazardous goods and materials correctly stored.
11. Maintain good communications with the client and/or the Client's representative.

Estimator and Surveyors:

Persons responsible for measuring and costing work carried out by the Company are obliged to maintain safety standards. When preparing estimates, they should make due provision for safety resources, both labour and equipment. They must consider any safety related conditions imposed by clients at tender stage and consult with the Director or Managers on such matters if necessary.

On site, Estimators and Surveyors must set a good example by their behaviour, act responsibly and not take actions that endanger themselves or others. If they spot employees acting irresponsibly, or observe any unsafe condition this should be notified to the Contracts Manager or Foreman/ Supervisor to rectify.

Site based staff:

The person appointed to run the site, referred to here as the Foreman/ Supervisor, is responsible for the day to day running of the site and the implementation of all safety procedures communicated to him. He should consult the Contracts Manager or immediate supervisor if there are any doubts as to the safety of any persons on site.

The Foreman/ Supervisor has the full authority of the Company to take whatever reasonable steps he considers necessary, however unpopular, to ensure the safety of all persons. **All site operatives must be made aware by him that they are also fully and legally responsible to work in a safe manner and are expected to co-operate in the implementation of these steps:**

1. Comply with the health and safety policy and maintain sites in a safe-as-possible state by remaining vigilant, and reporting and acting upon any unsafe conditions.
2. Assist in the maintenance of good housekeeping when present on construction sites or when employed on public or private property.
3. Make themselves aware of, and adhere to, any site rules regarding health and safety and any emergency evacuation procedures.
4. Wear and look after any Personal Protective Equipment when it is issued and report any loss or damage.
5. The Reporting of any defects of plant, equipment, material, storage vessels etc. and shortages of safety equipment via the Foreman/ Supervisor to the Company management and ensuring a hazard does not develop from any of these situations.
6. Adhere to all supplied Company check-sheets and guidance notes pertaining to health and safety and site procedures.
7. Co-operate on the attendance and understanding of Company training initiatives.
8. The incorporation and observing of Safety instructions into routine orders e.g. "No Smoking" near flammable materials, Site Tidiness, the correct use of tools and handling of materials etc.
9. The encouragement of operatives to check or ask if they are unsure of any process before embarking upon it - at possible personal risk.
10. The awareness of all personnel of the location of fire extinguishers and hoses, fire blankets, alarms, first aid kit (and who administers it), exits and telephones.
11. A co-ordinated, Foreman/ Supervisor led effort to make new-to-the-site employees aware of potential site hazards and notify the managers of the need for their attendance at induction training.
12. Insisting staff report and seek medical attention for even minor injuries, cuts, allergic rashes and persistent skin disorders. Such occurrences may need to be entered in the accident book.
13. The disallowing of "horse play" or dangerous practical jokes and the reprimand of those who fail to consider their own safety or that of others around them.
14. The maintenance of all Company sites as alcohol and drug free, and the reporting of offenders.

NEW EMPLOYEES

The Contract Manager and Foremen/ Supervisor shall co-ordinate to alert new employees to safety matters, given thorough site induction training and issued with appropriate PPE. They should be instructed on:

1. Their responsibilities and lines of communication.
2. The presence of any potential hazards in their workplace, be it office or site.
3. Accident procedures, First Aid locations, Fire procedures and welfare locations.
4. The correct way to use PPE and emphasis on their responsibility to look after it.
5. To read and sign induction documents and the relevant sections of the Safety policy.

The New Employee should be asked their age (regulations cover procedures for employees under 18), details of previous experience any illnesses/ disabilities which may affect safe working. Consideration should be given to these when allocating tasks.

PERSONS UNDER EIGHTEEN YEARS OLD

It is Company policy to avoid employing persons under school leaving age, other than for limited work experience in office situations.

The law requires that persons between the ages of 17 and 18 cannot carry out certain hazardous work, e.g. lone working, using cartridge guns and similar plant.

External advice should be sought if there is any doubt over which operations may or may not be carried out by young persons.

Young persons are not allowed to be left unsupervised in the workplace.

SUB CONTRACTORS

The Company occasionally uses specialist sub contractors. The Directors are responsible for the vetting, checking and selecting suitable sub-contractors.

The Contracts Manager is responsible for monitoring their performance on site. This may require liaison with the Foreman.

The Company requires its sub-contractors, be they sole traders or Companies themselves to behave responsibly and within the remit of this policy. They must have on site all necessary resources, tools and protection, including PPE, to safely carry out work and be willing to submit method statements and risk assessments on request.

HEALTH SURVEILLANCE

Although the work practices in which the Company is involved are not considered hazardous to health if precautions are taken, the Contracts Managers regularly liaise with operatives to monitor their health. Foremen/ Supervisor will from time to time check, and be alert to any deterioration in employees' health.

Procedural risk assessments carried out by management at the start of works will review the possible effects of processes and the materials used on employee's health.

Employees are expected to be responsible for their own health and are encouraged to seek assistance if there is a deterioration in their health, especially if this is work related e.g. handling materials or using computers.

SITE LAYOUT, WELFARE AND EMERGENCY PLANNING

The Director, advised by the Contracts Manager should examine the project specification, and ensure there are areas suitable for welfare facilities, material storage and delivery and safe access supplied either directly or by the main contractor. The following should be considered when drawing up a workable site plan:

1. Relevant arrangements and signage for pedestrian and vehicular traffic.
2. Fire and emergency procedures on display, including escape routes, fire fighting equipment, a telephone, first aid box, and someone to administer it.
3. Provision of safety documentation as listed in the section below.
4. The legal requirement of welfare facilities must be provided.
5. There must be safe access, scaffolding etc. and all plant and equipment must be in good working order.
6. There must be a safe method of handling, storage and transportation of materials, including a safe vehicle delivery area and suitable means of waste disposal.
7. Adequate site safety information must be given to operatives including procedural training and site induction.
8. Adequate protection or exclusion of unconnected persons and the public.
9. The company policy is to avoid "lone working" where ever possible, there should be at least two people on every job. Where lone working has to be carried out approval must be obtained from the senior management first.

