

### **HEALTH & SAFETY POLICY**

### 1. Introduction

This document contains the Policy Statement of **London Office Interiors Limited** of, 324-326 High Street, Harlington, Hayes, Middlesex UB3 5DU.

### 2. <u>General Statement</u>

- 2.1 It is our policy to perform work in the safest practicable manner, consistent with good practice. The health and safety of our employees and all those likely to be affected by our operations is the responsibility of the Partners, and as a priority it ranks equally with production and profit. Adequate resources will be made available to ensure the success of this policy.
- **2.2** It is the duty of management to do everything reasonably practicable to prevent injury and illhealth, and it is equally the duty of each employee to exercise personal responsibility for his or her own safety and that of others.
- 2.3 All employees are to be aware that, in the event of any conflict between the demands of production and safety, they will receive the support of management if they reasonably choose the safety of employees or third parties as the priority.
- 2.4 It is our policy to adhere completely to the requirements of the Health and Safety at Work etc. Act 1974, the Workplace (Health, Safety and Welfare) Regulations 1992, the Management of Health and Safety at Work Regulations 1999, the Construction (Design and Management) Regulations 2015, and all Acts, Regulations and Codes of Practice which affect our operations.
- 2.5 The attention of all employees is directed to this Safety Policy and its Appendices. Any revisions will be incorporated when necessary, and these will also be brought to the attention of all personnel.

The foregoing is the Statement of Safety Policy of London Office Interiors Ltd. It has been prepared after due consultation with those involved in its operation, and has the full backing and authority of management.

#### **ORGANISATION**

#### 3. Responsibility

- **3.1** Responsibility for health and safety on premises, sites and elsewhere is delegated to the persons in charge of the work. They are responsible for the safe conduct of work in their areas, and this responsibility cannot be delegated to others.
- **3.2** The Managing Director has overall responsibility for health and safety. Where difficulties arise in the maintenance of safe working conditions, or practices, reference must be made to the Managing Director who then has responsibility for ensuring that sufficient authority is given to enable safe conditions and practices to be maintained.
- **3.3** It is the responsibility of all our employees to use machinery, equipment, transport, hazardous substances and safety equipment in accordance with the training and instructions given.
- **3.4** Employees must inform the Health and Safety Co-ordinator of any dangerous situations or shortcomings in the Company's health and safety arrangements so that any necessary remedial action may be taken.
- 3.5 Specific responsibilities of all employees are set out in Appendix 1 attached to this Policy Statement.

### 4. Health and Safety Advice

- 4.1 In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, the company has appointed Mr R. Wooster as the Health and Safety Co-ordinator. He is nominated as competent person for the purpose of assisting the Company to undertake necessary measures to ensure compliance with statutory provisions.
- **4.2** In order to obtain specialist advice and up to date information on all health and safety matters, Agility Risk & Compliance are appointed as health and safety consultants to the company and provide specialist advice and regular updates on health and safety matters relating to the Company activities.
- **4.3** Copies of relevant health and safety guidance are kept in the office manager's office and are available for all employees to use. Agility Risk & Compliance Risk Assessment Manager system is used for risk assessment.
- 4.4 It is the responsibility of the Health and Safety Co-ordinator to ensure that all users of products and articles supplied or hired for use at work shall be made aware of any relevant information and instructions which may be provided by a manufacturer/supplier in order to comply with our obligations under Section 6 of the Health and Safety at Work etc. Act 1974.

# 5. Consultation

- 5.1 In compliance with the Health and Safety (Consultation with Employees) Regulations 1996 it will be company policy to consult all employees on any matters which could affect their health, safety and welfare.
- **5.2** Suggestions or comments on ways in which our health and safety performance can be improved will always be considered by management.

#### **ARRANGEMENTS**

### 6. Safety Policy Review

- **6.1** The Health and Safety at Work etc. Act 1974 requires us to monitor the effectiveness of this Policy in terms of the use made of it by both management and work force. Review of our safety performance and the functioning of the Policy is the task of the Health and Safety Co-ordinator. Annually, he will review the contents of the Policy Statement and indicate ways in which our safety performance can be improved.
- **6.2** Health, safety and welfare may also be considered at site meetings which the Contract Manager will attend with clients' or contractors' representatives, who may be present for discussions on their safety policies, working practices, risk assessments, safety performance and other related matters covered by legislation.
- 6.3 The Health and Safety Co-ordinator will monitor health and safety standards on our sites to ensure compliance with this policy, current legislation and guidance, using the Health and Safety Consultants where necessary upon request. The frequency of site monitoring will depend on the size of the contract and the foreseen hazards. Where appropriate written reports will be completed and forwarded to Health and Safety Co-ordinator for inclusion in the annual policy review.

