

Iron Designs

Health & Safety Policy

Including
Environmental, Anti-Slavery, Anti-Bribery & Equal
Opportunities Policy Statements

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Reviewed March 2024
To be reviewed before end March 2025

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1 General Statement of Policy

Iron Designs Limited is committed to ensuring the health and safety of everyone who works for the Company and also of everyone who may be affected by the Company's work activities, including visitors, clients, contractors, and the general public.

This policy sets out the arrangements that are necessary to achieve the above while complying with the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and all other applicable legislation.

The Company will ensure, so far as is reasonably practicable, that:

- Safe equipment is provided and safe systems of work are devised and implemented
- Adequate arrangements are in place for the safe use, handling, storage and transport of materials, substances and equipment
- Sufficient information, instruction, training and supervision is given to ensure the health and safety of employees and others affected by their actions
- A safe workplace, including a safe means of entering and leaving workplaces, is provided and maintained
- The working environment is without risks to health and adequate welfare facilities are provided

It is Company policy to consult with employees on health and safety issues before updating or modifying any part of the health and safety policy and to provide training and information, as appropriate. The Company will do as much as is reasonably practicable to ensure that health and safety arrangements are adequately resourced at all times.

This policy can only be successful with the active co-operation of employees, who have responsibility for taking care of themselves and others, following safe working procedures and reporting any safety issues as soon as possible.

This policy will be reviewed annually and revised as necessary in response to changes in legislation or methods of working.

X

Signed
Richard Higglesden – Managing Director

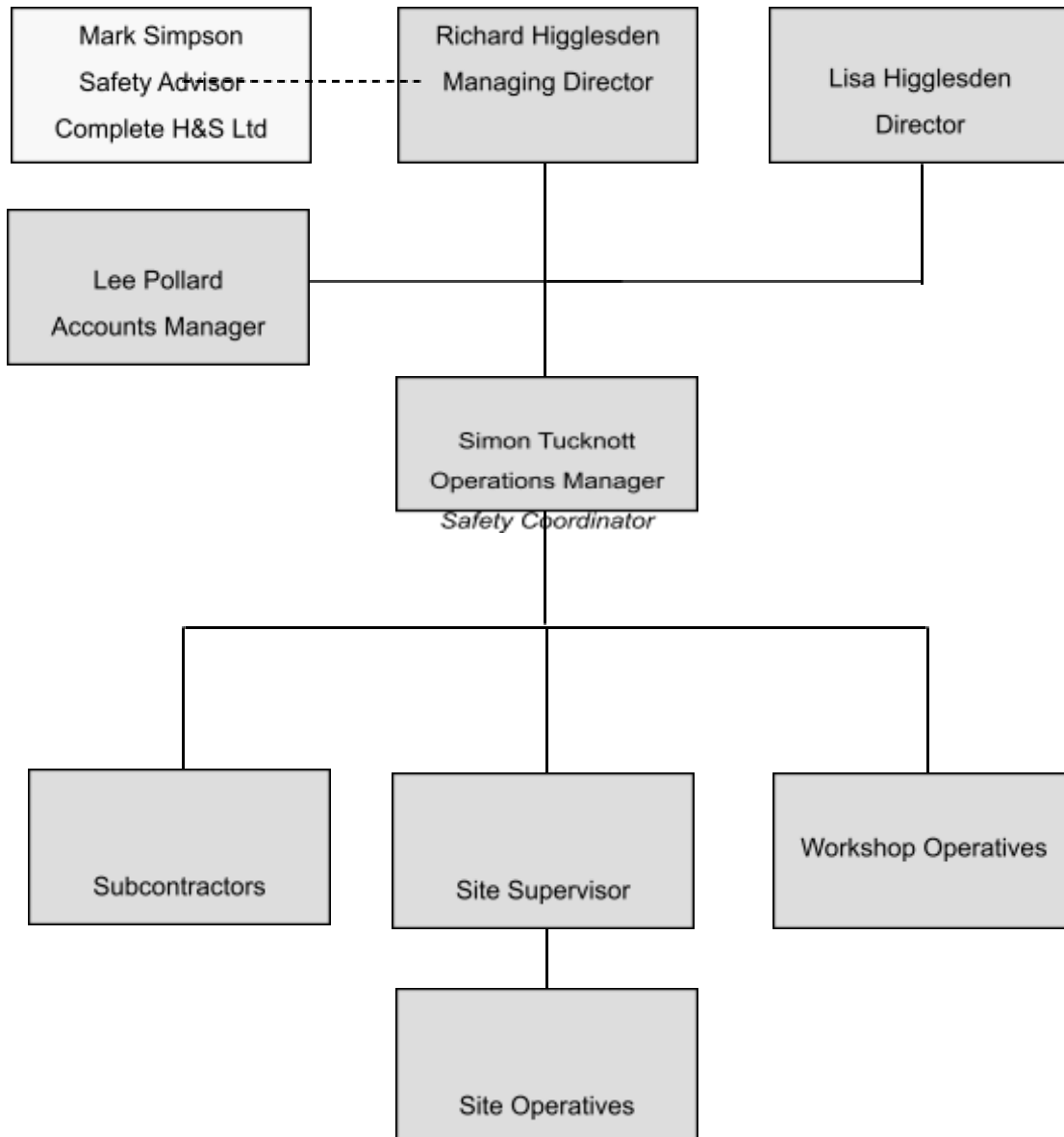
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Objectives for managing Health, Safety and the Environment

- To establish and maintain effective systems and plans for managing the health, safety and welfare of all employees and, in addition, for managing the environmental impact of our operations; to ensure that all risks are properly assessed and controlled, so far as is reasonably practicable
- To establish and maintain clear written standards and procedures to control the risk to health, safety and the environment and to ensure that they are adhered to
- To ensure that all Company employees are competent and able to perform their tasks safely, through the provision of adequate training, information and supervision
- To maintain an effective system of consultation with our clients, suppliers and contractors on health, safety and environmental issues
- To record and investigate all accidents, ensure appropriate corrective actions are taken to prevent recurrence and to continually improve the accident record year on year
- To promote an increased awareness of safety and a responsibility for the environment amongst all employees
- To maintain an effective system of monitoring and reviewing health, safety and environmental performance.

2 Organisation & Responsibilities

2.1 Organisation for Managing Health and Safety



2.2 Responsibilities of Managing Director – Richard Higglesden

The **Managing Director** of the Company is responsible for the health, safety and welfare of employees and others affected by the Company's activities and has overall responsibility for ensuring that:

- Adequate and effective arrangements for planning, organisation, control and monitoring for safety are implemented in accordance with relevant legislation
- Sufficient financial, labour resources and time are available to meet statutory requirements
- All employees receive adequate instruction, information, training and supervision to achieve the requirements of this policy
- Suitable equipment, procedures and other control measures are to be provided to prevent or reduce risks to health and safety
- Employees are fully aware of this policy and their duties in relation to health and safety
- Employees are consulted and their views considered prior to implementing changes that may affect their health and safety
- All reported health and safety issues are reviewed and remedial action applied when necessary
- Risk assessments are undertaken in accordance with statutory requirements
- Competent health and safety advice and support is available
- The Company Health and Safety Policy is reviewed annually with the External Health & Safety Advisors

The **Managing Director** also has responsibilities as an employee (see section 2.6)

2.3 Responsibilities of Operations Manager

The **Operations Manager** Simon Tucknott is also the **Safety Co-ordinator** for the Company and is specifically responsible for:

- Listening to employees concerns in relation to health & safety and act accordingly
- Implementing the arrangements set out in this policy and continually monitoring and improving safety performance on site
- Ensuring compliance with the Company Safety Policy, relevant regulations, risk assessments and method statements.
- Organising and co-ordinating workshop and site work on a daily basis to ensure minimum risk to the health and safety of employees or any persons who may be affected by the Company's activities
- Ensuring that employees and any suppliers / subcontractors are aware of their health and safety responsibilities and comply with the requirements of the policy
- Identifying employee training needs in respect of health and safety

- Ensuring new employees receive suitable and adequate induction training
- Ensuring that suitable health and safety information is provided to employees, suppliers and subcontractors
- Ensuring that risk assessments are undertaken and method statements produced
- Ensure that a fire risk assessment is undertaken and suitable fire safety precautions implemented and maintained.
- Ensuring that employees are aware of the findings of the risk assessments, and ensuring control measures, including the use of Personal Protective Equipment that (PPE), are used at all times
- The selection and provision of suitable Personal Protective Equipment to employees
- Ensuring that risk assessments, method statements and safe systems of work are adhered to and that all registers and records are kept up to date
- Ensuring that subcontractors produce and adhere to risk assessments and method statements
- Ensuring that all plant and equipment, procured or hired for the Company, is suitable for the intended task, complies with statutory safety standards and is CE marked as appropriate
- Ensuring that work equipment used in the premises and on site is adequately inspected and serviced / maintained in accordance with statutory requirements
- Ensuring that work equipment on site is used correctly by authorised, trained staff
- Ensuring that materials are stored safely in the premises
- Ensuring there are adequate first aid provisions in the Company
- Ensuring the accident book is kept in a safe place and ensuring that accidents are entered in the accident book
- Reporting accidents and dangerous occurrences at work to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Investigating accidents and implementing measures to prevent re-occurrence
- Maintaining a tidy site with safe access and egress
- Co-operating with statutory authorities (ie HSE Inspector)
- Setting a good example of behaviour with regard to health, hygiene and safety
- Listening to employees and subcontract Company employees concerns in relation to health & safety and act accordingly

The **Operations Manager** also has responsibilities as an employee (see section 2.6)

2.4 Responsibilities of Director and Accounts Manager

The **Director – Lisa Higglesden** and **Accounts Manager – Lee Pollard** are responsible for:

- Supporting the Managing Director in his duties
- Maintaining staff records
- Administration of transportation including obtaining proof of driving licenses and insurance details, and ensuring the information is reviewed and held on file

