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Health and Safety Policy



Produced with the assistance of M.E.L. (Health & Safety) Consultants Limited
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HEALTH AND SAFETY POLICY CONTENTS

HEALTH AND SAFETY ORGANISATION

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GENERAL POLICY STATEMENT OF REL MALDON LIMITED

REL Maldon Limited fully accepts its obligations to operate in accordance with the requirements of all current legislation and codes of practice relating to Health and Safety.

Compliance with legislation is regarded as the minimum requirement.

The Company's Health and Safety Policy confirms its commitment to the prevention of injury and ill health and continual improvement in Health and Safety management and performance; to achieving the highest practicable standards of Health and Safety on all projects with which it is associated and to providing working conditions that are safe and healthy for all employees and those under the company's control. The company also confirms its commitment to providing and maintaining safe plant and equipment; to ensuring safe handling and use of substances and to providing relevant information, instruction and supervision for employees.

The effectiveness of the REL Maldon Limited Health and Safety Policy relies heavily on the competency and co-operation of company employees. The policy is communicated to all persons working under the control of REL Maldon Limited with the intent that they are made aware of their individual occupational health and safety obligations. Every employee has the personal responsibility for implementing the Health and Safety Policy and applying safe systems of work.

The requirements of the Health and Safety Policy are communicated to all employees and their involvement in the management of health and safety is actively promoted through effective and regular consultation.

The Company has an excellent record for Health and Safety at its places of work. It recognises that this is achieved through the active participation of both management and those employed by the Company, in identifying hazards and risks and then taking positive action to control them.

Ultimate responsibility for health and safety lies with Mr Robert E Lee who, supported by the company's external Health and Safety Consultants, ensures that adequate resources, advice and training are provided to deliver the objectives of the Health and Safety Policy and review performance on a regular basis along with proposals for continuous improvement.

The Company's Health and Safety Policy is documented, implemented and maintained and provides the framework for setting and reviewing the occupational Health and Safety objectives. REL Maldon Limited will ensure that Health and Safety will never be compromised for other objectives. The policy will be reviewed annually to ensure that it remains relevant and appropriate or sooner should measures need to be taken to ensure its effectiveness.

This policy is available to all interested parties upon request.

Signed..... **Mr Robert E Lee**
REL Maldon Limited

Dated: March 2022

This Policy will be reviewed on an annual basis or:
If there is reason to suspect that it is no longer valid; or
If there has been a significant change in the matters to which it relates.

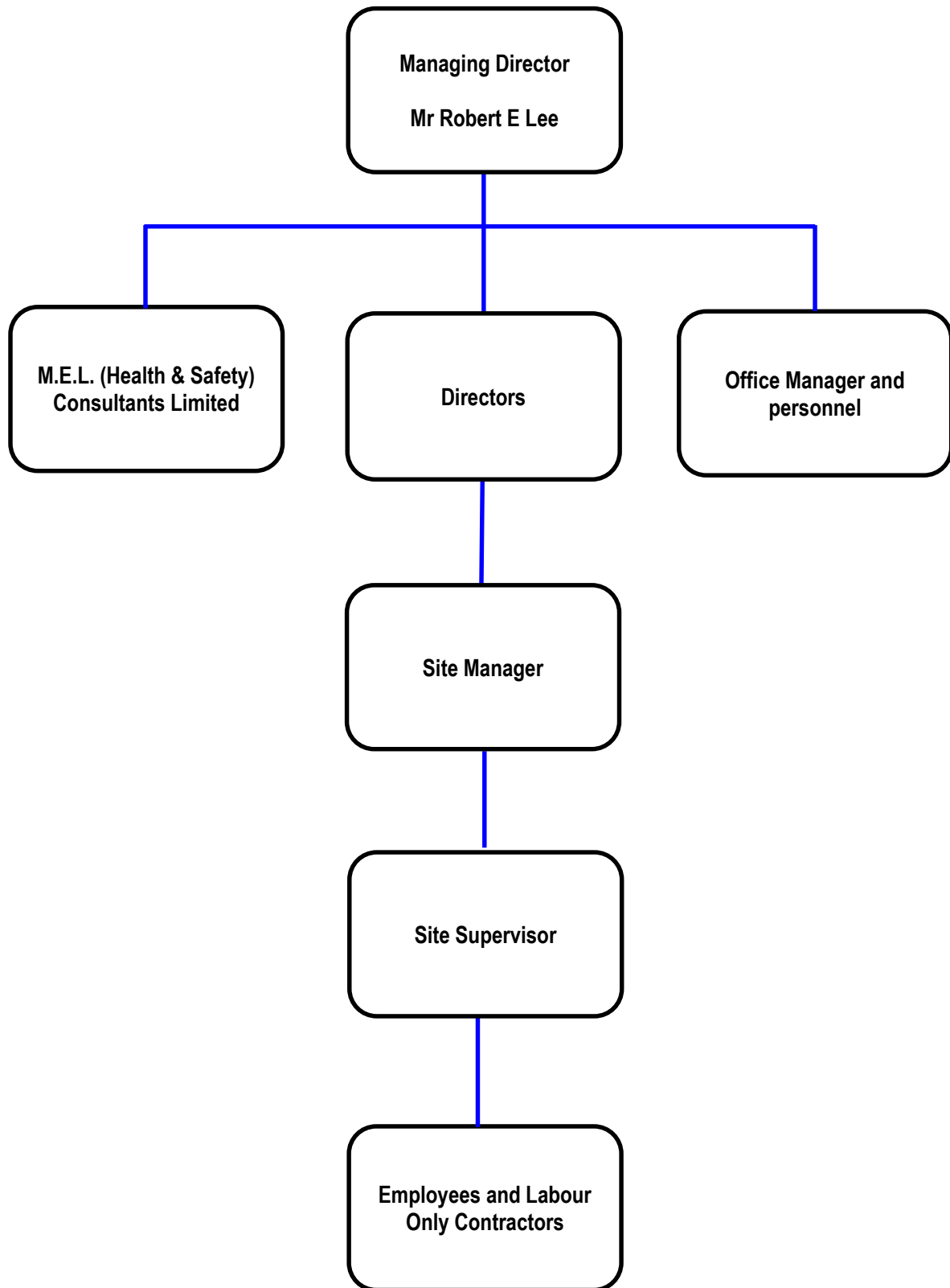
ORGANISATION FOR THE ACHIEVEMENT OF SAFE WORKING PLACES

The effectiveness of the Safety Policy is dependent on the people who are responsible for ensuring that all aspects of work are carried out with due consideration for safety and with minimum risk to health. REL Maldon Limited will ensure that this Policy is applied and is adopted by all Personnel and visitors to their premises. In order that this can be achieved REL Maldon Limited has a management structure as outlined in the Health and Safety organisation chart with individual responsibilities detailed on the following pages.

Each individual person has a duty of care to themselves and other persons who may be affected by their actions.

Any recognised breach of any Health and Safety Legislation or any potential hazard observed while at work is to be reported.

Employees are to pay due regard to any duty or requirement imposed on the Company or other person by or under any of the relevant statutory provisions and they must co-operate with the employer, so far as is practicable, to enable that duty to be complied with and are to act with all reasonable haste on advice and instructions given on matters of Health, Safety and Welfare.

SAFETY ORGANISATION CHART

— Denotes lines of communication

THE RESPONSIBILITIES OF THE MANAGING DIRECTOR MR ROBERT E LEE

The overall responsibility for Health and Safety rests with the Managing Director Mr Robert E Lee but specific duties are delegated to others according to their experience and training. Each individual person has a duty of care to himself as well as to all those they come into contact with during any part of the working day.