### 7. Training

- 7.1 It is the responsibility of the Health and Safety Co-ordinator to review the health and safety training needs of employees at all levels at regular intervals. Safety training will be given to all employees as necessary. Agility Risk & Compliance will offer advice on safety training needs upon request.
- 7.2 Management will undertake induction training for personnel when they join the Company. The Supervisor responsible for the work area is required to review with any new employee any hazards and the specific health and safety rules applicable to the work to be done, before putting the employee to work. Similarly, those transferring from job to job, or site to site, will be given any necessary information by the Manager or Supervisor responsible for the contract. Introduction of new technology or working methods will also be occasions when further training will be provided.
- **7.3** The Health and Safety Co-ordinator will ensure employees, contractors and sub-contractors have the necessary competency to carry out work for which they are engaged. He will also carry out formal vetting of contracting firms to establish competency in health and safety.
- 7.4 The Health and Safety Co-ordinator will ensure that all new employees and apprentices are provided with suitable induction training to ensure that they have sufficient information and instruction to comply with the Company's health and safety policy and procedures.
- **7.5** The Supervisor or the person responsible for the work will provide new employees and those transferring from job to job with suitable site induction training, which will include any hazards and specific health and safety rules applicable to the work to be carried out before putting the person to work.
- 7.6 The Health and Safety Co-ordinator will carry out induction training required for young persons. He will ensure that the Supervisor in charge of the work is made aware of the necessary training and level of supervision required for young persons, as detailed in the Management of Health and Safety at Work Regulations 1999.

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

### 8. Documentation

- **8.1** Accident details must always be entered immediately into the office Accident Book, Form BI.510, however trivial they may appear to be. In addition, as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR), accidents resulting in a fatality, a major injury or in absence from normal work for more than three days must be reported to the Health and Safety Executive on form F2508 by the "responsible person" as defined below (see 8.5). Accidents to non-employees must also be reported using this system, as it is our responsibility to report certain injuries to non-employees. The procedure is detailed on the form F2508 pad cover, together with the definitions of "specified major injury" and "dangerous occurrence". In compliance with the Construction (Design and Management) Regulations 2015, the Principal Contractor will also be informed where applicable.
- **8.2** Fatal or major injury accidents must also be reported by telephone immediately to Mr R. Wooster at 324-326 High Street, Harlington, Hayes, Middlesex UB3 5DU (telephone 0208 759 2042) who will inform the Health and Safety Executive's Incident Contact Centre by the quickest practicable means (e.g. telephone 0845 300 9923, or e-mail (riddor@natbrit.com).
- **8.3** Dangerous Occurrences as defined by law, and as listed on the pad cover of F2508, must also be reported immediately by telephone to Mr R. Wooster who will inform the Health and Safety Executive's Incident Contact Centre by the quickest practicable means.
- 8.4 Details of diseases and conditions which are listed inside the F2508A cover and which are notified in writing to us as having been suffered by employees, will be reported to the Health and Safety Executive by Mr R. Wooster.
- **8.5** Documentation for accidents, dangerous occurrences and notifiable diseases and conditions will be held by Mr R. Wooster who is the person in charge of office-held health and safety documentation. He is also responsible for making direct telephone or email notifications as above. Copies of all notifications made on our behalf, including those returned to us by the HSE, will be kept for record purposes.
- **8.6** Investigations of serious accidents and dangerous occurrences will be carried out by the Manager responsible for the work, in conjunction with our insurers and/or Safety Consultants where necessary.

# 9. Welfare and First-Aid Facilities

- **9.1** Welfare and sanitary facilities provided at the company's premises are to the standards required under the Workplace (Health, Safety and Welfare) Regulations 1992. On sites the Supervisor responsible for the job will ensure that adequate facilities are available and, where necessary, will make arrangements for our employees to use the client's or principal contractor's facilities.
- **9.2** To comply with the Health and Safety (First-Aid) Regulations 1981, the Health and Safety Coordinator will supply the office premises and company vehicles with adequate first-aid equipment.
- **9.3** The Contract Manager or Supervisor responsible for the job will make arrangements for site facilities to be shared with the client or principal contractor as appropriate.
- **9.4** Where facilities cannot be shared with the client or principal contractor the Health and Safety Coordinator will provide adequate first aid equipment to site.
- **9.5** The names of those persons trained and certified in first-aid will be displayed within the Office and on each site.
- **9.6** In the absence of trained first-aid personnel the company will nominate an 'appointed person' to take charge of the first-aid equipment and facilities, to replace missing or defective items and to summon assistance if required.
- **9.7** The arrangements for nominated 'appointed persons' for the purposes of the regulations are as follows: -
- Mr R. Wooster for the Office facilities.
- The Supervisor on sites where first-aid facilities are not shared with either the client or principal contractor.
- The driver will carry out this function in any of the company vans.

# 10. <u>Safety Rules</u>

- **10.1** The Company safety rules are designed to provide basic guidance for safe operating practices and procedures that form the Company Policy, and must be strictly adhered to by all employees. Wilful disregard by any employee of any Company safety rules may be considered sufficient cause for disciplinary action and possible immediate dismissal.
- 10.2 Personal protective equipment (PPE) shall be worn without exception wherever necessary, as identified by risk assessments carried out by the appropriate Manager, in liaison with the appropriate Supervisor. Instructions on the care and use of the PPE will be given to operatives by the person in charge of the work where this rule applies.
- **10.3** Safety helmets will be worn in accordance with the Construction (Head Protection) Regulations 1989 on sites or in work areas which are designated as "hard hat" sites or areas, or wherever there are risks of head injury.
- **10.4** Safety boots or shoes must be worn at all times when there is a risk of injury to the feet. No person may wear plimsolls, trainers or other soft-soled footwear.
- **10.5** Fire-fighting equipment is provided in all places of work. All employees must be aware of the location of fire extinguishers and of their method of operation.

