INDUSTRIAL ENGINEERING PLASTICS

(PO01)
HEALTH AND SAFETY POLICY

1 Introduction

Industrial Engineering Plastics Ltd (hereafter referred to as IEP) recognises its health and safety duty under Section 2 (3) of the Health and Safety at Work Act 1974 and has prepared this written health, safety and welfare policy accordingly. As a responsible employer it is our duty to bring this policy and any revisions made to this document, to the attention of all its employees.

IEP further recognises its responsibilities under:

- Health and Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- Construction (Design and Management) Regulations 2015
- Health and Safety (Display Screen) Regulations 1992
- Workplace (Health, Safety and Welfare) Regulations 1992
- Control of Substances Hazardous to Health COSHH 2002
- Personal Protective Equipment at Work Regulations 1992
- Manual Handling Operations Regulations 1992
- Provision and Use of Work Equipment Regulations 1998
- Regulatory Reform (Fire Safety) Order 2005
- And all other such legislation applicable to our business, both as an employer and as a company

This document contains the health and safety policy relating to its premises, operations, and activities undertaken, and for staff based at IEP's offices.

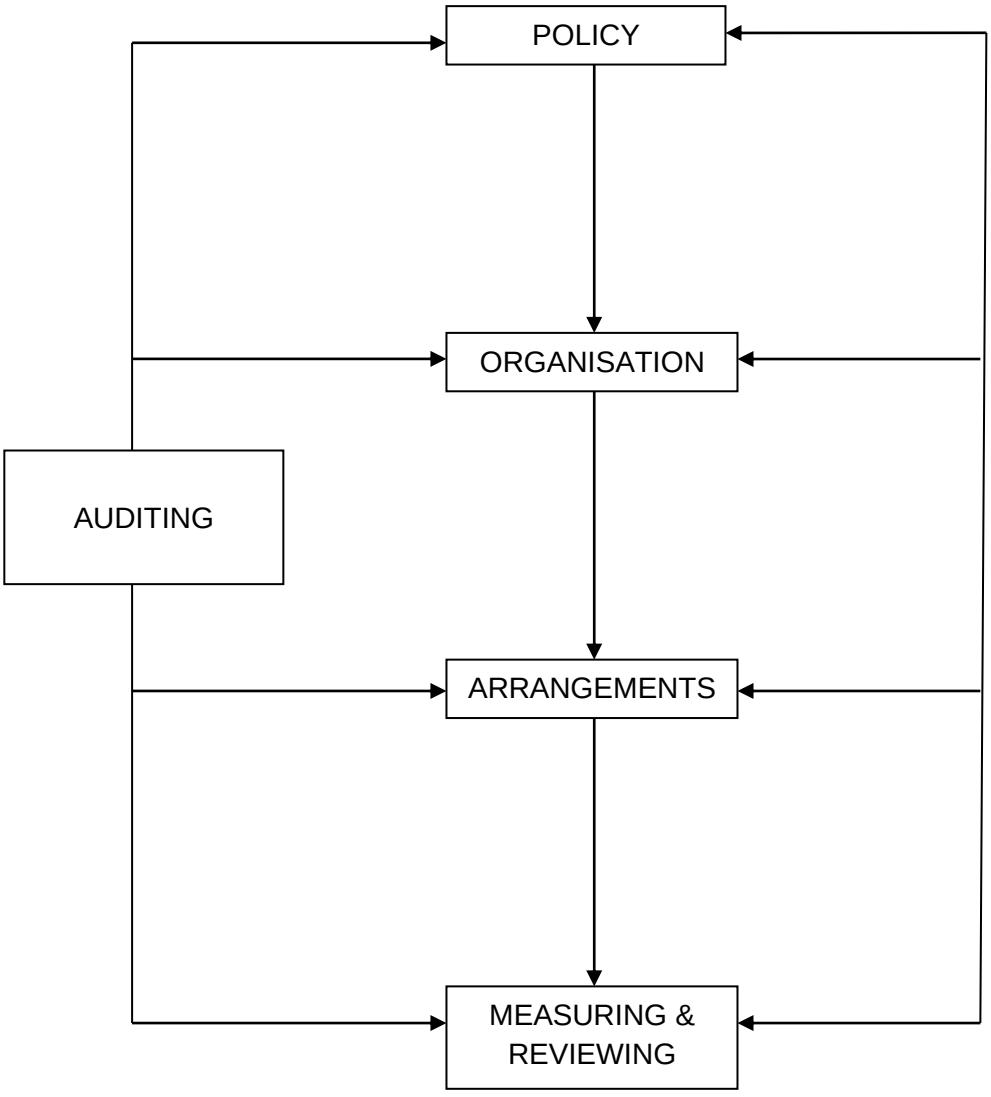
This policy had been formulated using a recognised general approach to a health and safety management system and contains the following key elements:

- **Policy Statement:** a statement of the key objectives of the company, signed by its most senior director;
- **Organisation:** identification of the management structure for the delivery of good health and safety performance. This will also detail the specific responsibilities of key post holders and (in more general terms) all employees. (as illustrated at figure 2.0)
- **Arrangements:** a series of statements and standards regarding how the company will deliver particular aspects of health and safety management.
- **Measuring and Reviewing Performance:** how well the company is doing. This aspect is key to ensuring continuing improvement.
- **Audit:** should be a continuing theme – from regular workplace inspections through to full management system reviews.

2 Health & Safety Management System

Based on the Health & Safety Executive's guidance (HSG65), this figure shows the interrelationship between the various elements of a quality Health & Safety Management System.

Figure 1.0



3 Safety Policy Review

IEP will review the safety manual at least annually. The following circumstances may also necessitate revision:

- Organisational changes.
- Concerns raised during internal inspections.
- Concerns raised during an external audit.
- Concerns raised following analysis of accident reports.
- Changes recommended following a risk assessment.

3.1 Amendment Record

All amendments will be included on this amendment record. It is the responsibility of Phil Wilde to ensure that all relevant persons are copied.

It will be the responsibility of the designated health and safety manual holders (See Distribution list below) to ensure that the amendments are placed correctly into their manuals.

Issue No:	Dated	Description of Amendment
1.0	16 Mar 11	Initial issue
2	22 Nov 2012	Name change to Gary Morton
3	14 Nov 2014	Name change to Phil Wilde
4	16 Sept 2016	Consultancy name change (IC Safety)
5	5th Feb 2018	Review and name change to Phil Wilde
6	6th Feb 2019	Annual Review
7	9th January 2020	Revision to reflect increasing volumes of site work and membership of BESA
8	17th February 2020	Revision following audit review by CQMS for SSIP purposes
8.1	7th May 2021	Review and name change to Steve Barnes

4 Distribution List

Copy No:	Holder	Location	Date Issued
1 Master	Steve Barnes	Passfield Mill Passfield GU30 7QU	9th May 2021
2	General issue	Staff Canteen Passfield Mill Passfield GU30 7QU	9th May 2021
3	General issue	Staff Canteen 100 Armoury Road Birmingham B11 2RH	9th May 2021

5 Health & Safety Policy Statement

Industrial Engineering Plastics Limited ("IEP") is committed to a system of health and safety management based on a common understanding of risks and how to control them. IEP recognises that health and safety is a management responsibility of equal importance to our work and that effective control of health and safety is achieved through co-operative effort at all levels within the company.

IEP is committed to a policy of taking all reasonably practicable steps necessary to safeguard the health, safety and welfare of its employees at work and the health and safety of other persons that might be affected by its work, including contractors, visitors and members of the public. IEP will comply with all statutory obligations including the provision of adequate supervision, information, instruction and training so that all staff should recognise that their health and safety responsibilities have equal rank with other work tasks.

In complying with the requirements of the Health and Safety at Work etc Act 1974, IEP will:

- Maintain all places of work under its control in a condition that is safe and without risks to health, including the provision and maintenance of adequate means of access/egress;
- Provide and maintain a working environment for its employees that is safe and without risks to health, including adequate facilities and arrangements for securing their welfare;
- Provide information, instruction, supervision and training as is necessary to ensure health and safety at work of its employees;
- Provide, operate and maintain buildings, plant, machinery, equipment and systems of work that are safe and without risk to health;
- Make arrangements for ensuring the safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances for use at work;
- Provide protective clothing and safety equipment as necessary to enable staff to undertake their duties safely;
- Ensure that travelling officers at work on other person's premises as part of their normal work duties are trained in the recognition of likely risks which they may encounter;
- Monitor IEP and the arrangements for health and safety detailed in this statement.

These duties will be performed by IEP, so far as is reasonably practicable, taking into account published guidance, including that from the HSE. The assessment of risks is central to this policy. Formal written assessments will be undertaken by the representatives of IEP as required by the relevant statutory provision. Assessments will be reviewed by IEP as appropriate.

This statement is a formal and unique declaration that IEP will devote sufficient effort and resource to the organisation of and arrangements for health and safety of its employees and those who may be affected by our work.

Steve Barnes – Managing Director

7th May 2021

5.1 Environmental Policy Statement

Industrial Engineering Plastics Limited ("IEP") wishes to make every practical effort to carry out our business as thermoplastic fabricators, at our workshops, sites and at customer premises, in a manner that minimises our impact/potential impact on the environment, both locally and on a larger scale.

We recognise that the workmanship of our employees could, if it were less than satisfactory, have serious environmental consequences, i.e. the failure of a weld resulting in spillage of chemicals. With this in mind, all our fabricators are fully trained and we submit test sections of their work to rigorous examination before we allow them to carry out work for our clients. Many of our fabricators are very experienced, some having been carrying out this type of work for more than 30 years.

We recognise that thermoplastics, G.R.P. and the various compounds used to construct fabrications from these materials, all of which constitute the core materials of our business, can have a detrimental impact on the environment if used in an uncontrolled manner.