Mr Robert E Lee will ensure that this Policy is applied throughout the company as well as being adopted by all Employees, Contractors and visitors to premises where contracts are undertaken and accepts the following responsibilities:

- To know, understand and implement the Company's Health and Safety Policy with the objective of ensuring safe places of work;
- To initiate the Company's Policy for Health and Safety to prevent injury, ill health, damage and waste;
- To set targets for the reduction of accidents; adhering to the Company's Health and Safety Policy for safe places of work and ensuring that this is explained to all Employees in the company's induction programme;
- To promote the Company's safety culture as a serious one and that Health and Safety is paramount at all times; by planning, creating and maintaining a strong positive Health and Safety culture throughout the Company and ensuring that all company safety rules are complied with whether in the office or on site;
- To implement, co-ordinate and control the administration of Health, Safety and Fire prevention strategies within the Company;
- To set a good personal example for others to follow;
- To ensure that the Company's Employees are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this Policy throughout the entire company;
- To ensure that all Employees are kept fully up to date on all matters relating to Health and Safety. This includes new legislation, good working practices, risk assessments and COSHH assessments including personal protective equipment and other control measures highlighted;
- To communicate with M.E.L. (Health & Safety) Consultants Limited ensuring new safety legislation is conveyed through all levels of employees;
- To pay particular attention to ensuring that Health and Safety matters are effectively communicated;
- To sanction the necessary resources for adequate welfare facilities and equipment.
- To allocate adequate time for training in all matters of Health and Safety including those deemed DSE users to meet the requirements of legislation and to ensure that the Company Health and Safety Policy is fully implemented;
- To ensure effective accident prevention and safety training programs are developed and procedures introduced to bring about a Safe and Healthy working environment; ensuring that management are trained in these policies and play their part in promoting Health and Safety and that all new employees at induction will be trained in the company Health and Safety requirements;
- To ensure that Health and Safety training needs amongst REL Maldon Limited Employees are identified, fulfilled and are regularly reviewed;
- To ensure that fire and evacuation drills are carried out at six monthly intervals and evacuation times monitored;
- To ensure that at the outset of every project, the correct Health and Safety procedures are established;

- To undertake positive vetting of the Health and Safety policies and practices of Contractors whom the Company may employ to ensure their competence;
- To ensure that risk assessments are issued or otherwise related to Employees throughout the Company and ensure the assessments describe control measures to protect third parties on whom works being undertaken may impinge;
- To ensure control measures highlighted in risk assessments are in place before commencement of work;
- To ensure that manual handling assessments are carried out and issued or otherwise related to employees throughout the company;
- To ensure that all plant and equipment is maintained to at least statutory standards and this includes electrical appliances and the keeping of records that can be viewed on demand by enforcing authorities;
- To ensure that accidents, dangerous occurrences and cases of ill health are investigated in line with our investigation procedure and that suitable remedial measures are introduced to prevent a similar situation in the future with the records being kept at head office;
- To ensure an accident that requires reporting under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 13) is notified to the Health and Safety Executive without delay and the causes thoroughly investigated;
- To take steps in preventing horseplay and reprimand those who fail to consider their own well-being and that of others around them;
- To discipline any Employee who fails to comply with his / her individual responsibilities towards achieving safe places of work.

Ultimately to stay abreast of developments in Health and Safety legislation and good working practices and to ensure that any new developments are communicated both quickly and effectively to all Company Employees.

THE RESPONSIBILITIES OF THE HEALTH AND SAFETY CONSULTANTS

The responsibility of the Health and Safety Consultants is to monitor and revise all modifications, amendments and requirements that are deemed necessary to comply with existing and / or new legislation.

In addition, the Health and Safety Consultants will undertake to perform those duties laid out below when requested, or should the necessity arise:

- To advise Management at all levels on the implementation of Health and Safety (i.e. relevant legislation, Codes of Practices and guidance material, fire precautions, the suitability of safety equipment and accident reporting procedures);
- To identify hazards and risks during site visits. To advise and assist in the preparation of risk assessments, method statements and the development of preventative and protective measures to combat the risks;
- To advise and assist the Directors in keeping the health, safety and welfare policy under review and to recommend changes that may be required to the policy as and when necessary;
- To prepare statistical analysis of accidents and causation classification, with recommendations on preventative measures to be implemented;
- To investigate and report major injuries, notifiable dangerous occurrences and any other accidents and incidents, attending and reporting on legal proceedings in which REL Maldon Limited may be involved;
- To promote good working relations with the Health and Safety Executive and other Enforcing Authorities, striving at all times to achieve, with the co-operation of the management, compliance with current legislation;
- To advise on fire precautions, signage and best practices with regards to fire prevention;
- To assist in the choice and suitability of safety equipment and methods of training in its use and storage, etc.;
- To give guidance on the correct reporting procedure with regards to accidents at work in accordance with RIDDOR 13;
- To give guidance on the training required to ensure continued competency and assist in the production and undertaking of a training program;
- To undertake noise surveys to ensure compliance with the Control of Noise at Work Regulations 2005;
- To undertake Portable Appliance Testing to ensure the integrity of electrical equipment when authorised to do so;
- To provide details of any changes to legislation or updated guidance that M.E.L. (Health and Safety) Consultants Limited feel is appropriate and applicable to individual clients;
- To provide information via safety bulletins on changes to legislation and matters of health and safety applicable to the operations of REL Maldon Limited.

The Health and Safety Consultant or his nominee is also empowered during an inspection to stop machinery or processes that he considers present hazards to the operators or to other personnel.

THE RESPONSIBILITIES OF THE DIRECTORS

The Directors of REL Maldon Limited accept that strong and active Health and Safety leadership is important and accept the following responsibilities:

- To know, understand and implement the Company's Health and Safety Policy with the objective of ensuring safe places of work;
- To protect the Health and Safety of employees or members of the public who may be affected by the business activities;
- To identify Health and Safety as a key business risk;
- To comply with Health and Safety legislation duties;
- To promote strong and active leadership from the top demonstrating; a visible, active commitment from the board;
- To initiate effective 'downward' communication systems and management structures;
- To ensure that good Health and Safety management is integrated with business decisions;
- To ensure effective worker involvement by engaging the workforce in the promotion and achievement of safe and healthy conditions and effective 'upward' communication;
- To provide employees with high quality training;
- To identify and manage Health and Safety risks, accessing and following competent advice, and monitoring, reporting and reviewing Health and Safety performance;
- To set a good personal example for others to follow;
- Ensure that the Company's Employees are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this Policy throughout the entire company.

Ultimately to stay abreast of developments in Health and Safety legislation and good working practices and to ensure that any new developments are communicated both quickly and effectively to all Company Employees.

THE RESPONSIBILITIES OF THE OFFICE MANAGER

Based within the Head office, the Office Manager is both responsible for ensuring the Health, Safety and Welfare of all Employees in the office environment, together with ensuring that all Health and Safety information that is received and compiled with regards to those persons on site, is efficiently stored or when applicable is relayed without delay.

The sharing of information, co-ordination of activities and the setting of high standards will result in continued improvement in Health and Safety.

The Office Manager has a responsibility to:

- Ensure that the Company's Policy for Health and Safety is initiated and actively supported with an aim of identifying training needs, preventing injury and ill health and improving systems within the office;
- Consider and discuss with the Director, Mr Robert E Lee requests for Health and Safety training voiced by Employees and ensure that the necessary resources are provided for matters affecting the Health and Safety of Employees or to meet the requirements of Legislation and the Company Health and Safety Policy;
- Ensure that those persons for whom you have responsibility are competent to identify Health and Safety hazards in their environment and know of the correct actions to take in those situations, as a minimum bringing these matters to your attention;
- Undertake to communicate with Mr Robert E Lee on a regular basis with regards to Health and Safety with an aim of ensuring that Health and Safety strategies are established and reviewed in light of new information and the setting of new standards;
- Give adequate information to staff during induction to the office on risks in the environment, reporting procedures together with emergency procedures. Do not allow tomfoolery in the workplace and ensure that any Employee who fails to comply with his / her individual responsibilities towards achieving safe places of work is disciplined;
- Communicate with our Health and Safety Advisors should there be an enquiry or an incident which is to be prevented from occurring again and make suitable arrangements to ensure resources are provided for remedial measures, which may need to be introduced to prevent a similar incident in the future;
- Stay abreast of developments in Health and Safety legislation and good working practices and ensure that all new safety legislation is conveyed to those Employees for whom you are responsible;
- Dedicate time to monitoring general operations in the office together with standards i.e. the physical state of the environment (cleanliness, maintenance of machines etc.) together with the psychological standards (morale, stress and attitude etc.) All are Health and Safety related and result in high or low standards of safety;
- Act pro-actively on the administration of Health and Safety matters and communicate with all other members of management regarding Health and Safety;
- Ensure that all Employees are kept fully up to date on all matters relating to Health and Safety. This includes new legislation, good working practices, risk assessments and COSHH data;
- Always be prepared to seek, or provide to others for whom you are responsible, Health and Safety advice and assistance and set a good example for others to follow, encourage a strong, positive Health and Safety culture;
- Promote that the Company safety culture is a serious one and that Health and Safety of all Employees is paramount at all times. Know, understand and implement the Company Health and Safety Policy with the objective of ensuring a safe workplace and a strong Health and Safety Culture.
- Ensure that all accident records are to be suitably filed and brought to the attention of Mr Robert E Lee;

- To ensure any training received by the Employees is recorded and entered into the company training matrix and record or their training certificates are filed and are regularly reviewed.

Ensure that safe systems of work are used and that there is perseverance towards the continual improvement in the Health and Safety performance of those companies providing goods and services to REL Maldon Limited.

THE RESPONSIBILITIES OF THE OFFICE PERSONNEL

All Employees based within our offices are to comply with their individual duties under Section 7 and Section 8 of the Health and Safety at Work Act 1974 and Regulation 14 of the Management of Health and Safety at Work (Amendment) Regulations 2006. That is to ensure their own safety and the safety of others and to generally co-operate with their Employer so as to enable the Employer to carry out their Health and Safety duties towards them. Failure to comply with Health and Safety duties and regulations on the part of the Employee, may lead to dismissal from employment.