- **10.6** All access equipment including ladders must be kept in good repair. Mobile towers must only be erected by those trained to do so, and in accordance with the maker's or supplier's instructions, which are circulated to site with other relevant safety documents.
- **10.7** All injuries, no matter how slight, must be reported immediately.
- **10.8** Employees' vehicles will not be parked in working areas. Vehicle parking is permitted only at the sole discretion of the person in charge of the site, whose specific responsibility is to designate areas in which vehicles may be parked.
- 10.9 Untidy areas and methods of working create unacceptable risks and must be avoided at all times.
- **10.10** Anyone known to be under the influence of alcohol and/or drugs shall not be allowed on the job while in that condition. Persons found to be displaying symptoms of alcohol or drug abuse will be subject to disciplinary action.
- **10.11** No-one shall knowingly be permitted or required to work while his or her ability or alertness is so impaired by fatigue, illness, temperature or other cause that might expose the individual or others to injury.
- **10.12** Horseplay, scuffling, and other acts which tend to endanger the safety or well-being of employees are prohibited.
- **10.13** Portable tools and other work equipment such as plant and test equipment must be kept and maintained in good condition for the tasks for which they will be used. Worn or broken tools must be replaced immediately, and it is the personal responsibility of each employee to ensure that this is done.
- **10.14** Smoking is restricted to designated areas outside the offices and outside enclosed spaces on sites.
- **10.15** Abrasive wheels and cutting discs may only be mounted or changed by persons who have been trained and appointed in writing.
- **10.16** Safety rules and advice covering specific work areas and/or systems of work will be attached as Appendices to this policy statement when formulated, as necessary. The following Appendices are attached:

Appendix 1 Responsibilities
Appendix 2 Office Safety Rules
Appendix 3 Joinery Safety Rules

# 11. Work Equipment

- 11.1 The Company will ensure that all tools and equipment provided for use at work will comply with the requirements of the Provision and Use of Work Equipment Regulations 1998.
- 11.2 It is the duty of the Managing Director and management to ensure all work equipment hired or purchased for use by our employees is suitable for the purpose for which it is to be used.
- **11.3** Where tools or equipment are issued to employees for their personal use, those employees are responsible for ensuring that the item is kept in good working order and that any defects are reported.
- 11.4 Supervisors are responsible for ensuring that all work equipment is properly maintained on site.

- 11.5 The Supervisor responsible for the work will ensure the users of new plant and equipment provided by the company will be given sufficient instruction, information and training in order that any such plant or equipment may be used safely.
- 11.6 The Health and Safety Co-ordinator will ensure that all portable and transportable electrical equipment is maintained, tested and inspected in accordance with HSE guidance HSG 107 "Maintaining portable and transportable electrical equipment". He will also ensure that adequate records of formal inspection and testing are kept. Portable and transportable electrical equipment is described as any electrical equipment, which can potentially result in a risk of fatal electric shock (i.e. more than 50v ac or 120v dc). Such equipment is not part of a fixed installation but is, or is intended to be, connected to a fixed installation or generator by means of a flexible cable and either a plug or socket or a spur box, or similar means.
- **11.7** The Health and Safety Co-ordinator will ensure that fixed electrical installations and wiring are inspected in accordance with the requirements of the Institute of Electrical Engineers Wiring Regulations, 17<sup>th</sup> Edition.
- **11.8** The Managing Director is to ensure that records of servicing, inspection, calibration and statutory tests/examinations are properly kept. Examples of records required are:
  - Ladders and access equipment maintenance
  - Portable electrical appliance testing
  - Statutory examination/test of lifting equipment.

# 12. General hazards, risk assessment and controls.

- **12.1** The Management of Health and Safety at Work Regulations 1999 and other Regulations require that risk assessments are to be carried out by employers and that the significant findings from the assessments are brought to the attention of those at risk.
- **12.2** The Company will use the Agility Risk & Compliance Manager system to assist in the control of common hazards associated with work activities
- **12.3** The Health and Safety Co-ordinator will carry out an ongoing assessment of the risks as required by the Regulations. Where significant risks have been identified on work to be carried out by the Company a written generic assessment will be available.
- **12.4** The Supervisor responsible for the work will make the assessment site-specific, taking into account local risk factors. When appropriate, risk assessments will consider additional risks to any young person who may be employed.
- **12.5** Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or its significant findings, together with details of the method of work to be followed if appropriate.
- 12.6 The Health and Safety Co-ordinator will review generic risk assessments made and kept by the Company at annual intervals or whenever it is suspected that they may no longer be valid.
- **12.7** Training will be given to employees where a need is identified by the risk assessment. Employees will be made aware of the findings of the assessments and the required control measures.

- **12.8** Any necessary plant, equipment, monitoring, hygiene and welfare facilities, and protective clothing and equipment specified in the risk assessment must be present at the relevant location before the task is carried out.
- **12.9** Risk assessments will always be taken into account when negotiating, or tendering for work.
- **12.10** Risk assessments may identify the need for medical examinations, or health surveillance. Whenever this is the case the records of any health surveillance, medical or other individual health record which may be required will be kept securely in personnel files held by the Company, and will be kept for 40 years after the date of the last entry as required by law.

# 13. Office work and display screen equipment.

- **13.1** The Health and Safety Co-ordinator is responsible for risk assessments of office work, including those for display screen equipment in the Office.
- **13.2** The Health and Safety Co-ordinator will carry out an annual health and safety audit of the company's office premises.