Safety Documentation and Warning Signs

The Company generally acts as a subcontractor, and the forgoing should be made available by the Main Contractor.

1. "Health and Safety Law – What you should know" poster (issued by HSE).
2. "Tear out" style Accident Book
3. Emergency procedures poster and signage
4. An appropriate scaffold register or stock of standard Inspection Report forms.

The company should have on site any method statements and risk assessments prepared for the works together with a copy of the Safety Policy.

The incorporation of safety posters and warning signs should be considered at the planning stage as part of the overall risk assessment. They should be selected on the basis of relevance to the perceived hazard. Foremen are asked to return posters etc. to the office at the conclusion of contracts.

Visitors to sites or workplaces

Persons visiting places on behalf of the Company where they are operating have a duty in law to themselves and others to act safely and responsibly at all times. The senior person on site should draw the attention of visitors to the fire and emergency evacuation plan.

Visitors should have, or be issued with safety helmets and other appropriate PPE if they are to go onto the site itself. The Company will require any person who disregards the forgoing to leave the site in the interests of both parties by the senior member of staff present.

HEALTH, SAFETY & WELFARE IN PERMANENT OFFICES

The Managing Director is responsible for creating a safe and healthy environment in permanent offices. By delegation of these duties to others, or directly, he must:

1. Draw up a series of office rules and draw the attention of all staff to their existence.
2. Create and review a suitable fire and emergency plan as outlined on page 10.
3. Provide suitable, ergonomically adjustable workstations with adequate surrounding space to enable employees to work in relative comfort.
4. Purchase and ensure the maintenance of office equipment; see that it is fit for purpose and safe and reasonably comfortable to use.
5. Provide reasonable welfare arrangements, toilets and washing facilities which must be externally ventilated and sufficient hygiene resources, an area to make hot drinks and a clean supply of drinking water.
6. Provide adequate lighting, natural if possible and sufficient heating and ventilation to maintain the ambient temperature at around 16 deg C.

The Director must give consideration to the following matters when setting up office premises and ensure that:

1. Buildings and their contents, including heating and ventilation systems remain reasonably clean and in good repair.
2. Floors, corridors and stairs (especially fire exits) are well lit, free of trip hazards, trailing cables or obstructions.
3. There is no danger of falling objects e.g. unsafe or overloaded shelving.
4. Power points do not become overloaded with excessive adapters.
5. Welfare facilities are kept clean and be easily accessible to all office employees including those with disabilities.
6. All fire fighting equipment, escape routes, signs must be maintained at all times.
7. The office first aid kit or box has the legal amount of first aid and its content are replaced as they are used and within their "use by" date.
8. The accident book is properly filled in should there be an accident.
9. The Director is made aware of any matters that may affect the welfare of occupants.

Staff who use premises and facilities are responsible to do so correctly and safely, be aware of emergency procedures and report deficiencies. Employees who abuse workplace facilities or act without regard for their own or other's safety will be subject to disciplinary procedures.

Computer and VDU screen Users

Regular screen and keyboard users should undergo periodic training and assessment to ensure they adopt correct posture and practise. Regular VDU users are provided with periodic eye tests. The Managing Director is responsible for overseeing these procedures.

A person who uses computers etc. consistently for more than 50% of their time every week are considered regular users. Occasional users are still encouraged to adopt good practice.

VDU screens must be adjustable for height and angle, free of stray reflections, show clear characters and have variable brightness/ contrast controls. Workers using VDUs should have a comfortable working position, and allowed breaks as required. They should notify management if they get headaches, eye strain, back, wrist, arm or upper limb problems.

FIRE SAFETY AND PROCEDURES FOR OFFICES, SITES AND STORE AREAS.

The Fire Safety Order requires the company to assess in full all aspects of fire safety. Not only is the company now responsible for its employees, but they must assess how an emergency will affect visitors, unconnected persons in the same or adjoining buildings, and the welfare of any emergency service personnel who would attend.

The responsibility for providing emergency infrastructure resources is as defined above. The director must then appoint a responsible person who is charged with undertaking a full fire and emergency risk assessment, instigating improvements and monitoring that the precautions in place remain effective. The director will be responsible for ensuring the improvements are resourced and put in place.

Fire precautions and an evacuation plan are considered part of the Company's overall risk assessment. For permanent offices, the Directors and responsible person will oversee the drawing up of suitable emergency plans and ensure these are periodically reviewed.

1. All persons must be aware of the evacuation plan and know their appropriate muster point outside the premises.
2. There must be adequate and appropriate means to detect a fire and give warning e.g. manually operated alarms, smoke alarms etc.
3. Signs denoting adequate fire escape routes, and fire fighting equipment must be maintained. These routes must be kept clear at all times
4. There should be access for emergency vehicles, suitable water supplies and a log of any extraordinary risks that may need to be notified to the emergency services.
5. Employees and visitors must be aware of the means of raising the alarm and of the fire escape routes and any danger areas.
6. Internal fire doors must be closed at all times and be free of obstructions.
7. Ensure that rubbish is disposed of in the correct waste containers and not allowed to accumulate elsewhere causing a fire hazard or obstruction. Waste containers must be kept in their designated areas and cleaned on a regular basis.
8. Areas where site materials are stored are at particular risk if these materials are harmful, toxic or inflammable. Their hazard labels should be clearly visible and fire extinguishers of the correct type installed and labelled. The area should be designated "No smoking".