Problems occur with thermoplastics that do not degrade, jointing and cleaning compounds that are very toxic and the toxic contents of existing systems. All of these can produce great difficulties from both a health and safety and environmental perspective.

Challenge	Action
All waste materials are removed from site and disposed of in an approved manner. Either by being returned to the workshop for correct disposal or to an authorised on-site disposal area/container.	All waste is removed from our premises or from client's premises by licensed waste disposers.
All waste jointing and cleaning compounds, containers, applicators and brushes etc, must also be disposed of in a similar manner. It is NOT acceptable to dispose of surplus liquid material, i.e. M.E.K., Acetone etc. by disposal into a drain or other watercourse, such materials containers etc. must be returned to the workshop for correct disposal.	The jointing and cleaning materials we use are described as harmful to the environment and every effort is made to prevent them getting into the environment via watercourses and drains. Leaking containers or spills must be cleaned up as directed by the material data sheet, and not water flushed, where the residue will enter surface water drains. Brushes should not be washed in sinks or gullies.
The production of thermoplastic material consumes an enormous amount of energy and uses non-renewable resources.	We feel it is incumbent on IEP to make every practical effort to recycle as much waste thermoplastic material as possible.

This Environmental Policy is directed at Board level and is reviewed regularly.

Steve Barnes – Managing Director

7th May 2021

6 Compliance with Legislation

6.1 Responsible Persons

IEP have appointed Steve Barnes as the Director with Special Responsibility for Health and Safety. In this document they will also be referred to as the "Director for Safety".

The Director for Safety has appointed a Consultant as the "Competent Person" for Health and Safety to provide advice and support.

6.2 Sources of information

IEP will be kept up to date with laws, regulations and standards applicable to its business through their appointed Competent Person, their Trade Association (BESA) and by maintaining links with external experts, subscribing to internet health and safety websites and through various trade magazines as necessary.

7 Safety Consultation

Communication

IEP recognises that the consultation and participation of all employees, at all levels is an essential requirement for achieving a healthy and safe working environment. IEP have the various communication channels in place (Team Meetings, IT usage, bulletins etc) and will actively encourage the involvement of all employees. It is the responsibility of every employee to ensure that they understand and comply with all requests.

Notice boards

IEP will make available all necessary health and safety information, such as, minutes of any health and safety meetings, names of "responsible" persons appointed to assist in the implementation of this policy, best practice and guidance information as applicable to the operations undertaken and any other information necessary to ensure all its employees are fully informed of current company health and safety safe working procedures and measures.

Language Problems

Steve Barnes or his deputy will ensure that IEP operatives or sub-contractors, whose first language is not English, adequately understand the safety arrangements and other information that is important for their continued safety at work.

Steve Barnes or his deputy will ensure that, when necessary:

- An interpreter will be used to convey the information to the operative/s
- A buddy system will be set up to ensure non-English speakers have a designated work colleague who can translate for them to ensure they are kept up to date with site safety information
- Where necessary, safety information, risk assessments, method statements etc will be translated into the required language/s

Competent Person

IEP have retained the services of an external H&S Consultant to act as the company's Competent Person and to assist the Management Team in fulfilling their duties.

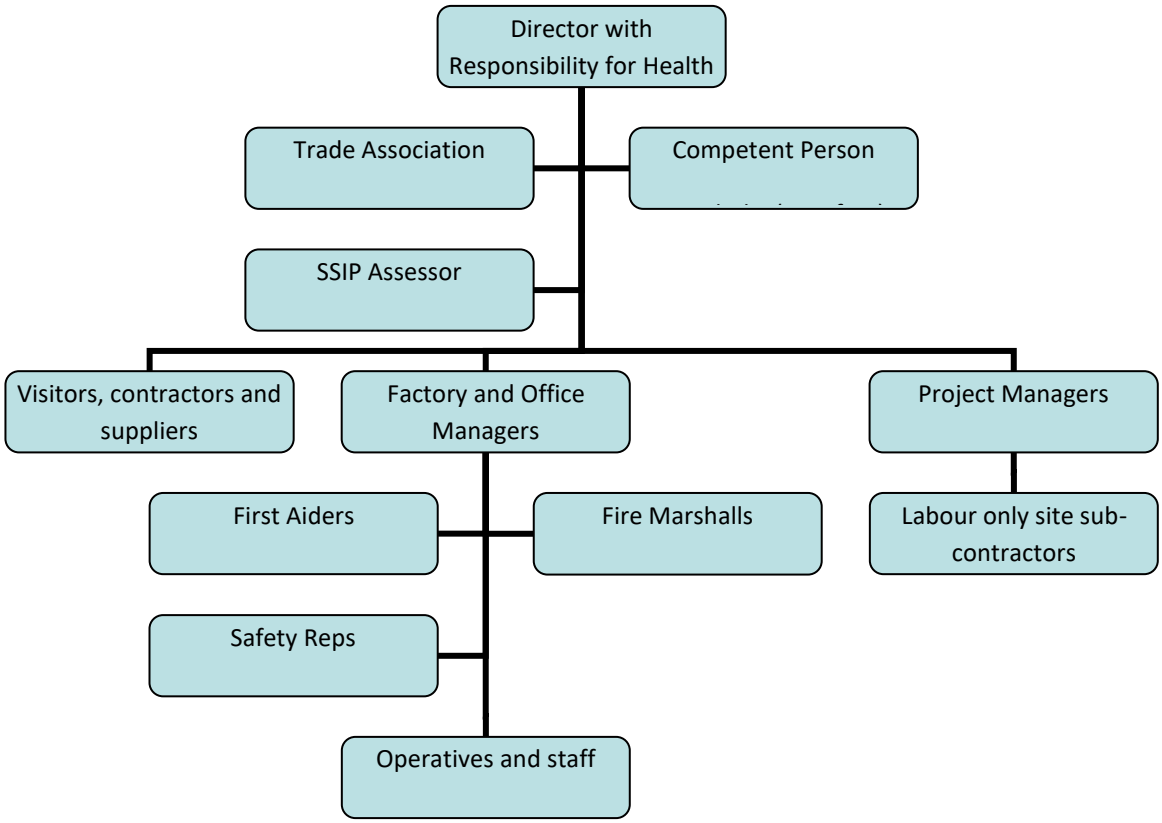
Further guidance and control documents:

- See Guidance Note: Guidance on Safety Committees

  (also contains Safety Reps' Duties)

8 Organisation (Health & Safety)

8.1 Organisation Chart (Figure 2.0)



8.2 Responsibilities

Responsibilities

Steve Barnes, Managing Director, has been nominated as the Director with Special Responsibility for Health & Safety and his responsibilities will include:

- Ensuring that the policy is effectively implemented, monitored, developed and communicated to all staff and that necessary alterations are made to the policy to reflect changes in legislation or company development
- Adequate resources are made available to meet the requirements of the policy
- Ensuring that the Company retains the services of a Competent Person for health & safety
- The appropriate insurance cover is provided and maintained
- Procedures are put in place to ensure that all equipment is supplied and maintained fit for purpose
- All levels of management and employees understand their responsibilities for health and safety placed upon them by this policy
- Procedures are put in place to ensure that planning and control measures are provided to establish safe working methods for situations involving potential hazards
- Procedures are put in place to ensure that adequate welfare facilities are provided for employees
- Ensuring this policy is effectively administered and monitored, and that necessary alterations are made to the policy to reflect changes in legislation or company development
- All reportable injuries, diseases and dangerous occurrences are reported to the relevant enforcing authority
- All accidents, incidents, ill health, dangerous occurrences and other issues concerning safety raised by anyone at work are recorded and investigated such that effective controls can be implemented to help prevent recurrence
- Health and safety assessment requirements are identified and advised to management
- Regular health and safety site inspections/audits are carried out to ensure that all staff and working conditions are in compliance with all mandatory legislation and site rules
- Adequate welfare facilities are provided and maintained in a satisfactory condition
- Communicate and consult with staff on issues of health and safety and encourage staff to report hazards and raise health and safety concerns
- Written instructions are provided through risk assessment and systems of work to establish safe working methods
- Health and safety site rules are followed by all employees
- Plant and work equipment is maintained in a safe condition, guarded in accordance with the relevant legislation and has the statutory certificates of inspection or examination
- Adequate supervision of staff is provided to ensure that they are working safely, including the provision of increased supervision for new employees and young persons (under the age of 18 years)
- Safety training requirements are identified for all members of staff under their control to ensure that those members of staff are competent to undertake their work in a safe manner.

Factory, Office and Project Managers

Managers' health and safety responsibilities are to ensure that:

- Safety rules are followed by all
- They set a good example by using the appropriate protective equipment whilst on site and actively lead the implementation of the health and safety policy
- Adequate welfare facilities are provided and maintained in a satisfactory condition
- Risks are controlled and staff are complying with written safety instructions
- Staff are encouraged to report hazards and raise health and safety concerns
- All accidents, incidents, ill health, dangerous occurrences are reported promptly
- Staff are adequately trained and competent to carry out their work and operate any plant or equipment in a safe manner
- Any hazardous substances are stored, transported, handled and used in a safe manner
- All plant and work equipment within the workplace is maintained in a safe condition
- Management is informed of any safety issues that cannot be resolved
- Personal protective equipment is readily available and maintained, and relevant employees are aware of its correct use, storage and procedures for replacement.
- They inform management of any change to their state of health, either temporary or permanent, which might affect their working ability or their suitability to carry out any particular task or tasks.

