

# Scenergy Limited Health & Safety Policy

#### **POLICY REVIEW RECORD**

This Policy for Health and Safety was first issued in this format in June 2010

Revision no.	Date	Details			
01	July 2011	Annual Review Dean Sykes & management			
02	July 2012	Annual Review Dean Sykes & management			
03	Jan 2013	Review of Policy & procedures Hunt & Sykes Safety Scenergy Management			
04	Jan 2014	Review of Policy & procedures Hunt & Sykes Safety Scenergy Management New Logo legislation up-dates			
05	Sep 2014	HV Amendments and reference to new HV safe working rules added by Jon Janz			
06	Jan 2015	Reviewed by Hunt and Sykes and Scenergy Management			

#### **HEALTH AND SAFETY POLICY AND PROCEDURES**

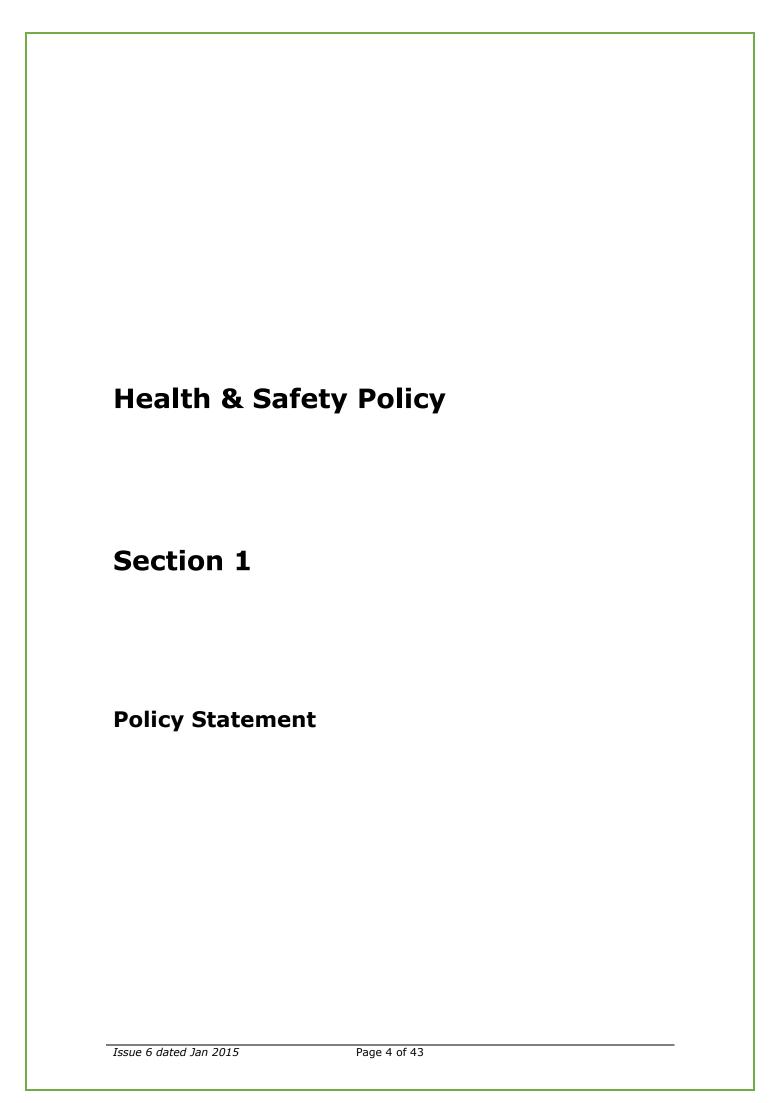
#### **INTRODUCTION**

We are aware of our duties and responsibilities in accordance with the Health and Safety at Work etc Act 1974 and other specific health and safety legislation.

The general objectives within the scope of the legislation are:

- To secure the health, safety and welfare of employees at work.
- To protect the people other than employees at work against risks to their health and safety arising from our actions / work activities.
- To identify hazards in the workplace, carry out risk assessments and introduce control measures in order to alleviate or reduce the risk to an acceptable level.
- To control the production, storage and use of substances hazardous to health and protect others coming into contact with such products.

To help us meet our Health and Safety responsibilities and our duty of care we have appointed the services and guidance of Hunt & Sykes Safety Ltd.



#### **Health & Safety Policy Statement**

Scenergy Ltd is firmly committed to ensuring the health, safety and welfare of the employees and others as a core business requirement alongside quality, productivity and customer satisfaction. We recognise people as the Company's most valued asset and, in aiming for an injury free work environment; they should not be placed at unreasonable risk at any time.

Through a pro-active and efficient management system we aim to promote, maintain and continually improve health and safety, whilst upholding legal requirements as a minimum.

The Managing Director is the person having overall responsibility for health and safety and its organisation and arrangements within the Company. A unified approach is required throughout all levels of the Company to ensure the safety of all personnel, our sub-contractors and those affected by our work operations.

Responsibility for the implementation of this policy lies with management and supervisory staff, while all employees are responsible for ensuring they co-operate and comply with this policy and all related safety standards and practices.

The Company will make all necessary resources available to ensure a successful health and safety management system. Senior management will provide necessary guidance and documentation through:

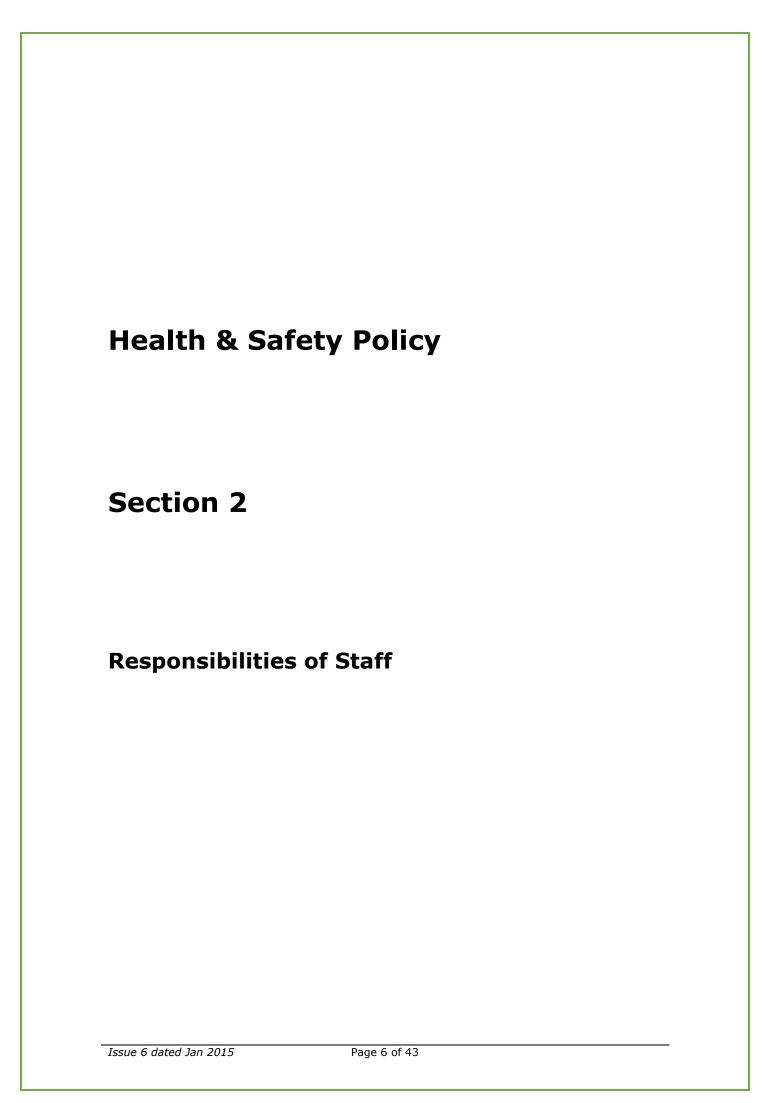
- Accepted safety standards and procedures
- Adequate instruction, information and training, and
- Implementation and strict enforcement of the Company Policy at all levels.