- Obtaining information from self employed and sub contract companies and maintaining records of questionnaires
- Arranging health and safety training and keeping suitable records
 - Ensuring that all training records are maintained
 - Filing records of premises risk assessments including fire risk assessment
 - Filing equipment maintenance and inspections records
 - Keeping PPE issue and inspection records
 - Keeping records of DSE assessments
- The security of all accident report forms and completed accident and RIDDOR report forms
- Issuing employees with an annual health & safety questionnaire
- Filling of Health Surveillance records in Personnel Files in the Office and retained for 40 years.
- Setting a good example of behaviour with regard to health, hygiene and safety

The **Director** and **Accounts Manager** also have responsibilities as employees (see section 2.6)

2.5 Responsibilities of Site Supervisor

The **Site Supervisor** is specifically responsible for:

- Organising and co-ordinating site work on a daily basis to ensure minimum risk to the health and safety of employees or any who may be affected by the Company's activities
- Ensuring compliance with the Company safety policy and relevant regulations, and the Construction Phase Plan where applicable
- Ensuring risk assessments, method statements and safe systems of work are adhered to and all registers and records are kept up to date
- Ensuring materials and substances are stored safely and comply with statutory requirements
- Maintaining a tidy site with safe access and egress to places of work and the site accommodation
- Ensuring all accidents and incidents are reported to the **Operations Manager**
- Meeting and liaising with visitors and inspectors to the site and appointing a competent person to take charge during temporary absences and maintaining a record of all site visitors
- Co-operating with statutory authorities (ie HSE Inspector)
- Setting a good example of behaviour with regard to health, hygiene and safety
- Listening to employees and subcontract Company employees concerns in relation to health & safety and act accordingly
- Ensuring combustible materials are not burnt on site
- Acting as fire marshal in the event of a fire alarm

The **Site Supervisor** also has responsibilities as an employee (see section 2.6)

2.6 Responsibilities of Employees / Self Employed Subcontractors

All **employees** have a duty to co-operate with the employer under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and all other related regulations.

Self employed subcontractors will comply with all aspects of this policy as though they were employees. Conversely the Company will treat **Self employed subcontractors** as though they were employees.

All **employees** will therefore:

- Comply with the Company safety policy, risk assessments, method statements and safe systems of work
- Comply with the site construction phase plan and site rules.
- Co-operate with both employer and management and follow instructions
- Use the appropriate plant, tools and equipment as instructed and not misuse
- Ensure that guards are in position whilst plant and portable equipment are in use
- Keep tools, equipment and PPE in good condition and report defects
- Report any accident, dangerous occurrence or condition to the **Operations Manager** or **Site Supervisor**
- Ensuring materials and substances are stored safely and comply with statutory requirements
- Maintaining a tidy site with safe access and egress to places of work
- Take all reasonable steps to ensure the safety of themselves and others
- Avoid improvised arrangements and suggest safe ways of reducing risks
- Not interfere with or misuse anything provided for them in the interests of health, safety and welfare
- Wear appropriate clothing, footwear and PPE conducive to the work
- Raise any health & safety concerns with the **Operations Manager** or **Site Supervisor**
- Report immediately any defective plant and equipment to the **Operations Manager** or **Site Supervisor** and do not use until repaired
- Inform the **Operations Manager** if they suffer from any allergy, health problem or are receiving medication likely to affect their work ability to do manual handling tasks

Any breach of these requirements will be treated as a breach of contract and appropriate disciplinary action will be taken. The taking of any reasonable action to safeguard the health, safety and welfare of themselves and others will not result in any form of disciplinary action.

2.7 Responsibilities of External Safety Advisors

The Company's nominated **External Safety Advisors** will:

- Meet with the **Operations Manager** as required to review/audit the Company's health & safety management system
- Ensure the Company H&S Policy reflects the Company's operations and organisation and is compliant with current legislation
- Assist the company in preparing health & safety plans, general risk assessments and method statements, as required
- Identify H&S training requirements as part of the review process and provide H&S training as required
- Provide health & safety advice and support as required
- Assist the company in undertaking accident investigations as required

3 Health and Safety Arrangements

3.1 Communication and Consultation

The Management of the Company will communicate to employees their commitment to safety and ensure that employees are familiar with the contents of the Company health and safety policy.

Communication and consultation will take place by providing written or verbal information from this policy, by project meetings, by memos, tool-box talks and general daily interaction and supervision process.

Relevant Legislation and Information:

Consultation with Employees Regulations 1996

3.2 Health & Safety Information

All new employees will receive induction training when they join the Company.

As part of the induction process employees will be provided with:-

- a copy of this policy
- relevant risk assessments and procedures
- information on workplace hazards, emergency procedures and first aid arrangements

Employees will receive information about specific site hazards and site rules during the site induction process on construction projects.

Employees will also receive information when:

- There are proposed changes that may affect their health and safety;
- There are changes to work procedures or working patterns;
- New plant and work equipment is being procured or hired;
- There are changes as a result of new or revised legislation

The Company will retain a number of useful and relevant HSE documents/leaflets for reference in the Health & Safety File retained in the main office and site office.

Employees will be encouraged to read the Health & Safety Law poster which provides key information about employer's responsibilities and employee's rights. The Company will also display a copy of the Company's Policy statement and Employer's Liability (Compulsory Insurance) Certificate.

Copies of these documents will be displayed on the notice board in the main office.

Relevant Legislation and Information:

Health & Safety at Work Act 1974

Health & Safety Information for Employees Regulations 1989

Employees Liability (Compulsory Insurance) Act 1969

3.3 Safety Training and Induction

All new employees will be given induction training in the following:

- Fire and emergency evacuation procedures on site
- Arrangements for First Aid
- Procedures for reporting hazards, accidents, dangerous occurrences, incidents of violence and occupational ill-health and problems in safety arrangements
- Safe use of any equipment

The person responsible for giving Company inductions will be the **Operations Manager**.

All employees working on site will undertake site specific induction when starting work at the site.

The persons responsible for giving site inductions and retaining induction records will be the **Operations Manager** or **Site Supervisor**, with records of site induction will be retained on site.

All employees will be trained in safe working practises and procedures prior to being allocated any new role. Training will be provided on the safe use and maintenance of work equipment where necessary.

Employees will be encouraged to bring to the attention of management any training courses or training needs which they think might be appropriate.

A formal review of training needs will be undertaken by the **Operations Manager**.

All employees will be trained and updated in health and safety and the specific hazards of their work on a regular basis. Special training will be given for specialist roles / tasks i.e. first aid.

The **Director (Lisa Higglesden)** or **Accounts Manager** will be responsible for maintaining records of training which will be filed in Health and Safety File in the main office.

Relevant Legislation and Information:

Health and Safety at Work Act 1974 Section 2(2c)

The requirement for training appears in all health and safety regulations

3.4 Co-operation and Care

If the Company is to build and maintain a health and safe working environment, co-operation between workers at all levels is essential.

All employees are expected to co-operate with management and customers on safety matters and to accept their duties under this Policy. Disciplinary action may be taken against any employee who violates safety rules or who fails to perform their duties under this Policy.

Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and of all other people affected by operations of the Company.

Relevant Legislation and Information:

Management of Health & Safety at Work ACOP 1

3.5 Monitoring and Review of Health & Safety Policy

The Policy will be reviewed annually by the **Managing Director, Operations Manager** and the **Safety Advisor** to ensure that all of the information given in it is still valid. Advice will be obtained from the Company's safety advisors to ensure that the Policy remains compliant with legislation.

Any updates or amendments will be brought to the attention of the employees, and information, instruction and training provided where necessary.

Relevant Legislation and Information:

Health and Safety at Work Act 1974 Section 2(3)

Management of Health & Safety at Work Regulations 1999

3.6 Inspection and Monitoring

The **Operations Manager** will be responsible for undertaking formal monthly inspections using an Inspection Checklist Form.

The **Operations Manager** and/or **Site Supervisor** will undertake informal monitoring of health and safety on site when working at or visiting sites.

The **Operations Manager** will also undertake formal monthly inspections on selective projects using a Site Inspection Report form.

Copies of the inspection reports will be filed in the H&S file in the office.

Workplace inspections will also provide an opportunity to review the continuing effectiveness of the policy and identify areas where revision of the policy may be necessary.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Construction (Design and Management) Regulations 2015

3.7 Annual Inspection / Review

The Company's nominated **Safety Advisors** will review the safety management system annually to:-

- a) Ensure that the Health & Safety Policy remains up to date and effective
- b) Ensure that the safety management system is being implemented correctly together with any recommendations for improvement
- c) Identify any unsafe working practices in the premises

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.8 Safety Advice

Advice on health and safety and occupational health matters will be available from the Company's nominated **Safety Advisors**:-

Complete Health & Safety Ltd
Suite 30
The Forum
London Road
Burgess Hill
RH15 9QU
Telephone: 01273 833919
Email: office@complete-hs.co.uk

Additional advice may also be obtained from the HSE Website – www.hse.gov.uk

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.9 Hazard Reporting

It is the policy of the Company to eliminate hazards from the workplace wherever possible.

All employees have a duty to report any unsafe or unhealthy working conditions, practices or arrangements. The **Operations Manager** or **Site Supervisor** will take immediate remedial action to eliminate or minimise the risk and will take the necessary long-term action to prevent future

occurrences.

If an employee is concerned that the Company is not doing enough, the Company accepts that the employee ultimately has the right in law to approach the Health and Safety Executive/Local Authority as detailed on the Health and Safety Law poster in the main office.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.10 Risk Assessments

It is the policy of the Company to comply with the statutory requirement for risk assessment as set out in the Management of Health & Safety at Work Regulations.

The Company will carry out suitable risk assessments for all tasks undertaken in the Company and significant risks will be identified, documented and risks reduced to the lowest level, so far as is reasonably practicable.