Operatives and staff

Operatives and staff will be responsible for ensuring that they:

- Take reasonable care not to endanger themselves or other persons through their actions or omissions at work
- Do not operate any equipment or machinery unless they have been fully trained and instructed in its operation
- Use the correct tools and equipment for the task
- Correctly put to use the personal protective equipment provided
- Only use tools which are in good condition
- Report all defects in tools, plant, equipment and materials, or any obvious safety or health hazards.
- Do not misuse or abuse anything provided under a statutory requirement in the interests of health and safety
- Co-operate with the company on all aspects of health, safety and welfare
- Report all accidents and incidents so that action can be taken to prevent a recurrence
- Inform their line manager of any illness, medication which might affect their ability or suitability to carry out any particular task

Competent Person (Consultant)

In accordance with the Management of Health and Safety at Work Regulations, Industrial Engineering Plastics Ltd have engaged a consultant, IC Safety Consultancy Limited, to be their Competent Person to

assist them with undertaking the measures necessary to comply with the requirements and prohibitions imposed by relevant statutory provisions.

The service offered by cannot alter responsibilities under statute or common law but is intended as an aid to help fulfil such duties. IC Safety Consultancy Limited will meet their responsibilities set out in the agreement by:

- Providing advice and guidance to the IEP management team on all aspects of health, safety and welfare
- Preparing a Health and Safety Manual to assist the organisation manage health and safety and to recommend amendments when necessary to encompass changes in legislation
- Undertaking health and safety audits in order to help identify hazardous operations, breaches of legislation and non-compliance with recognised guidance and standards
- Providing advice and guidance in the event of a major injury accident or dangerous occurrence and undertaking an investigation if necessary
- Liaising with enforcement authorities on the behalf of the client
- Informing and advising on changes in legislation that are relevant to IEP's work activities
- Providing advice and assistance to enable the client to undertake risk assessments
- Recommending training for specific groups of employees to ensure they are familiar with their responsibilities and the standards expected
- Recommending other specialist advice, training, surveys, environmental monitoring, examinations, etc. should aspects of work be identified outside the scope of the service provided by IC Safety Consultancy Limited.

Trade Association

IEP is a member of the Building Engineering Services Association (BESA).

BESA offers its members a free H&S helpline which should be used as a first port of call for low level enquiries.

SSIP Assessor

IEP seeks certification of its site and health and safety activities via CQMS, an SSIP member referred to the company by BESA.

Certification is carried out annually by means of a desk top audit.

First Aider(s)

First aiders will be appointed and located throughout the organisation and they will ensure:

- Appropriate and suitable first aid equipment and personnel are provided to cover all foreseeable risks.
- All relevant notices, records etc. are maintained.
- The names and locations of the current first aiders will be prominently displayed in work areas.
- First aid personnel will consist of staff volunteers who have been trained according to standards set by the Health and Safety Executive.

Health and Safety Representatives

The Representative/s of Employee Safety represents the health and safety interests and concerns of employees to Management and to that end he/she:

- Has access to the Manager and to all other duty holders mentioned in this plan
- Assists the Manager in conducting inspections
- Takes part in accident investigations
- Is consulted in the risk assessment process
- Attends safety meetings/briefings
- Is available to be consulted during office hours (pressure of work permitting) by all employees as to their health and safety concerns

All Employees

Employees also have duties, they must for example:

- Use any machinery, equipment, dangerous substance, vehicles or safety device provided by the company in accordance with any training and/or instructions received from the company
- Inform the company of any work situation which they consider might represent a serious and immediate danger to health and safety
- Inform the company of any matter which they consider represents a shortcoming in the company's health and safety arrangements
- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions at work
- Not remove or interfere with any signs or equipment that the Company has provided in the interests of Health & Safety
- Report all work related accidents, incidents (e.g. near misses), diseases or conditions to the Manager for recording
- Make sure they are aware of the location of the nearest fire alarm call point, fire extinguisher position and fire exit as well as the plan to be followed in the event of fire
- Co-operate fully with the requirements of this plan under penalty of disciplinary action

Labour-only sub-contractors

Labour-only sub-contractors work for IEP at client sites. They are expected to comply with IEP's H&S Policy and practices.

These sites are usually governed by the CDM Regulations 2015, where IEP typically acts as sub-sub-contractor or sub-contractor to a principle contractor.

They have duties similar to employees, for example:

- Use any machinery, equipment, dangerous substance, vehicles or safety device provided by the company in accordance with any training and/or instructions received from the company
- Inform the company of any work situation which they consider might represent a serious and immediate danger to health and safety
- Inform the company of any matter which they consider represents a shortcoming in the company's health and safety arrangements
- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions at work
- Not remove or interfere with any signs or equipment that the Company has provided in the interests of Health & Safety

- Report all work related accidents, incidents (e.g. near misses), diseases or conditions to the Manager for recording
- Make sure they are aware of the location of the nearest fire alarm call point, fire extinguisher position and fire exit as well as the plan to be followed in the event of fire
- Co-operate fully with the requirements of this plan under penalty of disciplinary action

In addition they must:

- Comply with the requirements of the site as defined in the site H&S file maintained by the principle contractor. This might include:
    - Attending a site induction
    - Adhering to site-specific health and safety rules over and above those set by the company
- Co-operate with the principle contractor to ensure a safe working environment

Further guidance and control documents:

- See Guidance Note: Employee Safety Rules

9 Risk Assessment

Policy statement

IEP is committed to reducing the risk of accident or injury to its employees or other persons who might be affected by its operations. It recognises the process of risk assessment as a valuable management tool in the reduction of accidents and injuries at work. IEP therefore intends to comply in all respects with legislation relating to risk assessment in the work environment whether as generally required under the Management of Health & Safety at Work Regulations 1999 or as required under more specific legislation.

Definitions

It is most important to understand the phrases used in risk assessment as any confusion will lead to the assessment being completed unsatisfactorily. The two phrases that most need to be understood are:

'Hazard': the potential for something to cause harm, such as electricity, working on a ladder or with dangerous machinery; and

'Risk': the likelihood that harm will actually occur from exposure to the hazard together with the likely injuries that will occur as a result and the likely numbers of people that this will affect

Employees at special risk

The Company recognises that some employees may from time to time be at increased risk of injury or ill-health resulting from work activities. The Company therefore requires that all employees advise their line manager if they become aware of any change in their personal circumstances which could result in their being at increased risk. This could include medical conditions, permanent or temporary disability, taking medication and pregnancy.

The need for risk assessments

The main reason for conducting risk assessments is to ensure that we have adequately considered the things that can go wrong in the workplace and their likely effects. By so doing we can implement measures that will either reduce the likelihood of such events occurring, or if the worst should happen, limit the severity of injuries that occur.

Adequate risk assessments are therefore fundamental to ensuring the effective management of health and safety risks at work. They should take into account:

- People
- Premises
- Plant
- Procedures

Approach to risk assessment

The HSE suggests that risk assessments should follow five simple steps, notably:

STEP 1: Identify the hazards.

STEP 2: Decide who might be harmed and how.

STEP 3: Evaluate the risks and decide on precautions.

STEP 4: Record your findings and implement them.

STEP 5: Review your assessment and update if necessary.

Principles of prevention

The best way to avoid risks is of course to remove the hazard completely. Unfortunately in the real world that is not often an option but nonetheless the law requires that, as an initial step that's what we should

try to do. In other words we should apply a hierarchy of risk controls to a situation in order to arrive at the reasonably practicable measures we need. MHSWR suggests the following:

- Avoid the risk completely – e.g. change the design or the process
- Substitute – use less hazardous materials e.g. different chemicals
- Minimise – e.g. limit exposure to individuals perhaps by job rotation
- General control measures – guarding, barriers or warning systems
- PPE – the last resort because it protects only the individual

Conducting risk assessments

The key to successful risk assessment lies largely in the competence of those involved. Whatever choice is made regarding type or method of risk assessment, the results should always be consistent as well as being simple to understand and action.

Communication of risk assessments

Risk Assessments are of no use unless they are communicated, whether by memos, training, team briefings, notice boards etc. The method of communication must reflect the needs of the workforce and the seriousness of the risk that exists.

Confirmation

It is necessary to get out into the workplace and make sure that not only are the risk control measures in place, but they are also working.

9.1 Risk Assessment (own premises)

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Identify all significant hazards to which their employees and others might be exposed.
- Assess the risks to which any persons can be exposed as a result of the significant hazards identified.
- Eliminate the risks where this is possible.
- Reduce and control the level of those risks which cannot be eliminated by the use of appropriate control measures.
- Record the significant findings of any risk assessment.
- Inform all employees (and others as necessary) of the risks and safe working procedures identified.
- Review and revise the assessments as necessary and in any case after a serious incident or accident has been reported.
- Ensure that managers receive sufficient and appropriate training in simple risk assessment techniques to enable them to act as competent persons.
- Use straight forward risk assessment techniques and will not over-complicate the process.

Identified Hazards

The main hazards identified arising out of Company operations include:

- Electricity

- Fire
- Occupational Driving
- Manual Handling

Risk Reduction

In general terms risks are reduced by the following policies and arrangements:

- The attitude and regard to health and safety by the Company and its employees.
- The proper management of health and safety and the organisation for implementing policies with employees having designated responsibilities and tasks.
- A system built into the organisation for monitoring and inspection of the parts of the premises, systems, machinery, equipment and reporting procedures and discussions at the highest level.
- The policy of removing the hazard at source or by substitution thus avoiding a risk altogether.
- Adapting work where possible to the individual.
- By providing suitable Personal Protective Equipment (when all other risk-reduction measures have been exhausted)
- Giving priority to those measures which protect the whole workplace and all those who work there and so yield greater benefit.
- By training employees in health and safety in respect of their tasks so they understand what they need to do.

Apart from the general measures that management take to determine hazard and reduce risk, the company will seek the advice of the appointed Competent Person to measure and determine hazards and to carry out particular risk assessments.