The management formally review this Policy and it's associated procedures annually. This review will take into account consultation with the workforce and any changes to work operations and relevant statutory requirements.

This Policy, and all subsequent revisions, will be made available at each work site for reference by any employee or interested party, as required.

A. Berry Managing Director Date: Jan 2015

Next review date: Jan 2016



#### 2. Responsibilities of Staff

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#### 2.1 Introduction

Managing Health and Safety is an integral function of management within The Company. It is therefore essential that this be reflected in the individual duties and responsibilities of every level of management within the organisation. Likewise, it is important to ensure that the avoidance of accidents and the provision and maintenance of safe and healthy workplaces is a common objective throughout the organisation, from directors to operatives. This will be achieved through the proactive management of Health, Safety and Environmental issues in conjunction with forward planning of all operations.

To this end, Health, Safety & Environmental responsibilities have been clearly defined as follows and are no less important than the responsibilities they may have in performing any other function.

#### 2.2 All Personnel/Office Based Employees

- Understand and adhere to the Company Policy for Health, Safety and Environmental matters.
- Actively promote at all levels the Company's commitment to effective Health, Safety & Environmental management.
- Make suggestions to improve the company's health, safety and environmental management.
- Ensure that each place of work is actively maintained in a safe manner, and accept ownership of the safety procedures laid down for their benefit.
- Work in a safe manner at all times and set a personal example by wearing appropriate Personal Protective Equipment within working areas.
- Assist the Company in achieving high standards of Health, Safety & Environmental performance.
- When working on a System under the Scenergy Electrical Safety Rules, or those of a Client, Comply and be conversant with those rules.

#### 2.3 Directors

 Provide the organisation, finances and resources necessary for the implementation of the Company Health, Safety & Environmental Policy.

- Ensure that staff at all levels receive appropriate training in relation to their employment.
- Monitor the Health, Safety & Environmental performance of the Company and take appropriate action whenever safety performance is below Scenergy Ltd standards.
- As Principle Duty Holder under the Scenergy Electrical Safety Rules I have ultimate responsibility to ensure appropriate advice is available on matters regarding the systems and equipment under those rules.

#### 2.4 Surveyor/Contracts Manager

- Ensure that Safety is planned at the pre-contract stage of all new projects.
- Identify the role and responsibility of the Company in respect of the CDM Regulations for each project.
- Identify the role and responsibility of the Company in respect of the application of the Scenergy Electrical Safety Rules or Clients Safety Rules for each project.
- Ensure the Health, Safety and Environmental Plan is prepared at the start of the project, develop the plan throughout the project and operate in accordance with it.
- Ensure method statements for work activities are in place and that activities are carried out in accordance with it.
- Make certain that, at all stages of a project adequate provision is made for welfare facilities including first aid, safe systems of work, suitable clothing and equipment, in order to avoid injury, ill health. Property and environmental damage and wastage.
- Plan safety into work activities, this will ensure that all teams have adequate time, resources, information, skills and training to carry out the operations safely.
- Discuss health, safety and environmental performance with all personnel at each location on a regular basis.
- Monitor the overall health, safety and environmental performance at each location and ensure that action is taken whenever Scenergy Ltd' standards are not being met.
- Ensure that all Supervisors are aware of their health, safety and environmental responsibilities, and allow sufficient time and resources for them to fulfil these responsibilities.

 Agree the competence of any sub-contractors prior to them commencing work. This will be done by the use of a preferred contractors database and the use of a Contractors Questionnaire.

#### 2.5 Site Managers / Site Supervisors

- Ensure that personnel with adequate skills and training are in each position to conduct all work in an organised, planned, safe and environmentally sound manner.
- Make full use of the services of the Company Safety Advisors, and take into account any recommendations made by them.
   Report any dangerous occurrences, reportable accidents or HSE visits to the Directors so necessary action can be taken.
- Understand the roles and responsibilities of the Company in respect of the CDM Regulations for each project.
- Understand the roles and responsibilities of the Company in respect of the application of the Scenergy Electrical Safety Rules or Clients Safety Rules for each project.
- Where a need is identified to deviate from the construction phase Health and Safety Plan/Method Statement, the Site Manager/supervisor will inform Head Office accordingly.
- Ensure that ALL new employees, including sub-contract employees are instructed in the Company requirements when being inducted.
- Organise and plan sites so that work is carried out to Company Standards with minimum risk to employees, other contractors, and members of the public, equipment, materials and the environment. Seek the advice of the Company Safety Advisors and assist and co-operate with regard to the implementation of any improvements, which may help to enhance these standards.
- Plan safety into all site operations; in particular by effective use of the site health, safety and environmental inspection reports.
- Ensure that adequate supplies of suitable personal protective equipment are available.
- Co-ordinate the activities of the Company sub-contractors and ensure that they are made aware of their Health. Safety and Environmental responsibilities.
- Assess the suitability of sub contractors prior to work commencing ensuring they have provided a suitable Method Statement for the work to be carried out.

- Ensure that COSHH, Noise and Risk Assessments in respect of Company and sub-contract activities are carried out and are in place, effectively monitored, reviewed and made available.
- Identify the requirements for Method Statements, and ensure they are produced and issued to all relevant individuals prior to commencement of works. Ensure the distribution of this information to Site Managers and or Supervisors and Operatives. Ensure that the method is followed and controlled.

#### 2.6 Operatives

- Ensure that you have received induction instructions at every site from the site supervision.
- Ensure that you have been given adequate task specific details (i.e. Method Statements, Risk and COSHH Assessments, and Permitry), and that you understand what is required, and you have the correct PPE, tools and equipment to carry out the task safely.
- Ensure that you follow the instructions given to you at the induction, and that you always act in a responsible, safe, and environmentally proper manner.
- Never knowingly work outside of your competency under the Scenergy Electrical Safety Rules or Clients Safety Rules
- Actively participate in the effective management of Health, Safety & Environmental issues by reporting all incidents, accidents and near misses.
- Keep your own work area tidy and safe, and actively encourage safe working by others.
- Bring to the attention of Supervision, any faults, defects or potential unsafe areas, systems of work, or equipment.

#### 2.7 Subcontractors

- Ensure persons under your control work in a safe manner and in accordance with this health, safety and environmental policy.
- Supply all requested Health, Safety and Environmental documentation for competence assessment purposes and contract specific documentation in a prompt manner and adhere to their requirements.

- Obey all site rules at all times and any instruction given by Scenergy Ltd management staff.
- Assist the Site Management in achieving Company Safety Standards by reporting unsafe operations and conditions.
- Suggest ways of improving overall health, safety and environmental performance.
- Ensure the provision of your services in no way compromises Health, Safety & Environmental performance.

