

J & E Hall Limited



Health and Safety Management Plan



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Abbreviations

The following abbreviations are used in this manual:

A.I.R.	Accident / Incident Rate
CEA	Capital Expenditure Authorisation
COSHH	Control of Substances Hazardous to Health
LEPd	Measurement of Noise Exposure
PASMA	Prefabricated Access Suppliers' & Manufacturers' Association Ltd
PUWER	Provision and Use of Work Equipment Regulations 1998
Table 1 Abbreviations	

1. Responsibilities

1.1. Managing Director

The Managing Director is the senior executive of J & E Hall Limited, and its subsidiary companies, with ultimate responsibility for all aspects of Health and Safety at work.

The Managing Director will ensure that there is an effective Health and Safety Management Plan in place and that there is an adequate organisation and arrangements to ensure that this Management Plan is implemented throughout each of the company's business units.

They will ensure that there are the necessary arrangements to monitor the effectiveness of the Health and Safety Management Plan and will report to the Board on all matters relating to Health and Safety at work.

The responsibility for Health and Safety at work will be delegated to all Senior Managers.

1.2. Senior Managers 'Top management'

The Senior Managers will be responsible for the health, safety and welfare at work of all employees under their control and will ensure that Health and Safety receives equal priority with all other managerial responsibilities and that there is full compliance with relevant legislation.

They will ensure in particular that there are adequately documented procedures for establishing and auditing standards, which will include:

- Provision and maintenance of safe plant and safe systems of working;
- Arrangements for the safe storage, handling and transportation of articles and substances;
- Provision of information, instruction, training and supervision;
- Provision and maintenance of safe means of access and egress;
- Provision and maintenance of a safe working environment;
- Provision of adequate welfare facilities, including first aid;
- Procedures for the reporting and investigation of all accidents, incidents and dangerous occurrences and for the implementation of remedial action;
- Arrangements to ensure that appropriate standards of safety are provided in respect of all products, equipment and processes supplied;
- Provision for Portable Appliance Testing.

To assist in achieving these standards, the Managing Director will appoint a competent Company Health, Safety, Quality and Environmental (HSQE) Manager who, assisted by company regional safety committee members, will make arrangements to the satisfaction of the Company Executive.

1.3. **The Company Health, Safety Quality and Environmental (HSQE) Manager**

The Company HSQE Manager reports directly to the HR Director. The HSQE Manager will work with the elected employee safety representatives to ensure compliance with Company policies and standards.

They will:

- Prepare reports on Health and Safety matters and prepare accident statistics on a monthly and annual basis;
- Advise the Company in respect of Health and Safety at work and will develop initiatives in conjunction with the Senior Manager;
- Ensure that the procedures for accident reporting and investigation are properly enforced;
- Organise the Company Safety Committee meetings and make recommendations for Companies Health and Safety Management Plan;

Where appropriate liaise with:

- Government Agencies, Employers' and Trade Associations;
- The 'Corporate Manger' on property and liability matters.

1.4. **Company Safety Committee**

The Company Safety Committee will meet under the Chairmanship of the HSQE Manager and will meet as a minimum once annually. It will review safety performance, accident trends and accident statistics.

It will consider, in particular, the implication of new legislation, UK directives and industry standards and their implementation throughout the Company. This will include the preparation of Company guidance where appropriate.

The Committee will also review the provision of Safety Training throughout the Company

1.5. **Employees**

All employees are responsible for acting responsibly and ensuring that their acts or omissions do not endanger or harm themselves or others. All employees are responsible for taking all reasonable care for the Health and Safety of themselves and others whom their actions or omissions may affect.

Employees will never intentionally or recklessly misuse or interfere with the Health and Safety systems and procedures that are in place at the company.

They will be expected to co-operate with management and staff on all matters, relating to Health, Safety, Welfare and the Environment.

Employees are responsible for reporting any accidents, incidents, near misses and dangerous occurrences in accordance with this document to the HSQE Function.

1.6. **Other Legislation**

Given the diversity of the Company, parts may fall under the scope of specific legislative requirements, which establish overriding considerations to those set out above.

2. Arrangements

2.1. Introduction

This document sets out the details of arrangements within J & E Hall Limited and subsidiary companies for the health, safety and welfare at work of all employees.