Office personnel have a duty:

- To understand the Company's Health and Safety Policy. Ensure that systems of work are planned in accordance with its requirements and that it is regularly examined to establish if improvements or additions should be made;
- To monitor, control and correct the Health and Safety actions of other persons with regards to Health and Safety;
- To ensure that all who report to you are kept fully up to date on any matters relating to Health and Safety and that the Health and Safety Policy is fully implemented;
- To pay particular attention to ensuring that Health and Safety matters are effectively communicated to those at the work place;
- To help maintain a comprehensive head office accident log for the Company and to ensure that in the event of an accident occurring the circumstances are fully and accurately documented without delay;
- To maintain a pro-active role in the assessment of risk and to familiarise themselves with the broad requirements of Health and Safety legislation;
- To ensure there is perseverance towards the continual improvement in the company's Health and Safety performance and those that the company employs;
- To assist Mr Robert E Lee to ensure that accidents and incidents are fully investigated and causation discovered to ensure that, in the event of an accident that requires the Health and Safety Executive to be notified, such notification is given without delay;
- To ensure that the office is kept clean and tidy and that escape routes are kept clear at all times. Frequently inspect immediate working environments to ensure that if a hazard presents itself it is reported directly;
- To become aware of emergency procedures;
- To ask for and expect to promptly receive assistance and guidance on any matter that relates to Health and Safety at work;
- To always consider how your acts or omissions may impinge on the Health and Safety of others;
- To report any incidents that may, if not corrected be able to cause harm to others;
- To provide Mr Robert E Lee with details of any areas where the Company Health and Safety Policy and actual Health and Safety practice differ and to highlight those areas where up to date refresher training may be required.

THE RESPONSIBILITIES OF THE SITE MANAGER

The Site Manager is normally in charge of all on site operations, working with Contractors and Sub-contractors and ensuring the building contract runs to schedule. They control all aspects of the site including planning work, arranging delivery of materials and managing a range of Sub-contractors, and is ultimately responsible for ensuring a contract is delivered on time.

The Site Manager must:

- Develop a strong concern for the safety of those that the Company engages on its sites and for those who may be affected by the activities of the Company. Understand that the Company safety culture is a serious one and that Health and Safety is paramount at all times. Know, understand and implement the REL Maldon Limited Health and Safety Policy with the objective of ensuring a safe workplace;
- Ensure that all Employees and Contractors engaged on sites under your control have a good understanding of the risks associated with their activities and the materials they handle. Ensure that risk assessments and COSHH data information is issued or otherwise related. Check that those who need to be aware of it understand it. If not, implement and re-check. Never assume or leave Health and Safety matters to chance. Be pro-active and prevent accidents from happening;
- Ensure that, all persons are inducted and provide a briefing on Health and Safety issues to those engaged to undertake the works. Ensure that any operatives who join the project at a later date are similarly briefed. Frequently update Employees and Contractors on Health and Safety matters;
- Ensure that adequate personal protective equipment is available on site, provided, worn when appropriate, replaced when damaged and is stored in an orderly fashion;
- Stop any unsafe or potentially unsafe working practices immediately and notify the Construction Director in the event that any labour only personnel persistently breach health and safety rules;
- Ensure that sites, workplaces and storage areas are maintained in a safe and orderly manner. Ensure heat, light and ventilation are adequate and materials not needed are removed or stored in an orderly fashion;
- Prevent obstruction of access and egress routes by the safe delivery, stacking and storage of materials;
- Ensure that each project under your control has adequate emergency procedures, firefighting equipment and first aid kit, and a trained First Aider where required by law. If work is undertaken without your presence on site ensure that those requirements which are normally shared i.e. provision of a First Aider and first aid kit are available to those on site;
- Ensure work equipment is maintained in a fit state. Equipment requiring repairs must remain safely out of use until such time as repairs that may be required are completed;
- Ensure that, if for any reason, you are away from work or unable to fully attend to Health and Safety responsibilities at your site, immediately refer the matter to a Director. Wherever possible take responsibility for fully briefing whoever takes over your position on any safety matters or issues particular to the sites concerned. Take responsibility for sites, inducting your replacement if necessary;
- Never, under any circumstances, allow works to proceed in an unsafe manner and report all accidents in accordance with the Accident Procedure and RIDDOR Procedure as laid out elsewhere in this Policy, whether or not anyone is injured;
- Set a good example while attending sites, ensuring that all site rules are adhered to and correct Personal Protective Equipment is worn at all times where necessary;
- Ensure that when at any time standing in for another Employee or assuming the duties of another Employee, carry out those duties in accordance with the appropriate section of this Policy.

Above all else understand and accept that those whom you manage are likely to have or be involved in accidents if you personally do not take positive steps to prevent them. In this respect your responsibility to others is considerable. Be safe rather than sorry. Failure to establish, maintain, monitor and control Health and Safety matters within your remit is regarded as extremely serious by the Company.

The Site Manager must also determine at the contract stage:

- That all hazardous materials are properly marked, used and stored, as outlined in the COSHH assessment;
- That flammables are stored in a suitable environment with adequate firefighting equipment to hand;
- That a tidy site is maintained and where required the work area is fenced off with barriers and adequate signage warning signage is displayed;
- The continued safety of third parties that may be present within the building (occupied buildings);
- The delivery and safe stacking of materials to prevent obstruction of access and egress routes;
- That arrangements are made between Employees, Contractors and others at the premises to avoid confusion about areas of responsibility for Health, Safety and Welfare;
- That there are adequate supplies of personal protective equipment available;
- That the safety of third parties is considered at all time before the commencement of any activity on site and to ensure that the site is left in a safe and secure manner at the end of each working day;
- That there are suitable and sufficient risk assessments for any hazardous situation and that control measures are adequately implemented.

THE RESPONSIBILITIES OF THE SITE SUPERVISOR

Site Supervisors are the backbone of the construction industry and construction projects. The Site Supervisor oversees the day-to-day construction activities on the project site.

Site Supervisors must:

- Develop a strong concern for the safety of those that the Company engages on its sites and for those who may be affected by the activities of the Company. Understand that the Company safety culture is a serious one and that Health and Safety is paramount at all times. Know, understand and implement the Company Health and Safety Policy with the objective of ensuring a safe workplace;
- Ensure that all Employees and Contractors engaged on sites under your control have a good understanding of the risks associated with their activities and the materials they handle;
- Ensure that risk assessments and COSHH data information is issued or otherwise related. Check that those who need to be aware of it understand it. If not, implement and re-check. Never assume or leave Health and Safety matters to chance. Be pro-active and prevent accidents from happening;
- Ensure that at the start of every project ensure that all persons are inducted and provide a briefing on Health and Safety issues to those engaged to undertake the works. Ensure that any operatives who join the project at a later date are similarly briefed. Frequently update Employees and Contractors on Health and Safety matters;
- Ensure that adequate Personal Protective Equipment is available on site, provided, worn when appropriate, replaced when damaged and is stored in an orderly fashion;
- Stop any unsafe or potentially unsafe working practices immediately and notify the Site Manager in the event that any labour only personnel persistently breach health and safety rules;
- Ensure that a tidy site, workplace and storage area is maintained. That heat, light and ventilation are adequate and materials not needed are removed or stored in an orderly fashion;
- Always prevent obstruction of access and egress routes by the safe delivery, stacking and storage of materials;
- Ensure that each project you oversee has adequate emergency procedures, firefighting equipment and a first aid kit. A trained first aider must also be present where required by law. If work is undertaken without your presence on site ensure that those requirements which are normally shared i.e. provision of a first aider and first aid kit are available to those on site;
- Ensure that workers visually check all work equipment prior to use and that all equipment is maintained in a fit state without risk to Health and Safety. Equipment requiring repair must remain safely out of use until such time as repairs that may be required are completed;
- Immediately speak to the Site Manager, if for any reason, you are away from work or unable to fully attend to Health and Safety responsibilities at your site;
- Wherever possible take responsibility for fully briefing whoever takes over your position on any safety matters or issues particular to the sites concerned. Take responsibility for sites, inducting your replacement if necessary;
- Never, under any circumstances, allow works to proceed in an unsafe manner and report all accidents in accordance with the Accident Procedure as laid out elsewhere in this Policy, whether or not anyone is injured;
- Set a good example while attending sites and ensure that all site rules are considered and correct Personal Protective Equipment is worn at all times where necessary.

Above all else understand and accept that those whom you manage are likely to have or be involved in accidents if you personally do not take positive steps to prevent them. In this respect your responsibility to others is considerable. Be safe rather than sorry. Failure to establish, maintain, monitor and control Health and Safety matters within your remit is regarded as extremely serious by the Company.