#### 2.8 Visitors to Site

- Visitors to site, including Company personnel, must comply with this Health, Safety and Environmental Policy.
- Visitors shall ensure that they follow any instructions given (including PPE requirements), and act in a responsible manner.

#### 2.9 Company Safety Advisers

#### Upon request:

- Once the role and responsibility of the Company in respect of the CDM Regulations for each project is identified agree a course of action with the Contracts Managers and Site Manager/supervisors to satisfy these requirements.
- Assist site management in preparing the Contract Health, Safety and Environmental Plan prior to the project site activities commencing, and assist the site team to review the plan.
- Identify areas/ operations, which require specific safety/ environmental instructions and produce such documentation.
- Provide information in the form of instructions, Best Practice Guidance notes, Codes of Practice, relevant articles etc, and inform the site management of Company accidents/ incidents/ visits from the Health and Safety Executive and Environment Agency.
- Ensure the Company induction instructions are reviewed and are relevant to the work in hand and are effectively carried out for all operatives.

- Ensure by all necessary means that projects are being carried out to Scenergy Ltd safety standards.
- Advise the Site Managers/supervisors if the project is not likely to achieve satisfactory Health, Safety & Environmental Standards, and further advise the Contracts Manager as appropriate. Work with the Site and Contracts Manager to develop a corrective action plan.
- Communicate effectively with the Health and Safety Executive regarding policy, inspections, accidents and incidents, ensuring that accidents and dangerous occurrences are reported promptly.
- Investigate accidents and incidents as required by RIDDOR. Make known and discuss all findings and recommendations.
- Work with the Company Management team to identify any necessary changes or additions to the Policy and any specific areas of the policy where particular emphasis or improvement is required.
- Monitor the effectiveness of the company's approach to Health, Safety & Environmental issues by undertaking site inspections and audits and report on improvements necessary.
- Ensure that all risk assessments required by current statute are carried out, and that effective arrangements for briefing employees on the above are implemented.
- Ensure that the Head Office meets relevant safety requirements. Ensure that office based personnel receive appropriate health safety and environmental training and instructions.
- Do all that is reasonable to ensure all statutory registers, and Company site safety records are properly maintained.
- Bring to the attention of the Company Managing Director issues that are not being addressed and identify to them individuals that are not managing their operations in line with Company values, systems and procedures.
- As the nominated competent health and safety advisors for Foundations & Buildings Ltd Hunt & Sykes Safety Ltd can be contacted at any time by the management or employees. The following contact details are provided:

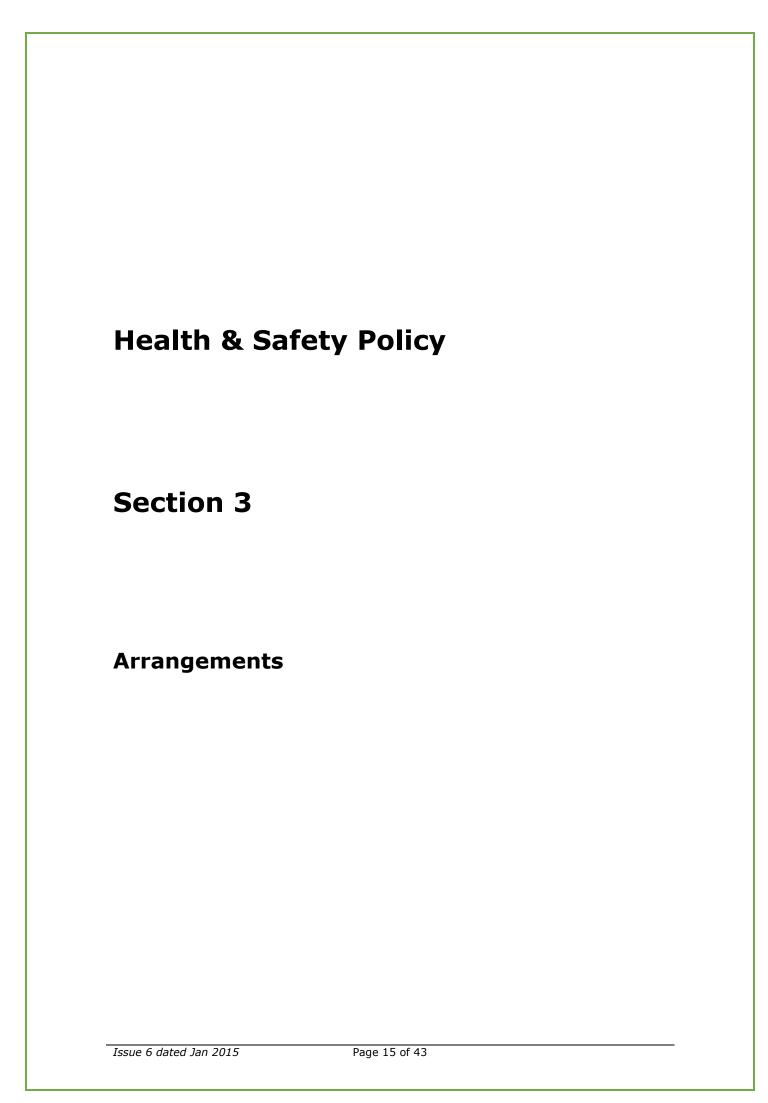
Hunt & Sykes Safety Ltd Commerce House Outer Circle Road Lincoln Lincolnshire LN2 4HY

Contact: Dean Sykes Mob: 07803 697058

Email: dean@huntandsykessafety.co.uk

Contact: Steve Hunt Mob: 07803 697059

Email: <a href="mailto:steve@huntandsykessafety.co.uk">steve@huntandsykessafety.co.uk</a>



#### 3. Arrangements

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#### 3.1 Introduction

The Company maintains a safety culture of proactive Health, Safety & Environmental management, based on principles that have consistently proved successful in the past, namely:

- Effective communication
- Empowerment of staff at all levels
- Information, instruction and adequate training
- Discipline
- Measurement and review of performance

The following section details the Company's Health, Safety Environmental Management Systems and its implementation throughout the business.

Health and Safety at Work Act 1974

#### 3.2 Proactive Planning Management

Project health, safety and environmental planning is addressed during the project feasibility study.

#### 3.3 Communication, Responsibility and Discipline

The Company ensures that all personnel are given a clear understanding of what is expected of them and the consequences when individuals do not co-operate. Communication, motivation and discipline are essential parts of the system. Operational personnel will be informed in the following ways;

#### a) Inductions and Briefings

All personnel employed by the company will receive an induction. Any persons wishing to enter onto a construction site must undertake a site-specific Health, Safety & Environmental induction detailing the known site hazards that they may encounter. This induction will be carried out by a senior member of staff and recorded.

Additional briefings will be required, including risk assessments, method statements, COSHH, noise assessments and environmental requirements, depending upon the nature of the work to be undertaken, and the materials to be used. The appropriate briefing record must be completed and retained.

As part of the induction process each individual is given a Policy leaflet detailing safety information emergency procedures and the Policy statement.

#### b) Site Managers/Supervisors

All Site Managers/Supervisors are made aware of their roles and responsibilities on each project before starting on site, with particular reference to Health, Safety & Environmental management. Each Site Manager and Supervisor is accountable for the provision of clear instructions to the personnel under their control.