In this document, reference to safety should be construed as meaning, health, safety and welfare at work.

These arrangements form part of the HSQE Policy, should be regarded as the basic minimum standards, and should be adhered to. Company Safety Guidance and Safety Bulletins will supplement them from time to time.

Company Safety Guidance will be produced either where the requirement for a Company approach is paramount or where it is desirable to achieve benefits of scale and cross-fertilisation within the Company. This will include producing concise guidance on identified risk areas such as controlling contractors, activities requiring Permits to Work, etc.

Safety Bulletins will also be issued and will be produced where a quick response is required to communicate advice to all within the Company concerning any aspect of health, safety, welfare and where action is urgently required.

2.2. Accident Reporting and Investigation

The Company has adequate arrangements in place for the reporting of accidents and major incidents that occur to any employee whilst at work. These arrangements will include the reporting of accidents to non-employees and all major losses. These will include all lost time cases, which exceed 1 day or where medical treatment has been provided. This will be in addition to recording all first aid treatments that may occur on site, and which should be recorded in the accident book.

All such accidents and major incidents, which involve more than 1 day's lost time, must be thoroughly investigated by the Site or Line Manager and an Accident Report produced containing recommendations for preventing recurrence.

Electronic Accident Reports are available to the Senior Manager responsible for the site and the HSQE Manager for action

The company accident policy clearly defines the roles, responsibilities, and time scales for the reporting of the accident, incident or near miss

All fatal accidents to employees or a member of the public must be notified immediately to the HSQE Manager, Managing Director, HR Director.

2.3. Accident Statistics

The Company will produce accident statistics on a monthly and yearly basis. The statistics will be calculated on an Accident / Incident Rate (A.I.R.) basis, which will be defined as the number of reportable incidents x 100,000 and divided by the total no. of persons at risk.

These statistics will also include the total number of days lost.

2.4. Auditing and Monitoring

The Company has its own Health and Safety Policy arrangements, which set out the basic standards that apply in its particular area of business, and reflects the profile of risk within that business.

The Company has effective arrangements for the auditing and monitoring of those safety standards at each work place. This will be supplemented with additional monitoring by the Senior Manager, which must be carried out on permanent sites as per the audit schedule.

The Company HSQE Function will also audit at appropriate intervals.

Reports will be produced following each inspection or audit by the HSQE function who will detail any recommendations together with responsibilities for action, which must be submitted, to the line management responsible for the site with copies to the Senior Manager and HSQE Manager.

Where recommendations have not been implemented by the agreed date, the HSQE Manager will notify the Managing Director.

In those cases where recommendations are not agreed or accepted, then the Company HSQE Manager will advise the Senior Manager.

Situations, which are not able to be resolved at Senior Management level, will be referred to the Managing Director.

2.5. Contractors and Visitors

The Company will ensure that there are comprehensive and effective arrangements in place for controlling contractors engaged by the business Groups.

These will include proper vetting of contractors to determine their competence and quality of service and to ensure that they carry sufficient public liability insurance cover.

Business Groups must ensure that before any major contract is agreed that the contractor has been fully vetted and acquainted with the contract conditions

The contractor has to provide a risk assessment and method statement (i.e. how the work is to be carried out safely without adversely affecting the Health and Safety of his or her own employees, J & E Hall employees or the general public).

A full list of contractors approved and used by J & E Hall Limited and subsidiary companies, is kept with the HSQE Function for verification and auditing.

The contract conditions may need to be supplemented from time to time to draw attention to any special conditions which may be necessary and which may include the need for permits to work.

These arrangements should also ensure that responsibility for monitoring the contract is assigned to a manager of suitable status to ensure that the contractor observes the agreed conditions.

The Company will ensure that at all its sites there is an effective procedure to ensure that all visitors to site are directed to reception or to the manager of the site and that where applicable they sign in and are issued with an appropriate form of identification.

It is the responsibility of employees to ensure that visitors are fully acquainted with any safety rules that are applicable on site and are provided with adequate personal protective equipment where it is required.

2.6. Discipline

The compliance by all employees with specific safety procedures forms part of their conditions of employment.