The Site Supervisor must also determine:

- That all hazardous materials are properly marked, used and stored, as outlined in the COSHH assessment;
- That flammables are stored in a suitable environment with adequate firefighting equipment to hand;
- That competent / trained persons are available to undertake work and use work equipment;
- That all areas of work are maintained in good order without slip, trip or fall hazards and that where necessary, suitable barriers are installed to protect third parties from work activities undertaken by the Company.
- Ensure the safe delivery and stacking of materials to prevent obstruction of access and egress routes;
- That arrangements that are made between Employees, Contractors and others at the premises to avoid confusion about areas of responsibility for Health, Safety and Welfare;
- That there is an adequate supply of Personal Protective Equipment made available;
- That the safety of third parties is considered at all times before the commencement of any activity on site and to ensure that the site is left in a safe and secure manner at the end of each working day;
- That there are suitable and sufficient risk assessments for any hazardous situation and that controls measures are adequately implemented.

THE RESPONSIBILITIES OF THE EMPLOYEES AND LABOUR ONLY CONTRACTORS

All Employees and Labour Only Contractors of the Company are to comply with their individual duties under Section 7 and Section 8 of the Health and Safety at Work Act 1974 and Regulation 14 of the Management of Health and Safety at Work (Amendment) Regulations 2006. That is to ensure their own safety and the safety of others and to generally co-operate with their Employer so as to enable the Employer to carry out his Health and Safety duties towards them. Failure to comply with Health and Safety duties and regulations on the part of the Employee, may lead to dismissal from employment.

To ensure that the locations where work is undertaken remain safe places of work, all Employees and Contractors must:

- Read and understand the Company Health and Safety Policy, and comply with its requirements and develop a personal concern for the safety of yourself and others who may be affected by your activities;
- Obtain a good understanding of the risks associated with your activities. Risk assessments will have been produced for any activity involving a significant risk. Ensure that they are seen, read and fully understood. In the event of any uncertainty stop work and ask for guidance;
- Never, under any circumstances, work in an unsafe manner. If you feel you have been asked to do so – don't! Contact the Director Mr Robert E Lee immediately;
- Wear personal protective equipment when necessary but regard its usage as a means of last resort. Work to first eliminate or control the risk;
- Not use plant and equipment for work for which it was not intended, or if you are not trained or experienced to use it;
- Report any damaged plant or equipment to the R.E.L. Site Supervisor or Manager immediately;
- Keep all work equipment in a good condition and inspect them frequently. Do not use them if they are damaged or inadequate for the job;
- Be aware that site emergency procedures exist. They are for your benefit. Find out what they are and establish the location and how to use fire-fighting equipment. Find out where First Aid equipment is kept and who the site First Aider is;
- Keep the work place tidy at all times to make it a safer and healthier place to work. Be aware of trip hazards and when possible, remove any hazards observed e.g. nails protruding from timber or cables unsafely located;
- Not play dangerous practical jokes or partake in “horseplay”. Always consider how your acts or omissions may impinge on the Health and Safety of others;
- Report any injury to yourself, which results from an accident at work, even if the injury does not stop you working. Suggest safer methods of working and to ensure that you and the general public are not put at any risk. Warn any other persons sharing the workplace of particular known hazards;
- Regard Health and Safety information and training as your right. Ask the Site Supervisor for it and do not start work until you are satisfied as to its adequacy. Ask for and expect to receive a toolbox talk on any work and Health and Safety matters you feel unsure about;
- Carry out duties in accordance with the appropriate section of this Policy, when at any time standing in for another Employee or assuming the duties of another Employee.

Above all else understand and accept that you are likely to cause or be involved in an accident if you do not take positive steps to avoid them. In this respect your responsibility to yourself and to others is enormous. Be safe rather than sorry.

GENERAL ARRANGEMENTS SECTION

HEALTH AND SAFETY OVERVIEW

Under the Environmental Protection Act 1990 and the Health and Safety at Work Act 1974, the Secretary of State is empowered to make regulations for a number of purposes, which are listed in the Schedules to the Acts. The Environmental Agency and the Health and Safety Executive may approve and issue Approved Codes of Practice. Although failure to observe such a code would not in itself be illegal, it may be referred to in criminal proceedings to show that the failure to comply with the code or any provision of it constitutes a contravention of any particular requirement or prohibition of the Act. All Acts, Orders, Regulations and ACoPs remain in force until they are modified or repealed.

ENFORCEMENT

This is the responsibility of the Environmental Agency and the Health and Safety Executive, with the proviso that responsibility may be transferred in certain cases to local authorities. Enforcement officers / inspectors may visit site and premises, if an inspector is of the opinion that a person is contravening a statutory provision or is likely to repeat a contravention, he may serve on that person an Improvement Notice requiring specified remedial action to be taken within a specified time. If the inspector considers that the contravention involves a risk of serious injury, they may serve a Prohibition Notice having immediate effect if considered necessary, directing that the specified activities must not be carried out until the specific matters have been remedied.

If an Improvement Notice or Prohibition Notice is not complied with, persons responsible are liable to imprisonment for up to 6 months (3 months under the Environmental Protection Act 1990) and an unlimited fine. Either of these notices may (but need not) include directions as to the measures to be taken, except where a Notice has immediate effect. The notice may be withdrawn by the inspector before the specified date, however, if the controls are not adequate, the notice may be extended. An inspector may seize any plant, article or substance he finds on any premises, if they consider it to be a cause of imminent danger.

An inspector may give to persons employed (or their representatives) factual information obtained relating to the premises and anything undertaken there, informing them of any action that they may pursue in relation to their findings.

The HSE has introduced a cost recovery scheme; fee for intervention (FFI); in accordance with The Health and Safety (Fees) Regulations 2012.

These Regulations place a duty on the HSE to recover its costs for carrying out its regulatory functions from those found to be in material breach of health and safety law.

A material breach is, when in the opinion of the HSE inspector, there has been a contravention of health and safety law that is serious enough to require them to notify the person in writing.

The HSE and the government believe it is right that businesses and organisations that break health and safety laws should pay for the HSE's time in putting matters right, investigating and taking enforcement action, particularly as businesses may have gained the upper hand with their competitors by saving money on matters of health and safety. Costs were previously paid for from the public purse.

The Fee for Intervention hourly rate is currently £160.

A person found guilty of an offence under the Acts is liable for, on indictment for certain offences, up to two years imprisonment, and / or an unlimited fine. Continuation of an offence for which a person has been convicted constitutes a further offence and that person is liable to a fine for each day on which the contravention continues.

The Legal Aid, Sentencing and Punishment of Offenders Act 2012 increases the penalties and provides courts with greater sentencing powers for those who flout health and safety legislation. The Act raises the maximum penalties that can be imposed for breaching health and safety regulations in the lower courts from £20,000 to unlimited, and the range of offences for which an individual can be imprisoned has also been broadened.

In accordance with section 120 of the Coroners and Justice Act 2009, the Sentencing Council issued new sentencing guidelines for the sentencing of Health and Safety offences committed by Organisations (employers) and by Individuals (employees). It applies to all organisations and offenders aged 18 and older, who are sentenced on or after 1st February 2016, regardless of the date of the offence.

Courts will determine the offence category based on the culpability and harm factors of each individual case. Health and Safety offences are concerned with failures to manage risks to Health and Safety and do not require proof that the offence caused any actual harm. The offence is in creating a risk of harm. Further factors to be considered will be whether the offence exposed a number of workers or members of the public or whether the offence was a significant cause of actual harm.

Courts will follow the general principles in setting a fine in accordance with section 164 of the Criminal Justice Act 2003, which requires that the fine must reflect the seriousness of the offence and that the court must take into account the financial circumstances of the offender.

The fine will be sufficiently substantial to have a real economic impact on the organisation or individual, which will bring home to both management and shareholders the need to comply with Health and Safety legislation.

REL Maldon Limited accepts that the level of fines for some Health and Safety offences has previously been too low and takes Health and Safety management responsibilities very seriously in order to prevent accidents and incidents of ill health at all levels within the organisation. Employees are encouraged to act in accordance with the statutory provisions placed upon them and are warned of the consequences that could result if they fail to adhere to our safe systems of work.

The Act fulfils a longstanding Government and HSE commitment to provide the courts with greater sentencing powers for health and safety crimes. The effect of the Act is to:

- Raise the maximum fine which may be imposed in the lower courts to unlimited for most health and safety offences;
- Make imprisonment an option for more health and safety offences in both the lower and higher courts;
- Make certain offences, which are currently tri-able only in the lower courts, tri-able in either the lower or higher courts.

ACCIDENT / INCIDENT INVESTIGATION

REL Maldon Limited, together with our Independent Health and Safety Consultants M.E.L. (Health & Safety) Consultants Limited, will undertake a thorough investigation of accidents/incidents in juxtaposition with contractors and Principal Contractors.