# 14. Manual handling operations

- **14.1** All manual handling operations having a risk of injury which are carried out by Company employees will be identified and recorded by the Health and Safety Co-ordinator. Agility Risk & Compliance Manager system contains information on manual handling and generic assessments. Where these operations cannot be avoided, specific assessments will be made and procedures developed to minimise the risks. Selection of appropriately capable staff will then take place, followed by any necessary training, information and instruction. All employees are encouraged to discuss potential manual handling problems not so identified with the person in charge of the work, together with any work involving repetitive motion.
- **14.2** All employees will be issued with HSE leaflet INDG 143 "*Manual Handling a short guide for employers*" on induction which gives basic guidance on manual handling techniques.

### 15. Personal protective equipment.

- **15.1** The provision of personal protective equipment (PPE) is only acceptable when the hazard cannot be controlled by other means. An assessment will be carried out by the Supervisor in charge of the work to ensure that any PPE provided is suitable and provides adequate protection against any hazard identified.
- **15.2** The Supervisor in charge of the work will ensure that employees are given sufficient training, which will include the selection, use and maintenance of personal protective clothing and equipment where it is required.
- **15.3** The Supervisor in charge of the work will ensure that suitable arrangements are provided for the storage of PPE.

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

- **16.1** It is the policy of the company to adhere to the principles of good practice for the control of exposure to substances hazardous to health as set out in Schedule 2 of the Control of Substances Hazardous to Health Regulations 2002 (as amended), namely:
- design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- take into account all relevant routes of exposure (inhalation, skin absorption and ingestion) when developing control measure
- control exposure by measures that are proportionate to the health risk
- choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- > check and review regularly all elements of control measures for their continuing effectiveness
- inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks
- > ensure that the introduction of control measures does not increase the overall risk to health and safety
- 16.2 Information on materials used in the Company's work will be obtained from the manufacturer or supplier, or from the client, as appropriate. The Company makes use of Agility Risk & Compliance Manager system to provide generic assessments for all substances likely to be used by employees whilst at work. Monitoring of the working atmosphere may be required and will be indicated on the relevant COSHH assessment. The Health and Safety Co-ordinator will produce COSHH assessments for the Company's work with applicable substances. He will review them annually at the time of the Policy review, or whenever it is suspected that they may no longer be valid. The Supervisor responsible for the work will then make the assessments site-specific.
- **16.3** The implementation of control measures for hazardous substances used at work will be considered in the following order of precedence:
  - Hazard elimination using alternative working methods
  - **Substitution** replace substance with a non or less hazardous substance
  - Segregation automation or enclosure of process/operator
  - **Use of procedures** use of engineering controls and other safe systems of work e.g. mechanical ventilation
  - Use of warning systems warning notices, proper labelling of containers and instructions
  - **Use of Personal Protective Equipment** must be adequate and used as last resort if other controls are impractical or cannot be implemented
- Any necessary work with new materials or substances rated as hazardous must not commence until the necessary information has been obtained, or the material has been analysed, and an assessment made of the risks involved in the operation. Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or its significant findings, together with details of the method of work to be followed.
- **16.5** The following general precautions apply to the use, handling and transport of all substances. Specific precautions are detailed in the written assessments for specific materials and other substances likely to be encountered in the work environment.

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

# 17. <u>Fire and emergency precautions.</u>

- **17.1** The Health and Safety Co-ordinator is responsible for <u>fire and emergency precautions and assessments</u> in the Company office. He will ensure that all reasonable steps have been taken to comply with the Regulatory Reform (Fire Safety) Order 2005. These will include:
  - identification of potential fire hazards in the premises
  - identification of people who may be at risk
  - evaluation of the risk
  - production of a written fire-emergency plan to remove, reduce or control the risks
  - ensuring an adequate means of escape in the event of a fire
  - · ensuring that escape routes are kept clear
  - sufficient firefighting appliances are available and properly maintained
  - an adequate means of warning in the case of a fire is available
  - provide suitable information, instruction and training to staff
  - review the assessment annually or when conditions change and revise as necessary.
- **17.2** The Supervisor responsible for the work will ensure that adequate firefighting equipment is available on site. He will liaise with the client or Principal Contractor to ensure that adequate fire and emergency procedures are in place before the start of the contract.

# 18. Arrangements for Special Hazards.

- **18.1** There are a number of special hazards, which have potentially serious consequences, and which have been identified as 'high risk' in the Company's risk assessments. This section of the policy identifies these hazards and is in addition to normal risk assessment procedures in Section 12. They include:
  - Work with asbestos-containing products
  - Live electrical work
  - Work involving noisy operations
  - Work involving vibration risks
  - Use of mobile scaffold towers
  - Use of ladders and stepladders
  - Use of mobile elevating working platforms
  - Lone working
  - Confined space entry
  - Work at height and work on flat roofs
  - Scaffolding