Where there is clear evidence of a persistent and/or serious breach of these safety procedures then individuals will be subject to the normal disciplinary procedure. In serious cases of misconduct, which is likely to jeopardise or adversely affect the Health and Safety at work of other employees or the public, then dismissal may be applied in accordance with normal procedures.

2.7. Safety Representatives and Safety Committees

J & E Hall Limited will ensure:

- The principle of employee representation on health, safety and welfare matters;
- That the safety representatives are suitably trained, or they have access to the HSQE Manager for each site to advise the Line Managers on all aspects of health, safety and welfare at work;
- That an appropriate Senior Manager chairs safety committees on site and that meetings are held at least twice per annum. Minutes should be published after each meeting, which should identify recommendations and responsibilities for action with time scales for completion.

Copies of minutes should be circulated with a copy for each notice board and the Company HSQE Manager.

HSQE manager has as authority to have access to all sites and safety-related information and to prohibit uses of equipment or any activity, which he/she deems to present imminent or immediate danger.

Where the size of the site or operating unit permits, a safety committee will be set up which should include adequate representation of all working groups on site consistent with the effective working of the site and the committee.

The Safety Committees will review previous inspections and audits and consider any recommendations, which are outstanding.

2.8. Disposal of Plant and Equipment

Any Senior Manager who wishes to dispose of obsolete plant or equipment should either offer it as scrap or dispose of it via a dealer in second hand-equipment.

The disposal of equipment by part-exchange is also acceptable provided it is via a dealer or supplier.

If the plant, equipment or article is to be sold or supplied for use at work, i.e. to be sold or supplied for the purpose for which it was designed, then the equipment should have all the necessary safeguards or safety systems.

This is to ensure that it is safe and without risks to health when it is used, set, cleaned and maintained.

The equipment, plant or article can only be supplied in a deficient state if the customer is prepared to provide a written undertaking, that they accept the liability and agrees to take the necessary action to ensure that it will be safe and without risk to health when it is used, set, cleaned or maintained.

2.9. Employers Liability

The Commercial department at Head Office administers employer's liability claims and it is essential that accurate and precise information about accidents and claims for ill health be forwarded to the Commercial department as soon as possible to ensure a prompt settlement wherever possible.

2.10. Fire

Fire on any site can result in injury to people and damage to property and seriously disrupt the business.

Each site has a fire risk assessment, which will include the appointment of a suitable number of fire marshals.

There should also be adequate procedures in place to ensure that there are fire protection systems where they are appropriate and an adequate means for fighting fires.

Fully documented procedures must also be drawn up dealing with fire evacuation, the frequency of inspections for fire prevention, firefighting equipment and testing of fire detection equipment.

There should be a full fire evacuation drill carried out twice in every 12 months for all operating sites including main offices and that fire alarm systems should be checked monthly to ensure that they are fully functional and that a suitable record is kept.

2.11. First Aid

First Aid boxes of sufficient size to cater for the number of persons employed are provided in the offices and company vehicles in compliance with the 1981 First Aid at Work Regulations.

On sites where first aid cover is not provided by our clients adequate arrangements will be made and notified to employees on commencement of work on the site.

All manufacturing sites will, wherever it is practicable and appropriate, have a first aid room provided which should be under the control of the most senior qualified first-aider on site.

All first aiders, appointed persons and the location of first aid boxes will be identified on office notice boards.

Appointed persons / first aiders are to check the contents of boxes and replenish where necessary.

Suitable signage will identify first aid points and boxes.

2.12. Lone Working

Operations should, wherever practicable, be arranged and organised such that there are no situations where lone working exists on any operating site.

In those situations where lone working is necessary such as in the case of security guards, etc. then there should be special arrangements to monitor the status of the lone worker. When engineering staff are on a customer's site, lone working should be subjected to a risk assessment.

2.13. New Plant, Equipment and Buildings

The Company will ensure that persons initiating Capital Expenditure Authorisation (CEA) give due consideration to health, safety and environmental problems where these are relevant to the plant, process and/or buildings and he/she will consult, where appropriate with the Company Safety Manager and/or any other relevant technical specialist.

In addition, such procedures should also include the requirement for a formal acceptance procedure particularly in relation to the supply of new plant or equipment, which should be the responsibility of the Line Manager responsible for the project.