Such instructions will include: -

- Identification of job-specific risks
- Methods of working
- Handling of materials
- Use of work equipment
- Use of personal protective equipment
- Environmental and waste management procedures

#### c) Notice boards

A Health, Safety & Environmental notice board will be established when we are the Principal Contractor in the main office area, when feasible which will display relevant information, and will include: -

- Company Health, Safety & Environmental Policy Statement
- Safety News Flashes
- Emergency procedures
- Relevant Insurance Certificates and Statutory Notices
- List of trained First Aiders
- Health and Safety at Work Poster

#### d) Consultation

To ensure an effective two way communication process is in place within the company between employees at all levels the following provisions are in place

- Sites are visited regularly by the MD and Contracts Managers who speak with employees.
- Safety Advisors visit sites monthly as directed and liaise directly with the workforce on Health, Safety and Environmental issues.
- Complaints forms are available within the company they can be submitted anonymously if desired and submitted to Head Office FAO: Managing Director.

#### e) Discipline

There is a formal disciplinary procedure within the Company. And the basic principles are as follows:

- Recorded verbal warning.
- Written warning.
- Final written warning.
- If an employee fails to correct his behaviour, offences may ultimately lead to dismissal with due notice.
- An employee may be suspended whilst alleged misconduct is investigated.

#### **Types of Offences**

The following are examples of the various categories of misconduct and/or poor performance, but the lists are not exhaustive.

### Misconduct – action taken at Stage 1 and/or Stage 2 of procedure

- a) unsatisfactory work
- b) poor timekeeping (repeated lateness or early leaving)
- c) failure to notify promptly reasons for absence in accordance with procedures
- d) smoking in designated No Smoking areas

#### Serious Misconduct - action taken at Stage 3 of procedure

- a) breach of confidence not amounting to gross misconduct
- b) unauthorised absence
- c) wilful breach of Health and Safety Regulations

#### **Gross Misconduct – action taken at Stage 4 of procedure**

- a) theft from Scenergy Ltd or its employees or clients
- b) fighting, threatening or assaulting another employee or a client
- c) incapacity for work due to being under the influence of alcohol or illegal drugs
- d) fraudulent wage claims or falsification of records
- e) gross insubordination
- f) harassment of another employee or client of Scenergy Ltd whether of a sexual, racial or otherwise offensive nature
- g) breach of confidence
- h) wilful destruction of Scenergy Ltd property and/or equipment
- i) wilful breach of Health and Safety Regulations
- j) wilful breach of legislation and/or the Scenergy Ltd policies on equal opportunities, sex, race and disability discrimination



#### 3.4 Training

Staff training is an integral part of the Company Culture. Training requirements are regularly reviewed by the management and cover every employee of the Company. It is our aim to ensure that all personnel receive the training they require to fulfil their appointment successfully.

A wide range of Health, Safety training is available to operatives. This includes task specific training for plant also, first aid, work at height, abrasive wheels, safety awareness.

The Company training needs are regularly reviewed to ensure that our standards are not compromised.

Site training requirements are reviewed at the start of each project and any shortfalls addressed this ensures that all personnel are adequately trained at all times.

The Company training records for each individual are maintained at head office and a training database maintained to record this training. It allows training to be structured and is regularly reviewed to identify any re-training requirements.

#### 3.5 Control and Dissemination of Information

Up to date health, safety and environmental information is received by the Company Safety Advisors, through safety Company membership, annual subscriptions to safety publications and update services both on CD-ROM and the Internet. This includes all current information relating to changes, reviews and additions to existing legislation, guidance, 'best practice' and enforcement implemented by the Health & Safety Executive.

All relevant health, safety and environmental information is passed on to staff, to promote awareness and to keep them up to date with legislation and codes of practice. This is done through safety visits, toolbox talks, and internal communication and Safety Bulletins.

#### 3.6 Policy Monitoring, Auditing and Review

Health, Safety & Environmental performance can best be enhanced through a policy of continuous improvement and analysis of past performance. From monitoring past performance of systems, individuals, projects and the like, new objectives can be set with performance parameters and criteria for measurement. New objectives and improvements add value to the Company as a whole.

Site managers/supervisors are responsible to monitor healthy and safety performance on a daily basis. At any one time there are a number of contracts ongoing, these are overseen by contracts managers who visit sites on a regular basis along with the Managing Director. The Safety Managers visit site on a monthly basis as requested and a report is produced and forwarded to the M.D who then circulates the report containing his comments and action points throughout the company.

The Management team meet regularly to discuss general safety issues that have arisen. This includes accident investigations, results of Company audits and new information pertinent to Health, Safety & Environmental issues, such as new legislation, codes of practice, Company information etc. Actions for future initiatives are discussed and agreed and new information from these meetings is distributed to all sites to encourage and motivate contract teams to manage Health, Safety & Environmental issues effectively.

This Health, Safety and Environmental Policy is reviewed annually, but also amended in accordance with changes in statutory legislation and improved company practices.

In addition, a pro-active and comprehensive insight into current legislation and industry trends is achieved by our Safety advisors maintaining active membership of the following organisations:

- Construction Industry Training Board (CITB)
- By information from both the Health & Safety Executive and the Environment Agency publications.
- By obtaining information from the Internet.
- (IOSH) Institution of Occupational Safety and Health
- (APS)Association of Project Safety
- (OSHCR) Occupational Safety and Health Consultants Register



#### 3.7 Risk Assessment and Method Statements

The Safety Advisors in consultation with contracts managers and site managers who have sufficient training/experience carry out risk assessments. They utilise a standard Generic Company format, and are used in conjunction with a site specific assessment that will make reference to generic assessments for more detailed information. These are always site-specific. The sites supervision is then accountable for ensuring that the risk assessment information is implemented and relayed to the relevant parties in a manner that is clear, understood and enforced.

Risk assessments will identify all hazards and evaluate risks to Company, other contractors, and the public. No work is to commence until the risk has been eliminated or reduced to an acceptable level. The site specific risk assessment will make reference to specifics of hazards that have not been fully eliminated or the control measures incorporated and signed by the person carrying out the assessment.

Company method statements will document an agreed safe system of work, for work with foreseeable high hazard content.

Method statements will specify stage-by-stage operations indicating the precautions necessary to protect operations personnel, staff occupying the premises and anyone else whom may be affected by the work.

The following features will be incorporated into Company method statements as a minimum: -

- Access provisions
- Safeguarding of existing work locations
- Safety of others
- PPE requirements
- Permit / isolation procedures
- Technique to be used
- Plant and equipment to be used
- Procedures for the prevention of area pollution
- Segregation of certain wastes
- Procedures to ensure compliance with specific legislation

The risk assessments used in writing the method statements would be included for the completion of site-specific method statements.

Management of Health and Safety at Work Regulations 1999



#### 3.8 Substances Hazardous to Health

Substances hazardous to health may be encountered in various forms, chemicals, radiations, dusts, gases, fumes and solids. As a company we do not anticipate the use of, or exposure to hazardous substances to our operatives.

Where a hazard is known adequate measures to protect the individual shall be implemented, this may be by eliminating that substance, substituting it for a safer alternative, supplying the appropriate personal protective equipment, ventilating or cleaning a

particular area, or removing the hazard by following specific safe procedures and practices.

The primary task however, will be to identify the substance then seek technical advice on all necessary precautions.

Where an unknown substance is evident or thought likely to be, advice will initially be sought from the Safety Advisors.

It may prove necessary to obtain advice from the Health and Safety Executive or other outside bodies.