CONSULTATION WITH EMPLOYEES

Under the Health and Safety (Consultation with Employees) Act 1996, the Company must open up channels of communication with all levels of employees to allow feedback on health and safety matters.

The *modus operandi* of the Company is fairly static and significant changes are rare. These would be notified to employees via a memorandum and reaction and feedback encouraged at the time. Minor changes made at a particular workplace are notified by the foremen who should report any feedback to the Contracts Manager and Directors. A similar channel would be available to office staff through the appointed representative. Feedback from employees is encouraged at the end of each tool box talk.

Any suggestions received via these routes should be considered on its merits and any resulting positive action acknowledged to the originator.

ACCIDENT REPORTING AND RECORDING PROCEDURE

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) apply. All employees should be aware that these regulations require the reporting of dangerous occurrences irrespective of injury. The following procedures should be adopted.

1. Each site and office must have a supply of Accident Book forms, either under the Company's control, or that of the main contractor.
2. Where injury occurs to an employee, subcontractor or unconnected person, or if there is a dangerous occurrence such as a structural collapse, fire, explosion, acts of violence to or by site personnel or incident which may threaten life and health, the details must be entered in the book, preferably by the injured person, and the form removed for reasons of confidentiality.
3. The Foreman should notify the office of the entry.
4. Office personnel may then check the HSE website to see if the incident is "notifiable" or "dangerous". The link is: **www.hse.gov.uk/riddor/what-must-i-report.htm**
5. If the injury is notifiable or if an individual becomes ill with a notifiable disease, the contracts manager in liaison with the safety adviser will send an incident report via the RIDDOR website (link as detailed below) to the RIDDOR Report Centre as soon as possible, but no later than 15 days after the incident.
6. A fatal or major injury, or a dangerous occurrence as defined in the above regulations must be notified to the HSE immediately by telephone, then followed up as above.
7. The Foreman/ Supervisor must take immediate steps (but with regard to his and others' safety) to ensure no repetition of the incident and no-one is at risk from its consequences.

Irrespective of HSE action, a notifiable incident must be investigated by the Contracts Manager or other appointed competent person and a report detailing remedial steps compiled. Recommendations or control measures arising from the report should be reviewed by senior management and implemented as soon as possible. Consideration should be given to informing insurers via a standard Incident form.

On conclusion of the contract, the accident form must be returned to the office and remain on file with contract documents for a minimum of 3 years.

Incidents are dealt with by:

**THE INCIDENT REPORT CENTRE, CAERPHILLY BUSINESS PARK,
CAERPHILLY, CF83 3GG.**

Tel: 0845 300 9923. Internet site: www.riddor.gov.uk

*Persons who are required to report an incident of any kind should follow this link:
<http://www.hse.gov.uk/riddor/report.htm#online>*

SAFETY INFORMATION - TRAINING AND EXTERNAL ADVICE

It is the Company's and Director's objective to gather and keep pace with the most up to date safety procedures, legislation and thinking, from literature, the HSE, the safety adviser and from external training courses, process the resulting information into an understandable format for distribution to its employees.

Training and Safety Familiarisation

The intent is to provide employees with a level of training on safety matters relevant to their skills, tasks and position within the company. Assessment of training requirements should be a point of regular discussion at management meetings.

The Company Directors are jointly responsible for arranging training seminars from time to time to remind and instruct Foreman/ Supervisors and employees on safety matters. Specific training courses must be arranged by them to cover matters of safety and procedure so that employees are trained to deal with situations they may encounter.

Deliberate attempts should be made by the Foremen/ Supervisors (on site) and Managers to alert employees to risk assessment, literature and posters on site and in offices.

The company engages a Safety adviser to monitor safety issues and perform tasks in support of its commitment to Health and Safety. In particular, he will monitor and update its Safety Policy, risk assessments and other Company data sheets, obtain relevant Health and Safety literature for reference, provide advice as required on training and procedures, research and assess more specific hazards or procedures, carry out safety audits on sites or workplaces and report on matters which affect any person's welfare.

Prior to commencement on site, new-to-site employees should be given induction training by the site controller. The Foreman/ Supervisors should check and ensure operatives are provided with any site rules and induction, and are given the risk assessment to study.

DISCIPLINARY PROCEDURES

The Company prefers to eliminate dangerous working practices by establishing a safety ethos through example and training. However, the Directors will make clear to employees that flagrant or careless disregard to correct safety procedures will not be tolerated.

The Directors administer disciplinary procedure and are responsible for investigation of alleged breaches. They must always set a good example. They should investigate any breaches of discipline and, along with the Office Manager and Foreman/ Supervisor, watch for hazardous behaviour or examples of disregard for procedure.

Instigation of disciplinary procedures may be made by any Manager in authority. The person against whom allegations are made should receive a fair hearing and staff should be prepared to review any safety procedures to ensure they are adequate. If the person is deemed to have broken safety guidelines, appropriate action must be taken.

- An informal verbal reminder is sufficient for minor indiscretions.
- A more formal, verbal warning is appropriate for a careless or less minor breach.
- A written warning should be given for overtly negligent, potentially hazardous or persistent breaches of procedure.
- The Directors should dismiss an employee found guilty of a major safety breach which had or may have caused injury or worse, or has received two written warnings.

SECTION “C” – SPECIFIC WORKPLACE HAZARDS

This section covers the most common hazards encountered by the workforce and others involved in operations traditionally carried out by the Company. On exceptional occasions, unusual working conditions are encountered or processes not defined below are carried out. Examples are: work in confined spaces, on public highways, work involving asbestos, mobile plant, cartridge tools, propane or other LPG, work near water or other specialist operation.