The Company will prepare site-specific risk assessments for all projects and where site conditions, hazards and risks vary.

The **Managing Director** has overall responsibility for ensuring that the Company has a risk assessment programme in place.

The **Operations Manager** is responsible for ensuring that risk assessments are prepared for the premises and ensuring that the findings of the risk assessment process are communicated to employees.

The **Operations Manager** is responsible for undertaking site surveys and preparing site specific risk assessments.

The **Operations Manager** will ensure that employees in the factory are made aware of the significant findings of the risk assessment process and the necessary control measures before commencing work.

The **Site Supervisor** will ensure that employees working on site are made aware of the significant findings of the site risk assessment process and the necessary control measures before commencing work.

Master copies of Risk Assessments for the premises will be filed in the Health and Safety File.

Copies of the site risk assessments for projects will be filed in the Job File in the main office and with

the Principal Contractor on site.

It is important for employees to understand the difference between hazard and risk. A hazard is "something which could cause harm" and a risk is "the potential severity of the hazard combined with likelihood, high or low, that someone will be injured by the hazard".

The risk assessment documentation will include a detailed explanation of the risk evaluation criteria used for establishing high, medium or low risk.

Risk assessments will be reviewed:

- At an agreed review date, normally annually
- When there are any changes to equipment or procedures
- When there are changes as a result of new or revised legislation
- Following any accident or incident

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999 Regulation 3

A number of other Regulations also have a specific requirement for risk assessment

3.11 Safe Systems of Work / Method Statements

All employees will be informed, instructed and/or trained in the safe systems of work for the factory at the start of employment or when job roles change.

All site work will be carried out in accordance with the safe systems of work documented in the method statement, a copy of which will be provided in the health & safety pack which resides in Company vehicles.

Site specific method statements will be prepared by the **Operations Manager** when required by **Clients** and for all significantly hazardous activities such as work at height and lifting operations. The Company will generally not prepare method statements for routine work with low hazards and risks.

Method statements will include, as a minimum, the following information:

Description of work; sequence of operations; supervisors; plant and equipment used; PPE required; First Aid requirements; emergency procedures; safety of third parties and waste disposal.

The **Site Supervisor** will be responsible for ensuring that the method statement is implemented and ensuring that site operatives follow read and comply with the document.

The Company will request and review method statements from subcontractors before commencing work on site.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

Temporary Works Forum Information Sheet No.3 (The Construction (Design & Management) Regulations 2015 Principal Designer: Guidance on Temporary Works.

CITB Industry Guidance for Principal Contractors

CITB Industry Guidance for Contractors

CITB Industry Guidance for Workers

CITB Industry Guidance for Designers

3.12 First Aid

It is the policy of the Company to comply with the Health & Safety (First Aid) Regulations.

An adequate number of employees will be trained in first aid at work or emergency first aid at work in order to provide a reasonable level of first aid cover at site.

The **Managing Director** has overall responsibility for ensuring that the First Aid Policy is implemented.

An appropriate number of **Employees** will be trained in first aid at work or emergency first aid at work.

First Aiders will receive refresher training at least once every 3 years.

Suitable first aid kit(s) will be located in the following location(s):

- In the office
- On the site in the main office

Employees will be informed about first aid procedures during induction.

The **Operations Manager** will be responsible for regularly checking and restocking the first aid kits.

All operatives working on site will be required to carry mobile phones, which should be used to call an ambulance or other assistance in the case of an emergency.

Relevant Legislation and Information:

Health & Safety (First Aid) Regulations 1981

First Aid at Work ACOP (L74)

3.13 Accident Procedures

All employees will be informed about the requirement to report accidents and incidents (near misses) in the premises and on site during site induction.

Accidents / incidents (near misses) in the premises or on site will be reported to the **Operations Manager** and recorded in the accident book retained in the office.

The **Operations Manager** has responsibility for ensuring the accident book is kept in its designated location, completed as required and ensuring that the removable pages are filed securely in Health and Safety file in accordance with the requirements of the Data Protection Act 2018.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Data Protection Act 2018

3.14 Accident Investigation

The Company views accident investigation as a valuable tool in the prevention of future accidents/incidents. In the event of an accident/incident, the accident/incident will be investigated, and a report drawn up by the **Operations Manager**, with assistance from others as required, and **Safety Advisor**, as appropriate. The accident report will detail:

- The circumstances of the accident including photographs and diagrams whenever possible
- The nature and severity of the injury sustained
- The identity of any eyewitnesses
- The time and location of the incident
- The date of the report

All eyewitness accounts will be collected as near to the time of the accident as reasonably practicable. Any person required to give an official statement has the right to have a lawyer or other representative present.

The completed report will then be analysed to discover the underlying or root causes and what action should be taken to prevent a recurrence.

The accident report will be filed in the Health and Safety file.

A follow up report will be completed after a reasonable time examining the effectiveness of any new measures adopted.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

3.15 Reporting Accidents and Incidents to the HSE

In the case of an over 7 day injury which is reportable under RIDDOR (Reportable Injuries, Diseases and Dangerous Occurrences Regulations) the **Operations Manager** will ensure that the HSE Incident Contact Centre is notified within 15 days of the incident using the online form at website. www.hse.gov.uk/riddor/report.htm .

In the case of an occupational health condition which is reportable under RIDDOR the **Operations Manager** will ensure that the HSE Incident Contact Centre is notified as soon as possible after diagnosis of the occupational health condition using the online form at website. www.hse.gov.uk/riddor/report.htm.

In the case of a fatality or specified injury to worker the **Operations Manager** will ensure that the HSE Incident Contact Centre is notified as soon as possible by phone on 0345 3009924 or using the online reporting facility www.hse.gov.uk/riddor/report.htm. In the case of notification by telephone, a report must be submitted within 10 days.

In the case of a dangerous occurrence or injury to the public involving treatment at a hospital, the **Operations Manager** will ensure that the HSE Incident Contact Centre is notified as soon as possible using the online reporting facility www.hse.gov.uk/riddor/report.htm.

The **Operations Manager** will ensure a copy of any reportable injury, disease or dangerous occurrence report is kept on file in the office and retained for a minimum of three years. The report will include the date and method of reporting, the date, time and place of the event, personal details of those involved and a brief description of the nature of the event or disease. All reports will be filed securely in accordance with the requirements of the Data Protection Act 2018.

The Company accepts that failure to report these types of accidents or incidents could result in a criminal prosecution.

For more information about RIDDOR and specific criteria for reporting refer at website www.hse.gov.uk/riddor/ .

Relevant Legislation and Information:

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

HSE leaflet 'RIDDOR' HSE31

ACOP L73 Guide to RIDDOR

Data Protection Act 2018

3.16 Construction (Design and Management) Regulations

The CDM Regulations are intended to ensure the complete safety of any building from design through construction and working life to, ultimately, demolition.

The CDM 2015 Regulations apply to both **domestic** and **commercial** projects. A “notifiable” project is one which lasts more than 30 working days and has more than 20 workers working on the project at any one time, **or** exceeds 500 person days.

When there is more than one **Contractor** involved in a project, regardless of duration, then the project will require a **Principal Contractor** and **Principal Designer** to be appointed by the **Client**. Specific duties as applicable to the Company are detailed below.

3.16.1 Worker Duties

For all **Workers** working on all types of domestic or commercial projects **Workers** must:

- Be consulted about matters which affect their health, safety and welfare;
- Take care of their own health and safety and others who may be affected by their actions;
- Report anything they see which is likely to endanger either their own or others' health and safety;
- Cooperate with their employer, fellow workers, contractors and other duty holders;
- Comply with legal health and safety requirements for construction sites.

3.16.2 Contractor Duties

On all types of construction projects the Company will:-

- Plan, manage and monitor own work and that of workers and subcontractors
- Co-operate and co-ordinate activities with the other duty holders
- Appoint competent contractors and workers
- Provide the right supervision
- Consult with workers
- Prepare a Construction Phase Plan (when the Company is the only Contractor on site)
- Ensure welfare facilities are provided
- Ensure a site induction is provided
- Ensure the site is secure
- Provide information to the **Principal Contractor** (where applicable), **Workers** and **Subcontractors**
- Comply with the specific requirements in Part 4 of the CDM Regulations

When appointed as sole **Contractor** on a domestic project, the Company will:

- Undertake the duties of **Client**

3.16.3 *Principal Contractor Duties*

When appointed as **Principal Contractor** the Company will:-

- Ensure the **Client** is aware of their duties (on commercial projects), has prepared a Client Brief and has appointed a **Principal Designer** before starting work
- Liaise and co-operate with the **Principal Designer** during the preconstruction and construction phase
- Plan the construction phase and prepare the construction phase plan
- Ensure welfare facilities are provided
- Provide site induction
- Ensure the site is secure
- Appoint competent **Contractors** and **Workers**
- Ensure adequate arrangements in place for managing and supervising
- Engage **Contractors** and **Workers** – through information, communication, consultation, co-operation and co-ordination
- Maintain health and safety standards and monitor risks on site
- Provide information for the health & safety file to the **Principal Designer**
- Liaise with the **Client** and **Principal Designer** throughout the project, including during the pre-construction phase

When appointed as **Principal Contractor** for domestic projects, the Company will:

- Undertake the duties of **Client** – although this can be duty can be undertaken by the **Principal Designer** if agreed in writing

3.16.4 *Client Duties (When managing Domestic Projects)*

As **Contractor/Principal Contractor** on domestic projects the following duties as **Client** will also apply:

During Design Phase:

- Prepare/agree a Client brief which sets out key requirements, visions for the project and communicates aims and aspirations
- Ensure suitable arrangements in place for managing the project
- Ensure a competent project team is appointed for the project
- Ensure sufficient time and resources are allocated for health & safety is adequately throughout the project
- Provide information to help with design and construction planning

- Notify notifiable projects to the enforcing authority using the F10 Form or arrange for someone else to notify on their behalf
- Check that the **Principal Designer** is carrying out their duties

During Construction Phase

- Ensure the construction phase plan is in place
- Ensure welfare facilities are in place
- Check completion and handover arrangements

During Post Construction Phase

- Check that the health and safety file has been prepared (where applicable)
- Maintain and make available the health and safety file (where applicable)

3.16.5 CDM Responsibilities in the Company

The **Operations Manager** will be overall responsible for the planning, management and control of projects.