Every effort will be undertaken to protect employees of the Company and others from harmful effects.

Control of Substances Hazardous to Health Regulations 2002

#### 3.9 Management of Sub-Contractors and visitors.

All specialist sub-contractors employed by the Company are carefully selected to ensure a high level of competence in the duties for which they are employed by satisfactory completion of a CDM questionnaire. Sub-contractors <u>must</u> satisfy the Company Managing Director / Contracts Managers as to their competence before commencement of work.

Where sub-contractors are not on the Company 'approved list', then pre-qualification plays a major role in influencing the selection of such sub-contractors. Pre-qualification requires that they submit their own Health, & Safety Policy and complete a pre-qualification questionnaire or valid SSIP certificate before being allowed to tender.

The pre-qualification questionnaire is used to identify past performance, experience and any enforcement action taken against them.

Sub-contractors, or anyone else under the control of the Company, will receive site-specific induction training detailing site rules and procedures.

These parties will also be monitored against their own method statements and risk assessments, which will require approval by the Company before any work commences on site.

The site induction and sub-contractor's risk assessment and method statements are used by site management and the safety managers to assess performance on site in relation to safe working practices. Failure to work in accordance with approved safe working practices can result in termination of contract and immediate dismissal from site.

Visitors to site, including management and client representatives, will also undergo a site-specific induction.

#### 3.10 Construction (Design & Management) Regulations

The Company is fully aware of its responsibilities under all current health and safety legislation, including the Construction (Design and Management) Regulations 2007 and has the necessary competence, experience and resources to carry out the role of a Principal Contractor & Contractor. Our safety procedures cover planning, utilisation of competent personnel in a co-ordinated team approach, training and, where necessary, discipline. The Company believes that following its procedures will enable it to fulfil all duties and requirements under these regulations.

The Company will, as a minimum:

- Have prepared an acceptable health and safety plan.
- Have allocated sufficient resources to ensure the efficient and effective management of health and safety.
- Employ competent personnel who have received suitable training for their individual responsibilities.
- Have a proven ability to carry out the intended works.
- Demonstrate an ability to manage and co-ordinate health and safety during the construction phase.
- Compile a project Health, Safety & Environmental file.
- Maintain an acceptable record of accidents and dangerous occurrences.
- Provide information, instruction and training as necessary to ensure the competence of employees and third parties.
- Provide suitable welfare facilities from the commencement of works.

Construction (Design and Management) Regulations 2007 & ACOP

#### 3.11 Design

Safe, high integrity and cost effective design is fundamental to the Company's continuing success, and hence the designers are required to consider Health, Safety and Environmental issues during the construction, future maintenance and final removal of supplied equipment, including the access to it. In considering this, designers will:

- Identify the hazards, which will occur during construction and maintenance and final removal
- Eliminate risks wherever possible
- Minimise the remaining risks

 Provide adequate information on the risks that cannot be eliminated.

The appropriate level of risk assessment will vary from project to project and from one operation to another. A large majority of work undertaken by the Company involves repeat work, which means that many risk assessments remain valid over long periods of time. These risk assessments can be used as a foundation for a site-specific method statement, where the working environment, specific to a particular project location, may vary the actual site hazards.

Construction (Design and Management) Regulations 2007 & ACOP



#### 3.12 Accident and Incident Reporting

Within the Company, <u>all</u> accidents/incidents and near misses must be reported to the Site Manager/Supervisor at the time of the event. For all injuries, including minor ones, the Site Manager must ensure that it is recorded on an accident report form and forwarded to Head Office.

The company secretary is responsible for reporting all reportable injuries in compliance with RIDDOR, this will be completed via the internet and copies retained. The Safety Managers will complete an investigation and produce an accident file for all reportable accidents /incidents this will include recommendations any further preventative procedures that can be implemented.

This reporting procedure is of the utmost importance as further investigation may need to be carried out by the safety department and the Health and Safety Executive may need to be notified. This procedure is the same for the reporting of incidents and near misses.

All incidents which require notification under the Health and Safety Executive Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 will be investigated as follows:

- Site manager/supervisor reports accident/ dangerous occurrence to Head Office.
- The Company secretary will contact the safety advisors if required to carry out an initial investigation.
- If reportable the company secretary will send the report to HSE via the internet reporting system and copies retained.

 Accident panel which may comprise of some or all of the following staff (depending on the severity of the incident) to discuss the investigation findings.

Directors
Safety Advisors
Contracts Manager(s)
Site Manager/supervisor(s)
Site Personnel

 Recommendations for preventative actions will be notified and/or be discussed with <u>all</u> Company site managers within two weeks of accident/ dangerous occurrence.

Accidents statistics are formulated from figures collated to generate statistics for the Company.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013



#### 3.13 First Aid

Provisions for First Aid will be supplied and kept at each workplace in compliance with the First Aid Regulations 1981 amended 2013, where more than one Contractor is on site, joint arrangements may be made.

A number of full time personnel have received training from recognised organisations and hold certificates of competency valid for three years.

At least one competent first aider will be resident at each workplace who will be responsible for ensuring first aid facilities are available and kept stocked.

Should the need occur, training of further personnel would be undertaken to ensure adequate arrangements are maintained on site.







#### 3.14 Emergency Procedures

Emergency procedures will be identified within the health and safety construction phase plan /Method Statement and should include procedures for any potential emergency situations, and remedial actions locations and contact details for emergency services etc.

The Company have contingency arrangements for dealing with emergencies; details of such arrangements are covered in induction training of Site personnel.

Information regarding emergency procedures is displayed in the workplace/ site accommodation units detailing site and national telephone numbers and assembly points.

Precautions are instigated at site to prevent fires and adequate fire fighting appliances are made available and a site specific fire risk assessment carried out when we are Principal Contractor.

#### 3.15 Fire Precautions

Suitable fire extinguishers shall be available for use where hot works are to be undertaken.

Precautions will be taken to prevent fires at work place, where hot works take place by using fire retardant materials to minimise the spread of sparks / hot slag.

The Site Manager/supervisor will inspect all facilities and operations as part of his contract duties and liaise with the PC and/or Client to confirm procedures prior to commencing work.

Used extinguishers shall be exchanged immediately after use, recharged and placed in spares stock.

A Fire Management Plan is in place for the Office premises this incorporates a fire risk assessment and details responsibilities including actions on discovering fire or hearing the alarm fire warden, marshals and maintenance procedures.

Regulatory Reform (Fire Safety) Order 2005



#### 3.16 Drugs, Alcohol and Substance Abuse Policy

The Company recognises that its own health is dependent upon the physical and physiological health of its employees. Accordingly, it is the right, obligation and intent of the Company to maintain a safe, healthy, and efficient workplace for all its employees, and to protect the Company's projects, equipment, operations and reputation.

The Company Policy on Drug, Alcohol or Substance Abuse aims to ensure a drug-free working environment, and to comply with criminal, civil and health and safety laws that relate to the maintenance of a workplace free from illegal drugs and alcohol.

The policy applies to all Company employees, including part-time workers, sub-contractors and agency workers. The Company notifies each employee by giving to them a written copy of the policy and obtaining from them a written acknowledgement that the policy has been received read and understood.

#### 3.17 Site Services and Accommodation

At planning stage it will be confirmed that facilities will be provided for all personnel on site where meals can be taken in clean and suitable surroundings. Provision will be made for the supply of hot and cold water for meals and drinking purposes.