In such cases, a process specific method statement and risk assessment is drawn up by the Contracts Manager assisted if necessary by the Safety Adviser and issued prior to any works commencing. Operations would as usual be reviewed from a safety angle at appropriate intervals.

PROCEDURES FOR STARTING UP A NEW SITE

The Company will fulfil its duties under the Construction (Design and Management) Regulations 2015, especially in regard to the provision of any information which might affect the health and safety of any person who has any connection with the project. The Company must provide this information to the Client or Principal Contractor and will enforce the recommendations included in the statement.

On receipt of an initial enquiry or invitation to tender, the Director and Estimator will assess the scope of works commercially and from a health and safety point of view.

If Harley Facades is acting as a main contractor, the Contracts Manager will, prior to the commencement of work on site, oversee the preparation of a construction phase Health and Safety Plan based on information received from the CDM coordinator and information received and learned. If the company is directly carrying out contract works, a risk assessment relating to processes undertaken and the hazards they pose will be prepared.

Similar documentation will be required from subcontractors and their operations will be reviewed to ensure resources are available to counter hazards and to eliminate as far as possible, by programming and liaison, unconnected personnel being put at risk.

The Director is responsible for ensuring the Principal Designer has notified the site details to the HSE. A copy of the F10 must be requested for records and display.

Where the Company is a subcontractor on a notifiable project, a bespoke written risk assessment, including a material assessment as per the COSHH Regulations will be provided detailing what risk reduction procedures will be in force for each of the operations it conducts.

In all cases, similar documentation will be required from subcontractors and their operations will be reviewed to ensure resources are available to counter hazards and to eliminate as far as possible, by programming and liaison, unconnected personnel being put at risk.

The Health and Safety Executive receives the full co-operation of the Company in the implementation of safety measures and any action recommended by their Officers would be acted upon.

Prior to commencement of works on a new site, the Company management must impart to the selected Foreman/ Supervisor all the above documentation, safety equipment and other resources required to carry out the works safely. Emphasis should be placed on any potential hazards either observed on site or notified by others. This information is passed to employees by the Contracts Manager and Foreman/ Supervisor.

RISK ASSESSMENT AND MONITORING PROCEDURE

The Director and Contracts Manager are responsible for preparing the risk assessment for the new works. The following procedure will be adopted to carry out this task:

- a) Identify all the hazards faced by Harley Facades' own operatives and any that may affect others. These may be generic, i.e. related to the types of routine work that the Company conducts, or job specific i.e. as a result of the site itself, its location (including height, confined spaces etc.), geography, other trades, public access or that unusual procedures are being carried out that generate specific hazards.
- b) Consider the hazards faced by operatives, or other unconnected persons, whether the operation generates harmful substances (e.g. dust) or other hazards (e.g. spray drift, welding arc, Weil's disease near water).
- c) Deduce all the risks that result from the above hazards, both to site personnel and others. Calculate just how serious the risks are in terms of the number of people affected, the severity of the risk and the length of time exposure is anticipated.
- d) Identify the control measures needed to reduce these risks to as low a factor as is reasonably possible. This should start with the whether a process is needed at all or can it be done in a different way or place. When this exercise is complete, local protection measures such as PPE, screening or exclusion should be recorded and resourced. Is specialist assistance required (e.g. hoist fitters, slingers, traffic control), or specialist training needed for a particular item of plant, or process.
- e) Once the risk assessment has been prepared, the Contracts Manager in liaison with the Foreman should periodically review and obtain feedback from others on the effectiveness of the assessment.
- f) With information from the feedback, he must revise the control measures if deemed necessary to reduce, or further reduce the hazards and associated risks arising from the work.
- g) The Contracts Manager and Foreman will combine to notify all operatives of the key contents of the risk assessments, either initial or revised versions, via induction and tool box talks.

Monitoring the works

The Contracts Manager or Foreman/ Supervisor and Safety adviser will co-ordinate to monitor the site as work proceeds and liaise with all parties to eliminate any problems or matters arising that are causing hazards.

Sub contractors will be subject to similar checks and asked to address any hazards arising as a result of their works.

The contracts Manager will oversee the modification of any risk assessments if there is a need to add or adapt it.

FIRST AID ARRANGEMENTS AND PROCEDURES

The Contracts Manager must ensure that every work area meets first aid requirements. Legal requirements will differ between work locations due to the type of work and number of personnel. It is Company policy to have a suitably trained person on site.

1. Provision of first aid on site is dependant on the Company's contractual position. If they are a subcontractor, the main contractor may provide first aid support/facilities.
2. Each work location must have an "appointed person" capable of handling an accident and dealing with serious injury or illness.
3. All work locations should have a first aid box or kit meeting the legal requirements for that particular work location. The first aid box or kit must be checked on a regular basis by the appointed person to ensure it has the right contents and none of the contents have expired.
4. All first aid boxes or kits must be clearly signposted and accessible.
5. All accidents and first aid cases must be logged in an accident book and the tear out form returned to the office and reported to the Managing Director.

USE OF VEHICLES AND MOBILE PHONES

A significant amount of time is spent by Company employees driving to and from site and other places of work. They must drive them in a responsible and safe manner at all times. If the driver is found guilty of dangerous driving or driving under the influence of alcohol or drugs, that person will be subject to disciplinary procedure.

The Contracts Manager must ensure drivers carry a full current driving licence. The person in charge of the vehicle must look after it and not mistreat it. In particular it should never be overloaded.

The person in charge must observe the servicing intervals and notify the company when routine servicing is due, or if there are any faults that require attention. The company must also be notified if there is any accident damage to the vehicle.