The **Operations Manager** and **Site Supervisor** will be responsible for the management and control of health and safety on site.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

CITB Industry Guidance for Clients

CITB Industry Guidance for Principal Contractors

CITB Industry Guidance for Contractors

CITB Industry Guidance for Workers

CITB GE700 Section A8

3.17 Co-operation and Co-ordination on Site

The Company recognises that good co-operation and co-ordination on a shared site is essential to ensure that risks affecting everyone on site are identified in good time and suitable control measures implemented and followed.

When the Company is a **Contractor** on a construction site the Company recognises that the **Principal Contractor** will take the lead during the construction phase of a project, in encouraging all parties to interact at an early stage and throughout the project.

As a **Contractor** we will ensure that information about risks and precautions are shared effectively and appropriately with those who need to know and we will make sure that design changes are communicated as soon as possible to the relevant managers and employees.

Communications will take place at morning briefings or as required, between our **Site Supervisor** and other trade **Managers/Supervisors** as required.

Operatives will be briefed about activities undertaken by others in the morning before work commences or as required throughout the working day.

The Company's method statement will identify any activity that may affect others on site and will identify the means of co-ordinating that activity.

The **Operations Manager** will ensure that effective inductions are given to all our employees before they start work relating both to the health and safety provisions on the site and to the work which is to be carried out.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

3.18 Managing Subcontract Companies

The Company uses the services of **Subcontract Companies** at times. Under the CDM Regulations the Company is responsible for ensuring that the work undertaken by the **Subcontractor** is carried out safely and without risk to employees or others affected by the **Subcontractor's** acts or omissions, so far as is reasonably practicable.

The Company will ensure that **Subcontractors** are competent before any work is started. To achieve this, some or all of the following information will be requested from the Subcontractor depending on the size of the **Subcontractor** and the size / nature of the work.

- Health & Safety Policy
- Copies of risk assessments, method statements and any documented safe systems of work
- Copies of Insurance Policies
- Details of competence of key employees (ie qualifications, experience, training)
- Details of membership of professional or trade bodies

The information will be obtained by the **Operations Manager** and reviewed and held on file by the **Director (Lisa Higglesden)** or the **Accounts Manager**.

Prior to commencing any work on site, a **Subcontractor** will be required to submit a suitable risk assessment and method statement for review by the **Operations Manager**. The **Subcontractor** must ensure that these documents are brought to the attention of contractor employees to ensure that the work can be carried out safely.

Subcontractors are required to co-operate with, and to follow, any reasonable instructions given by the Company in the interests of health and safety.

The **Operations Manager** will bring to the attention of the **Subcontractor** any specific hazards, specific requirements for safe working and site rules or provide any specific health and safety guidance, training or information.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

3.19 Managing Self Employed Subcontractors

The Company uses the services of **Self-employed Subcontractors**. Under the CDM Regulations the Company is responsible for ensuring that the work undertaken by the **Self-employed Subcontractors** is carried out safely and without risk to employees/operatives or others affected by the **Self-employed Subcontractors** activities.

The Company will ensure that **Subcontractors** are competent before any work is started. To achieve this, some or all of the following information will be requested from the Subcontractor depending on the size / nature of the work.

- Details of competence (i.e. qualifications, experience, training)
- Details of membership of professional or trade bodies

The information will be obtained, reviewed and held on file by the **Director (Lisa Higglesden)** or the **Accounts Manager**.

Self Employed Subcontractors are required to co-operate with, and to follow, any reasonable instructions given by the Company in the interests of health and safety.

The **Operations Manager** will bring to the attention of the **Self Employed Subcontractors** any specific hazards, specific requirements for safe working and site rules or provide any specific health and safety guidance, training or information.

Relevant Legislation and Information:

Construction (Design & Management) Regulations 2015

Construction (Design & Management) Regulations 2015 – HSE Guidance L153

3.20 General Fire Precautions in the Premises

The **Managing Director** has overall responsibility for ensuring that suitable fire precautions are implemented and maintained and that a fire risk assessment is undertaken in accordance with the Fire Regulations.

Employees will be instructed to remain vigilant with consideration given to guarding against things that can fuel a fire (e.g. cardboard, paper, clothing etc) and ignite a fire (heaters, electrical equipment etc).

Employees working in the premises will be made aware of the location of fire extinguishers, other fire precautions and the emergency exit routes during the Company induction briefing.

Signs will be positioned above each extinguisher to make it clear about which type of extinguisher to use in the event of a fire.

A fire exit is located at the main entrance to the Company building. Everyone in the Company will be made aware that exit doors and corridors must never be blocked locked or used as storage space.

The day to day informal inspection of the premises will be undertaken by the **Operations Manager** to identify any shortcomings in fire arrangements.

The Company will provide employees with information in the safe use of fire extinguishers. Employees are only expected to tackle a fire themselves if it would pose no threat to their personal safety to do so. If the situation is dangerous or potentially dangerous the employee should leave the building immediately.

The fire extinguishers will be serviced and tested annually by **an approved fire equipment servicing company**

Employees must abide by the no smoking policy in the premises and at client's premises.

Employees will be instructed not to store or allow combustible materials to accumulate in the workplace as this can result in a fire hazard.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety Order) 2005

Fire Safety Risk Assessment: Guide 1 Offices & Shops

3.21 Emergency Evacuation Procedure at the Premises

In the event of the fire, the person discovering the fire will shout 'FIRE' and activate the alarm. On hearing the alarm all employees will leave the building by the front door and assemble at the designated assembly point in the street.

Suitable fire action signs will be positioned in a key and prominent location in the premises.

The appointed **Fire Marshall** is the **Operations Manager**.

The **Fire Marshals** will be responsible for ensuring safe evacuation; they will be the point of contact with the emergency services.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety Order) 2005

Fire Safety Risk Assessment: Offices & Shops

3.22 General Fire Precautions on Site

Operatives working on construction sites will be given details of the fire precautions and procedures during site induction.

Operatives working in housing association sites will be make themselves aware of the premises fire precautions when they arrive on site.

On all projects, the fire precautions will be outlined in the Construction Phase Plan or separate fire safety plan. Suitable fire extinguishers will be located at strategic points throughout the site.

Operatives will only be expected to tackle a fire themselves if it would pose no threat to their personal safety to do so. If the situation is dangerous, or potentially dangerous, then the site operative should leave the building immediately.

Operatives will be required to abide by the smoking policy on the site. Smoking will only be permitted in external designated areas to be advised during site induction.

Operatives will be instructed to not store or allow combustible materials to accumulate in the workplace as this can result in a fire hazard.

Relevant Legislation and Information:

Regulatory Reform (Fire Safety) Order 2005

Construction (Design and Management) Regulations 2015

3.23 Work Equipment

It is the policy of the Company to comply with the Provision and Use of Work Equipment Regulations.

The **Operations Manager** will be responsible for selecting/hiring appropriate and CE marked work equipment.

The **Operations Manager** will ensure that all equipment is serviced and maintained in good working order in accordance with the equipment manufacturer's recommendations and statutory requirements using approved servicing companies. A limited amount of cleaning and maintenance will be undertaken by **authorised operatives** subject to risk assessment.

Risk assessments will be undertaken on work equipment with significant risks. The risk assessments will take into account the risks during maintenance, fault finding etc as well as general use.

All employees will be provided with adequate information and training to enable them to use work equipment safely.

The use of any work equipment with significant risks will be restricted to authorised persons.

Where equipment has been provided with covers/guards and interlocks, the covers/guards and interlocks will be kept in good working order and used at all times.

All employees will be provided with such personal protective equipment (PPE) as is necessary to protect them from the dangers of using work equipment. PPE will be issued as a last resort, the management having first considered whether risks can be eliminated or reduced by other more permanent means.

All work equipment will be clearly marked with health and safety warnings where appropriate.

Relevant Legislation and Information:

Provision and Use of Work Equipment Regulations 1998 (PUWER)

ACOP L22 Safe Use of Work Equipment 1998 (PUWER)

3.24 Abrasive Wheels / Angle Grinders

It is Company policy to ensure that anyone who is expected to use either portable or fixed abrasive wheels is made aware of the hazards and trained to operate the equipment safely.

The **Operations Manager or Site Supervisor** will ensure that the right type of abrasive wheel is available for the work being undertaken.

No employee will be permitted to mount or set an abrasive wheel unless they have received training and have a certificate of competence. Any training will be provided by an approved training provider.

Guards are fitted for the protection of operators and they must not be removed or interfered with in any way. Any employee found interfering with, or misusing, an abrasive wheel may be disciplined.

The equipment will be maintained by competent persons in accordance with manufacturer's recommendations.

Should an employee believe any abrasive wheel to be dangerous or unsafe to use, they should remove it and report it so that arrangements can be made for it to be inspected by a competent person.

Relevant Legislation and Information:

Provision and Use of Work Equipment Regulations 1998 (PUWER)

HSE leaflet HS (G) 17 'Safety in the Use of Abrasive Wheels'

3.25 Hand / Arm Vibration Syndrome (HAVS)

It is company policy to comply with the Control of Vibration at Work Regulations. The Company will take all reasonably practicable steps to reduce the likelihood of any employee/operative contracting the condition known as Hand/Arm Vibration Syndrome (HAVS).

The **Operations Manager** will procure or hire work equipment with preference given to equipment with the lowest published vibration emission levels. The vibration levels for each type of equipment will be obtained from the equipment manufacturer or hire company. The instruction leaflet normally contains this information.