Further provisions will be provided so that employees can wash before leaving site or taking meal breaks, toilet facilities will be required in adequate quantity for the number of persons employed.

Arrangements will be made to ensure accommodation facilities are maintained in a clean condition and good state of repair.

Compliance with The Construction (Design and Management) Regulations 2007 schedule 2 will be observed.

Construction (Design and Management) Regulations 2007 & ACOP Workplace (Health, Safety and Welfare) Regulations 1992

#### 3.18 Flammable Liquids and Gases



Storage to the requirements of Statutory Regulations will be undertaken for gas cylinders, chemicals, oils, paints and other flammable substances.

Where flammable substances of any description are used in confined areas adequate ventilation will be ensured to prevent a build up of fumes or gases.

Oils and greases will be stored away in containers.

Diesel oils will be stored in the open with easy access allowed for vehicles for re-fuelling purposes. Diesel tanks are to be bunded.

Paints and chemicals in small quantities will be held in secure storage.

Substances will be taken onto site in the correct containers, glass bottles are prohibited. All personnel handling flammable substances will be instructed in safe use of the material and warned of inherent hazards. Adequate fire fighting facilities will be readily available near storage and working areas.



#### 3.19 Lifting Equipment

All lifting equipment and lifting accessories will be tested, examined and certified in accordance with Lifting operations and Lifting Equipment Regulations 1998.

A competent person will visually inspect all lifting equipment and lifting accessories on a weekly basis and record the results of these inspections in the site lifting register.

Lifting equipment and accessories will be examined by a competent person before each use.

Competent Slingers, Riggers, Banksmen and Supervisory staff will be employed to ensure that all operations are conducted and controlled in a safe manner.

Suitable risk assessments will be carried out for lifting operations and safeguards put in place to ensure the safety of all personnel, plant and equipment, members of the public and others not involved in the lifting operations.

Suitable crane studies will be carried out for any large or unconventional lifts prior to lifting.

All relevant information will be supplied to personnel involved in lifting operations.

Lifting Operations and Lifting Equipment Regulations 1998

#### 3.20 Good Housekeeping

It is acknowledged a clean environment is safer, more pleasant to work in and is a pre requisite in pro active safety management, a duty is therefore placed on each Site Manager/Supervisor to ensure good housekeeping standards are maintained in each area throughout the projects operations.

As far as practicable, all scrap, debris and rubbish will be cleared as work continues and placed in designated disposal areas.

Spillage of oil, greases or other substances will be cleaned up with haste and all substances disposed of in accordance with Control of Substances Hazardous to Health regulations.

Tools and equipment will be stored securely, neatly and tidily.

Hoses and cables will be supported off floor levels wherever possible (above head height).

All gangways, stairways, scaffold platforms, access points, floor levels and fire exits will be maintained free from obstruction, clean and tidy.

#### 3.21 Confined Spaces



Before the onset of any work within a confined space, a suitable risk assessment must be carried out which will be specific to that individual workplace. Where risks are identified then suitable preventative measures must be put in place in order to protect all personnel involved.

Where there is a need for access into confined spaces, provision shall be made to ensure each confined space is safe, free from harmful substances and bears sufficient oxygen to support life before access is allowed without respiratory support.

Work will not commence in any confined space until contracts managers have been consulted, advice may be required from the safety advisors.

It may be necessary to undertake specialist training before work can commence and strict control and experienced supervision and a permit for work in place.

Confined Spaces Regulations 1997

#### 3.22 Floor Openings

Where openings in floors exist, fixed barriers or the openings covered shall be put in place to prevent falls of persons, plant or materials. If it becomes necessary to remove floor panels or sections of floor, correct authority / permitry, must be sought. Barriers may also be required at lower levels to protect people working below.

Additional PPE may need to be worn when removing floor gratings, i.e. Safety harnesses.

No floor sections may be removed without the permission of Site Management.

Work at Height Regulations 2005

#### 3.23 Barriers

Where a hazard is likely to exist from work activities, barriers shall be positioned to prevent unauthorised access, should circumstances require it the work area will be screened. This could be deemed necessary where grinding, burning or arc air operations take place and spark containment is required, or where weld glare may affect others not involved in the operation. Where the risk of a fall exists, a fixed barrier must be erected by a competent person.

Notices of warning of such hazards will be fixed at suitable points adjacent to the working area.

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All PPE is to be purchased from reputable suppliers meeting the requirements of British standards or European standards and displaying the CE mark on the product.

Sufficient quantities of personal protective equipment will be held on site suitable for any operation requiring bodily protection. Where it is not clear of the standard of PPE required the safety managers are to be consulted for guidance.

Gloves appropriate to the task being undertaken will be supplied, e.g., handling of fuels, chemicals or sharp objects.

Safety footwear is mandatory as necessary, sandals, trainers and ordinary footwear is not permitted in construction areas.

Safety helmets are mandatory on site in designated areas. Operatives are to have a helmet in their possession they may be removed on the discretion of the Site Manager dependant on the localised hazards.

Eye protection is mandatory in all work areas, when grinding, chipping, using a hammer and chisel or any other operation where injury to the eye is likely from flying objects, glare or chemicals, then appropriate levels of protection shall be worn.

Supervisors are to carry out monthly inspections of PPE to check for serviceability and replace if required. All issues of PPE are to signed for on the company PPE issue sheet and returned to head office (company secretary) to be retained.

Personal Protective Equipment at Work Regulations 1992



Wherever possible noise levels will be reduced to a minimum by offering suppression or substitution of plant.

However it is not always possible to reduce noise levels, as noise emitted from sources beyond the control of the company may be evident.

Some machinery in use does emit noise levels in excess of statutory action levels; in such cases the following will apply.

Sufficient supplies of hearing protection will be held and issued to personnel where noise levels exceed a safe limit.

Personnel will receive advice and instruction on the use of ear protection.

Signs shall be posted where noise levels are deemed to be excessive and hazardous to health.

Control of Noise at Work Regulations 2005

#### 3.26 Permit for Work Procedures

Where site conditions require it, a permit for work system shall be used and strictly adhered to, in some circumstances this will require the approval of the Site Manager or may be a requirement of the client or that specific site.

Only nominated personnel may take out, transfer and cancel permits for work.

All conditions entered on the permit shall be strictly complied with.

The nominated person shall be responsible to ensure such conditions are complied with, before a permit is cancelled he will ensure all tools and equipment are removed from the area, and all personnel withdrawn.

For particular activities, the company shall adopt comprehensive Safety Rules (Scenergy Electrical Safety Rules). Where these Rules apply, they must be made widely known and enforced by all managerial, technical and other supervisory staff and observed by all employees and by staff employed by contractors to work on sites controlled by the company.



#### 3.27 Plant and Equipment

Operation of plant will be by competent personnel only.

Routine weekly inspections will be undertaken by competent persons on site and recorded, defective items will be removed from service until repaired.

Should it be deemed appropriate, operational instructions for any item of plant or equipment will be kept on site and issued with the consent of site management.

Training may be undertaken on site, or where more appropriate, off site by specialist training bodies.

Where certificates of test and examination are required by statutory regulations, a copy of a current certificate will be held on site for each item of plant or material and available for inspection by interested parties.

Any item hired to site will be delivered with a current test certificate and relevant health and safety information, which shall be held on site for the duration of hire.