The Directors and other senior staff responsible for setting Schedules for themselves and other employees must take into account the length of time within a day, or the number of consecutive days a person is being asked to drive significant distances.

The employee must alert senior company staff if he or she feels that the amount of driving they are doing is significant, and contributing to fatigue.

The use of hand-held mobile phones while driving, or even stationary in a queue, is prohibited by law, and subject to a fine and penalty points. The Company management must consider strategies to ensure no employee is expected to make and receive calls while driving. The following should be considered:

- Employees must be actively instructed to switch their phones off when driving.
- Voice mail messages can be changed to alert the caller that the recipient does not answer the phone when driving and they should be encouraged to leave a message or send texts.
- Senior management must oversee the supply of hands-free systems if receiving calls while driving is essential.

Regardless of the presence of a hands-free system, using the keypad when driving is prohibited and employees should stop the car if they have to make a call.

PLANT AND POWER TOOLS

The following steps should be observed when using any type of plant:

1. All plant should be supplied to site in a safe working order, all safety devices must be in good working order along with all the necessary noise reduction systems.
2. The correct eye/face, ear, hand and head protection should be worn.
3. Only staff who are properly trained should use plant and they have a responsibility to look after the equipment, check if it is due for service and report any defects.
4. Loose or frayed cable, cracked cases, missing guards, loose or intermittently working switches, overheating and any other damage should be reported and tools not used.
5. Operatives must use electricity supplies and tools correctly. They must ensure there is means of switching off the power, the sockets into which the appliance is plugged are in good condition and not loose, have broken or burnt socket casings. The supply must be rated sufficiently to support the load. Where these standards are not met, then work with electric appliances must not continue until the faults are rectified.
6. If a person suffers an electric shock, it is imperative that the person is not touched until the electricity supply has been switched off. Only then can first aid be administered.
7. Formal training should be given to all persons using angle grinders, cartridge tools, any kind of mobile plant, mobile elevated work platforms, towers and to persons banking or guiding delivery lorries.

Plant Maintenance

The Work Equipment Regulations require that plant systems are constructed and maintained properly, are fit for purpose, regularly tested and also advises that records of such tests are kept.

The Contracts Manager is responsible for ensuring company owned plant should be maintained and inspected by a suitably qualified person, and a certificate of test issued.

Where plant is hired, the items should be supplied with a test certificate or tag, and this should be dated to give guidance as to when the next test is due on long term hire. The Manager should take into account the willingness of Hire Companies to provide examples of records of inspection when engaging their services.

Equipment maintenance applies to office based items too, such as kettles, computers etc. It is the responsibility of the office safety representative to see that electrical items are maintained in good condition, and records kept.

A schedule of the suggested frequency of tests may be found in Electricity at Work Regulations ACOP. The accompanying notes therein list also how to detect most plant malfunctions, visible or otherwise. If these are found, plant must be removed from service, isolated, labelled as not working and sent for repair.

Company operatives do not use vibrating tools extensively but managers should be aware of the requirements of the Control of Vibration at Work Regulations (2005). Regular and frequent exposure to vibrating tools may lead to permanent injuries. The Directors are responsible for overseeing that all operatives are aware of the existence of HAV and its consequences. They must take seriously, any notification of the symptoms to them by the Foremen/ Supervisors or operatives and take active steps to ensure the person affected is correctly advised and treated. Foremen/ Supervisors who oversee sites must take seriously training initiatives designed to make them aware of the need to control HAV exposure.

NOISE

Control of noise on sites is a requirement mainly of the Control of Noise at Work Regulations (2005). The onus is on both employers to control noise and on employees to protect themselves from the cumulative, irreversible handicap of deafness brought on by continuous loud noise. As a rule of thumb, if a person engaged in a noisy operation cannot talk to someone 2m away without having to shout to be understood, then protective measures must be taken.

The Contracts Manager should consider the level of risk posed by the generation of noise as part of the overall site hazard assessment, ideally prior to works commencing. This assessment should be ongoing to take into account any changes in noise levels as work proceeds, as part of routine Audits or monitoring.

The current regulations require that the matter is addressed in the following order:

1. Eliminate the noise altogether
2. Remove the source of noise from the environment, or relocate persons away from it.
3. Protect persons against extensive exposure to noise.

There is a requirement to take specific action if a person is exposed to a regular level of noise between 80dB – 85dB, or a peak sound pressure of 135dB. Exposure to levels of noise in excess of 87dB must not be exceeded.

As a guide a busy office would be 55dB, Scaffold dismantling at 10m, 80dB, unsilenced pneumatic breaker at 1m (130dB - also the threshold of pain). 0 dB represents the threshold of hearing.

Using a pneumatic breaker and similar tools typically generate noise well in excess of 87dB. Site staff must watch for operations carried out by others on site, which become noisy and take steps to protect themselves accordingly. If there is doubt or query about the extent of noise levels, then specialist advice should be sought.

If noise is deemed to be in excess of 85dB, operatives should wear ear defenders or at least, close fitting ear plugs. For noise levels in excess of 87dB, ear defenders are compulsory and all possible steps must be taken to reduce noise levels as far as reasonably practical. Exposure to noise should be defrayed where possible by rotating operatives engaged in breaking out and suchlike. Plant should be fitted with silencers, mufflers etc. and special consideration given to noise when in confined spaces, near the general public, at night or near Hospitals.

Personnel must watch for the following symptoms in themselves and others, which may signify excessive noise levels and hearing impairment: noise or ringing in the ear, trouble hearing speech or TV/radio at average volumes, difficulty hearing high or soft sounds (e.g. a watch ticking). If they experience these problems they should seek medical advice.