First aid injuries will be recorded and the record sheets forwarded to Mr Robert E Lee for his consideration as to what action to take. RIDDOR accidents / incidents will be investigated to ensure that suitable controls are implemented and safe systems of work are adopted, with the aim of preventing recurrence, removing the hazard and reducing the risk. Details of company accidents will be reviewed, as will investigations when undertaken, with details analysed to consider if there are any trends present; whereby working practices need to be changed and further controls included in risk assessments, to reduce risk or eliminate a hazard.

The reasons for investigating accidents are:

- To discover the circumstances of an accident in order to implement controls to prevent recurrence;
- To ensure that the preventative measures taken are adequate and pose no further risk;
- To determine whether any specific breaches of legislation have occurred;
- To increase the knowledge and awareness of employees;
- To maintain credibility of the accident reporting mechanism to the general workforce;

- To provide confidence to our clients those systems will be reviewed and controls applied if required.

All accidents will be reported to the Site Manager or Site Supervisor for consideration, as soon as is practical after the incident has occurred. The Site Manager will determine if an accident investigation is required and dependent on the circumstances and a subjective assessment an investigation will be undertaken. Examples of these circumstances are:

- Accidents or incidents which have been repeated;
- Fatalities irrespective of cause;
- Accidents whereby the cause is uncertain and the controls in place to prevent recurrence require expert attention;
- Specified injuries to persons at work, as defined in RIDDOR 2013;
- All reported cases of disease that meet the criteria for reporting under RIDDOR 2013;
- Dangerous occurrences where it appears from the report that the outcome, potential outcome, or apparent breach of law is serious;
- Work related accidents involving the public, as defined in RIDDOR 2013.

ACCIDENT PROCEDURE AND RIDDOR

All accidents are to be reported to Mr Robert E Lee at the head office and entered into the accident book. The statutory requirement to report under RIDDOR 2013 will be complied with and attended to by Mr Robert E Lee. An accident book will be retained at the office and on the work sites. In the event that there is an accident on site, full details will be completed in the book and the page detached and sent to the head office for the attention of Mr Robert E Lee.

In the event that an accident is reportable, Mr Robert E Lee, together with M.E.L. (Health & Safety) Consultants Limited, will give consideration to completing a formal investigation.

In recognition of its duties under RIDDOR 2013, the Company has instigated a system for reporting accidents, diseases and dangerous occurrences to the Health and Safety Executive. In the first instance, REL Maldon Limited will, so far as is reasonably practicable, provide and maintain a safe place of work, a safe system of work, safe appliances for work and a clean, safe and healthy working environment.

The company will provide such information, instruction, training and supervision as may be necessary to ensure the Health and Safety at work of its employees and to promote awareness and understanding of the Environment and Health and Safety throughout the workforce.

In accordance with RIDDOR 2013, Mr Robert E Lee will ensure that the reporting of all accidents, diseases and dangerous occurrences outlined in the regulations will be reported within 10 days unless where detailed:

- All deaths to workers and non-workers that arise from a work related accident (report to HSE without delay);
- Specified injuries to workers as outlined in Regulation 4 of RIDDOR 2013;
- Over 7 day injuries (whereby an employee or self-employed person is away from work or unable to perform their normal work duties for more than seven consecutive days, not counting the day of the accident) (within 15 days);
- Work related accidents involving members of the public who are taken from the scene to hospital for treatment to that injury (examinations and diagnostic tests do not constitute 'treatment' in such circumstances);
- Reportable occupational diseases caused or made worse by work, as listed in RIDDOR 2013;
- 27 categories of Dangerous Occurrences as listed in the regulations.

How to report

Online

Go to www.hse.gov.uk/riddor and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

Telephone

All incidents can be reported online but a telephone service remains for reporting fatal and specified injuries only. Call the Incident Contact Centre on 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

REL Maldon Limited will retain all records of incidents to ensure that sufficient information is collected to properly manage health and safety risks. This information will be used as a valuable management tool as an aid to risk assessment helping to develop solutions to potential risks. In this way, records will help REL Maldon Limited prevent injuries and ill health and control costs from accidental loss.

ALCOHOL, DRUGS AND SMOKING

Anyone found under the influence of or in possession of alcohol or narcotics will be dismissed from the areas of work and may be subjected to appropriate disciplinary measures, which could result in dismissal for serious or repeated offences.

Employees, labour only contractors and contractors are reminded that some prescription drugs may induce tiredness and lethargy etc. Therefore it is the Policy of REL Maldon Limited that any person who is taking medication, prescribed or not, is to inform their Site Manager or Site Supervisor if those drugs could affect their performance whilst at work. Employees etc. are also requested to notify their Site Manager or Site Supervisor of any illness that may affect their ability to undertake work activities in a safe manner. Employees are required to submit this information pursuant to Section 7 of the Health and Safety at Work Act 1974.

Anyone found smoking in an area other than designated "Smoking areas" will be instructed to extinguish the cigarette immediately with repeat offences being subject to disciplinary measures. Together with being a health risk smoking also greatly increases fire risk. The Smoke-free (Premises and Enforcement) Regulations 2006 now prohibit smoking within premises and within company vehicles. Therefore this is a statutory requirement.

ASBESTOS – DEALING WITH UNIDENTIFIED MATERIALS

The presence of asbestos is not always obvious. The HSE have advised that it is sensible to assume that any building constructed or refurbished before the year 2000 will contain asbestos materials, e.g. insulation boards, corrugated roof sheets, cement guttering, pipe work and lagging. No work should be carried out which is likely to expose employees to asbestos unless an adequate risk assessment with regard to exposure has been made.

If materials containing asbestos are cut or damaged, minute fibres of asbestos can be released into the air which may be inhaled if adequate precautions are not taken. Some people exposed to this risk, and in particular those who also smoke cigarettes, have developed asbestosis and/or certain types of cancer. It is well known that exposure to asbestos fibres can result in asbestosis; a disease caused by fibrous scarring of the lungs. Lung Cancer, Mesothelioma and Laryngeal Cancer are other diseases that can be suffered after contact with asbestos fibres.

If you suspect a material to be asbestos which was not identified during an initial assessment of the site, **STOP WORK!** Inform your Site Manager / Site Supervisor immediately and ask others to leave the immediate work area.

Employees of REL Maldon Limited are not permitted to handle asbestos products.

All asbestos is prohibited in the manufacture of new materials under The Control of Asbestos Regulations 2012, but is still to be found in many old buildings and plant.

NOTE: There can be no guarantee that asbestos will not be found in more recent applications.

If asbestos is found or suspected to be present at a workplace where it is likely to be disturbed it must be analysed. This will determine the type of asbestos and the precautions which will need to be taken.

Remember!

If you suspect a material to be asbestos which was not identified during an initial assessment of the building, STOP WORK! Inform your Site Manager / Site Supervisor immediately and ask others to leave the immediate work area.

Asbestos Survey

Prior to undertaking demolition or refurbishment works there is a requirement to undertake a destructive survey to ascertain the extent of asbestos containing materials within the building. This is to be carried out before works commence and should be passed to us as part of the tendering package to enable us to price the works accordingly.

Requirements for surveys are laid down in the HSE guidance HSG 264 Asbestos: The Survey Guide, which replaces MDHS 100. This document will be referenced to for further information.

Survey must be kept on site for the duration of the works and be under the control of the Site Supervisor and be included as part of the induction process.

Surveys must be undertaken by competent and trained persons and with a Demolition & Refurbishment survey all parts of the building must be accessed as far as is reasonably practicable and any non-accessed areas must be recorded as containing asbestos until they can be suitably accessed and further sampling undertaken.

Identified asbestos containing materials will be removed by trained and competent persons relevant to the materials discovered and in accordance with the Control of Asbestos Regulations 2012, L143 and relevant guidance.

BULLYING / HARASSMENT

REL Maldon Limited is committed to providing a work environment free of any kinds of bullying or harassment. This applies to all persons involved in the operations of REL Maldon Limited and prohibits bullying or harassment by any employee of the company, including supervisors, managers and visitors.

Bullying

Bullying is defined as repeated verbal, psychological or physical aggression by an individual or group against others that could be regarded as offensive, humiliating or intimidating. Any such activity is viewed as an act of misconduct. Examples may include:-

- Manipulating the victim's reputation by rumour, gossip and ridicule;
- Social exclusion or isolation;
- Preventing the victim from speaking by voicing loud criticisms or obscenities;
- Manipulating the nature of the work or the ability of the victim to perform their work e.g. by overloading, withholding information or setting meaningless tasks.

Harassment

Harassment occurs if any person feels intimidated, humiliated, patronised or embarrassed by the derogatory, offensive or discriminatory remarks or actions of others. Harassment may interfere with job performance, undermine job security or create a threatening or unpleasant work atmosphere.

Sexual Harassment

Sex harassment is unwanted behaviour of a sexual nature by one employee towards another person that is sexual in nature. Examples of sexual harassment include:-

- Sexual gestures;
- Displaying sexually suggestive material, such as pictures or sending suggestive or sexually explicit correspondence;
- Unwelcome sexual comments or jokes;
- Unwelcome physical conduct, such as unnecessary touching, pinching etc.