Methodology – How to use the Risk Assessment Form

The Risk Assessment form that we use has 6 columns:

Ser	Identified hazard	Potential harm	Persons affected	Controls	Residual Risk

Ser:

The serial number of the identified hazard

Identified Hazard:

The significant hazard that has been identified for the task e.g. Electricity

Potential Harm:

The harm that the Identified Hazard could cause (can be more than one) e.g. electrocution, fire

Persons Affected:

Identify the person or group pf people that could be harmed e.g. Operative, General Public

Controls:

Here is where you list all the Control Measures that need to be put in place to reduce the risk to ‘insignificant’ e.g. provide training, switch off power, provide PPE

Residual Risk:

This is a subjective assessment of how much the risk has been reduced if all the Controls are working effectively. It is not possible to get rid of risk completely, unless you decide to not allow the task to be undertaken.

We use High, Medium and Low

High

You have to apply a bit of Common Sense and the Law says you have to put in place 'reasonable' controls to reduce the risk sufficiently so that it becomes insignificant.

If you 'feel' that the Controls are inadequate or ineffective, you need to assess the Residual Risk as 'High' and discontinue the task until better Controls are put in place to reduce the risk to 'insignificant'. So, in fact, you would only ever use 'High' on a draft Risk Assessment that has still to be completed.

Medium

Medium would be used where you feel that a risk is reduced sufficiently but only if strict controls are in place e.g. working off a ladder to change a light bulb.

Low

Low is used for everything else where the controls are in place and working effectively. There is a slim chance something might go wrong but even if it does, the consequences are insignificant e.g. getting paint on your skin.

Example……..

Ser	Identified hazard	Potential harm	Persons affected	Controls	Residual Risk
1.	Electricity	Electric shock, Fire	Operatives, visitors	Portable appliances will be subject to regular PAT testing by a competent person. Operatives will carry out before use checks. The electrical installation for the building will be inspected by a competent person – 5 yearly.	Medium

Further guidance and control documents:

- Safety Form SF 0302 Risk Assessment

9.2 Risk Assessment (site)

Policy standards

To comply with this policy the following standards must be met.

The Project Manager will:

- Identify all significant hazards to which their employees, sub-contractors and others might be exposed.

- Assess the risks to which any persons can be exposed as a result of the significant hazards identified.
- Eliminate the risks where this is possible.
- Reduce and control the level of those risks which cannot be eliminated by the use of appropriate control measures.
- Record the significant findings of any risk assessment.
- Inform all employees, our sub-contractors and the principle contractor (and others as necessary) of the risks and safe working procedures identified.
- Review and revise the assessments as necessary and in any case after a serious incident or accident has been reported.
- Ensure that project managers receive sufficient and appropriate training in risk assessment techniques to enable them to act as competent persons eg IOSH Managing Safely.
- Use of straight forward risk assessment techniques will not over-complicate the process.

Identified Hazards

The main hazards identified arising out of site operations include:

- Working at Height
- Use of MEWP
- Manual Handling
- Use of hand tools

Methodology – How to use the Risk Assessment and Method Statement form (RAMS)

The RAMS that we use has the following columns:

			Initial risk assessment before controls applied				Final Risk Assessment with Controls		
Hazard	**Risk to Personnel**	**Who could be harmed**	**Likelihood**	**Severity**	**Score**	**Controls to be applied**	**Likelihood**	**Severity**	**Score**

Hazard:

The significant hazard that has been identified for the task e.g. Electricity

Risk to personnel

The harm that the Identified Hazard could cause (can be more than one) e.g. electrocution, fire

Who could be harmed:

Identify the person or group pf people that could be harmed e.g. Operative, other persons working in the area, people below, etc

Initial risk assessment

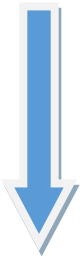
We use a standard 5 x 5 matrix for assessing risk:

	Severity				
	Minor Injury	**Lost time injury < 3 days**	**Lost time injury > 3 days**	**Major Injury**	**Fatality**
Likelihood	**1**	**2**	**3**	**4**	**5**
Improbable – 1	1	2	3	4	5
Remote -2	2	4	6	8	10
Possible – 3	3	6	9	12	15
Probably – 4	4	8	10	16	20
Likely - 5	5	10	15	20	25

Controls:

Here is where you list all the Control Measures that need to be put in place to reduce the risk to 'insignificant' e.g. provide training, switch off power, provide PPE

The hierarchy of risk control is as follows:

Hierarchy of Risk Control	**Consider**
Eliminate	**First**
Reduce	
Isolate	
Controls	
Systems of Work	
PPE	
Discipline	**Last**

Residual Risk:

This is a subjective assessment of how much the risk has been reduced if all the Controls are working effectively. It is not possible to get rid of risk completely, unless you decide to not allow the task to be undertaken.

Using the matrix above:

Acceptable risk (1-6): Controls are sufficient and work can proceed
Medium, tolerable risk (7-15): Proceed ONLY if risk is reduced As Low As Reasonably Practicable (ALARP)
Unacceptable risk (16-25): Work cannot commence until further controls are in place to mitigate the risk

Method Statements

A method statement is the step-by-step method that MUST be followed, taking into account all controls recorded in the risk assessment in order to complete the job safely.

Further guidance and control documents:

- Safety Form SF 0302 Risk Assessment

10 Training

Policy statement

IEP is required to carry out training under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. So far as reasonably practical IEP will provide information, instruction and training as part of their induction, so as to ensure the health and safety at work for all employees, regardless whether full-time, part-time, or temporary.

Training is an important way of achieving competence and helps to convert information into safe working practices. It contributes to an effective health and safety culture and is needed at all levels.

Our scale and nature of work

Our primary activities are as follows:

- Distribution of thermoplastic sheet, pipe and duct
- Fabrication of thermoplastic products, including tanks and ductwork
- Installation of thermoplastic ductwork

How do we comply with the requirements?

	What training is required?	**What training is carried out?**
Distribution of thermoplastic sheet, pipe and duct	Safe use of display screens General health and safety awareness	New starter induction Display screen assessments Risk assessment for general office activities
Fabrication of thermoplastic products, including tanks and ductwork	General health and safety awareness Specific training for tools and equipment	New starter induction Risk assessment for factory activities Toolbox talks
Installation of thermoplastic ductwork	General health and safety awareness Specific training for tools and equipment Asbestos awareness Working Safely Managing Safely	New starter induction Specific site RAMS CSCS cards (incl H&S training) – 100% of site staff (currently two people) Asbestos awareness IOSH Managing Safely

Licenses/certificates

Our site team requires accreditation for MEWP and mobile scaffold

Designers

Other than implementing and advising on the requirements of DW154 Plastics Ductwork, the UK standard for fabrication and installation of plastic ductwork, we do not design.

Policy standards

To comply with this policy the following standards must be met

The Director for Safety will, with the assistance of the Competent Person:

- Complete risk assessments as detailed above in Section 10, which will help to determine the level of training needed for each type of work as part of the preventative and protective measures.
- Consider through this risk assessment process the need for, basic skills training, specific on-the-job training and training in general health and safety matters to ensure competence is achieved which allows for the discharge of employee duties.
- Ensure all new employees receive basic training on health and safety on their first day, which must include, emergency evacuation procedures, company safety rules, first aid provision etc as a minimum. (This forms part of the induction process)
- Identify further training as required for staff identified as having designated responsibilities (e.g. nominated Appointed Persons, appointed Fire Marshals etc) and establish a suitable and sufficient training programme to ensure regular review, using outside health and safety specialists, as appropriate.
- Ensure that all training in health and safety is recorded and records maintained in the employee personnel file.
- Ensure that there is a programme of refresher training to keep employees up to date with legislation and industry best practice.
- Ensure consideration is given to training, on exposure to new and increased risks owing to, transfer or change of responsibilities, upon the introduction of new work equipment or a change to existing work equipment and upon the introduction of a new system of work or change to existing systems of work.

Training – Non-English Speaking

The Director for Safety or his deputy will ensure that operatives, who do not have an adequate understanding of English, are provided with an interpreter to translate the training for them.

The Director for Safety or his deputy will ensure that, when necessary:

- An interpreter will be used to convey the information to the operative/s
- A buddy system will be set up to ensure non-English speakers have a designated work colleague who can translate for them to ensure they are kept up to date with training and safety information
- Where necessary, safety information, risk assessments, method statements etc will be translated into the required language/s

Further guidance and control documents:

- Safety Form SF 0401 Induction Training Record
- Safety Form SF 0403 Group Training Record

11 Accident/Incident Reporting

Policy statement

IEP accepts that to help maintain a safe and healthy environment for employees and others, who use its premises and facilities, accidents and incidents need to be reported and investigated. The responsibility for such investigation rests with the local manager with appropriate support from safety professionals, such as outside health and safety experts.

IEP also accepts its obligation to report certain types of injury, disease and dangerous occurrence to the Health and Safety Executive. IEP is committed to ensuring that all employees are made aware of the need to report such accidents to management.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure that all current, new and temporary employees receive suitable information and instruction during their induction training, to make them aware of the need to report all incidents / accidents.
- Ensure that all incidents / accidents are investigated. The depth of the investigation will relate to the seriousness of the event.

  (See Safety Form SF 0101 Accident Investigation Form plus Guidance)
- Report all relevant accidents as defined in the relevant regulations to the reporting authority (RIDDOR):
  - Incident Contact Centre - Caerphilly Business Park - Caerphilly - CF83 3GG
  - Tel: 0845 300 9923
  - Report online via HSE website: http://www.hse.gov.uk/riddor/online.htm
- Ensure that accurate records of all accidents are maintained and recorded in the accident book by the relevant staff member (or individual).
- Ensure that accurate records are kept of all incidents / accidents to employees whilst at work and all accidents to visitors etc, whilst on or using IEP premises or facilities, through the use of the company accident book.
- Ensure that information gained from any investigation will be used to help prevent recurrence and prompt the review of the appropriate risk assessment.