2.14. Noise

Wherever it is practicable all plants and operating units ensure that persons and employees are not exposed to a daily personal noise dose (LEPd) in excess of 80 dB (A).

Where noise levels at existing plants and installations exceed an (LEPd) of 80 dB (A) measures should be implemented to reduce the noise level by engineering means wherever it is reasonably practicable to do so.

When new plant and equipment is purchased the suppliers and / or employees must ensure that it will operate within the limits of a daily personal dose (LEPd) of 80dB(A) and not have an instantaneous peak sound pressure level of 200 Pascal's.

Noise assessments must be carried out at all plants, which should be repeated at least once every three years. The Company will ensure that there is an adequate system in place to keep records of noise assessments and other exposure records

2.15. Occupational Health

All prospective employees must be subjected to a simple pre-employment health check and copies retained on record.

Occupational Health Surveillance will be carried out in situations where it is deemed appropriate and which have been identified under the assessments carried out for the purpose of the Control of Substances Hazardous to Health Regulations.

All cases of occupational ill health must be referred to the HSQE Manager, HR Director and the company insurers.

2.16. Substance Abuse

Where employee performance is thought to be affected by drug or alcohol abuse. Employees who have been identified as having a drug or alcohol problem will be given the opportunity to seek treatment to which the employee is expected to conform. Failure to sustain the treatment agreed will lead to disciplinary measures being instituted.

Disciplinary measures will also be instituted against any employee who is unable to fulfil his or her function because of alcohol or drugs.

2.17. Personal Protective Equipment (PPE)

All employees are provided, where required with adequate protective footwear. There should also be suitable arrangements for the provision of safety hats, gloves, overalls, respirators, hearing and eye protection where they are deemed appropriate and for ensuring that such equipment is worn.

Where employees who wear prescription spectacles are engaged in activities, which require the wearing of eye protection, they will be provided with the appropriate prescription where this is available for the class of eye protection required for the process or activity.

2.18. Product and Process Safety

All employees engaged in the design and manufacture of new (or the modification of existing) plant and/or processes must have adequate procedures in place to ensure that safety is built at the design stage of all new projects whether they be plant and equipment or new processes or buildings.

In respect of new plant and equipment design standards which clearly set out the safety criteria required and that they take account of current legislative requirements.

There should also be consideration, of not only mechanical safety requirements but also the potential risk associated with the electrical supply, static electricity, extremes of temperature, fire, explosion, noise, vibration, radiation and emissions of dust, gases and other fumes. The means of access and egress must also be considered.

Operations engaged in research and development work particularly in respect of new processes and/or products will ensure that proper investigations are carried out of the potential risk to health that may be associated with the use of the final product.

Wherever possible, these should be eliminated or reduced to a commercially acceptable level.

The actual and potential effects to the environment should also be investigated where this is relevant.

Where Company sites are engaged in supplying articles for use at work, e.g. either machinery or substances, there should be arrangements in place to ensure that adequate product safety information is provided to the user and that suitable records are maintained.

2.19. Site Security

J & E Hall Limited has clear responsibilities under the Occupiers Liability Act for sites, which it owns or occupies and all divisions must ensure that all sites whether operational or not are secure as far as is practical and that any special hazards are either protected or adequately marked or otherwise identified.

2.20. Substances Hazardous To Health

Wherever possible, all operations should seek to eliminate substances, which are potentially hazardous to health.

This will be done as part of the design of new products or processes, but where this is impractical for technical or other reasons then adequate controls must be applied so that all substances that may pose a health risk are effectively controlled.

Derived from the Safety Data Sheets, company usage and manufacturers instruction suitable and sufficient COSHH assessments are conducted for all substances hazardous to health, which will include handling, usage, PPE requirements and storage.

The Company will ensure so far as it is reasonably practicable that employees daily personal exposure to hazardous substances does not exceed the exposure limit assigned for the substance and that it is reduced to as low a level below the exposure limit as it is reasonably practicable to achieve.

The Company will have a program for monitoring the processes carried on and to ensure that hazardous substances are effectively controlled during storage, handling, transportation, processing, use and disposal.

2.21. Training

New employees will have Induction training 'Stage One' within the first week of their employment and then 'Stage Two', which includes; Safe Start and Your Start within the first six months of employment.