Where vibration levels are not known for particular equipment, a look up HAVS chart will be referenced to establish the approximate vibration levels for that equipment. The chart will be positioned in a prominent position in the office for reference.

The **Operations Manager** or **Site Supervisor** will ensure that the risks of HAVS to operatives is minimised by planning, managing and supervising work activities such that exposure levels are below the 2.5m/s² (A8) Exposure Action Value (EAV). In situations where the EAV could be exceeded, then technical and organisational measures will be implemented to that exposure levels do not exceed the 5.0m/s² (A8) Exposure Limit Value (ELV).

As part of the risk assessment process, the management will prepare and/or provide a list of equipment generally used by the Company which states the exposure times to reach EAV and ELV.

The HSE website <http://www.hse.gov.uk/vibration/hav/vibrationcalc.htm> will be used to determine the EAV and ELV values.

Employees/operatives will be provided with information on recognising symptoms of HAVS and about the measures required to reduce the risks. This will be undertaken through provision of HSE leaflet INDG296, toolbox talks and by giving them a copy of the equipment list showing vibration exposure limits.

The **Operations Manager or Site Supervisor** will ensure that employees using vibrating equipment are provided with suitable equipment, suitable gloves, have adequate rest breaks and a place for warming hands in cold weather.

Vibrating equipment will be well maintained to ensure that the levels of vibration do not increase over time and use.

Employees/operatives will be instructed to report any signs of HAVS or any concerns with the equipment being used.

The Management will record typical usage of work equipment and undertake a risk assessment to establish whether individual employees are being exposed to vibration levels in excess of the EAV (but below the ELV). If this is the case, then the individuals will be subject to annual health surveillance to check whether there is onset of HAVS symptoms. This will be undertaken using a checklist. Those individuals who report HAVS symptoms will be consulted in confidence to establish possible causes and be referred to an occupational health specialist for diagnosis, prognosis and treatment.

The **Operations Manager** will ensure that any instances of HAVS when confirmed by a doctor, is reported to the HSE under RIDDOR (see policy on RIDDOR).

Employees with a record of previous HAVS conditions will also be subject to annual health surveillance.

Health surveillance records will be retained by the Company for 40 years.

Relevant Information:

Control of Vibrations at Work Regulations 2005

L140 (Second Edition) The Control of Vibration at Work Regulations 2005

HSE leaflet INDG175 Controlling the risks from hand arm vibration

3.26 Fork Lift Trucks

It is company policy to ensure that fork lift truck (FLT) operations are carried out with minimal risk to the health and safety of employees, other site workers, visitors and the general public in accordance with the Provision and Use of Work Equipment Regulations 1998, the Lifting Operations and Lifting Equipment Regulations 1998 and the Construction (Design and Management) Regulations 2007.

The management will procure/hire FLT's from reputable companies and ensure that they are suitable for the workplace and the type of work being undertaken. It is crucial that the FLT's have a current proof of thorough examination and test at all times.

Only authorised employees will be allowed to drive FLT's. FLT drivers will:-

- Have a current certificate of competence
- Be medically fit
- Be continually monitored for safe performance by the Operations Manager
- Undertake refresher training every 5 years

Drivers will be required to carry out daily inspections in accordance with the FLT manufacturer's recommendations.

Any problems should be immediately reported to the **Operations Manager** that he can arrange for its repair.

FLT's will be operated in accordance with established safe systems of work and risk assessment.

Relevant Legislation and Information:

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

HSE document L112 – Rider Operated Lift Trucks: Operator Training ACOP

3.27 Lifting Equipment & Lifting Operations

It is the policy of the company to comply with the Lifting Operations and Lifting Equipment Regulations.

The **Operations Manager** will be responsible for procuring/hiring lifting equipment or lifting services from reputable companies. He will ensure that any lifting equipment selected for use on site is suitable for the task while having adequate strength and stability. The **Operations Manager** will also ensure that adequate information on the safe and proper use of the equipment is obtained from the supplier.

The **Operations Manager** will be responsible for ensuring that adequate maintenance, inspections, statutory examinations and tests of lifting equipment have been undertaken by a competent person/organisation and will also ensure that appropriate records and reports are available before any lifting operation.

Lifting accessories will be examined and tested at least once every 6 months while lifting equipment will be examined and tested annually, in accordance with statutory requirements.

Risk assessments will be carried out on the use of the lifting equipment and all lifting operations will be planned, undertaken and supervised by competent persons. Method statements will be prepared by competent people for all lifting operations.

The **Site Supervisor** will be responsible for supervising lifting operations on site.

Employees who are expected to use the lifting equipment will be provided with suitable information, instruction and training in the safe operation of the equipment.

All operators must ensure that the specified safe working loads (SWL) of the lifting equipment or accessories are not exceeded. Operators of the lifting equipment must be aware that it must not be used in a way, or for a purpose, for which it is not intended.

Any defective lifting equipment will be reported to **Operations Manager or Site Supervisor** immediately and taken out of service.

A label will be fixed to the equipment to clearly identify it as being out of service.

The **Operations Manager** will ensure that any failure of the lifting equipment, even if no one is injured, is reported to the HSE under RIDDOR (see policy on RIDDOR).

Relevant Legislation and Information:

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) ACOP L113

3.28 Electricity at Work

It is the policy of the Company to comply with the Electricity at Work Regulations.

The regulations stipulate that anyone working with electricity must be competent to do so. Therefore only qualified electricians are authorised to undertake any electrical work in the premises.

Employees will be instructed to switch off electrical equipment immediately if they notice a problem with electrical equipment and report the situation to the **Operations Manager or Site Supervisor**, who will arrange for a suitably qualified electrician to check the equipment.

All portable electrical equipment used by the Company will be subject to regular inspection and test to ensure it remains safe to use. Employees will be encouraged to inspect equipment before use.

Portable electrical equipment will be subjected to inspection and or test by a competent person at the following intervals:

| Type of Equipment | User Checks | Formal Inspection | Visual | Combined Inspection & Testing (PAT Test) |
|---|-------------|-------------------|--------|--|
| Mobile Equipment in Office (ie kettles) | N/A | N/A | | Recommend Annually |
| Static Equipment in Office (ie computers) | N/A | Annually | | N/A |
| Portable Equipment used on site | Before Use | N/A | | 6 monthly |

All portable electrical equipment will be tagged with a date for re-inspection and test. Employees will be instructed to take out of service any equipment found without a date or an expired date report it to the **Operations Manager or Site Supervisor**.

The fixed electrical installation in the premises will be checked by a qualified electrician at least once every 5 years.

Relevant Legislation and Information:

The Electricity at Work Regulations 1989

Electricity at work: Safe working practices – HSG85

3.29 Personal Protective Equipment

It is the policy of the Company to comply with the Personal Protective Equipment at Work Regulations. All employees, who may be exposed to a risk to their health and safety while at work, will be provided with suitable properly fitting and effective personal protective equipment (PPE) – such as safety boots, eye protection and gloves. PPE will always be considered as a last resort or as a back up to other control measures.

The Company will ensure that independent subcontractors (LOSC, LIMB, Bonafide) appointed by the Company shall have available and wear appropriate PPE. If necessary, and by arrangement, the Company shall supply the appropriate PPE

Employees will be required to use PPE as identified by the risk assessments.

All PPE provided by the company will be properly assessed and selected by the **Operations Manager** prior to provision.

The Company will not charge employees for the issue of PPE, the exception being safety footwear which will be procured by employees and to which the Company will provide a contribution to the cost.

All employees who are required to use PPE will receive information and instruction on the use, maintenance and purpose of the equipment. The Company will provide facilities for the correct storage of the PPE whenever necessary. Employees will be instructed to report any defects with PPE and not use it until replacement PPE has been issued.

The Company will endeavour to ensure that all PPE provided is used and used properly by its employees.

The **Operations Manager** will be responsible for keeping records of PPE issued to employees. Records will be retained in the Health and Safety Files.

Relevant Legislation and Information:

Personal Protective Equipment at Work Regulations (As Amended) 2022

PPE at Work Guidance L25

3.30 **Manual Handling Operations**

It is the policy of the Company to comply with the Manual Handling Operations Regulations.

Manual handling operations will be avoided as far as is reasonably practicable. Where it is not possible to avoid manual handling operations, an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual concerned.

The **Operations Manager and/or Site Supervisor** will be responsible for assessing significant manual handling risks during the project planning stage.

The **Site Supervisor** will be responsible for day to day assessments of manual handling on site.

The assessment will identify measures that will reduce the risk of injury to the lowest possible level possible. Priority will be given to providing mechanisation where practicable.

All employees who undertake manual handling tasks will be trained in safe manual handling techniques.

Relevant Legislation and Information:

The Manual Handling Operations Regulations 1992

Manual Handling Guidance L23

3.31 **Display Screen Equipment**

It is the policy of the Company to comply with the Health and Safety (Display Screen Equipment) Regulations.

The **Operations Manager** will ensure that each person who is a designated “user” of computer workstations undertakes a Workstation Assessment to ensure that the risks to their health and safety is minimised by meeting the workstation requirements as set out in the Schedule of the Regulations.

Workstation assessments will be undertaken soon after an employee joins the Company, following any changes to the workstation or work environment and at 3 yearly intervals.

The **Operations Manager** will ensure that any identified actions are implemented and filing workstation assessments in Health and Safety Files.

The Company will take all reasonably practicable steps to ensure the risks to the users of computers are eliminated or reduced to the lowest possible levels.

Computer users will be advised to undertake other tasks, take rest breaks etc to enable them to have 5 to 10 minutes break away from the screen or keyboard every hour.

Eyesight tests will be provided for Computer users on request.

Where computer users require corrective equipment specifically for using computers at work, the Company will provide funding towards a pair of glasses or contact lenses, the amount being equivalent to the cost of procuring a basic pair of glasses.

All computer users will be given appropriate and adequate training on the health and safety aspects of this type of work and will be given further training and information whenever the organisation of the workstation is substantially modified.