Further guidance and control documents:

- Safety Form SF 0101 Accident Investigation Form & Guidance

12 First Aid

Policy statement

First Aid is the initial management of any injury or illness suffered at work. It is administered to minimise the consequences of injury and illness and to preserve life until professional medical assistance can be obtained.

IEP will provide suitably trained personnel for rendering first aid to employees if they become ill or injured. IEP will also provide adequate first aid equipment for such treatment. There will be first aid and emergency procedures in place to minimise any effect of ill health or injury; this covers the arrangements that need to be made to ensure serious illness or injury is treated in an appropriate manner.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

- A sufficient number of first aid personnel are appointed, the actual number to be decided by risk assessment.
- An adequate number of suitably stocked first aid kits are available.
- All first aid procedures carried out are recorded in the company accident book.
- All contents of first aid kits are “in date” and appropriate to the risk assessment.
- First aiders undertake an initial Draft course in first aid and regular training thereafter, as prescribed by the Health and Safety Executive.
- Any “Appointed Persons” undertake an approved course and receive regular training updates as required.
- A list of First Aid personnel and their contact numbers / locations is prominently displayed in the workplace.

Further guidance and control documents:

- Safety Form SF 1201 First Aid Kit Checks

13 Fire and Emergency Planning

Policy statement

IEP policy is to alert staff and other persons to any perceived threat or emergency, to follow set procedures and to provide training to minimise the risks arising from such emergencies. Further in accordance with the Regulatory Reform (Fire Safety) Order 2005 the principal of risk assessment will be utilised to identify, eliminate and/or reduce risk to as low as reasonably practicable.

Emergencies in this context could be, for example, a fire, a gas leak, a bomb threat, a dangerous substance or object, flooding, or damage caused to the building by freak weather conditions.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Identify the types of emergencies or threats that are likely to occur.
- Assess and reduce the risks arising from such emergencies or threats.
- If necessary, reduce the accessibility of unauthorised persons in to their premises.
- Review those assessments on a regular basis and in any case after an incident in which an emergency evacuation of the building has taken place.
- Ensure that an emergency evacuation system is in place and that certain employees have been nominated to assist in such an evacuation.
- Ensure that all supplied fire fighting systems are maintained in accordance with the manufacturers' guidelines.
- Ensure that all employees are made aware of such procedures and know what to do in an emergency by taking part in regular practice drills.
- Ensure that all fitted audible warning systems are tested regularly, with a record of all such tests maintained.
- Ensure Fire Marshals receive adequate training

Fire Safety Documentation

All Fire Safety documentation, maintenance and testing records are held in a safe location, (Fire Log) available for inspection.

Further guidance and control documents:

- Safety Form SF 0312 Site Emergency Plan template
- See Guidance Notes: Fire & Emergencies Template

  See relevant office Fire Log and forms

14 Workplace (Health & Safety)

Policy statement

IEP is committed to providing a safe and healthy working environment at all times, therefore it intends to ensure compliance with the Workplace (Health, Safety and Welfare) Regulations 1992, and any other relevant workplace legislation, to avoid ill health and promote good health and employee welfare.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Continually identify potential hazards and assess the risks to the health and safety of their employees and other persons who have access to the workplace.
- Through the risk assessment approach, consider the interface between the activities undertaken at the premises and the structure of the building itself, eliminating or reducing those risks, so far as is reasonably practicable.
- Review assessments on a regular basis or in response to a change in working conditions, and in any case following an incident / accident caused by a unsafe of unhealthy workplace environment.
- Ensure that suitable and sufficient heating, lighting and ventilation is provided and maintained within the premises.
- Monitor and maintain, as appropriate, the condition of all floors and traffic routes to ensure that such areas are kept in good condition.
- Ensure a good level of general housekeeping is maintained within all areas of the business
- Monitor and maintain, as appropriate, the rest areas, sanitary conveniences and washing facilities provided for employees, ensuring that areas are sufficiently cleaned and waste is not allowed to build up.
- Report any defects, hazards or other risks, beyond his immediate power to remedy to the Directors.
- Ensure that regular inspections of the workplace are carried out in conjunction with the relevant section line management, paying particular attention to the areas detailed above
- All statutory inspections of work equipment are planned and are carried out within the timescales specified by the competent person.
- Where the condition of the work equipment is likely to cause risk to safety of operators etc, the work equipment is removed from service and isolated from its power supply or otherwise made safe, until it has been repaired or replaced.
- Ensure all Statutory Inspections and Tests are carried out at the required frequency e.g:
    - Lifting equipment within six months, unless otherwise specified by the competent person, e.g. passenger lifts, goods lifts and hoists, escalators, access cradles, elevating platforms, latchway systems, eyebolts, harnesses and lift trucks
    - All pressure systems examined at the specified frequencies set by the competent person in the written scheme of examination.
    - Annual safety checks of the gas installation and gas appliances.
- All reports following statutory inspections are kept along with evidence of remedial action taken.

- The exact dates by which each item requires its statutory inspection will be identified and will be prompted through the planned maintenance system.

Further guidance and control documents:

- See Guidance Note: Workplace Safety

15 Housekeeping

Policy statement

IEP is committed to providing a safe and healthy working environment at all times but employees are required to cooperate by maintaining good housekeeping practices.

Tidiness is one of the foundation stones of safety and good environmental practice. Many accidents are caused through people tripping, slipping and falling over materials and equipment which should not have been left lying around. A great deal of environmental problems could be avoided if materials were disposed of properly instead of being allowed to escape into the surrounding area.

Policy standards

Everyone can make a significant contribution to safety and the environment, merely by applying common sense e.g:

- Do not leave rubbish lying about - clean up as you go
- Ensure all waste is disposed of in the correct skip / bin.
- Do not obstruct gangways, aisles or stairways with tools, equipment, cables or materials.
- Make sure that spilled liquids are cleaned up from floors immediately and the contaminated clean up material is disposed of in the correct skip / bin. If clean up is delayed, post a notice to warn others.
- Keep outside areas regularly swept clear of rubbish - especially in windy conditions.
- When clearing up, make sure the refuse disposal point is in a safe position and all waste containers are clearly marked for their contents.
- Position all cables and hoses out of the way. Where possible do not lay them across walkways
- Do not allow accumulations of waste materials.
- Maintain a “tidy desk” policy.
- Ensure the waste disposal area is kept tidy and containers are removed in adequate time to prevent overspill.

Proper waste disposal is an integral part of good housekeeping. Not only does this improve tidiness but it also improves safety and reduces the likelihood of pollution and prosecution.

16 Electricity

Policy statement

It is IEP policy that mains electrical equipment and supplies are appropriate to the working environment and are subject to appropriate routine testing and inspection.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure all (mains) fixed electrical installations and supplies are subject to formal testing and inspection by a competent person every five years with an appropriate certificate of conformity retained.
- Ensure suitable protective measures are in place to protect employees and others from electric shock/electrocution. (i.e. RCD's)
- Ensure that adequate procedures are in place to inspect and test all portable electrical equipment (PAT) used by its employees during the course of their work and that such formal testing and inspections are properly recorded.
- Ensure that only competent persons are used for inspections and testing of electrical systems and equipment.
- Provide relevant instruction, information and training to employees in the routine pre-use, visual inspection of all mains operated electrical equipment and the reporting of defect portable appliances.
- Establish a system of reporting and repairing of defect portable appliances.
- Ensure that emergency and first aid procedures take account of the actions to be taken in the event of electric shock or burns.

Further guidance and control documents:

- Safety Form SF 0802 Portable Elec Equip Insp Record

17 Display Screen Equipment

Policy statement

It is IEP policy that all computer users (display screen users) will be assessed once they commence employment with us. This will help us determine whether or not they can be classified as "users" for the purposes of current legal requirements. This assessment will be carried out by completing a Display Screen Equipment (DSE) self-assessment questionnaire. This will then determine whether or not any further action is required. If so, a further assessment will be carried out.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

- Hazards and risks associated with the use of display screen equipment are identified.
- An assessment of the risks of injury from the use of display screen equipment for each identified "DSE User" is made, with a suitable assessment record maintained.
- Reviews of assessments on a regular basis (or in response to a change in working practice), and in any case following any report of detrimental health effects suffered by a user, involving the use of display screen equipment.
- Ensure that system of work breaks are known and implemented.
- All system users are aware of how to use the display screen equipment safely by providing relevant information.
- Ensure a system is in place to provide eye and eyesight tests for those display screen equipment users who request them and further to ensure the provision of spectacles (in line with current regulations) as necessary.

Eye tests

Any employee who has been designated as a DSE user has the right to request an eye test.

This will be organised through an optician usually nominated by IEP. However, it is the employee's responsibility to make arrangements to have the eye test carried out. Following the initial eye test, the frequency of any follow-up tests will be decided solely by the optician.

Supply of prescription glasses

Where the optician has confirmed in writing that glasses are needed exclusively for DSE use, IEP will make a contribution towards the cost. This figure is reviewed periodically and will be set to reflect the cost of a basic pair of glasses. Should employees wish to purchase a more expensive pair, then this amount will be made available towards the cost. The balance will need to be funded by the individual employee.

Note: Employers only have to pay for spectacles if special ones (for example, prescribed for the distance at which the screen is viewed) are needed and normal ones cannot be used.

Laptop users

Some of our staff may use laptops instead of, or in addition to, desktop computers. This is most likely to apply to those who spend much of their day outside the office.

If so, this policy should be read in conjunction with our Laptop Safety guidance. This contains guidelines on the safe use of laptops whilst being used in less than ideal conditions, such as cars.