Additional training will be carried out according to the requirements of their job, and will include all situations when employees are re-assigned to a different job.

The Company will ensure that all managers are provided with adequate safety training so that they will be able to discharge their duties effectively. Safety training should also be provided for all line managers and supervisors.

There should also be adequate provision for the training of safety representatives or representatives of employee's safety.

2.22. Provision and Use of Work Equipment

The Company will take all reasonable steps to ensure that all work equipment i.e. appliances, apparatus, vehicles, tools or installations for use at work utilise the best practices as laid down in the regulations (PUWER) to ensure the safety of employees and any others that may be affected by their work activities.

It is the responsibility of all employees to use any equipment in the manner in which it is designed. No safeguards e.g. machine guards; safety trips etc. are to be tampered with or removed which are installed to protect the operator or any other who may be affected.

Supervisors and Managers are to ensure all required maintenance regimes are followed and employees are suitably trained in the operation of any such work equipment.

All portable electrical equipment will have 'portable appliance testing' carried out to ensure safe use of equipment by employees.

This testing is controlled centrally by the HSQE function (Inspection & Warranty Engineer) who maintains all records.

Before use any plant, equipment, machinery etc. is to be inspected prior to use to check for any abnormalities.

All testing is to be carried out annually. Certain items may be deemed to be frequently used and may require testing on a more or less frequent basis.

Portable electrical equipment will be clearly marked with current / due test date stickers and accompanied by a certificate.

An appointed contractor or an internal appointed employee, with the relevant qualifications, are to carry out all testing.

2.23. Provision of Welfare Facilities

The Company will adhere to all regulations laid down in the Workplace (Health, Safety and Welfare) Regulations 1992. All Company work premises will provide adequate welfare facilities; maintain them in a satisfactory condition to ensure a safe and healthy working environment for employees and any persons visiting any work premises.

The Company places a general requirement on itself and any employees in control of a workplace or workstation to ensure that all areas and locations under their control, where staff are employed, comply with the overall regulations.

2.24. Manual Handling

Information, Instruction and Training will be conducted for all employees. Where specific manual handling operations are identified within Risk Assessments and Method Statements, a specific Manual Handling Risk assessment will be completed.

A hierarchy of control measures will be identified and adopted to reduce the risk to as far as reasonably practicable level.

Where possible the use of suitable mechanical lifting / moving equipment is to be used to eliminate or reduce the risks associated with manual handling.

2.25. Working At Height.

Information, Instruction and Training will be conducted for all employees who will undertake working at height in their job roll.

Where specific Working at Height operations are identified within our Risk Assessment and are found to be above and beyond our general working conditions a suitable specific Working at Height Risk assessment will be completed for the operation.

A hierarchy of control measures will be identified and adopted to reduce the risk to as far as reasonably practicable level.

Only qualified employees are to erect, dismantle and inspect any access equipment.

Only PASMA trained employees are to erect, dismantle, inspect or alter any mobile tower scaffold.

All mobile tower scaffold is to be erected, dismantle, inspect or altered in line with PASMA training and manufacturers instruction.

The use of stepladders / ladders is to only be considered after other access equipment has been investigated or is suited to that particular operation.

Fixed scaffold is to be erected, dismantled and inspected by qualified sub-contractors only. All access equipment is to be only used by suitably trained employees.

2.26. Consultation / Communication

J & E Hall Limited, and its subsidiary companies will ensure effective communication between Directors, Managers, Supervisors, Employees, Customers, Sub-contractors and other interested parties.

The element of communication is an important part of the working environment. It allows individuals to gain information and knowledge on which they can then act. Most importantly, when communicating with others the party for which the message is intended needs to receive and accept it. Due to this two-way interface, the sender and the receiver should ensure that both parties interpret and act on the message in the same way.

All communication must be delivered effectively and address any barriers such as language, intermediaries, technical and perceptible.

Following all communication, the company will ensure that the received Information has been interpreted correctly and understood and communicated to all relevant personnel.

2.27. Display Screen Equipment (DSE)

The Health and Safety (Display Screen Equipment) Regulations 1992 apply to work with display screen equipment (DSE).