Relevant Legislation and Information:

The Health and safety (Display Screen Equipment) Regulations 1992

Guidance L26 Work with Display Screen Equipment

HSE Leaflet: Working with VDUs INDG36

3.32 **Control of Hazardous Substances**

It is the policy of the Company to comply with the Control of Substances Hazardous to Health (COSHH) Regulations.

A COSHH assessment will be conducted on work involving exposure to hazardous substances. It will be the responsibility of the **Operations Manager** to ensure COSHH assessments are undertaken.

The assessment will be based on manufacturers' safety data sheets and the Company's knowledge of the work process. The findings of the COSHH assessment will be filed in the Health and Safety File and with the method statements.

The Company will take all reasonably practicable steps to ensure that exposure to hazardous substances is minimised and adequately controlled in all cases. The Company will follow the HSE's COSHH Approved Code of Practice (ACOP) to ensure adequate precautions are implemented. By applying the precautions outlined in the ACOP, the Company will ensure that the Workplace Exposure Levels are not exceeded.

Employees who come into contact with hazardous substances will receive information about the hazards and information and training on the safe handling and use of the substance.

Employees will be instructed to only work with hazardous substances if the company has undertaken a COSHH assessment beforehand.

The COSHH assessment process will also help to identify arrangements for first aid, storage, spills and disposal.

COSHH assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

Relevant Legislation and Information:

Control of Substances Hazardous to Health (COSHH) Regulations 2002

Control of Substances Hazardous to Health (COSHH) ACOP L5

3.33 Local Exhaust Ventilation Systems

Under the Control of Substances Hazardous to Health Regulations 2002 as amended, the Company is required to ensure that health risks to employees or others in the premises as a result of hazardous airborne substances are eliminated or minimised so far as is reasonably practicable. Local Exhaust Ventilation (LEV) Systems are used at the premises for this purpose.

The Company realises the importance of the correct design, installation, use and maintenance of the LEV system for the effective control of welding fume.

The **Operations Manager** will ensure that the systems are examined at least once every 14 months by a competent organisation. The equipment will be checked once a month. Records of maintenance and inspection will be retained in the H&S file in the office.

Employees will be instructed to report any problems with the LEV systems immediately to the **Operations Manager**.

Relevant Legislation and Information:

Control of Substances Hazardous to Health (COSHH) Regulations 2002

Control of Substances Hazardous to Health (COSHH) ACOP L5

HSE Guidance HSG258 :Controlling airborne contaminants at work: A guide to local exhaust ventilation (LEV)

3.34 Health Surveillance

The Management of Health and Safety at Work Regulations 1999 and Control of Substances Hazardous to Health Regulations 2002 require the Company to conduct occupational health surveillance programmes where employees may be at risk of contracting a disease or adverse health condition related to the work they are doing. The requirement for health surveillance will be established through the risk assessment process or following reports of work related illness.

The purpose of health surveillance is to detect any health problems at an early stage and to evaluate the effectiveness of controls.

The **Operations Manager** will issue employees with an annual health & safety questionnaire which includes first line questions about any occupational health symptoms.

If any employee responds with an answer that would suggest that further investigation is required, then the **Operations Manager** will arrange for further investigations to be undertaken by a qualified occupational health specialist.

Where employees are required to undertake critical works such as Work in a Confined Space or Slinger/Signaller duties they will be required to attend a Fit for Work Medical, paid for by the Company. These will be renewed every four years for employees under 55 years of age and every two years for employees over 55 years of age. The **Office Administrator** will be responsible for booking all Fit for Work Medicals.

The Company will advise employees about the health surveillance procedures and outcomes following the surveillance.

Employees have a statutory duty to co-operate with their employer in health surveillance programmes deemed necessary by risk assessment or statutory provision.

Health Surveillance records will be filed by the **Director (Lisa Higglesden)** or **Accounts Manager** in Personnel Files in the Office and retained for 40 years. Information will be securely filed in accordance with the Data Protection Act 2018.

Any indication of increasing health effects will initiate a review into the effectiveness of existing control measures.

Relevant Legislation and Information:

Control of Substances Hazardous to Health (COSHH) Regulations 2002

Data Protection Act 2018

HSE Leaflet: Understanding Health Surveillance at Work INDG304

3.35 Working at Height

Under the Work at Height Regulations, the Company has a legal requirement to ensure that employees remain safe when working at height.

It is the policy of the Company to avoid working at height if possible. If work at height cannot be avoided then priority will be given to the provision of equipment that prevents falls (ie guard rails, scaffolding, scaffold towers, mobile elevated working platforms, podium steps). Ladders and stepladders may be used, but only after having first considered the possibility of using safe working platforms and after having fully assessed the risks associated with undertaking the work from ladders and stepladders.

The **Operations Manager** and/or **Site Supervisor** will ensure:-

- All work at height is properly planned and organised
- Those involved in working at height are competent
- The risks from work at height are assessed and appropriate work equipment is selected and used
- The risks from fragile surfaces are properly controlled
- Equipment for working at height is properly inspected and maintained

All equipment for working at height is covered by the Provision and Use of Work Equipment Regulations 1998, therefore, equipment used for working at height must be suitable for the type of work being done.

The **Operations Manager** will ensure that any equipment used for working at height is regularly inspected and maintained.

The **Operations Manager** will ensure that users of the equipment receive information, training and instruction in the safe use of the equipment.

Ladders

It is Company policy to use ladders only when other safer means of access are not practicable and where the work is light and short term (i.e. less than 30 minutes at a time).

The **Operations Manager** will ensure that only Class 1 or EN131 ladders or step ladders are used (for ladders procured prior to January 2018). Ladders and stepladders procured after 1st January 2018 will comply with the EN131 (Professional) standard.

Ladders will be stored in a safe place when not in use and the Company will only permit authorised employees to use the equipment.

Any defective equipment will be reported immediately and taken out of service. A label will be fixed to the equipment to clearly identify it as out of service.

Mobile Scaffold Towers / Mobile Elevated Working Platforms / Podium Steps

Employees will be required to use Mobile Scaffold Towers, Mobile Elevated Working Platforms (MEWPs) or Podium Steps. The Company will hire suitable equipment from reputable suppliers when required.

All persons who are expected to use Mobile Scaffold Towers, MEWPs or Podium Steps will be trained in the use of the equipment.

Employees will inspect the equipment following delivery. Employees will be instructed to report any defects immediately and not use the equipment until replacement or missing parts have been delivered.

Safety Harnesses

All persons who are expected to use Safety Harnesses will be trained in the use of the equipment. The **Operations Manager** will ensure that safety harnesses are inspected annually by a competent person.

The **Operations Manager** will ensure that any lanyards/harnesses are suitable for the type of work being undertaken.

Operatives will be required to inspect harnesses before use. The harness will be connected to a designated anchor point which is certified to take the load of a falling person.

Safety Harness's must only be used when at least two persons are present on site. Only one operative may use a harness, the other must remain on the ground as banks man / observer. Operatives will be instructed to ask a manager if in doubt about using harnesses.

The **Operations Manager** will ensure that a rescue plan is prepared where there is a risk that a person could fall while using the equipment.

Scaffolding (Commissioned by others)

Employees will occasionally be required to work from scaffolding that has been commissioned by another company.

To ensure the safety of the employees using the scaffolding, the **Operations Manager** must make enquiries to ensure that:

- The equipment was erected by a competent scaffolding contractor
- A handover certificate was issued by the scaffolding contractor
- The equipment is being inspected at least once every seven days by a competent person
- A register is kept to record the inspections

The Company will provide information and training on basic scaffold safety to employees who are expected to work from scaffolding unsupervised. The **Site Supervisor** and **Employees** working at the site will be instructed to visibly inspect the structure for any obvious defects and inform the **Operations Manager** immediately about any concerns with the scaffolding.

Relevant Legislation and Information:

Work at Height Regulations 2005

Provision and Use of Work Equipment Regulations 1998 (PUWER)

HSE Document: Work at Height Regulations – A brief guide INDG401

HSE Document: Health & Safety in Roof Work HSG33

Ladder Association Leaflet: Safe Use of Ladders & Stepladders LA455

HSE Leaflet: Preventing falls from boom-type mobile elevating work platforms MISC614

HSE Leaflet: Tower Scaffolds CIS10

NASC Document “Guide to Good Practice for Scaffolding with Tubes and Fittings” TG20:13

3.36 **Confined Spaces**

There are a number of specific instances where people have to enter and work in confined spaces. In such cases Management will ensure that all works are conducted in accordance with the Confined Spaces Regulations.

Management have a legal duty, so far as is reasonable practicable, to ensure that the requirements of the Regulations are applied to work carried out by their employees and by Contractors, particularly in relation to matters which are within their control.

It is the responsibility of the **Operations Manager** to conduct suitable risk assessments and put in place measures to ensure your safety whilst working in confined spaces. The priority when carrying out a risk assessment is to identify the measures needed so that entry into the confined space can be avoided in the first instance. If the risk assessment has identified high levels of risks, and work cannot be undertaken unless the confined space can be entered into, then it will be necessary for the **Operations Manager** to draw up a safe system of working.

The risk assessment will need to identify the risks to those working there and others, including contractors and the general public in the vicinity, who could be affected by the work.

The Company is also required to provide information, instruction, training and supervision as is necessary to ensure the health and safety at work of any employee or contractor working in a confined space.