Further guidance and control documents:

- Safety Form SF 0701 DSE Users Records

- Safety Form SF 0305 Homeworker Assessment
- Safety Form SF DSE Workstation Assessment
- See Guidance Note: Laptop Safety
- See Guidance Note: Safe use of Display Screen Equipment
- Guidance on Workstation Ergonomics - www.hp.com/ergo

18 Manual Handling

Policy statement

IEP is committed to reducing the risk to employees who carry out moving and handling in the course of their work. In accordance with the Manual Handling Operations Regulations 1992, the need for manual handling will be avoided so far as reasonably practicable and employees will not be expected to undertake a manual handling task that may lead to injury or ill health.

Wherever reasonably practicable hazardous handling will be by mechanical means, where mechanical means cannot be employed, then alternative safe systems of work will be identified.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

- Hazardous handling and moving operations (including lifting, pushing, pilling, carrying etc.) are identified.
- The need for any hazardous moving and handling operations is avoided so far as is reasonably practicable.
- Risk of injury from all unavoidable hazardous moving and handling operations is assessed and action taken to reduce that risk is identified, recorded and communicated to all staff identified as being at risk of harm.
- All assessments are reviewed on a regular basis or in response to a change in working practices, and in any case following an incident / accident involving moving and handling.
- Employees who carry out moving and handling operations in the course of their work are trained in the correct moving and handling techniques.
- Any equipment provided for moving and handling is maintained in accordance with manufacturers' instructions.

Further guidance and control documents:

- Safety Form SF 0303 Manual Handling Risk Assessment
- See Guidance Note: Manual Handling Safety

19 New and Expectant Mothers

Policy Statement

IEP recognises its responsibilities under the Management of Health and Safety at Work Regulations 1999 to specifically address the risks to women of childbearing age and her unborn or newly born child.

Both women and their unborn or newly born child are at increased risk from various physical, chemical and biological hazards in the workplace. The company will carry out risk assessments in accordance with procedure detailed above and will introduce appropriate preventative and protective measures, to reduce any risks so far as is reasonably practicable.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Upon notification of pregnancy from an employee, identify all significant hazards to which a new or expectant mother might be exposed and eliminate the risks where this is possible.
- Ensure that working arrangements are reviewed to minimise risk, including matters such as working patterns.
- Ensure any representations made by the pregnant workers medical advisors are acted upon.
- Re-assign the employee to low risk work where a significant risk cannot be avoided, if no such work exists then the employee will be placed on paid leave until she ceases to be pregnant or a new mother, or suitable work can be found.
- As appropriate, arrange suitable facilities where pregnant and nursing mothers may take their rest breaks in a degree of privacy and calm.

Further guidance and control documents:

- Safety Form SF 0306 New Expectant Mum Risk Ass't

20 Young Persons

Policy statement

This procedure gives general guidance in relation to the Company's obligations in relation to the health and safety of young people at work. The Management of Health and Safety at Work Regulations require employers to protect young people from any risks to their health and safety which are associated with their lack of experience, lack of awareness of existing risks, or immaturity.

Employers must not take young persons into their employment unless a risk assessment has been carried out in order to ensure that any risks to those young persons are identified and addressed.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Carry out and document Risk Assessments specific to Young Persons and the work they will be doing - before they start work
- Not employ them on the activities or where the hazards/risks are listed in the Guidance Notes (which are supplementary to this procedure)
- Before offering Work Experience to children still at school, seek the advice of the Competent Person.

Risk assessment

The key to protecting young persons at work is Risk Assessment. Existing or generic risk assessments for older workers should not be relied upon. The risk assessment should look specifically at the work to be carried out from a risk to young person's perspective.

The risk assessment must determine whether the work and/or premises represents any such risks to young persons and whether existing control measures provide adequate protection and if necessary, to introduce control measures to eliminate or limit the risks, so far as is reasonably practicable..

When carrying out the assessment or review of the risks to young persons, employers must take into account certain hazards, where these are relevant to the employer's work and young people may be exposed to them.

There is no need to carry out a new risk assessment each time you employ a young person, as long as your current risk assessment takes into account the characteristics of young people and the factors outlined above. In all cases you will need to review the risk assessment if the nature of the work changes or you have reason to believe that it is no longer valid. Employers must not employ young workers in certain activities where you identify significant risks to their health and safety, which cannot be avoided.

The normal Risk Assessment form is adequate for recording risks assessments specific to Young Persons.

You must inform all employees, including those under 18 years of age, about the risks to their health and safety identified by the assessment, and the measures put in place to control them.

You should make sure training is undertaken and check that key messages have been understood. Young people will also need training and instruction on the hazards and risks present in the workplace and on the preventive and control measures put in place to protect their health and safety. This training should include a basic introduction to health and safety, for example including first aid, fire and evacuation procedures.

As well as training, you will need to bear in mind that young people are also very likely to require more supervision than adults.

The provisions of Working Time Regulations 1998 (and the Working Time Regulations 1999) apply to all workers, with some additional provisions available for young workers.

Work Experience

You must consult with the Competent Person before contemplating offering Work Experience to an individual or organisation.

When offering Work Experience to any children still of compulsory school age i.e. below the Minimum School Leaving Age (MSLA) you must also let parents/guardians know the key findings of the risk assessment and control measures you have introduced before the child starts work or work experience. You may want to ask the work experience organiser to help you in getting information to parents or guardians of any child seeking a placement.

You do not need parental consent to employ young people above the MSLA, but your local authority does require you to obtain it before you employ a child of compulsory school age. You must provide the local authority with relevant information on the child so that he or she can be issued with an employment permit. The local authority will advise you on your full responsibilities which include providing written confirmation that you have completed a risk assessment and have written approval from the parents or guardians. When you are offering a work experience placement for school pupils/students, the work experience organiser will deal with parental consent.

Students and trainees, including children, on work experience are regarded in health and safety law as employees. If you offer work experience placements to students, you must provide them with the same health, safety and welfare protection you give to your other employees.

Children below the MSLA must not be employed in industrial undertakings such as factories, construction sites etc except when on approved work experience schemes.

Definitions

Minimum School-leaving Age (MSLA)

A child may not legally leave school until the last Friday in June of the school year during which they reach the age 16, or if his or her birthday falls after that date, but before the start of the next school year.

This means that if a child's 16th birthday falls on or before the last Friday in June, they can leave school on that day. They can also leave school on that day if their 16th birthday falls during the summer holidays.

Young Worker

A "young worker" is defined as anyone between the minimum school leaving age (MSLA) and eighteen years of age.

Child

A "child" is defined as a person who is not over compulsory school age.

Work Experience

An arrangement between an employer and an organiser whereby a "child" who is at least 13 years old, is allowed to gain experience of a working environment.

Inexperience

Inexperience and lack of perception of danger are important factors in why young people may be at greater risk than their older colleagues.

Immaturity

Physical immaturity should be taken into account in work activities requiring prolonged strenuous physical effort, repetitive and / or forceful movements, particularly where these are combined with awkward working postures and/or insufficient recovery positions. Psychological immaturity is also important, especially given the increasing prominence of work-related stress within the field of health and safety management.

Further guidance and control documents:

- See Guidance Note: Young Persons Guidance

21 Use of Work Equipment

Policy statement

IEP is committed, in accordance with the Provision and Use of Work Equipment Regulations (PUWER) 1998, to reducing the risk of accident or injury to its employees or other persons who may be affected by its operations, by the careful selection, installation use and maintenance of all work equipment, (i.e. company vehicles, mechanical handling equipment, access equipment, such as ladders, portable tools etc). IEP therefore intends to comply, in all respects with legislation relating to the provision and use of work equipment in the work environment.

Definitions

'Work equipment' is defined as any operational machinery, appliance, apparatus, tool or installation for use at work (whether exclusively or not)'.

This definition is very broad and covers a wide range of equipment, both manually and power operated, such as company vehicles, computers, ladders, trolleys, photocopiers etc.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure that any work equipment is appropriate for the task.
- Identify all significant hazards to which its employees and others may be exposed when using any work equipment, or mechanical lifting equipment.
- Assess the risk to which any persons can be exposed as a result of the hazards identified when using any work equipment or mechanical lifting equipment,
- Document and communicate the findings to all staff identified as being at risk of harm.
- Review the assessment on a regular basis and in any case following an incident / accident involving the use of work equipment.
- Ensure that all work machinery and mechanical lifting equipment is routinely inspected as required by current legislation and manufacturers guidelines.
- Ensure that only authorised personnel, with the appropriate learning (licence, certificate or otherwise) operate or maintain any work machinery or mechanical lifting equipment (company vehicles, operational machinery etc)
- Ensure that employees receive appropriate general information, instruction, training and supervision in the safe and correct use of all work equipment.
- Ensure that employees are aware of the requirement to use work equipment in accordance with any training and instruction given, regarding safe use
- Provide through competent persons, more detailed training to any staff who are required to fit and/or maintain abrasive wheels and/or cutting / grinding discs.

Employee training

As part of our duty to maintain safe systems of work, only trained employees will be allowed to operate machinery. This training may be provided by a number of sources including our suppliers, as well as training on the job by our own staff. All records of staff training will be kept on individual employees' personnel files. In addition, we will maintain a register of trained users, which can be updated as necessary.

Maintenance

All identified relevant equipment or machinery will be subject to maintenance and inspection, as necessary, for its continued safe operation. Where appropriate, this will be carried out under a service contract. Records of any maintenance and routine repairs will be kept for at least three years. A sufficient budget will be made available to ensure the safe maintenance of any machinery.

Should any employee experience a problem between routine maintenance, they should report it immediately to their manager.