WORK AT HEIGHTS

50% of fatalities at work involve falling from heights. It is vital therefore that the access offered to or selected by the Company is safe and suitable. The basic rules to follow – in preferential order - are:

1. **Avoid** working at height unless it is essential.
2. Make sure that working platforms are secure, they will not topple, they can be safely reached and will support the weight of workers and materials likely to be used and stored thereon.
3. **Prevent** persons falling using guard rails, barriers etc. at open edges, including floor edges and openings.
4. **Minimise** the fall distance using safety harnesses with proper lanyards, safety nets and similar.

Handover tickets must be available for checking from fixed scaffold or cradle suppliers at initial installation and after moves or adaptations.

Arrangements must be made to adequately control falling debris. In particular the area below must be cordoned off if deemed necessary.

The Work at Height Regulations call upon those controlling all forms of temporary access, fixed or mobile to inspect them at least every week or after high winds. If the Company is responsible, then the Contracts Manager must ensure that whoever is entrusted with inspection is capable and confident in doing so. In any event they should be sufficiently trained to do simple access assessments and recognise a badly unsafe working platform.

All Harley Facades Ltd personnel must report defects through normal channels. Individuals who are uneasy or panic at height or in some types of access must be treated with sympathy and should be reassigned other tasks. The Company will not carry out any type of work off bosun's chairs or rope cradles.

TYPES OF ACCESS

The contracts manager possibly in liaison with the principal contractor is responsible to ensure the correct type of access for the job in hand is selected, using the criteria established above.

Operatives should be trained to erect or check the type of access they will be using. Where access is supplied by others, the contracts manager must ensure directly or through a competent employee that access is safe and suitable for company employees to work on.

Fixed tubular scaffold: This should possess adequate guard-rails and toeboards all around every lift. All components must be in working order. Any protection fans or hoarding should be fit for their purpose. Ladders throughout to be tied and protrude one metre above the top platform. Those to first lift level must be removed at night. Scaffold must not be altered in any way by site staff except to lift inner boards to access the face of the structure - these should be immediately replaced.

Mobile Tower scaffolds: These must be erected by a competent person trained in the assembly of mobile tower scaffolds using the “continual handrail/ through the trap” method. Note especially: Overhead obstructions, proper use of outriggers, vertical alignment, safe working loads and moving of towers only when there is no one on it. There must be adequate cross bracing, forming a criss cross pattern up the tower.

Suspended scaffold and mastclimbers: The erection of suspended access must be carried out only by qualified installers. Operatives should be trained in the use of these units. Weekly inspections must include the gates, including safety interlocks, edge protection panels, properly functioning motors and controls, and brakes & emergency descent systems. Access/egress must always be gained by the safest means.

Podium Steps: these platforms can be hazardous if not used correctly. The user must be familiar with the way podium steps are assembled. They must be inspected by the user prior to use and any defects remedied before they are put back into service. Steps should be in the correct place, cross bracing properly fitted. The top handrail must always be minimum of 950 mm above the platform. The user must close the gate and apply the brakes in use.

Mobile Elevating Work Platforms: There are many types of platform available, and advice is best sought from specialist suppliers on the most suitable type. No attempt should be made to drive or use these units by persons not trained to IPAF or similar standards.

Ladders: These items should only be utilised if no other form of access is appropriate. Ladders should be taken down and secured when not in use. They should be inspected for broken rungs, distorted frames and be properly aligned prior to use and tied in if possible. All ladders, especially aluminium must be the correct way up - i.e treads uppermost. Only short duration low risk work can be done off ladders. Operatives must not reach over too far. Ladders must be secure and stable. Stays on stepladders must be fully extended.

Hop ups and staging: These should only be used for low level access. They must be fit for purpose and inspected prior to use. Damaged units must not be used. Ideally the minimum platform size should be 600x600, though narrower units are acceptable for low hazard, short duration work. Staging must be sound and not too narrow. Pairs of bandstands should be identical with the correct pins. Boards across them must not sag.

Fragile Roofs or other surfaces: These are deceptively dangerous and company management must obtain full information on the stability of such surfaces. Suitable measures should be deployed, again involving the briefing of employees, to protect them from having to walk on fragile surfaces at any time. These may need to include emergency rescue measures as defined above.

STORAGE, TRANSPORT AND USE OF FLAMMABLE AND CORROSIVE SUBSTANCES

The safe handling of and exposure to materials is subject to several regulations but mainly the Control of Substances Hazardous to Health (COSHH) Regulations. This requires the Company to assess the level of risk associated with handling of products used and substances generated prior to their use. Materials should not be allowed on site, whether sourced by Harley Facades or a sub contractor until this is done.

If an alternative process can be found that eliminates use of hazardous materials, this will be communicated to the client's representative. This is however unlikely. The choice of materials is usually determined by its suitability for the task, and by client specification. If on assessment, the Contracts Manager considers substitution of a safer material to be a viable option, he will communicate this to the client and make efforts to effect the change.

Materials supplied to the Company with hazard warning labels or references on supplier's safety literature, or are generated as a by-product of its operations, eg dust, sawdust, will be assessed by the Contract Manager or Safety Adviser prior to commencement. Any known or perceived hazards, risks and consequent control measures will be noted and supplied to all parties, including site operatives, in the form of a written COSHH assessment or poster.

The principal hazards which may arise are as follows:

- 1 Contamination of eyes or skin by liquids, dust or particles.
- 2 Harmful effects caused by inhalation of dust or vapours produced.
- 3 Toxic effect resulting from oral ingestion or skin absorption.
- 4 Fire or explosion caused by smoking or improper use or storage of certain flammable or volatile materials e.g. petrol.