Relevant Legislation and Information:

The Confined Spaces Regulations 1997

Management of Health & Safety at Work Regulations 1999

HSE Leaflet: Safe Work in Confined Spaces INDG 258

Confined Spaces ACOP L101

3.37 **Asbestos in the Premises**

Under the Control of Asbestos Regulations it is the responsibility of the person in control of a premises to establish whether there are any asbestos containing materials (ACMs) in the premises and to assess the possible location of ACMs and potential risks to employees or others visiting or working in the premises. A written asbestos management plan must be prepared and implemented to ensure risks of exposure to employees or others in the premises are adequately managed. The asbestos management plan will include details of any known or potential ACMs within the premises

The **Operations Manager** will be responsible for implementing and maintaining the asbestos management plan and ensuring that a suitable asbestos survey is undertaken by a competent organisation before any works are undertaken in the areas of risk identified in the plan. Depending on the outcome of the survey, the Company will arrange for the removal of the ACMs by a licensed contractor where the risks of exposure are significant and cannot be controlled by other means.

The Company has a duty to inform employees, contractors or any other person working in the premises about the location of ACMs. It may be necessary for contractors to work near ACMs without disturbing it. This should not be a problem, but a risk assessment will need to be prepared beforehand.

Should any employee discover any substance which may be ACMs, then work will stop immediately and the **Operations Manager** or **Site Supervisor** will be informed. Work will not start again until full assurance has been given that it is safe to do so.

Relevant Legislation and Information:

Control of Asbestos Regulations 2012

Control of Asbestos Regulations ACOP L143

HSE INDG 233 Managing Asbestos in Buildings

3.38 **Asbestos on Site**

Under the Asbestos at Work Regulations it is the responsibility of the Company to ensure that employees working on site are not exposed to asbestos in client's premises, so far as is reasonably practicable.

There is always the possibility of encountering asbestos on sites where work is required on existing buildings. Employees will be provided with information on how to recognise asbestos, the risks concerning exposure to asbestos, and the procedures to be adopted following discovery of potential asbestos.

Under current regulations it is the Client's responsibility in commercial premises to identify, assess and control asbestos in his premises and advise the Company if and where asbestos may be encountered.

It may be necessary for employees to work near asbestos without disturbing it. In this case the **Operations Manager** will prepare a risk assessment beforehand.

Where asbestos is likely to pose a significant risk, the Company will request the Client to arrange for its removal by a licensed contractor before work commences.

Any employee discovering a substance that could be asbestos will be provided with instructions to stop immediately and inform the **Operations Manager or Site Supervisor**. Work will not start again until full assurance has been given that it is safe to do so.

Relevant Legislation and Information:

Control of Asbestos Regulations 2012

Control of Asbestos Regulations ACOP L143

HSE INDG 233 Managing Asbestos in Buildings

3.39 **Noise at Work**

Where necessary, the Company will comply with the Control of Noise at Work Regulations.

The work undertaken by the Company is likely to produce noise above the lower noise exposure action level (80 dB(A) Lepd / Lepw). The Company will therefore undertake formal noise assessments, undertaken by a competent person.

Where the noise levels exceed 80 dB(A) Lepd / Lepw then the **Operations Manager** will take all possible steps to lower the sound levels and exposure, and issue employees with hearing protection and advise the employees about the risks to their hearing.

Where the noise levels exceed 85 dB(A) Lepd / Lepw then the **Operations Manager** will define the area as a mandatory noise protection area, notify employees and instruct them to wear the ear defenders at all times.

Even when the sound exposure levels are likely to be below the lower exposure action level, all employees will be required to wear ear defenders when using exceptionally noisy equipment, such as abrasive wheels.

Any employee who works in a workplace where noise levels have been assessed as exceeding 85 dB(A) Lepd / Lepw will be subject to health surveillance in the form of annual personal audiometry tests. For more details about Health Surveillance refer to earlier paragraph.

Relevant Legislation and Information:

Control of Noise at Work Regulations 2005

Controlling Noise at Work - Control of Noise at Work Regulations Guidance L108

3.40 Workplace & Welfare

It is Company policy to comply with the appropriate regulations concerning the workplace environment.

The Company will take all reasonable steps to ensure that employees are provided with a comfortable and safe working environment with adequate space, lighting, ventilation, welfare facilities and good standards of housekeeping.

The **Operations Manager** will always enquire to ensure that there are suitable toilets and suitable washing facilities at each site as part of the planning process. If necessary, the Company will arrange to hire temporary toilets with hot and cold running water.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

Construction (Design & Management) Regulations 2015

3.41 Cleanliness and Waste Disposal

All employees will observe a high level of personal hygiene and cleanliness at all times and assist in maintaining a clean and acceptable working environment, whether in the company's premises or in the premises of others.

Waste and rubbish will not be allowed to accumulate and will be disposed of in the receptacles provided.

The Company encourages employees to take responsibility for their own working environment and to tidy up after themselves and others if necessary.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

3.42 General Storage and Stacking

No equipment, plant, furniture, tools or materials will be stored in the premises in a way likely to cause danger or hazard to themselves or others.

The **Operations Manager** will ensure suitable storage systems are provided and maintained within the Company's premises. Storage systems will have adequate stability and adequate structural integrity for the type and weight of materials being stored. Heavy items will be stored at lower levels, and only lighter items stored at higher levels.

Relevant Legislation and Information:

The Workplace (Health, Safety and Welfare) Regulations 1992

3.43 Driving on Business

Employees will only be allowed to drive Company vehicles or their own vehicles while at work if they have been authorised to do so. An authorised driver will: -

- Be at least 25 years old
- Have their driving licences periodically checked at the DVLA website by the **Director (Lisa Higglesden)** or **Accounts Manager**
- Provide a copy of their MOT and Insurance to the **Director (Lisa Higglesden)** or **Accounts Manager** annually
- Advise the **Operations Manager** immediately if they accrue any driving penalty points
- Be fit to drive and advise the **Operations Manager** if they have a medical problem that may affect their ability to drive the vehicle safely
- Be responsible for daily vehicle checks in accordance with a written list

No person will be required to continually drive a vehicle for more than 3 hours without a rest break.

Drivers of vehicles will ensure that the carrying capacity of the vehicle under their control is not exceeded.

Drivers of vehicles shall always drive in a careful and consistent manner while complying with the Road Traffic Act, local byelaws and other relevant legislation.

All accidents will be reported to the **Operations Manager** as soon as possible.

Relevant Legislation and Information:

Health & Safety at Work Act 1974 section 2

Road Traffic Act 1988

3.44 **Company Vehicles**

The **Operations Manager** is responsible for ensuring that vehicles owned by the Company are kept roadworthy and in good condition, and repaired and maintained by competent vehicle servicing companies.

The Company subscribes to a suitable rescue and recovery firm. No-one will be expected to work on a vehicle in the event of a breakdown.

A travelling first aid kit and small fire extinguisher will be provided for all Company vehicles.

Relevant Legislation and Information:

Health & Safety at Work Act 1974 section 2&3

3.45 **Use of Mobile Phones and Electronic Devices in Vehicles**

No drivers will be allowed to use mobile phones, text messaging systems or any other electronic devices whilst driving a vehicle unless the vehicle has been fitted with hands free/Bluetooth equipment.

Similarly employees will not be permitted to manually operate SAT NAV equipment while a vehicle is in motion.

Relevant Legislation and Information:

The Road Vehicles (Construction and Use) (Amendment) (No 4) Regulations 2003

Using a hand held mobile phone whilst driving Regulation 2003

3.46 **Drugs and Alcohol Abuse**

The Company operates a zero-tolerance policy for drugs including psychoactive substances (so called “legal highs”) and alcohol

- Employees must not under any circumstances consume drugs, psychoactive substances or alcohol while at work.
- Employees that need to drive and operate equipment must not consume drugs, psychoactive substances or alcohol less than eight hours before coming to work and must not attend work under the influence of drugs or alcohol.
- Abuse of drugs, psychoactive substances or alcohol that affects an employee’s performance at work or their safety or the safety of others will not be tolerated.

If a supervisor or colleague notices behaviour that indicates an employee may be affected by the use of alcohol, psychoactive substances or drugs while on the job, he/she must report it to management immediately.

Any employee/operative taking medication or prescribed drugs that could affect their work or present a potential hazard must report their situation to a **Manager** before commencing work. All information provided will be handled in the strictest confidence and in accordance with the requirements of the Data Protection Act 2018.

Any breach of this policy will be treated as gross misconduct, and the Company will be entitled to initiate disciplinary procedures.

Relevant Legislation and Information:

Misuse of Drugs Act 2001

Psychoactive Substances Act 2016

Data Protection Act 2018

3.47 **Smoking**

Smoking is not allowed in the workplace, except in authorised external smoking areas.

Relevant Legislation and Information:

The Health Act 2006

Smoke-free (Premises and Enforcement) Regulations 2006

Smoke-free (Signs) Regulations 2007

The Smoke-free (Exemptions and Vehicles) Regulations 2007

HSE Guide “Passive Smoking at Work” INDG63

3.48 **Young Persons**

The Management of Health and Safety at Work Regulations 1999 stipulate that a special risk assessment must be undertaken for individuals’ aged 18 or under. The Company recognises that

young persons are more vulnerable to risks at work due to their immaturity and lack of experience in the work environment.

The **Operations Manager** will therefore prepare a risk assessment for young persons and ensure they receive additional training, instruction and supervision, over and above that ordinarily required to comply with legislation, to ensure the health and safety of themselves and others affected by their actions. The young person and his/her manager / supervisor will be briefed about the findings of the risk assessment. Records of the risk assessment will be retained in personnel files.

Relevant Legislation and Information:

The Health Act 2006

Management of Health & Safety at Work Regulations 1999

HSE INDG 364 (Rev1) Young Persons and Work Experience

3.49 **New or Expectant Mothers**

Under the Management of Health and Safety at Work Regulations 1999 employers are required to undertake a specific risk assessment for new or expectant mothers. This is to ensure that the mother and/or baby do not suffer health problems as a result of work activities.