- Work in excavations
- Buried cables
- **18.2** These activities will require a specific risk assessment to be made prior to the commencement of work. The Manager responsible for the contract will carry out these specific risk assessments, and further information on standard precautions is given in Section 13 below.
- **18.3** The client may operate a 'permit to work' system to govern our activities in situations where our work interfaces with his operations. This will need to be considered when we are carrying out risk assessments.
- **18.4** All those to be involved in the work will be made aware of the control measures for the identified risks and any procedures to be followed.
- Asbestos. At the pre-tender stage of the contract the Health and Safety Co-ordinator will make specific enquiries to the client as to the presence of asbestos. When asbestos is suspected or known to be in any material to be handled by our employees, work is not to be undertaken until a sample has been analysed, an assessment carried out and appropriate control measures put in hand. Any employee discovering material that is suspected of containing asbestos is to stop work immediately and inform the Contracts Engineer in charge of the job. All employees involved in site work will be issued with a copy of pocket card issued by the HSE, INDG 418 "Asbestos Kills", at induction
- 18.6 <u>Live electrical work</u> is only to be carried out in exceptional circumstances under the authorisation of the Health and Safety Co-ordinator. The circumstances for live work will be assessed using HSE Guidance -HS(G) 85 Electricity at work-safe working practices. A written safe system of work will be produced before the work starts. All electrical systems must be proved dead before work starts. NO assumptions about the state of any system must be made without positive verification all circuits must therefore be assumed to be live unless it is established they are dead.
- 18.7 Noise at work is subject to the Control of Noise at Work Regulations 2005. Noise assessments will be made as required by the Regulations when the noise action levels are likely to be reached. As electrical contractors noise is not normally an issue when carrying out normal type of work. It is not considered that noise levels will exceed the first action level during a normal working day. When excessive noise levels are encountered they are usually either of short duration or client generated. We have never undertaken work that has necessitated detailed noise assessment however our employees are issued with suitable hearing protection to BS EN 352-1 and noise is considered when carrying out any risk assessment for work being undertaken. Instructions for safeguarding hearing will be given to employees as appropriate by the Health and Safety Co-ordinator responsible for the site.
- Hand arm vibration (HAV) is not normally a significant hazard in work undertaken by this company. Hand held power tools are used for short duration during installation and maintenance work and only for a small proportion of working hours. Hammer action drills are used, but for less than 30 minutes in any one-day. It is considered that the action level is not likely to be approached during normal work activity. A specific risk assessment will be carried out by the Health and Safety Co-ordinator should the occasion arise where there is a known or suspected hazard arising from using power tools.
- 18.9 <u>Mobile Scaffold Towers</u>, are only to be erected, altered, or dismantled by competent persons and in accordance with the manufacturer's instructions. The Supervisor must inspect all towers after they have been erected or adapted and before first use to ensure that they are suitable for the work to be carried out. No mobile tower may be used unless it has been inspected on site after being erected and within the previous seven days. A record is to be made by the Supervisor in accordance with the Work at Height Regulations. Mobile towers are not to be used in the vicinity of overhead electric lines.

- **18.10** Ladders and Step Ladders will only be used as working platforms for work of short duration and low risk, or where there are existing site features that cannot be altered to permit the use of other means of access. Steps and ladders will be used in accordance with the guidance found in HSE Guidance *HSG 150 Health and Safety in Construction,* and only after the risks and suitability for the operation have been assessed.
- **18.11** Mobile Elevating Working Platforms (MEWPs) may only be operated by suitably trained and competent persons. Manufacturer's instructions must always be followed. MEWPs must have been subject to a thorough examination during the previous six months, and must be inspected at least every seven days while in use. Before use the ground upon which a MEWP is to operate must be checked for suitability. MEWPs are not to be used in the vicinity of overhead electric lines.
- 18.12 Lone working will only be allowed after a risk assessment has been carried out to assess the nature of the work, the workplace and the specific risks to the lone worker. Where it is not possible for the work to be done safely by one person, arrangements will be made to provide back up and assistance. All employees who work alone will be given instruction and training on recognising the risks, the precautions to be taken and the procedure for requesting assistance. Lone working will not be allowed where there is any significant risk of exposure to live conductors.
- 18.13 <u>Confined spaces</u> such as ducts, manholes, sewers and deep excavations, are not to be entered until a risk assessment has been carried out and a safe system of work has been drawn up and brought to the attention of every person likely to enter. The safe system must include details of necessary atmospheric monitoring and the provision of emergency evacuation apparatus. HSE Approved Code of Practice "L101 Safe work in confined spaces" is to be used to assist in risk assessment and evolving safe systems of work.
- 18.14 Work at height and work on flat roofs will only be carried out where it is not reasonably practicable to carry out the work otherwise than at height. Specific risk assessments will be carried out for all such work and will only be undertaken by competent people. The work must be properly planned and supervised to ensure that it is carried out in a safe manner. Work equipment enabling work at height to be carried out will always be selected on the basis that collective protection measures will be given priority over personal protection measures and account will be taken of any other relevant factors that may affect safety such as the location of the work, ease of access, consequences of a potential fall, the duration and frequency of use, emergency rescue/evacuation and any additional risks posed by the selection of a particular item of work equipment. Edge protection will always be provided where practicable when there is a risk of personal injury as a result of falling. Where it is not reasonably practicable to provide edge protection, other collective protective measures such as soft landing systems will be used. Finally, where these are not practicable personal fall arrest and or restraint equipment must be used. The advice of the Health and Safety Coordinator should be obtained before work starts if there is any doubt about the precautions required in particular circumstances. Roof work will be carried out in accordance with the guidance contained in HSG 33 Health and Safety in Roofwork.
- **18.15** Scaffolding, all of which is to be erected, altered, or dismantled only by competent persons, should be incapable of being climbed outside working hours, by the removal of any ladders at ground floor level. Scaffolding with working platform(s) exceeding 2m in height must be inspected by a competent person before first use and at intervals not exceeding seven days and the results recorded. This may be done by the principal contractor but a specific check must be made on each site by the Supervisor or person in charge of the work to ensure that inspections are being made as required. He must also ensure that the scaffold is suitable for the work to be carried out by our employees. This requirement applies to mobile towers as well as fixed scaffolding.