Further guidance and control documents:

- Safety Form SF 0901 Register of Work Equipment
- Safety Form SF 0902 Ladder Reg and Insp Record

22 Occupational Driving

Policy statement

It is IEP policy that all use of road vehicles (whether privately owned, hired or IEP vehicles) on company business be in accordance with current UK best practice standards to ensure that the risks associated with occupational driving are minimised and to fulfil the requirements of its statutory 'duty of care' so far as reasonably practicable.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

Choice of Vehicles

- Vehicles used on IEP business are taxed and have a current MOT certificate by undertaking regular and routine checks.
- Drivers are properly licensed and are provided with advice on the appropriate level of motor insurance required for the business operations.
- Drivers are made aware of the importance of regular maintenance, servicing and user checks (i.e. brakes, lights, seat belts etc) to keep vehicles in safe and good working order.

Work Planning

- Drivers are aware of the need to plan their journeys using the appropriate mapping systems available to calculate the optimum route and to allow sufficient time to travel within the appropriate speed limits (drivers are personally liable for any infringements).
- Drivers' journey lengths are kept to a minimum and accompanied where necessary to share the driving. Overnight accommodation is provided as appropriate.

Driving Competences

- For normal occupational driving on IEP business there is no need for special training and competences (other than the need to hold a current driving licence, including the relevant "authorised category" for the vehicle being driven).

Use of Mobile Telephones

- Drivers must be made aware that, except in emergency situations, the use of hand held mobile telephones is strictly prohibited whilst vehicles are either in motion or are stationary with the engine running (because of the distraction they present) as defined by law.
- The use of hands-free telephones (factory fitted or earpiece etc) is acceptable as long as the driver feels it is safe to do so and that the action does not involve touching or handling the telephone. All such actions are the responsibility of the driver.
- If a driver is required to answer the phone whilst driving, IEP will provide a suitable hands-free set. Otherwise the phone is to be switched off whilst driving and messages picked up when safely parked-up.

Further guidance and control documents:

- Safety Form SF 2101 Drivers Weekly Check List

23 Work at Height

Policy statement

IEP is committed to reducing the risk of accident or injury to its employees from the risk of work at height and will do all that is reasonably practicable to prevent anyone falling. It therefore intends to comply, in all respects with current legislation and best practice guidance relating to the working at height and in particular the Work at Height Regulations 2005.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure the following hierarchy for managing (and selecting equipment) for work at height is maintained:
    - Avoidance of work at height wherever possible
    - The use of equipment or other measures to prevent falls where work at height cannot be avoided; and
    - Where the risk of an injury from a fall from height cannot be eliminated, the use of work equipment or other measures to minimise the distance and consequences of a fall.
- Ensure that any work at height is evaluated and where appropriate, the Work at Height procedure and additional risk assessment is implemented.
- Ensure that where precautions implemented do not entirely eliminate the risk of a fall occurring, staff who will be working at height are trained on how to avoid falling and how to avoid or minimise the injury to themselves should they fall
- That any work equipment selected to work from height is suitable and sufficient taking into account the place where the work is being done and the working conditions.
- That any access equipment is regularly inspected, with staff trained in its safe use and are aware of the importance of reporting faulty or damaged equipment
- Ensure that no work is undertaken on fragile surfaces (e.g. fragile roofs)

Note:

Where there is no other alternative other than to access or work from a fragile surface, the manager must be informed and a further, more detailed assessment undertaken.

Further guidance and control documents:

- Safety Form SF 0304 Work at Height Risk Assessment

24 Lone Working

Policy statement

It is IEP policy to ensure, so far as is reasonably practicable, employees and self employed contractors who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

Assess the risks and in doing so will consider the following:

- Remoteness of isolation of workplaces
- Communication problems
- Possibility of interference (such as violence or criminal activity)
- Nature of injury or damage to health and anticipated “worse case” scenario

Senior managers will develop safe systems of work where their employees or contractors often work alone and these will include:

- Required ability of the employee
- Suitability of equipment
- Means of communication
- Provision for treatment of injuries
- Emergency and accident procedures
- Training requirements
- Supervision of new recruits or young people
- Provision, where deemed necessary, of personal attack alarm

25 Smoking at Work

Policy statement

This policy has been developed to protect all employees, service users, customers and visitors from exposure to second-hand smoke and to assist compliance with the Health Act 2006. Exposure to second-hand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Therefore it is IEP policy that all our workplaces are smoke free, and all employees have a right to work in a smoke free environment.

Policy Standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

- All inside areas of IEP premises are “No Smoking” areas
- No-smoking signs will be displayed in a prominent position at every access entrance to IEP smoke free premises. These will meet the following minimum requirements:
    - Be a minimum of A5 in area (210mm x 148mm) display the international no-smoking symbol at least 70mm in diameter
    - Carry the following words in characters that can be easily read: “No smoking. It is against the law to smoke in these premises”
- All company vehicles will be smoke free at all times, if they are ever used by more than one person, regardless of whether they are in the vehicle at the same time.
- All smoke free vehicles will display a no-smoking sign in each compartment of the vehicle in which people can be carried. This will show the international no-smoking symbol at least 70mm in diameter.

(Vehicles that are used primarily for private purposes will not be required to be smoke free)

Further guidance and control documents:

The NHS offers a range of free services to help smokers give up. (www.gosmokefree.co.uk or call the NHS Smoking Helpline on 0800 169 0 169 for details) Alternatively you can text

‘GIVE UP’ and your full postcode to 88088 to find your local NHS Stop Smoking Service.

26 Stress at Work

Policy statement

IEP is a responsible employer and are aware of our duty of care regarding the mental health and welfare of our staff. For this reason, we will take all reasonable steps to ensure that staff are not placed under excessive stress by their work. This means that we need to ensure that staff do not have excessive demands placed on them by their job. As stress is also caused by bullying, harassment and violence, we are required by law to provide a working environment which is, as is reasonably practicable, free from these influences.

However, we are legally entitled to assume that all staff can cope with the normal day-to-day pressures of their job. If this is not the case, staff have a duty to inform us.

IEP have adopted the following Health & Safety Executive (HSE) "Definition of Stress"

"The reaction people have to excessive pressures or other types of demands placed on them. It arises when they worry that they cannot cope." In other words, stress occurs when the pressures on a person exceed their ability to deal with them.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will consider the following controls:

Should any member of staff feel that they are suffering from an unacceptable level of work related stress; the following procedures should be implemented:

- At first instance, the employee should inform their immediate line manager. He or she will treat the matter with sympathy and in confidence
- If necessary, the manager will carry out a stress risk assessment. This will include a review of the employee's actual duties against those described in their job description
- The findings of the risk assessment will be discussed with the employee. If appropriate, changes will be made to their role in order to reduce the levels of stress experienced
- If appropriate, the employee will be referred to a doctor of the company's choice for a medical assessment. Alternatively, the employee may be offered counselling.

Note:

Whilst IEP are not responsible for causes of stress outside the working environment, we recognise that it can impact on an employee's attendance and work performance. Therefore, we would encourage employees to make us aware of any problems which are causing them undue concern.

Further guidance and control documents:

- See Guidance Note: Management of Stress

27 Temporary Workers

Policy statement

IEP may from time to time, employ temporary staff in any capacity, to deal with peak workloads, changes in work, staff absences, and for other reasons. IEP will ensure that any temporary staff are protected in terms of their health and safety and required to protect that of others, to exactly the same standards which apply to permanently employed staff.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Advise the agency, in advance of the general approach to health and safety adopted, by the company and require potential staff to be briefed prior to being sent to work on our premises.
- Provide to the agency a job specification detailing any competence (skills, knowledge and experience) required in the temporary worker.
- On arrival, ensure the worker is assessed for compliance with the specification.
- Upon arrival of the temporary worker provide an induction briefing on the general arrangements within the company (i.e. Fire protection, First Aiders etc)
- During the induction, ensure relevant hazards associated with the premises and work activity to be undertaken are brought to the attention of the temporary worker along with the relevant control measures and safe working procedures etc.
- Ensure that any work specific or general training is provided in line with the activities to be undertaken, prior to their undertaking.

Further guidance and control documents:

- See Guidance Note: Agency Workers

28 Visitors e.g. contractors working in the office

Policy Statement

IEP recognises its responsibilities towards visitors, and the need to ensure that any contractors visiting the site are themselves protected from hazards to their health and safety.

IEP will ensure that all visitors and contractors are made aware of the emergency evacuation procedures and are not left unattended and are made aware of IEP health and safety procedures relevant to their visit.

Note: Contractors employed by the company to assist them with their undertakings are covered in the above "Temporary Workers" policy

Policy Standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure that method statements and risk assessment are received prior to any work commencing. This will ensure the contractor has considered the health and safety of its own workforce and others that could be affected by the work.
- Ensure that any nominated contractor receives and acknowledges receipt of IEP Health and Safety Policy. (This policy must be passed to the actual personnel carrying out the work).
- Make contractors aware of the need to supply competent personnel with regards to the undertaking.
- Make all visitors and contractors aware of the fire and emergency evacuation procedures, by ensuring that they report to reception, and announce their presence to the senior person present.
- Ensure safe working practices by its visitors and contractors by regular monitoring.
- Allow only tested and inspected equipment on site, which must be verified by the contractor prior to completing any works.

Permits to Work

IEP managers and supervisors should be aware that certain 'High Risk' work must be controlled by the issuing and management of a Permit to Work. Such work would normally be managed by the Landlord or their Agent.

When should a Permit to Work apply?

A Permit to Work would normally apply in the following circumstances:

Working at Height

For example:

- Where a roof does not have permanent edge protection
- Where a roof has fragile surfaces
- Where a roof has hazardous equipment i.e. transmitter

Electrical

For example:

- Working near to or on 'Live' conductors

- Working on the main power supply to a building

Hot Work

For example:

- Welding or soldering
- Cutting or grinding that creates sparks
- Using a burner to melt pitch

Confined Space

For example:

- Sewer and man-hole inspection chamber
- Where there is a risk of drowning, asphyxiation due to a lack of oxygen or being overcome by a noxious substance

General Hazards

For hazardous work that does not fall easily into one of the above categories.