Provision and Use of Work Equipment Regulations 1998

Lifting Operations and Lifting Equipment Regulations 1998

#### 3.28 Abrasive Wheels



It is not permitted for any person to mount an abrasive wheel unless that person has been trained to do so, holds a valid Certificate of Competence and is authorised by the Company.

Before use, the user will ensure the correct guard is attached and properly adjusted. The rotary speed of the spindle will be clearly marked on the machine.

No abrasive wheel will be used unless the rotary speed is clearly identifiable. Grade 1 Eye protection is mandatory in all abrasive wheel operations. FFP3 dust mask and water suppression if silica dust present.



#### 3.29 Powered Hand Tools and Equipment

Only competent persons may operate powered tools or equipment unless being trained to do so under the direct supervision of a skilled person and then only with management authority.

Operatives must inspect power tools and equipment before use to ensure they are in good working order. A formal inspection by the user is to be completed and entered onto the electrical register monthly defective items should be returned immediately for repair.

All electrically operated equipment used shall be subjected to Portable Appliance Testing at regular intervals by a competent person. All records of PAT are kept at head office for future use. The supervisors are responsible for ensuring all appliances on site have a valid PAT test certificate. HSE recommend 3 monthly testing for 110V appliances on construction sites.

All hand held electrically operated tools shall be of 110-volt supply maximum.

Cartridge tools may be used only by persons trained and authorised for that particular tool.

The correct quard must be in place at all times.

Loaded tools may never be left unattended, unload before storage.

Eye protection must be worn during use and loading.

Electricity at Work Regulations 1989

Electrical Equipment (Safety) Regulations 1994 Provision and Use of Work Equipment Regulations 1998

#### 3.30 Electrical



All of our site operatives are Electrotechnical Certification Scheme (ECS) accredited and work within the guidelines of HSG85 and other trade specific guidance in order to meet the requirements of Electricity at Work Regulations 1989 and the IEE Wiring Regulations seventeenth edition.

All electrical portable appliances held by the company are to be entered onto an electrical register. All office equipment will be inspected annually. Users are responsible for visually inspecting the appliances within their areas prior to use for any sign of visual damage. Refer to the electrical information sheet provided by the safety managers for guidance.

All electrically operated equipment used shall be subjected to Portable Appliance Testing at regular intervals by a Scenergy operative competent person he is to ensure the PAT test equipment is calibrated as required. All records of PAT inspection are kept at head office for future use. The site operatives are responsible for ensuring all appliances on site have a valid PAT test certificate. HSE recommend 3 monthly testing for 110V appliances on construction sites.

Trailing cables will wherever possible be supported off floor levels to prevent damage or tripping hazards.

Before use each day, every portable tool will be inspected by the user who are trained electricians.

Electricity at Work Regulations 1989

Electrical Equipment (Safety) Regulations 1994

#### 3.31 High Voltage Enclosures



The Company has a set of comprehensive safety rules that form the foundation for a High Voltage Safety Management System. These Safety rules (Scenergy Electrical Safety Rules) must be enforced by all managerial, technical and other supervisory staff and observed by all employees, staff and contractors to work on High Voltage systems controlled by the company.

No access to high voltage enclosures will be permitted.

Should the need arise to gain access to any enclosure containing electrical equipment; this will be carried out under a Permit for Work.

Where work is carried out adjacent to high voltage apparatus, arrangements shall be made to ensure all metal objects, vehicles, and in particular cranes, are kept at a safe distance.

Personnel employed in such vicinities should be made aware of the dangers and the fact that electricity can earth by arcing gaps of several feet to metal objects.

Adequate instruction and supervision will be employed to ensure safe working.

The need to obtain advice from the Company Health and Safety Advisers may be necessary particularly where extremely high voltage apparatus is involved.



#### 3.32 Asbestos

The removal of asbestos when necessary will be carried out by licensed asbestos removal contractors to statutory requirements:

During work activities if any material is suspected of being asbestos work must cease immediately. The suspected material must be reported and further investigation conducted to verify if asbestos is present. No material suspected of containing asbestos will be removed until the nature of material content has been identified and adequate arrangements made for safe removal by licensed contractors.

All operatives within the company will undertake annual asbestos awareness training as required by regulation 10.

Control of Asbestos Regulations 2012

#### 3.33 Lead

Lead can be encountered in various forms on Construction Sites, e.g., pipework, electricity cables, painted surfaces, paints and motor fuels.

Storage tanks may have contained leaded fuels and possible protected by lead bearing paint.

Hazards to health may be evident from the undertaking, e.g., burning welding and grinding, painted surfaces or entry into confined spaces.

Breathing in dust or fumes, absorption through the skin and ingestion, are factors requiring consideration.

Work with lead where risks to health are likely, will be carried out to The Control of Lead at Work Regulations 1998, and the Approved Code of Practice.

For work in confined areas, adequate ventilation will be proved or respiratory protective equipment provided and used depending upon the degree of risk involved, a survey will be carried out before work commences.

When work is carried out where lead levels hazardous to health are evident, and then employees will be instructed in the dangers and precautions required to avoid contamination.

Adequate washing facilitates will be provided and used before those employed take food, drink or anything by mouth.

Separate storage facilitates will also be provided for protective clothing away from personal clothing.

Medical surveillance will be undertaken for those workers coming into contact with lead with records kept.

Client will be approached for information regarding the likelihood of lead contamination at the place of work.

Control of Lead at Work Regulations 2002

#### 3.34 Waste Disposal

A high standard of waste disposal is essential throughout the project period.

Where the Company is required to arrange disposal this will be to an authorised site by a licensed carrier.

Copies of transfer documentation will be maintained on site for reference.

A copy of carriers licence will also be retained at site for reference.

All wastes shall be disposed of in accordance with Statutory Regulations.



#### 3.35 Dust

The nature of construction work can present very dusty atmospheres.

Wherever practical, all efforts will be made to remove concentrations of dust to an acceptable level, it is acknowledged however, this may not always be possible and even with heavy concentrations removed, fine particles will still exist.

The use of local exhaust ventilation and respiratory protective equipment may be necessary, in most instances the paper or fabric type of ori-nasal mask is satisfactory, in heavier concentrations the filtered type may be required (FFP3).

## 3.36 Smoking

It is the policy of Scenergy Ltd that all our workplaces are smokefree, and all employees have a right to work in a smokefree environment.

This policy has been developed to protect all employees, customers and visitors from exposure to secondhand smoke and to assist compliance with the Health Act 2006. Exposure to secondhand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely, stop potentially dangerous exposure.

Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace and includes company vehicles & plant. This policy applies to all employees, contractors, customers and visitors. All staff are obliged to adhere to, and support the implementation of the policy and monitor its effectiveness.

Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the company's premises, and in all smokefree vehicles.

Disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the smokefree law may also be liable to a fixed penalty fine and possible criminal prosecution.

Smoke Free (Premises & Enforcement) Regulations 2006

#### 3.37 Stress

Research has revealed that stress in the workplace is a growing problem but one that has not been widely recognised, or generally accepted within the building and construction industry.

Our policy to avoid or prevent stress shall be achieved by a combination of management and task related provisions which will include:

#### Management Related:

- 1. The fostering of good relationships between staff and management.
- 2. Well set and achievable objectives.
- 3. Good and effective two way communications.
- 4. Employee involvement.
- 5. Good management support.
- 6. Staff training.