- 18.16 Work in excavations will not be allowed without a specific risk assessment. This assessment will identify the requirements for the provision and use of suitable supporting equipment or other arrangements to prevent collapse or falls of materials. The provision of safe access will also be identified. The Supervisor will inspect the excavation's support system before the start of each day's work. Excavations will also be inspected before entry on the first occasion, after substantial change or circumstances likely to affect the stability or supporting arrangements and at seven-day intervals thereafter. The results of the inspections will be recorded. Assessment, planning, work and inspection will be carried out in accordance with the recommendations of HSG 185 health and safety in excavations. Work in unsupported excavations where there is a risk of injury as a result of collapse or materials falling will not be allowed.
- 18.17 <u>Buried cables</u> should be anticipated on every site where excavation work is to be carried out, and the Supervisor or person in charge of the work must obtain cable plans where available and make specific enquiries where they are unavailable. The position of buried cables must be clearly marked on site and treated as live. Power tools and machinery must not be used knowingly within 0.5 metres radius of a buried cable, and hand-digging with spades only is permitted. If in doubt, seek the advice of the Electricity Company or relevant undertaking.

#### 19. Stress

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

# 20. Company vehicles.

- **20.1** The Company will maintain company vehicles at intervals recommended by the manufacturers. Drivers are responsible for reporting any defects that are hazardous to passengers or could render the vehicle un-roadworthy. It is the driver's responsibility to ensure that loads are properly secured and the vehicle is not overloaded. Drivers of company vehicles are expected to drive in a safe and considerate manner. Drivers who fail to comply with the provisions of the Road Traffic Act will be subject to disciplinary action.
- **20.2** Under no circumstances must hand-held mobile telephones be used whilst driving a company vehicle. All drivers must pull over to the side of the road and switch off the engine before either answering or making calls. Hands-free kits may be used at the driver's discretion but calls should be kept as short as possible and drivers should not allow themselves to be distracted.

### 21. Environmental impact

**21.1** As our activities may have environmental implications, we pursue a policy designed to minimise environmental damage. Our operations will be managed and organised so as to reduce, so far as is reasonably practicable, environmental damage caused by noise, dust, disposal of waste/redundant materials and damage to groundwater and drainage systems. In pursuance of this policy, environmental considerations will be taken into account in tendering.

# 22. Smoking

- 22.1 In accordance with The Health Act 2006, it is the policy of this company that all our employees have a right to work in a smoke-free environment.
- **22.2** Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace and in company vehicles.
- 22.3 It is expected that other employers or persons controlling premises where company employees may be working will comply with their duty in enforcing this legal requirement. Employees should contact the Health and Safety Co-ordinator or the Supervisor responsible for the work in a situation where the prohibition is not being observed.

### 23. Information for employees and others

- **23.1** Other contractors and clients will be given a copy of this Policy Statement on request.
- **23.2** Employees will be asked to read this Policy Statement on joining, as part of their induction training. Their attention will also be drawn to the generic risk assessment system and specifically to those hazardous operations applicable to their work.
- **23.3** Employees will be advised by the appropriate Supervisor of any risks drawn to our attention by other employers sharing a particular workplace.

# 24. CDM compliance and Design safety.

- **24.1** It will be our practice to co-operate fully with the Client and Principal Contractor when appropriate, and with other designers involved in projects to make the maximum contribution to design and general site safety.
- **24.2** The Supervisor responsible for the site will take all reasonable steps to ensure the health and safety competence of all employees and subcontractors carrying out work for the Company.
- **24.3** Those preparing designs on our behalf will alert clients to the duties they may have under the Construction (Design and Management) Regulations 2015, and follow the designer's duties as defined within the Approved Code of Practice to the Regulations.
- **24.4** The guiding principles for all designs prepared by us will be to design to avoid risks to health and safety so far as is reasonably practicable, to reduce risks at source where avoidance is not possible, and to include relevant information with the design. Only persons competent to produce designs will be permitted to do so.
- **24.5** The Managing Director has the final responsibility for design safety matters and he is to ensure the competence of any external designer used and of any subcontractor to whom work is passed.
- **24.6** The Health and Safety Co-ordinator will ensure that when appointed Principal Contractor the Company complies with its duties under the Regulations.