Racial Harassment

Racial harassment is unwanted behaviour of a racial nature by one employee towards another. Examples may include:-

- Abusive language, mockery or racist jokes;
- Display or circulation of racially offensive material;
- Racial name calling;
- Intrusive or persistent questioning about a person racial or ethnic origin, culture or religion;
- Exclusion from normal workplace conversation or social events i.e. frozen out.

REL Maldon Limited deplores all forms of harassment and seeks to ensure that the working environment is comfortable and secure for all its employees.

The company will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

Once the investigation is completed and determination is made regarding the alleged bullying / harassment, the result is communicated to the employee as soon as possible.

Any employee who brings a complaint of harassment will not suffer for having brought the complaint: however, disciplinary action will be taken against employees whose allegations of harassment are found to have been malicious.

CDM CONTRACTORS DUTIES

When acting as a Contractor, REL Maldon Limited will:

- Ensure that when appointing a Designer or Contractor that they have the skills, knowledge and experience and, where relevant, organisational capability to carry out the work for which they are being appointed, or that they are in the process of obtaining them;
- Co-operate with other duty holders;
- Plan, manage and monitor the construction work under our control so it is carried out in a way that controls the risks to Health and Safety and that it is proportionate to the size and complexity of the project and the nature of risks involved;
- Ensure that effective, preventative and protective measures are put in place to control the risks and the right plant, equipment and tools are provided to carry out the work involved;

- Co-ordinate the planning, management and monitoring of our own work with that of the Principal Contractor and other Contractors, and where appropriate the Principal Designer. Attending regular progress meetings with other duty holders to ensure that our arrangements for planning, managing and monitoring our own work can feed into, and remain consistent with, the project-wide arrangements;
- Monitor our work to ensure that the Health and Safety precautions are appropriate, remain in place and are followed in practice;
- Assess the existing Health and Safety skills, knowledge, training and experience of our workers, compare these existing attributes with the range of skills, knowledge, training and experience they will need for the job; and identify any shortfall in order to provide the 'necessary training'; and not rely on CSCS cards or similar as evidence that a worker has the right qualities;
- Provide appropriate supervision to all Employees, Contractors and newly trained individuals giving them the opportunity to gain positive experience of working in a range of conditions. The level of supervision provided will depend on the risks to Health and Safety involved, and the skills, knowledge, training and experience of the workers concerned;
- Provide Supervisors who have the skills, knowledge, training, experience and leadership qualities, good communication and people management skills to be effective. All Supervisors will be provided with nationally recognised site supervisor training which includes leadership and communication skills;
- Domestic clients are now also in scope of CDM 2015; we understand that their duties may be transferred to REL Maldon Limited (on a single contractor project) or the Principal Contractor (where more than one contractor is involved). Where a Principal Contractor or Principal Designer has not been appointed by the client, this role may fall to REL Maldon Limited where the company will be in control of the construction phase of the project;
- Where a Principal Contractor has been appointed we will follow the Construction Phase Plan that is relevant to our work and facilitate co-operation and co-ordination between contractors. We will produce a Construction Phase Plan before construction begins where REL Maldon Limited are the only Contractor on the project;

We will also ensure that Employees or Contractors under our control:

- Are consulted about matters which affect their health, safety and welfare;
- Take care of their own Health and Safety and others who may be affected by their actions;
- Report anything they see which is likely to endanger either their own or other's Health and Safety;
- Co-operate with the management of REL Maldon Limited, fellow workers, Contractors and other duty holders.

COMMUNICATION

REL Maldon Limited sees communication within the company as an essential part of effective Health and Safety management. The company will endeavour to communicate to employees their commitment to Safety. In doing so, we will ensure that employees are familiar with the contents of the Company's Health and Safety Policy. Communication with employees will be in the form of directions and statements, in writing, by way of the Policy Statement and by example.

REL Maldon Limited aim to work with their Client's Health and Safety representatives and other employers to ensure that all information and documentation is shared regarding Environmental, Health and Safety matters and is communicated to relevant employees in order to ensure safe working of all parties at all times. In the event that an employee has concerns with regards to health and safety they are encouraged to contact their Site Manager / Site Supervisor or Mr Robert E Lee so that the issue can be solved. Members of the public who may have concerns with regards to any matter will be given the telephone number of the head office so that it can be dealt with.

REL Maldon Limited will ensure that there is adequate consultation with all personnel should there be any alteration to working practices; when new plant is introduced or for any reason that may impinge on the Health, Safety and Welfare of employees, in accordance with the Health and Safety (Consultation with Employees) Regulations 1996 and the Safety Committee and Safety Representatives Regulations 1977. Employees are encouraged to have a representative when a formal convener has not been appointed.

COMPANY OFFICES

Management is responsible for the provision and control of all office accommodation and equipment, and the management of the office personnel.

Suitable access to and egress from the office accommodation shall be provided, kept clear of obstructions and adequately illuminated.

Suitable lighting, adequate ventilation and heating control will be provided to ensure a suitable working environment.

The positioning of office furniture, equipment and machinery will be planned to ensure it is located in accordance with the manufacturers' specifications and ensure it is compatible with safe and healthy operational practices.

All office staff will be provided with suitable instruction on office procedures to achieve tidy working conditions and safe working practices.

Management will undertake risk assessments of the fire risk relating to premises under its control.

Appropriate fire precautions shall be provided in accordance with the fire risk assessment.

Procedures shall be prepared that are to be followed in the event of fire or emergency and personnel shall be instructed in those procedures and given appropriate training in the use of firefighting equipment. Fire evacuation drills shall be conducted at least every six months, the date and comments are to be recorded and retained.

A fire plan will be displayed at conspicuous locations and firefighting equipment provided and maintained serviceable at the locations identified. All fire extinguishers will be provided in accordance with the current British standards.

Fire alarms and smoke detectors will be installed and tested weekly.

Fire exits will be inspected at the start of each day and maintained serviceable at all times.

Suitable first aid and welfare facilities will be provided and maintained.

COMPLAINTS PROCEDURE

Construction work by its very nature, is likely to impact upon the surrounding environment, including neighbouring buildings and their occupants including passers-by and members of the public in general. Our policy is to conduct our activities with due consideration to anyone that may be affected by our work and to reduce any adverse impact of our activities to as low as practicable.

REL Maldon Limited will work pro-actively with the allocated Principal Contractor, Principal Designer, the Client and Local Authority to ensure that site nuisances are restricted as far as is reasonably practicable.

Consideration will be given to all reasonable recommendations to obviate the impact on the surrounding environment. Should a third party or member of the public offer a complaint, the details will be recorded by the Supervisor in accordance with the complaints procedure and forwarded directly to the company office for the attention of Mr Robert E Lee.

In the event that an Employee has any concerns with regards to any Health and Safety matter, they are encouraged to speak directly to their Supervisor so that the issue can be resolved. In circumstances where an employee feels that the issue has not been adequately rectified, they are to outline their complaint in writing and forward it to the Head Office for attention of Mr Robert E Lee. Where required, Mr Robert E Lee will arrange a meeting to discuss the issue further so that the appropriate action or controls can be put into practise.

CONSULTATION WITH EMPLOYEES AND CONTRACTORS

The Company will ensure that there is regular consultation with all Employees and Contractors to achieve and maintain an effective Health and Safety culture within the Company's operations. The Company will consult with the Employees or their representatives and contractors, before the introduction of new procedures or technology that may affect their working practices.

Consultation will also occur before the introduction of new statutory information, new or modified work equipment or systems of work and when new technology or new substances are to be used. The consultations will be undertaken on a formal and informal basis according to the matters being relayed. Where necessary the Company will keep records of the consultations. Employees are encouraged to contact Mr Robert E Lee or their Site Supervisor if they have any concerns or queries with regards to Health and Safety matters or systems of work.

CONTROL OF HAZARDOUS SUBSTANCES

REL Maldon Limited recognise our duties in accordance with the Control of Substances Hazardous to Health (Amendment) Regulations 2004 (COSHH) and will endeavour to purchase substances that are not hazardous to health if they compare favourably in all characteristics i.e. cost, effectiveness and quality.

Material Safety Data Sheet (MSDS)

REL Maldon Limited will keep copies of the MSDS for every product used which is identified as being hazardous. The MSDS will be obtained from the suppliers or manufacturers. The Site Manager will review the MSDS to ensure they remain current, usually at the same time as reviewing the COSHH assessments.

Assessment of risk

The Site Manager will ensure that before work starts, information is obtained on any material or substance to be used and that an assessment of the risk in the use of that material or substance is completed.

REL Maldon Limited will ensure all products which fall into the COSHH regime are subject to assessment. Assessments will be produced with advice and input from others as necessary.