Safe handling of materials

Persons involved in handling materials must observe the following at all times:

- 1 Wear correct PPE as described in the Personal Protective Equipment section. Suitable PPE is issued as a last-resort to protect the user.
- 2 Read handling and safety literature printed on or accompanying the material.
- 3 Strict attention should be paid to cleanliness. Tools, mixers and workwear must be kept clean. In the working area, used bags and containers should be cleared away as directed and the working method should not generate excess hazardous waste.
- 4 Never eat or drink near materials and wash hands after using them. Any deficiencies in the toilet/washroom areas should be notified or rectified immediately.
- 5 Replace lids and caps when the materials are finished with. Put half used bags of cement products into polythene bags, label and fold down. Store carefully in the designated area.
- 6 Wash all splashes of resins, solvents, dust and paints off the skin immediately with soap and water or a resin removing cream. Dry hands and skin with paper towels or hot air dryers. Never use solvents to clean the skin.
- 7 Be aware of hazards posed and encountered on and around sites, which may not have been realised were present when the necessary risk assessments were drawn up. Examples are asbestos, drug users' needles or syringes, broken glass and other sharps and dust, from whatever source. All these should be regarded as hazardous, left alone and reported to the site management if unexpectedly encountered.

Storage of materials

- 1 Storage and use of flammable or corrosive products must comply with the relevant legal requirements. Extinguishers should be provided in accessible locations and clearly signed if deemed necessary.
- 2 Solvents, fuels, corrosive and resin based products must be kept in a secure, preferably ventilated storage compound, clearly marked with the necessary signage. Petrol and diesel should be stored in correct cans with a fluid tight top and pourer.
- 3 All other materials should be securely stored to when not required to prevent unauthorised interference and keep sites tidy.
- 4 Materials in transit must be secured or wedged so as not to roll about. All vehicles must have adequate ventilation

DUST AND WASTE

The risks associated with dust should not be underestimated. Apart from being unpleasant, dust presents a hazard to eyes, respiratory tracts and skin. Cutting, grinding, sweeping, blasting, cement handling and windy weather all generate potentially harmful dust.

The likelihood of any form of dust being generated should be considered at pre tender stage and control measures highlighted in the risk assessment by the Contracts Manager.

For instance, the cutting, sawing or sanding wood or fibrous boards generates sawdust and particles of adhesive in bonded sheets such as MDF or ply.

The hazards posed by these dusts and particles must not be treated lightly and operatives must wear suitable dust masks, keep work areas clean and warn other personnel.

Consider the following measures:

1. Use different materials e.g. pastes not powders
2. Vacuum rather than sweep floors
3. Avoid blowing dust with compressed air
4. Use dust extraction or water suppression equipment at source.
5. To deal with the residual risk, issue good quality dust masks to persons exposed to dust.

Safe Disposal of Waste Materials

Disposal from site is usually done by placing in skips or into collection lorries from controlled designated rubbish areas. The Controlled Waste Regulations (1991) require those who collect waste to be registered carriers. The company must check that a skip provider is so registered as they would be responsible if the waste were fly tipped.

There is a general duty on site staff to keep work areas clean and tidy. Operatives must safely and securely store rubbish, ideally into a skip but otherwise in polythene bags awaiting disposal.

Rubbish piles must be kept as confined as possible and not impede gangways or roads.

Managers assessing materials under COSHH must note down any special disposal requirements all waste materials including spoil, materials, especially cleaners or solvents and their containers.

MANAGEMENT OF ASBESTOS

It is the intention of the company to ensure that neither its employees and subcontractors nor unconnected personnel are exposed to asbestos in any form, and thus eliminate the possibility that such persons will contract any terminal and debilitating cancers and other diseases that are associated with inhalation of the fibres given off by ACMs if they are inadvertently disturbed.

Harley Facades is not registered to handle or remove asbestos containing materials (ACM).

The company restricts its involvement with asbestos to ensuring it finds out if ACMs are present on site, its operatives and subcontractors are familiar with the areas where ACMs may be found and what to do if they are.

If the building being worked upon is existing as opposed to new-build, the Contracts Manager will, prior to commencement, approach the client and enquire if there is an asbestos register or invasive survey. This information will be used to review whether company personnel are likely to be exposed to ACMs and what can be done to mitigate the risk of contact.

Assuming the ACMs are removed or can be avoided, there remains a small residual risk that hitherto undetected examples may still be present. The company, as part of its commitment to training will progressively educate its frontline employees on techniques of how to recognise ACMs, where they might be found, and what to do if a suspect material is encountered.

If a suspect material is discovered, operatives must notify the foreman immediately. Work in the area should stop and the directors alerted. The company may, in liaison with the client, arrange for samples of the material to be removed by competent personnel and sent for analysis. If ACMs are present, then a way forward will be agreed with the client prior to work recommencing.

In suspect properties, posters will be displayed, induction procedures will be modified and instruction issued to keep the issue of the possible presence of asbestos at the forefront of the site personnel's thinking to ensure they remain vigilant and do not disturb suspect materials inadvertently.

PERSONAL PROTECTIVE EQUIPMENT AND SAFETY HELMETS

The European regulations on PPE put onus equally on to employers to assess and provide PPE and on operatives to wear and look after it.

The Contracts Manager is responsible for supplying to site sufficient PPE (including visitor's hard hats) for staff to work in safety. The site Foreman/ Supervisor must ensure as far as reasonably possible that PPE is issued, used correctly and looked after. All operatives must properly wear the protection supplied in accordance with written rules and signs. They must take reasonable care of it and report loss or obvious defect. Sub-contractors are required to supply PPE and comply in all respects with regulations and site notices.