#### Task Related:

- 1. Well defined tasks.
- 2. Clear responsibilities.
- 3. Proper use of skills.
- 4. Good control of hazards and risks.
- 5. Support from senior management.

#### 3.38 Display Screen Equipment



All DSE work stations are assessed and any issues are then actioned by re-arranging the work station as a first preference to alleviate any issues. Where this is not effective then further actions will be taken as required.

Users (persons who "habitually" use DSE equipment at work) of DSE equipment will be offered a full eye examination during working hours at an optician nominated by the Company.

Health and Safety (Display Screen Equipment) Regulations 1992

#### 3.39 Company Vehicle Driving



The Company has in place procedures to ensure all vehicles are adequately insured, maintained and serviced and with a valid MOT.

Company vehicle drivers will make daily visual inspections of their vehicles as specified. This process will form a defect reporting procedure to ensure unsafe vehicles are dealt with promptly and in an appropriate manner.

Company vehicle drivers must always adhere to statutory restrictions and the Highway Code and drive in a respectful manner when on private land.

Any traffic violations or incidents which employees are involved in will be fully investigated by the Company and any necessary action taken to ensure preventative measures are in place to prevent future recurrences.

Company vehicle drivers are instructed never to attempt to drive whilst potentially under the influence of alcohol or any drug which could impair their performance. Company drivers are to inform the management of any driving convictions. A copy of the individuals licence is to be held at the head office this is to be completed annually.

#### 3.40 Use of Mobile Telephones



It is important measures are in place to reduce the risk of injury to individuals whilst using mobile phones. Conversations on any phone require concentration and should not be undertaken whilst trying to carry out other activities, or in situations where your attention should focused on the hazards in the surrounding environment.

To avoid the unsafe use of mobile phones this policy applies to all employees.

Research has proved that using a mobile telephone whilst driving whether hands free or not is distracting and reduces the drivers attention to what already is a hazardous activity. The following points are made with the requirements of the amended regulations being taken into consideration:

- Drivers of vehicles shall only use a mobile phone whilst driving on a road if the vehicle is provided with a Company installed hands free device.
- Drivers are advised that out going calls should only be made if the vehicle is parked in a safe place off the road.
- Incoming calls should only be accepted if they can be answered by the pressing of a single, easily accessed button or voice command and it is safe to do so.
- Calls received whilst driving on a road should be kept to a short duration- this must be considered by both the caller and receiver.

# 3.41 Manual Handling





Operations where manual handling is a significant risk are identified through planning all operations effectively. Processes can then be implemented to eliminate or reduce the risk accordingly. Where handling be eliminated cannot manual handling assessments will be undertaken using the Site Specific Manual handling assessment form. The assessment considers the task to be undertaken, the load involved, individual's capabilities and the working environment. Suitable information and training will be

provided to persons required to carry out manual handling activities.

Manual Handling Operations Regulations 1992

#### 3.42 Working at Height (General)



All work at height is to be suitably planned before commencing using the hierarchy of controls.

- Avoid Work at height where possible.
- Use work equipment or other measures to prevent falls.
- When the risk of a fall cannot be eliminated, use work equipment or other means to minimise the distance and consequences of a fall if it should occur.

Where work at height is identified within our operations that cannot be eliminated the necessary preventive and protective measures will be implemented to ensure that all personnel are protected from any fall or falling material that could result in an injury being sustained.

Employees and any other persons involved in any work at height must co-operate with the systems put in place to protect them.

The necessary equipment to allow safe access to and egress from the place of work will be provided.

Suitable plant will be provided to enable the materials used or created in the course of the work to be safely lifted to and from the workplace and stored there if necessary

Regular inspections of all equipment required for working at height will be undertaken

Competent persons will be appointed to be responsible for the planning and supervision of all work at height and associated activities.

Suitable information and training will be provided to persons who are required to undertake activities that involve work at height. Refresher training will also be given at reasonable intervals.

Work at Height Regulations 2005

#### 3.43 Health Surveillance

Scenergy Ltd realize that occupational ill health is preventable and that by taking effective steps to control health risks at work, the costs of absence through sickness and lost production can be reduced.

The Company has a legal duty under the management of Health and Safety at Work Regulations and the Control of Substances Hazardous to Health Regulations to provide health surveillance at work.

We will ensure that:

- Risk assessments are carried out for the operations taking place.
- COSHH Assessments are produced for any substances which are hazardous to health.
- Where the Risk or COSHH assessments identify the requirement, place effected employees under suitable health surveillance.
- Regular consultation is made with our employees and where applicable safety representatives, over the arrangements for health surveillance and the requirement for affected employees to participate in these arrangements.
- All affected employees are made aware of the relevant health risks and of the health surveillance procedure.
- The person conducting the health surveillance procedure is competent to carryout the task.
- The results of any health surveillance will be accurately recorded, and the records will be made for available for inspection as required.
- Any recommendations identified as a result of the health surveillance will be actioned and if necessary the risk and COSHH assessments will be reviewed.
- Our employees and safety representatives are informed of the collective results of health surveillance.

Employees complete a health questionnaire on first arrival at the company. All operatives will also be required to complete an ongoing surveillance questionnaire as a minimum annually.

Where required, individuals may be referred to an occupational health professional for further assessment if required.

#### 3.44 Young Persons

Where young persons are employed it is ensured that work activities exposing them to unacceptable risks are eliminated, so far as is reasonably practicable. Measures to achieve this include preventing exposure to such risks by ensuring relevant legal standards are met (dependent on the risk involved), and that official guidance and good practice is followed.

Where hazardous activities cannot be eliminated, risk assessments are undertaken to identify residual risks and to reduce them to the lowest level reasonably practicable. The assessments will take into account the actual risks associated with the work activities and whether or not these risks are increased due to the age of the young person.

Suitable information, instruction and training will be provided to young workers to ensure their health and safety.

Management of Health and Safety at Work Regulations 1999



#### 3.45 Worksafe Procedure

Scenergy Ltd acknowledge their responsibilities and duty of care under the Health & Safety at Work, etc Act 1974, and will undertake to maintain safe working systems which affect the health, safety and welfare of our employees and subcontractors.

This Worksafe Policy will ensure that we provide and maintain a blame free procedure for questioning, and ultimately refusing to undertake work where it is considered unsafe, and/or a risk to employee or other peoples' health and safety. Where there is potential or imminent risk of accident or incident, that is not already sufficiently controlled, the work is to be stopped and the system of work changed to remove or minimise the risk.

The following list is not exhaustive but details some of the reasons why Scenergy would expect this Worksafe Procedure to be implemented:

- You are not competent to undertake the work
- You do not have the correct work equipment
- There is not a documented safe system or risk assessment for the activity
- You do not have the correct Personal Protective Equipment

Scenergy Ltd have in place a reporting system that will provide employees with the means of reporting any incident, unsafe act, concern and safety or environmental related issue.

The Worksafe reporting system is designed to provide Scenergy Ltd employees the confidence that should they question the safety of working systems or procedures, their views will be given serious consideration by the Company Management.

When a Work Safe report (either written or verbal) is received from an employee the Directors will ensure that the issue is investigated and a response to the concern is published.

The Directors will ensure Scenergy Ltd will not discipline, discriminate or impose any form of penalty on an employee who uses this Worksafe and refusal to work procedure. The employee or employees who initiated the Worksafe Procedure will be kept informed of any decisions made throughout the process.