The Site Manager will ensure that the results of any such assessment are provided to site, together with any necessary control measures or personal protective equipment, and that all appropriate measures for the protection and health of persons who may be exposed to materials or substance hazardous to health are planned before work starts.

Training

Operatives must be trained to look out for warning signs, e.g. harmful, irritant, corrosive, toxic etc. on the containers label and the MSDS.

The Site Supervisor will ensure that operatives receive adequate information and instruction in the handling and use of any material or substance hazardous to health, and that all procedures planned to handle or use any hazardous substances are carried out fully and that any protective clothing, equipment or hygiene measures are provided and maintained as required.

All measures necessary to protect other workers and members of the public from any substance hazardous to health will be provided and maintained.

Storage and use of hazardous materials

All hazardous materials will be stored in secure ventilated areas.

Care will be taken to ensure that in the event of a spill hazardous mixing does not occur, for example the mixing of a bleach with an acid.

Hazardous material stores will include spill containment and where they are a dedicated room, will not have drainage installed or any drains present will be covered and sealed unless in use. Where hazardous materials are stored in cabinets, etc. any nearby drains will be sealed when not in use.

Spill containment materials such as absorbent granules, socks, etc. will be stored by the hazardous materials for use in the event of a spill.

Dust

Some hazardous substances are the product of a work process, such as the dust produced when cutting-off saws and angle grinders. Dust from concrete products is known to be particularly hazardous. REL Maldon Limited will purchase tools and equipment when available that eliminates dust or in the next instance reduces dust produced. Water suppression or a dust extraction system will be implemented and in the last instance Respiratory Protective Equipment (RPE) will be worn by the operatives to further reduce any remaining risk.

CO-OPERATION AND CO-ORDINATION

If we are to build and maintain a Clean, Healthy and Safe working environment, it is essential that there is co-operation between all Employees and Contractors. All Employees and Contractors are expected to co-operate and accept their duties contained in this policy. Employees have a duty to take all reasonable steps to preserve and protect the Environment and the Health and Safety of themselves and all other people affected by the Company's undertakings.

REL Maldon Limited will ensure that through co-operation and co-ordination, all employees within shared places of work, operate in a safe environment.

CORPORATE MANSLAUGHTER AND CORPORATE HOMICIDE ACT 2007

An offence will be committed where failings by an organisation's senior management are a substantial element in any gross breach of the duty of care owed to the organisation's employees or members of the public, which results in death. The maximum penalty is an unlimited fine and the court can additionally make a publicity order requiring the organisation to publish details of its conviction and fine.

In considering the liability of an organisation under the Act, a jury must consider any breaches of health and safety legislation and may have regard to any health and safety guidance. In addition to other health and safety guidance, this guidance could be a relevant consideration for a jury depending on the circumstances of the particular case.

The Law

There are no new obligations under this Act. However, the Act does provide a new offence under existing common, civil and criminal law. Companies and organisations who comply with existing health and safety legislation are not likely to be in breach of the new provisions, particularly if they can show due diligence to continual improvement in their Company's Health and Safety culture.

This Act:

- Makes it easier to prosecute companies and other large organisations when gross failures in the management of health and safety lead to death;
- Removes a key obstacle to successful prosecutions because, until now, a company could only be convicted of manslaughter if a "controlling mind" (such as a director) at the top of the company was also personally liable;

- Means that both small and large companies can be held liable for manslaughter where gross failures in the management of health and safety cause death; not just health and safety violations;
- Does not apply to individual directors, senior managers or other individuals: it is concerned with the corporate liability of the organisation itself (but where there is sufficient evidence, individuals can already be prosecuted for gross negligence manslaughter and for health and safety offences and the Act does not change this position).

The Sentencing Council issued new sentencing guidelines for judges imposing fines in relation to the size of the convicted organisation. Under the Corporate Manslaughter and Homicide Act 2007, there is no upper limit on penalties.

The following factors will be assessed when deciding upon penalties:

- How foreseeable was serious injury;
- How far short of the appropriate standard did the organisation fall;
- How common is this kind of breach within the organisation;
- Was there more than one death, or a high risk of further deaths, or serious personal injury in addition to death.

The fine imposed will reflect the seriousness of the offence and will take into account the financial circumstances of the organisation. The fine will be sufficiently substantial to have a real economic impact which will bring home to management and shareholders the need to achieve a safe environment for workers and members of the public affected by their activities.

DATA PROTECTION AND RECORD KEEPING

The General Data Protection Regulations 2018 (GDPR) and the UK General Data Protection Regulations 2020 (UK-GDPR) aims to facilitate the free flow of personal data whilst ensuring a high level of data security. The data protection regulator, the Information Commissioner's Office (ICO), will also be given more power to defend consumer interests and issue higher fines, of up to £17 million or 4 per cent of global turnover, in cases of the most serious data breaches.

REL Maldon Limited are aware of our legal responsibilities and will:

- Document our current data processes and demonstrate that they meet compliance requirements;
- Document what personal data is held;
- Assess the security of data stored, personal data in particular;
- Document where data is shared with 3rd party organisations;
- Review and define justifications for holding personal data;
- Categorise the risk level associated with personal data held; and
- Commit to data retention policies.

In accordance with the requirements of the ICO, REL Maldon Limited will nominate a Data Controller and a Data Processor to decide:

Data Controller

- To collect personal data in the first place;
- Which items of personal data to collect;
- The purpose the data is to be used for;
- Which individuals to collect data about;
- Whether to disclose the data, and if so, who to;
- Whether the subject has access rights to the data; and
- How long to retain the data, or whether to make non-routine amendments to the data.

Data Processor

- What IT systems to use to collect personal data;
- How to store the personal data;
- The details of security surrounding the data;
- The means used to transfer the data from one organisation to another;
- The means used to retrieve personal data;
- The method for ensuring a retention schedule is adhered to; and
- The means used to delete the data.

Collection of data

In order to maintain accurate and efficient records, information regarding the planning and management of Health and Safety is stored as follows:

- By means of paper based records, manually retrievable;
- By means of retrievable electronic systems.

In all circumstances, it is the policy of the company to maintain a record keeping system, regardless of description that provides protection for the privacy of all Employees, Clients and Contractors, where personal data is stored **N.B. *personal data is defined as data that relates to a living individual who can be identified.***

Description of data

Some Health and Safety data retained by the company will be classified as being sensitive personal data and may include:

- Records of physical injury suffered during the course of employment i.e. the accident book;
- Records of occupationally induced ill health e.g. sickness records;
- Records of health and safety awareness training;

- Records of safety management audits, safety sampling, safety encounters or safety inspections, where the employee is named in the reporting document;
- Financial information.

Other data may include:

- Safe working procedures, developed in support of this Policy document;
- Construction Phase Health and Safety Plans;
- Safety method statements;
- Assessment records of significant risks;
- Permit to work controls; which may directly refer to named employees.

Processing of personal data

Personal data shall be:

- Processed fairly and lawfully;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary;
- Kept for no longer than is necessary;
- Processed in a manner that ensures appropriate security.

Managing Data

Our Employees will be made aware of GDPR. Where we retain personal data relating to our Employees, Clients and Contractors:

- We shall process personal data solely for the purpose of providing our services or otherwise in accordance with instructions received and where consent is provided;
- We shall have in place technical and organisational security measures, including measures which guard against unauthorised or unlawful access to, or alteration, disclosure or destruction of personal data, and against accidental loss or destruction of, or damage to, personal data;
- We shall not sell, transfer or otherwise disclose personal data to any third party, unless such disclosure is required by law or court order;
- We shall define retention times for all data stored.

Data Subject Access Request

Employees, Clients or Contractors may request information regarding their own personal data and information will be promptly released and explained, within one month and no fee will be charged.

Rectification and Erasure

Employees, Clients and Contractors shall:

- Have the right to the rectification of inaccurate personal data;
- Have the right to the erasure of personal data where one of the following grounds applies:
 - The data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - The Employee, Client or Contractor withdraws the consent on which the processing is based and where there is no other legal ground for the processing;
 - The Employee, Client or Contractor objects to the processing and there are no overriding legitimate grounds for the processing;
 - The personal data has been unlawfully processed;
 - The personal data has to be erased for compliance with a legal obligation;

Right to Restriction of Processing

The Employee, Client or Contractor shall have the right to restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject;
- The processing is unlawful, and the Employee, Client or Contractor opposes the erasure of the personal data, and requests the restriction of their use instead;
- REL Maldon Limited no longer needs the personal data for the purposes of the original processing, but the data is required by the data subject for the establishment, exercise or defence of legal claims;
- The Employee, Client or Contractor has objected to the processing pending the verification whether the legitimate grounds of REL Maldon Limited override those of the Employee, Client or Contractor.

ELECTRICAL WORK EQUIPMENT

The Provision and Use of Work Equipment Regulations 1998, which requires the employer (person in control) to select suitable work equipment (regulation 5) and to 'ensure that work equipment is maintained in an efficient state, in efficient working order and in good repair'.