The **Operations Manager** will therefore take all necessary steps to protect new or expectant mothers and their babies against health problems. Typical areas which will be addressed by the risk assessment are:-

- Seating and workstation arrangements
- Elimination of manual handling tasks
- Change of working hours
- Alternative work

If any employee is pregnant or thinks they are pregnant they are required by law to advise ??????? in writing about their condition. This is required before the Company can commence the risk assessment process. The risk assessment will be undertaken by ?????? with the expectant mother present. The expectant mother and her manager / supervisor will be briefed about the findings of the risk assessment. Records will be retained in personnel files.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Workplace (Health, Safety and Welfare) Regulations 1992

Equality Act 2010

HSE INDG 373 New and Expectant Mothers Who Work

3.50 **Work Related Stress**

The Company recognises that excessive workplace pressure and resulting stress can be harmful and damaging to employees' health and the Company's business performance. Occasionally, often because of an external factor such as family illness, divorce etc or sometimes because of job-related factors such as fluctuating workload or poorly defined role, the degree of stress becomes too great and individuals can suffer from inability to concentrate, disturbed sleep, feelings of not being able to cope or other stress related symptoms.

Any employee who feels that he/she is suffering from stress can consult, in complete confidence, one of the **Operations Manager** to resolve any work related difficulties. In addition, the Company will assist, where necessary, in obtaining professional advice and guidance where external factors are precipitating the stress.

The Company recognises that workplace stress can be effectively managed by listening and responding to employees' concerns, by providing a suitable working environment and by ensuring that employees do not have unreasonable work pressures.

A number of factors affecting levels of stress and possible solutions are documented in the HSE guide below.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

HSE guide "Work Related Stress" INDG281.

3.51 **Workplace Violence and Aggression**

The Company recognises that employees may occasionally face aggressive or violent behaviour. Verbal abuse, threats and bullying are the most common types of violence while physical attacks are comparatively rare. The Company realises that verbal abuse can be just as upsetting as a physical injury and that violent and aggressive behaviour can lead to low morale, absenteeism and stress as well as physical injuries.

Any employee finding themselves in a confrontational situation must report their concerns immediately to their manager. The **Operations Manager** will record all incidents of violence or aggressive behaviour and will monitor the situation to establish whether any additional improvements can be made to reduce further risks of violence or aggression. Any violence instigated by an employee will result in disciplinary action.

Any employee who has been the subject of violent or aggressive behaviour will be given time off as required, and support and assistance to help them come to terms with the situation and avoid long term distress. Further advice can be found in the Home Office leaflet listed below which can be obtained from the local library, police station or Citizens Advice Bureau.

Relevant Legislation and Information:

Management of Health & Safety at Work Regulations 1999

Health and Safety at Work Act 1974

Home Office leaflet 'Victims of Crime'

4 Environmental Policy

Iron Designs Limited recognises the need to operate the business in a manner which reflects good environmental management. The Company is aware of the environmental impacts of its operations and will balance its business with the need to protect the local and global environment.

Our Environmental Policy shall earn the confidence of employees, customers and the general public by demonstrating our commitment to comply with all relevant environmental legislation and minimise pollution, resource use and waste, where feasible, through the continual improvement of performance in all areas of the Company.

The Company has a commitment to identify all activities that have the potential to cause an environmental impact, as well as providing adequate resources to help minimise or prevent any negative impact.

In order to achieve this commitment, we will:

- Identify all environmental impacts that the Company contributes to and establish environmental management procedures that can be incorporated into all business decisions, in a cost effective manner.
- Regularly measure and evaluate our environmental performance, and improve where necessary.
- Promote a culture of continual environmental improvement within the Company.
- Delegate the responsibility for environmental matters to the appropriate levels in the Company.
- Consistently increase the awareness and provide necessary training to all our employees and customers to ensure environmentally responsible concepts are integrated into their normal working practices.
- Demonstrate control of all our operations and ensure that all are performed with due consideration of the environment.
- Identify and mitigate against potential accidents that could result in an environmental impact, so that if an accident did occur the consequences would be minimised.
- Use products that have a negligible environmental impact, where appropriate options exist.
- Reduce the consumption of resources (energy, materials, packaging), where feasible.
- Minimise waste through a commitment to reuse, recover or recycle, where feasible.

It is our duty to ensure that good environmental management is practiced in all contracts and projects that we are involved in, and we will seek to influence customers to demonstrate a positive environmental commitment.

The Company will communicate the Environmental Policy to all employees, and it will be freely available to customers and the general public.

The **Managing Director** is personally responsible for the environmental performance of the Company and signs this policy statement in acknowledgement of this overall responsibility.

Signed

Date 14th March 2024

5 Anti Slavery Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Iron Designs Ltd have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships. Iron Designs Ltd are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the business or in any of its supply chains.

Iron Designs Ltd are also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout Iron Designs Ltd supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015.

Iron Designs Ltd expect the same high standards from all contractors, suppliers and other business partners, and as part of the contracting processes, Iron Designs Ltd include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and Iron Designs Ltd expects suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Iron Designs Ltd or on its behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and Iron Designs Ltd may amend it at any time.

Responsibility for the policy

The Board of directors has overall responsibility for ensuring this policy complies with Iron Designs Ltd legal and ethical obligations, and that all those under Iron Designs Ltd control comply with it.

The Projects Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Consultants at all levels are responsible for complying with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Projects Director or any other Board Member.

Compliance with this Policy

Employees must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Iron Designs Ltd or under Iron Designs Ltd control.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify a company director as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Iron Designs Ltd business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this policy has occurred or that it may occur they must notify a company director or report it in accordance with Iron Designs Ltd Whistleblowing Policy as soon as possible.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Iron Designs Ltd supply chains constitutes any of the various forms of modern slavery, raise it with a company director.

Iron Designs Ltd aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Communication and Awareness of this Policy

Training on this policy, and on the risks Iron Designs Ltd faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

Iron Designs Ltd zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of Iron Designs Ltd business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Iron Designs Ltd may terminate its relationship with other individuals and organisations working on Iron Designs Ltd behalf if they breach this policy.

This Policy will be communicated to all staff and is made available for the public on request.

Endorsed by

Signed

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14th March 2024

6 Equal Opportunities & Diversity

The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally.

The Company will take all reasonable steps to employ, train and promote employees on the basis of **their experience, abilities and qualifications to meet the competence requirements as defined under the safety legislation**, without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

Employees have a duty to co-operate with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper, gratuitous or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.

Employees should draw the attention of their manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all **suitably qualified and experienced** people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation,

religion or racial group.

2. Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, religion or racial group or which would fully exclude disabled job applicants.
3. Avoid prescribing any requirements as to marital status.
4. Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation, religion or racial group or from employees with a disability.
5. Ensure that the setting of age limits as a criterion of any specific job is justifiable.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work arrangements or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Training and promotion

The Company will brief all supervisors in the Company's policy on equal opportunities and in helping them to identify discriminatory acts or practices or acts of harassment or bullying. Supervisors will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

The Company will also provide training to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment free of bullying and harassment.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice.

Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability.

Equal pay

The Company is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

Harassment

It is against the Company's policy for any employee, male or female, to sexually harass another employee or to harass him or her on the grounds of actual or perceived sexual orientation. It is also against the Company's policy for any employee to harass another employee on the grounds of his or her race, colour, ethnic origin, nationality, national origin, religion or belief, age or disability. Harassment occurs where a person engages in unwanted conduct which has the purpose or effect of violating the other's dignity at work or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal or physical conduct of a sexual nature, subjection to obscene or other suggestive comments, and sexual jokes or pictures. Racial harassment includes, but is not limited to, engaging in unwelcome verbal or physical conduct of a racial nature, subjection to racist comments, and racist jokes or pictures. Harassment may comprise intentional bullying which is obvious or violent but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the complainant to decide for him or herself what they regard as offensive.

Reporting complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular sex, sexual orientation, religion or racial group or from employees who are disabled.

With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you wish to make a complaint of discrimination or harassment, you should follow the following steps:

1. First of all, report the incident of discrimination or harassment to your line manager. If you do not wish to speak to your line manager, you can instead speak to an alternative line manager or to a member of the personnel department.
2. Such reports should be made promptly so that investigation may proceed and any action taken

expeditiously.

3. All allegations of discrimination or harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation.
4. Once the investigation has been completed, you will be informed of the outcome and the Company's conclusions.
5. The Company is committed to taking appropriate action with respect to all complaints of discrimination or harassment which are upheld.
6. You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

Monitoring equal opportunity and diversity at work

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices

Eligibility to Work in the UK

There is legislation that supports the immigration system and requires employers to check and monitor that migrant workers are eligible to work in the UK. A condition contained in your Principal Statement of Written Particulars is that you are and remain eligible to work in the UK. You must therefore inform us immediately of any circumstances that may impact on your eligibility. You may be dismissed without notice if it comes to our attention at any time that you are not eligible to work in the United Kingdom.

Signed:.....

14th March 2024

7 Anti-Bribery and Corruption Policy

1. Introduction

The aim of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Iron Designs Ltd (The Company) business is conducted in a socially responsible manner.

2. Policy Implementation

Bribery is the offering promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial.

It is our policy to conduct all of our business in an honest and ethical manner. The Company takes zero tolerance approach to bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine.

3. Scope

This policy applies to all individuals working for the Company, including Directors, Managers, employees, sub-contractors or any other person associated with the Company.

3.1 Bribes

Employees must not engage in any form of bribery either directly or through any third party.

3.2 Gifts and Hospitality

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper. The Company will never offer or accept gifts or hospitality if The Company feels it could influence a business decision or give the appearance of doing so.

3.3 Facilitation Payments and Kickbacks

Facilitation payments are a form of bribery made to public officials in order to facilitate or speed up routine Government action.

The Company policy is that facilitation payments must not be paid. The only exception is if you feel that you have been coerced or that your safety is at risk, then you should make the payment but report it to your Line Manager immediately.

3.4 Political Contributions

The Company does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.5 Charitable Contributions

Employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. The Company will only make charitable donations that are legal and ethical. Donations must be approved by a Director.

4. Your Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for The Company or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Signed

14th March 2024