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#### **SAFETY POLICY STATEMENT**

#### **APPENDIX 1**

#### **RESPONSIBILITIES**

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

- a) Mr T A Abrook (Director with overall responsibility for health and safety) will:
  - i. initiate, administer and interpret the effective implementation of the Health and Safety Policy.
  - ii. have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Factories Act 1961, the Management of Health and Safety at Work Regulations 1999, the Construction Regulations, the Workplace (Health, Safety and Welfare) Regulations 1992 and relevant special Regulations and Codes of Practice.
  - iii. arrange for funds and facilities to meet the requirements of the Policy.
  - iv. be aware of changes in legislation which affect our activities.
  - v. promote the safe conduct of work generally, and review our safety policy and performance, arrangements and generic risk assessments annually in liaison with M Abrook as the appointed competent person for the Company.
  - vi. reprimand any employee failing to exercise their safety responsibilities.
  - vii. receive and consider suggestions made by employees concerning their health and safety at their workplace, and for improving our health and safety performance generally.
  - viii. set a personal example, including the wearing or use of protective clothing equipment as appropriate on site visits.

# b) Mr R. Wooster (Health and Safety Co-ordinator) will:

- i. have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, the Construction Regulations, the Workplace (Health, Safety and Welfare) Regulations 1992 and relevant special Regulations and Codes of Practice.
- ii. be aware of changes in legislation which affect our activities.
- iii. promote the safe conduct of work generally, and review our safety policy and performance, arrangements and generic risk assessments annually in liaison with the Managing Director.
- iv. co-ordinate health and safety information and disseminate such information in his position as an appointed competent person under the Management of Health and Safety at Work Regulations 1999.
- v. take responsibility for the design function within the Company as it relates to health and safety issues and compliance with the Construction (Design and Management) Regulations 2015.
- vi. be responsible for making direct telephone and written notifications of serious injuries, dangerous occurrences and notifiable diseases to the enforcing authority, and take charge of office-held health and safety documentation.
- vii. review our health and safety training needs at regular intervals, and review with new employees and apprentices hazards and specific rules relating to the work to be done.
- viii. investigate serious accidents and dangerous occurrences.
- ix. carry out risk assessments for office work, including display screen workstations and manual handling tasks, and be responsible for health and safety generally within the office and stores.
- x. ensure that office fire and emergency procedures are in place and that fire-fighting equipment is serviced regularly.
- xi. set a personal example, including the wearing or use of protective clothing equipment as appropriate on site visits.

- c) The Contract Manager (Mr M Abrook), when responsible for projects will:
  - i. have an understanding of the application of the Construction Regulations, the Gas Safety (Installation and Use) Regulations 1998, and other legislation relevant to our activities, and a general knowledge of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and relevant special Regulations and Codes of Practice.
  - ii. be aware of changes in legislation which affect our activities.
  - iii. ensure that tenders are adequate to cover sound methods of working and the provision of the required welfare facilities.
  - iv. determine at the project planning stage:
    - a) the most appropriate method and safe system of working
    - b) the provision of welfare and sanitation facilities
    - c) hazards which might arise, and complete risk assessments as required
    - d) whether asbestos is present by making specific enquires
    - e) allocation of responsibilities
    - f) necessary fire precautions
    - g) adequate first-aid facilities
  - v. take all reasonable steps to ensure the competence in health and safety of any persons or contractors to whom work is subcontracted, as required by the Construction (Design and Management) Regulations 2015.
  - vi. carry out site-specific risk assessments for general risks, and for special work activities identified in Section 12.1 of the Policy. They will identify and determine precautions and control measures necessary in particular circumstances, especially in respect of the identification of the need to wear personal protective equipment, and manual handling tasks.
  - vii. devise safe systems of work where necessary, particularly for work where specific risk assessments have been made.
  - viii. arrange for the assessment of any COSHH substances found or created during our work, and for the giving of necessary instructions, training or equipment to employees which the assessment finds to be necessary.
  - ix. provide first-aid facilities to site or ensure that arrangements are made with the client or the principal contractor for the provision of adequate first-aid facilities, which will be available during working hours.
  - x. investigate serious accidents and dangerous occurrences.
  - xi. set a personal example, including the wearing or use of protective clothing or equipment as appropriate when visiting sites.

# d) <u>Supervisors</u> will:

i. have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 the Construction Regulations, and relevant special Regulations and Codes of Practice.

**HEALTH & SAFETY POLICY** 

- ii. be aware of changes in legislation which affect our activities.
- iii. organise sites so that work is carried out to the required standard of health and safety with minimum risk to persons, equipment and materials.
- iv. ensure that places of work and working platforms (including scaffolding) are inspected as required prior to use and at weekly intervals.
- v. ensure that hazards from material storage and stacking, positioning of plant and installation of electricity supply are eliminated.
- vi. plan and maintain tidy work areas.
- vii. ensure that working methods established do not require or allow persons to take unnecessary risks.
- viii. ensure that all tools and equipment used by employees are suitable for the purpose which they are used and are in good condition.
- ix. ensure that all tools and equipment used by employees are properly maintained and that suitable maintenance records are kept
- x. advise employees on site of any risks drawn to the Company's attention by other employers sharing a particular workplace, and distribute information contained in the site's health and safety plan where this is applicable under the Construction (Design and Management) Regulations 2015.
- xi. make and issue specific risk assessments where necessary, and modify generic risk assessments applicable to the work.
- xii. ensure that users of articles and substances supplied or hired to us are made aware of any necessary instructions or information provided by the manufacturer or supplier which assists with the taking of necessary measures for their own or others' health or safety.
- xiii. issue work method statements in written form where necessary or required, and be available to give advice on precautions needed to control any site risks not previously identified.
- xiv. carry out manual handling risk assessments, and determine precautions and control measures so as to minimise risks to employees from manual handling activities carrying a risk of personal injury, so far as is reasonably practicable.