The basic range of PPE provided by the Company to protect against the harmful effect of substances is as follows, and lists the EN standards with which the PPE must comply. Further protection would be needed for more hazardous operations, e.g. grit blasting:

Eyes/face: Hazard: low level impact (dust) and minor chemical splash,
Protection: Clear Acetate visors with headband/browguard or Direct vent Goggles or spectacles with clear polycarbonate lens to EN166.

Mouth (respiratory): Hazard: Dust, Spray mist & some fumes.
Protection: Dust masks to minimum standard EN149 FFP2S For protection against fine dusts, spray or organic vapour consult the PPE supplier or the Safety adviser.

Other Procedures: Supply adequate fresh air/ ventilation (against fumes). Restrict or substitute solvent based products.

Hands: Hazard: dusts, chemical contamination, cuts or abrasion.
Protection: Lined abrasion, puncture or chemical resistant gloves .Rigger cloth gloves.

Other Procedures: Substitution of harsh chemical products. Barrier cream.

General skin and body: Hard hats to EN397, Ear defenders to EN352, parts 1 (over 90dB) and 2 (over 85dB). Waterproofs where needed, suitable gloves, Wet work barrier cream.

Feet: The Company expects all employees and other labour to wear steel toed safety boots on all sites.

Safety Helmets

Despite recent changes in legislation, the wearing of safety helmets to EN397 (bump caps to EN812 are not acceptable) is still compulsory in areas designated by the site controller. Foremen/ Supervisors must be fully aware of hard hat areas designated by the company or main contractor and enforce the wearing of helmets, particularly by example. Employees will be subject to disciplinary action and non-employees asked to leave site if they refuse or forget to comply. Paints, solvents, cleaning agents or non approved stickers must not be applied to helmets. They must be kept out of hot areas (e.g. car rear windows) and replaced if badly scratched, cracked or over 2 years old. There are no common, valid medical reasons for not wearing a helmet.

MANUAL HANDLING AND LIFTING EQUIPMENT

30% of all reported accidents (and probably more unreported) occur as a result of incorrect manual handling and lifting. The likelihood that operatives will be engaged in the lifting and manoeuvring of any heavy or awkward objects should be considered at the pre-contract stage and control measures highlighted in the risk assessment by the Contracts Manager.

The Manual Handling Operations Regulations 1992 govern the way employees should be expected to lift and move materials. The company's objective is to ensure that no person shall be employed to move any load so heavy as to be likely to cause them injury.

Lifting Equipment

Emphasis should be given to eliminating manual handling if possible. The Contracts Manager should consider mechanical means of lifting, for instance the use of the principal contractor's cranes, lifting gear, including panel suction clamps, a goods hoist to reach the roof or high levels, or using a telehandler, especially if there is a considerable amount of material to move.

All lifting equipment is subject to the inspection regime defined in the LOLER Regulations, therefore all items of lifting equipment must have been thoroughly examined by a competent person within the previous 6 or 12 months, depending on the category of the item, and a Certificate of Thorough Examination issued. Evidence of the CTE's must always be readily available on the site where they are used.

Operatives engaged in the use of lifting equipment must be trained and competent to do so. This is especially true of crane drivers and slinger signallers.

Managing the residual

The following points should be borne in mind:

1. Suitable gloves and footwear should be worn as appropriate.
2. Operatives must lift loads with a straight back, not bend from the hips, to pick loads up.
3. Site Foremen/ Supervisors should ensure that sufficient labour is assigned to heavy lifting tasks, such as unloading, filling skips etc. and rectify shortages.
4. Watch for sharp edges on metal handles and cans, especially damaged ones.
5. Management and the Foreman/ Supervisor should obtain suitable lifting equipment (e.g. gin wheel, pallet truck, slings etc) in advance of their being required. Employees then have a specific duty in law to properly use the equipment provided. Even a wheelbarrow or sackbarrow is a positive aid to handling heavy materials or plant.
6. Materials must be stacked safely. Any panels on stillages and/or stored vertically must be tied back so they do not topple. The numbers of panels stacked this way must not be so heavy as to cause serious injury if they fall when being manoeuvred.
7. If hoists are being used, consult pages 46 - 47 of Health and Safety in Construction HS(G)150 (2006 revision) for further information.
8. Remember - if the load is too heavy or awkward persons should ask for help.

The general principles of lifting techniques are communicated to all operatives via a regime of tool box talks and a Company issue poster on the subject displayed in canteen or other suitable area at all workplaces.

ENGAGEMENT OF FOREIGN WORKERS ON SITE

From time to time, Harley Facades Ltd engage workers who do not have English as a first language. Such persons may not be able to interpret instructions, especially safety related, in a timely manner and arrangements must be made to accommodate their requirements.

It is unusual for foreign workers with little English to be engaged on a site where there are no others of his nationality and the Company will avoid that scenario. Generally a number of workers whose command of English varies are engaged, one of whose number will be able to act as interpreter for some of the others.

The following steps will be taken on sites where this scenario exists:

- At induction, whether from Harley Facades or the principal contractor, the interpreter will be present to guide the individual through the instructions and warnings.
- The company's supervisor will determine the individual's level of skill, probably with the aid of the interpreter, but otherwise as he would with any new starter, and allocate work accordingly.
- The individual will be put to work alongside other persons (this tends to be the norm for new starters regardless of nationality) one of whom is sufficiently able to interpret.
- If any supervisor or manager speaks to or issues instructions to the individual, they should have an interpreter present to ensure the message is clearly understood.
- The Company will try to provide training and promotion opportunities to the individual as they would for all employees, but for safety and administrative reasons, would have to take into account the level of his ability to speak English.
- Other than that the individual's working conditions will be monitored by company supervision and management in exactly the same way they would for all employees.
- Should disciplinary action be necessary, the individual will be allowed to have with him an interpreter to help him make his case.