For example:

- Interruption of fire detection, alarm or suppressant system
- Moving heavy plant or machinery
- Where there is risk of an environmental incident

NOTE: If in doubt, seek guidance from the Competent Person.

Further guidance and control documents:

- Safety Form SF 1004 Approved Contractors List
- Safety Form SF 1005 Rules for Contractors
- Safety Form SF 1003 Contractors Pre Qual Questionnaire
- Safety Form SF 1008 Visitors Record
- Safety Form 1801 Permit to Work – Work at Height
- Safety Form 1801 Permit to Work – Hot Work
- Safety Form 1801 Permit to Work – Confined Spaces
- Safety Form 1801 Permit to Work - Electrical
- Safety Form 1801 Permit to Work - General
- Safety Form 1801 Register of Permit to Work Issued

29 Control of Substances Hazardous to Health

Policy statement

It is IEP policy to ensure that the risks associated with the use of chemicals on-site is minimised at all times. This will be achieved by implementing a series of risk control measures. Our starting point will be to eliminate the use of hazardous chemicals wherever possible in accordance with the Control of Substances Hazardous to Health 2002. If this can't be done then we will take all reasonable steps to find less hazardous chemicals. In the event that hazardous chemicals will need to be used, control systems such as local exhaust ventilation will be introduced. Personal protective equipment (PPE) will only be issued where hazards cannot be effectively managed by other means. Employees are advised not to use any new or existing chemicals without prior assessment.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Identify all hazardous substances present in the workplace and maintain an up-to-date register of all such substances.
- Assess who may be exposed and the level of such exposure.
- Refer to the COSHH Essentials service located at www.coshh-essentials.co.uk to assist in the process of risk assessing all chemicals.
- Control or reduce any exposure to those hazardous substances by elimination, substitution or by use of appropriate control measures.
- Review assessments at regular intervals, and in any case annually, and following an incident / accident involving a hazardous substance.
- Provide suitable and effective personal protective and/or respiratory equipment where necessary, when all other elimination and substitution measures have been exhausted.
- Record and communicate the significant findings to all staff identified as being at risk of harm, provide information, instruction and training to all such employees and any other persons likely to be exposed.
- As necessary undertake health surveillance on employees who are exposed to a substance(s) linked to a particular disease or adverse health effect; *and* if there is a reasonable likelihood under the conditions of the work of the effect occurring.

Further guidance and control documents:

- Safety Form SF 1402 COSHH Assessment
- Safety Form SF 1401 Inventory of Hazardous Substances

30 Personal Protective Equipment

Policy statement

IEP intends to provide a safe and healthy working environment and practices at all times. IEP is committed to reducing the risk to those employees and other persons whom, as a last resort, have to be provided with Personal Protective Equipment (PPE) to wear while at work on IEP business.

For the purpose of this policy, personal protective equipment is defined as equipment including clothing such as wet weather coats, gloves, safety footwear or high visibility waistcoats etc. Protective equipment includes eye protection, dust masks or safety harnesses etc.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Identify hazardous operations where there may be a need for personal protective equipment through the risk assessment process detailed above noting that personal protective equipment is only specified as a last resort and last line of defence.
- Provide the required PPE free of charge and replace it when faulty or worn out.
- Identify suitable PPE for the task/process and the wearer.
- Review all use of PPE via the relevant risk assessments on a regular basis or in response to a change in working practice, and in any case following an incident / accident caused by the use of personal protective equipment.
- Ensure that any required PPE is provided to those employees identified as being at risk.
- Provide information, instruction and training on the use, (and limitations) maintenance, storage and defect reporting of any personal protective equipment issued. (This is included as part of the Induction process)

Employees note:

PPE is not a matter of personal choice.

If the Risk Assessment calls for PPE to be used, **IT MUST BE USED.**

Employees are responsible for ensuring the correct maintenance and storage of any issued PPE following the provision of the information described above.

Employees must report faulty, damaged or worn PPE and get it changed immediately.

Employees are also reminded that any misuse of issued PPE is not acceptable and may lead to disciplinary action.

Further guidance and control documents:

- Safety Form SF1602 PPE Register

31 Waste Materials

Policy statement

It is IEP policy to ensure that all waste produced is properly and safely stored pending disposal, collected by Authorised Waste Carriers and disposed of in accordance with waste requirements.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will ensure:

- Waste materials are collected from all work areas on a daily basis.
- All work areas will be provided with suitable receptacles for the storage of waste.
- Special arrangements will be made for any 'non-domestic' types of waste, including chemicals, asbestos, plasterboard, metals, flammable liquids, cooking oil etc.
- Waste liquids e.g. waste oil must be stored in a bund large enough to contain all the liquid plus 50% should there be a spillage
- Before collection, waste must be safely and securely stored out of work areas, normally outside the building.
- Bulk refuse bins must not be stored immediately adjacent the building or under eaves, or in any other place which may create a fire risk.
- Bulk refuse bins are to be fitted with tightly fitting lids to prevent pest ingress and to prevent littering.
- Refuse areas are to be kept clean and tidy.
- A Waste Transfer Note or Consignment Notes (low grade asbestos – non licensed processes) issued from the local Waste Disposal Authority must be obtained and held on site.
- Copies of all Waste Transfer Notes and Consignment Notes must be obtained from those collecting waste and retained, available for inspection and held for two years from the date of issue.
- Any person who collects and disposes of waste from the properties must be properly licensed. A copy of the licence must be kept on file.

32 Supervision

Policy statement

It is IEP policy to ensure that adequate supervision is provided to all staff and sub-contractors such that work can be carried out safely, efficiently and to the quality standard required.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will provide an adequate and appropriate level of supervision for our employees

- Supervisors need to know what we expect from them in terms of health and safety. They need to understand our health and safety policy, where they fit in, and how you want health and safety managed.
- Supervisors may need training in the specific hazards of our processes and how we expect the risks to be controlled.
- New, inexperienced or young people, as well as those whose first language is not English, are very likely to need more supervision than others. Make sure workers know how to raise concerns and supervisors are familiar with the possible problems due to unfamiliarity, inexperience and communication difficulties
- Supervisors need to ensure that workers in their charge understand risks associated with the work environment and measures to control them
- Supervisors will need to make sure the control measures to protect against risk are up to date and are being properly used, maintained and monitored
- Make sure we have arrangements in place to check the work of contractors is being done as agreed

33 Compliance with CDM Regulations

Policy statement

As a contractor, IEP has an important role in planning, managing and monitoring our work to ensure any risks are controlled. Contractors and the workers under our control are most at risk of injury and ill health from construction work.

A contractor is anyone who directly employs or engages construction workers or manages construction work. Contractors include sub-contractors, any individual self-employed worker or business that carries out, manages or controls construction work. They must have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health.

Policy standards

To comply with this policy the following standards must be met.

IEP, on all projects, must:

- make sure the client is aware of the client duties under CDM 2015 before any work starts
- plan, manage and monitor all work carried out by themselves and their workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them
- check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them
- make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the principal contractor
- provide appropriate supervision, information and instructions to workers under their control
- ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access
- ensure suitable welfare facilities are provided from the start for workers under their control, and maintain them throughout the work

In addition to the above responsibilities, where IEP is working on **projects involving more than one contractor** must:

- coordinate our work with the work of others in the project team
- comply with directions given by the principal designer or principal contractor
- comply with parts of the Construction Phase Plan relevant to our work

Further guidance and control documents:

- RA05 Welfare Needs Assessment

34 Labour-only sub-contractors

Policy statement

As a contractor, IEP has an important role in planning, managing and monitoring our work to ensure any risks are controlled. Sub-contractors under our control are most at risk of injury and ill health from construction work.

Sub-contractors must have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health.

Policy standards

To comply with this policy the following standards must be met.

Where we use sub-contractors on projects, IEP must:

- select a suitable subcontractor – ensure they have sufficient skills and knowledge to do the job safely and without risks to health and safety
- provide information, instruction and training, including induction into IEP's Health & Safety Policy and Procedures
- decide what we need to do to manage and supervise the work of sub-contractors and agree the nature of the controls before work starts

Further guidance and control documents:

- IF65 Sub-contractor review
- IF28 Site Inspection

35 Monitoring and Review

Policy statement

IEP accepts that to prevent deviations from the established standards of safety in each area of the workplace, safety inspections and audits will be undertaken. Inspections will take place on a quarterly basis to identify every potential hazard in a particular area. This detailed inspection of the workplace checks maintenance, working practices, procedures and housekeeping.

Audits will take place annually to determine the true state of safety within IEP. An audit is a systematic and critical examination of every component of the total safety system, including, the policy, organisation, occupational health and safety controls, housekeeping and working practices.

Policy standards

To comply with this policy the following standards must be met.

The Director for Safety will:

- Ensure that management conduct formal inspections of IEP operations at the frequencies not normally less than 6 monthly
- Ensure that any such health and safety inspections are completed using an appropriate site-specific checklist provided by the Competent Person
- Ensure that full Safety Management System audits are arranged and conducted by the Competent Person
- Following a full safety management audit, ensure that a report is forwarded to the Director for Safety and all other interested parties.
- The Director for Safety with the assistance of the Competent Person, use these reports as the basis for continuing improvements in all matters relating to health and safety.

Further guidance and control documents:

- Safety Form SF 0611 Workplace Weekly Inspection
- Safety Form SF 0612 Management 6 Monthly Inspection
- Safety Form SF 0603 Management Inspection
- Safety Form SF 0604 Property Management Checklist