- xv. ensure that personal protective equipment is issued and worn by employees wherever necessary, as identified by risk assessments, providing information, instructions and training on the proper use, maintenance, care and storage of equipment, as required by the Personal Protective Equipment at Work Regulations 1992.
- xvi. ensure that appropriate fire-fighting appliances are maintained on site as necessary.
- xvii. ensure that adequate first-aid facilities are established and are available during working hours.
- xviii. accompany Health and Safety Executive Inspectors on their site visits.
- xix. review with new or transferred employees hazards and specific rules relating to the work to be done, in addition to their job induction training.
- xx. attend site meetings where health and safety matters are discussed.
- xxi. set a personal example, including the wearing or use of protective clothing equipment on site visits.

# e) Employees will:

- i. use the correct tools and equipment for the job, including safety equipment and protective clothing as necessary.
- ii. keep tools in good condition.
- iii. report to the person in charge of the work any defects in plant or equipment of which they become aware.
- iv. develop a personal concern for safety for themselves and for others, particularly newcomers and young people.
- v. avoid improvising which entails unnecessary risks.
- vi. warn new employees of known hazards.
- vii. refrain from horseplay and the abuse of welfare facilities.
- viii. report incidents which have led or may lead to injury.
- ix. suggest ways of eliminating hazards.
- x. co-operate in the investigation of any accidents.
- xi. set a personal example.

### In addition, first-aid 'Appointed persons' will:

- xii. ensure that the first-aid boxes in their charge are maintained correctly stocked, requesting replacement items from the Buyer when necessary.
- xiii. summon help if required to do so in an emergency.

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#### **SAFETY POLICY STATEMENT**

#### **APPENDIX 2**

### **OFFICE SAFETY RULES**

This Appendix to the Safety Policy, which is a supplement to the Safety Rules set out in Section 10 of the main Safety Policy document, sets out the safety rules which must be observed by all employees working in our offices at 326 High Street, Harlington, Hayes. These have been derived from our risk assessments.

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

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

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#### **SAFETY POLICY STATEMENT**

#### **APPENDIX 3**

### **JOINERY SAFETY RULES**

This Appendix to the Safety Policy, which is a Supplement to the Safety Rules set out in Section 10 of the main Policy Document, sets out the safety rules which must be observed by all employees working in our Joinery Workshop located at 326 High Street, Harlington, Hayes. They have been derived from our risk assessments.

#### General

- 1. Only persons suitably trained in operating woodworking machinery and authorised by the Company are allowed to operate the joinery machinery.
- 2. Area surrounds to machines are to be kept clear of wood waste and timber pieces.
- 3. Joinery walls, ledges, lights and machinery are to be kept clear of wood waste and timber pieces.
- 4. Good and efficient lighting is to be maintained throughout the joinery. Defective or inadequate illumination is to be reported to the Managing Director.
- 5. Pushsticks and/or push blocks are to be readily available to feed pieces to woodworking machines, to prevent hands being exposed to their cutting edges.
- 6. Push sticks of hardwood are to be used for feeding a bench saw any cut of less than 305mm in length or when feeding the last 305mm of a longer cut.
- 7. Damaged or defective machinery is to be reported immediately to the Managing Director.

### **Machinery** guarding

- 8. No cleaning of machines, or adjustment of the guards or fences, is to be carried out while the machines are in operation.
- 9. Adjustable bridge guards on the planing machines and saw blade guards on circular saws are to be adjusted securely to suit the work piece and its size.
- 10. Guards for individual tools on the combined machines are the same as for single-purpose machines, and extra care is to be exercised to ensure that tools not in use are also protected.

11. The cutters of the vertical spindle moulding machine is to be guarded and enclosed to the greatest extent practicable, as permitted by the work to be carried out, by the use of false fences, saw guards with pressure pads, jigs and pressure springs. The most appropriate method of guarding must be selected and used for each operation at the machine.

### **Blades and cutters**

- 12. All machine cutters and blades are to be checked before they are mounted to ensure that they are in good condition, with care being exercised to ensure that their securing nuts or set bolts are properly tightened and secure.
- 13. Only one piece of timber is to be thicknessed at a time on the planing machine if the anti-kickback device is not fitted or becomes inoperable.
- 14. No sawblade of a diameter of less than 60% of the maximum the saw-bench will accommodate is to be used.
- 15. Riving knives on bench saws must be curved to the saw-blade arc, be slightly thicker, and set in line with the saw blade, with its knife edge adjusted to within 13mm of the sawblade teeth at table level.

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

- 16. Control measures determined as a result of COSHH assessments are to be provided, used and maintained to ensure that they effectively protect against substances hazardous to health (e.g. wood dust).
- 17. Operatives will be provided with appropriate information, instruction and training to ensure the effective use of any necessary control measures to protect against substances hazardous to health.

#### Noise

18. Necessary control strategies which are determined as a result of assessments of noise levels, will be provided, implemented and maintained to ensure the protection of operatives against those levels which are likely to cause damage to their hearing.

This statement was approved on 27<sup>th</sup> January 2020 by London Office Interiors Managing Director Tony Abrook, who will review and update it annually.

Managing Directors signature

**Tony ABROOK** 

DIGITALLY SIGNED BY TONY ABROOK

DATE: 27/01/2020

27/01/2020