Information, Instruction and Training will be conducted for all employees who regularly use DSE. All employees who are required to carry out a DSE assessment can do this online through the company's electronic system

This organisation takes the health, safety and welfare of its staff seriously. It is our policy to meet the minimum Health and Safety requirements of the law. To provide a working environment that is both comfortable and maximises the effectiveness of employees.

Although the regulations only apply to DSE users or operators (an operator is a self-employed DSE user), to apply the principles to all DSE workstations, regardless of the category of user.

2.28. Electricity

All electrical equipment must meet the safety requirements of the Electricity at Work Regulations 1989 so that employees, customers and visitors are not exposed to danger. All fixed wiring and portable appliance testing will be conducted.

2.29. Driving

A comprehensive Policy document has been generated and can be obtained from the HR Function that clearly identifies both employer and employee responsibility.

A comprehensive risk assessment has been generated which also includes the safe use and inspection of trailers. All employees who may drive on company business will be subject to a periodic licence review.

2.30. Asbestos

Hazard identification and risk assessment are the basis for introducing practical preventive policies and control measures in the workplace. Information, Instruction, Supervision and Training on the risks, systems of work and the precautions to be taken will be communicated to employees and others who may, in the course of their work for or on behalf of J & E Hall Limited, and its subsidiary companies, be exposed to asbestos.

Training is to be provided for all employees on the hazards, risks and appropriate preventive control measures in order to fulfil the company's obligations under the Control of Asbestos Regulations 2006 and the Health and Safety at Work etc. Act 1974.

A comprehensive Policy document has been generated and can be obtained from the HSQE Manager.

2.31. Hot Work

The purpose of this policy is to provide information to all employees regarding safety when carrying out welding or hot cutting operations. The aim is to prevent injury or fire from the hazards associated with hot work within the workplace.

All hot work must be carried out under a permit to work, a risk assessment and method statement must be provided before the permit to work is issued.

2.32. Working in Sub-Zero Environments

Engineers will be subjected to working in sub-zero environments on the company's behalf as part of their employment.

Therefore, information, instruction, training and supervision will be provided along with any personal protective equipment required to carry out the tasks safely.

2.33. Construction Design Management (CDM)

Information, instruction training and supervision will be provided for those involved in CDM projects.

Site visits will be carried out by the Management and HSQE function and records kept.

Site waste management plans will be generated and communicated in line with current legislation.

2.34. Permit to Work

As part of our duties under the Health and Safety at Work, etc. Act 1974 to provide safe systems of work, the organisation has introduced permits to work for the following work activities.

- General Permit to Work for Contractor/Subcontractors;
- Hot Work;
- Entry into Confined Spaces;
- Working at Height;
- Work on High Voltage Electrical Equipment;
- Excavation Work;
- Maintenance of Power Presses;
- Work with Asbestos.

All Permit to Works issued must be completed on JEH-Q1-020 form.

The permit-to-work system applies to all the identified work carried out on site, and employees, contractors and visitors are all expected to comply with the requirements of any permits that are in force.

Employees working off site, i.e. on another organisation's premises, are expected to abide by all permits to work operated on that site. If no such permits are in use, employees must operate permit procedures, as they exist under their employer.

If additional permits are deemed necessary for certain off-site work, this must be raised with the appropriate person and the need for the permit determined.

Should employees experience any problems with the operation of permit-to-work systems, they should immediately inform a responsible person (usually a manager or supervisor) so the organisation can investigate and rectify the situation.

If the manager or supervisor are unable to rectify the situation then they are to raise the issue with the HSQE function

2.35. Risk Assessment

Risk assessments form the central strand of a self-regulated safety management system. The use of a risk assessment provides sound economic benefits to the organisation as well as satisfying legal requirements.

This policy is intended to reduce risks to the Health and Safety of employees and others who may be affected by the way in which we conduct our business. Those involved in the risk assessment process will receive appropriate training.

The persons responsible for conducting risk assessments and for reviewing existing risk assessments are HSQE Function and competent employees.

Site Specific Risk Assessments are completed on 'Contract Sites'. Engineers are to complete prior to starting work a 'Dynamic Risk Assessment' where no site specific risk assessment is available or upon review the site specific risk assessment has not identified all Hazards and Control.

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