REL Maldon Limited are committed to ensuring that all electrical work equipment used by the employees, is only used in accordance with the Manufacturer's instructions, for its intended purpose and in the environment that it is designed for.

Portable electrical equipment will only be used after completion of a risk assessment. A risk assessment is about identifying hazards and taking sensible and proportionate measures to control the risks in the workplace.

Factors to consider when making the risk assessment include:

- Manufacturer's recommendations;
- Initial integrity and soundness of the equipment;
- Age of the equipment;

- Working environment in which the equipment is used (e.g. wet or dusty) or likelihood of mechanical damage;
- Frequency of use and duty cycle of the equipment;
- Foreseeable misuse of the equipment;
- Effects of any modifications or repairs to the equipment;
- Inspection and maintenance regime.

Training

All REL Maldon Limited employees will be properly trained to give the equipment a visual inspection (user check) prior to use, to identify any damage or defects to the equipment and to only use it for the purpose for which it is intended for. Where equipment is found to be faulty, it must be taken out of use immediately and reported to the Supervisor. The defective equipment must be labelled as faulty and quarantined so that it will not be used until it has been repaired by a competent person.

Maintenance

All electrical work equipment will be Portable Appliance Tested (PAT) as recommended by the HSE Guidance note HSG107 (Third edition) - Maintaining Portable Electrical Equipment. All electrical equipment tested will be entered onto a PAT register and labelled to indicate that the equipment has been tested to a satisfactory standard i.e. has been passed as safe to use and the date it was tested.

ELECTRICITY AT WORK REGULATIONS

The Regulations require management to take precautions against risk of death or personal injury from all use of electricity; including the mains electricity supply. Company management will accept responsibility for managing the use of electricity in its premises.

All electrical work is to be undertaken by competent persons only when the equipment has been isolated adequately so as to prevent inadvertent re-energising of the system by third parties.

Electrical circuits are never to be worked on live unless in all circumstances it is unavoidable to do so. In these circumstances a risk assessment is to be undertaken and all suitable controls are to be applied and checked prior to the works being undertaken.

Company management will ensure safety by specifying that electrical equipment is compliant with current standards for the electrical industry. Work to be undertaken on the removal of services will not be permitted until an isolation certificate has been received from the Client or Principal Contractor.

EMERGENCY PROCEDURES

REL Maldon Limited will provide a recorded emergency plan for the company office or when acting as a Principal Contractor on a project. The plan will be specific to the premises and it will detail the pre-planned procedures to be followed in an emergency situation. The prime objective will be to ensure that no employee or visitor can access any area where an emergency or possible danger may be present without first receiving adequate Health and Safety instruction.

The emergency plan will include the following features:-

- Action on discovering a fire;
- Warning if there is a fire;
- Calling the fire brigade;
- Evacuation of the premises including those particularly at risk;

- Power/process isolation;
- Places of assembly and roll call;
- Liaison with emergency services;
- Identification of key escape routes;
- The firefighting equipment provided;
- Specific responsibilities in the event of a fire;
- Training required;
- Provision of information to relevant persons.

REL Maldon Limited will inform employees and visitors about the emergency procedures and will provide the names of those persons given tasks to complete should there be an emergency situation. The emergency plan / evacuation will be practiced at least every 6 months to ensure that it remains valid and to develop employee's competencies and give them practice in carrying out their roles in procedure.

FACE FIT TESTING

Where a respiratory sensitiser cannot be eliminated, and environmental controls, such as ventilation cannot reduce exposure to a low enough level, exposure may need to be controlled using RPE. HSG 53 states that RPE should only be selected and used after a justification has been made in a risk assessment.

REL Maldon Limited will ensure that RPE is only used:

- When a respiratory risk remains after all other reasonable controls have been put in place;
- For short-term or infrequent exposures where other controls are not reasonably practicable;
- As an interim measure while other control measures are being put in place;
- In an emergency, to escape, to carry out emergency work, or for trained personnel for rescue purposes.

For RPE to be an effective control, it's essential that it's selected, fitted, maintained and stored correctly, and that people exposed to respiratory hazards are in a programme of health monitoring and surveillance.

According to The Control of Substance Hazardous to Health (Amendment) Regulations 2004, the performance of respiratory protective equipment (RPE) with a tight-fitting face piece depends on a good contact between the wearer's skin and the face seal of the mask.

Fit testing is needed where RPE is used as a control measure. Where it is worn by choice for comfort, fit testing isn't required. Loose fitting RPE, such as hoods and ventilated visors, do not need fit testing, although they should fit appropriately.

Selection of RPE will take account of:

- Individual factors such as facial hair, health conditions and the need to wear glasses;
- Task factors such as duration, temperature, humidity, other personal protective equipment required, and the need to see fine detail, to move around or communicate;
- Hazard factors such as the substances and their volatility.

The selection stage will include face fit testing with individual users who will need to wear RPE. Ideally, different models of RPE should be provided to individual users for them to try on.

When selecting RPE, we will make sure that it:

- Provides effective protection for the wearer against the hazard(s) identified;
- Is suitable for use in the environment in which it's to be used;
- Can be worn correctly while carrying out tasks;
- Can be worn correctly with other personal protective equipment that's needed;
- Is CE marked;
- Reduces exposures sufficiently, to comply with the law.

Fit testing will be repeated if the wearer:

- Loses or gains enough weight to change the shape of their face;
- Undergoes substantial dental work;
- Develops any facial scars or moles, etc. which could affect the fit of the RPE.

Once a user has passed a fit test for a particular face piece, they can wear other face pieces of the same make, model, type and size. However, if they need to use a different make, model, type or size then that face piece will also need to be fit tested.

It is the policy of REL Maldon Limited that a two-year cycle for re-testing is undertaken to check that the face piece remains suitable and that the wearer is taking care to wear and remove the mask correctly.

FIRE SAFETY

In accordance with the Regulatory Reform (Fire Safety) Order 2005, REL Maldon Limited has appointed a 'Responsible Person' to undertake the following specific duties:

- Ensure that general precautions are in place to protect Employees from the risk of fire;
- Ensure that a fire risk assessment is prepared and regularly reviewed;
- Ensure the effective planning, organisation, control, monitoring and review of the preventive and protective measures;
- Ensure that specific arrangements are made for the safe handling, storage and transport of dangerous substances and waste containing dangerous substances;
- Ensure that appropriate steps are taken to reduce the risks of ignition or have taken steps to limit the spread, growth and impact of a fire;
- Ensure that adequate and suitable means are provided; giving warning in the event of a fire, for the escape from a fire and for firefighting;
- Any equipment, fixed or portable, used for fighting fires must always be kept in an operational condition;
- Ensure that identified risks and safety precaution information is passed onto Employees and others that may be affected;
- Ensure that Employees are adequately trained in relation to fire safety.

Firefighting equipment

REL Maldon Limited will provide a fire alarm system and firefighting equipment at strategic points throughout the company's premises. Additional firefighting equipment will also be provided at work places i.e. whereby any 'hot works' are being carried out. All equipment will be maintained and regularly serviced.

Employees are not expected to tackle a fire unless they have been trained in the use of firefighting equipment and if it poses no threat to personal safety when they do so.

Evacuating procedure

All employees and visitors of REL Maldon Limited will be instructed in the procedure for evacuating the premises and the location of the Assembly Point at induction to the Company.

Fire notices will be posted within the company offices stating the evacuation procedure, together with the names of the fire wardens.

Fire exits and routes must be kept clear from obstruction, in the event of an alarm.

FIRST AID

The Health and Safety (First Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work.

REL Maldon Limited is committed to providing suitable and sufficient first aid facilities and a number of First Aid trained personnel at all workplaces under our control.

A First Aid Risk Assessment will be undertaken within each of the companies' workplaces to assess the facilities and personnel to be provided.

Factors to consider when making the risk assessment include:

- The nature of the work and workplace hazards and risks;
- The nature of the workforce;
- The organisation's history of accidents;
- The size of the organisation;
- The needs of travelling, remote and lone workers;
- Work patterns;
- The distribution of the workforce;
- The remoteness of the site from emergency medical services;
- Employees working on shared or multi-occupied sites;
- Annual leave and other absences of First Aiders and Emergency First Aid at Work trained person;
- First-aid provision from non-employees.

Training

REL Maldon Limited will provide suitable training to ensure that there are adequate first aid provisions within the work place, such as First Aid at Work (FAW) training or Emergency First Aid at Work (EFAW) training.

Equipment

As per the First Aid Risk Assessment, first-aid equipment will be provided at the company offices and workplaces to ensure that adequate first-aid equipment is made available, should someone become injured or become ill whilst at work. The location of the first-aid kit will be known to all Employees at Induction briefings and first-aid notices will be displayed on the companies' noticeboard, indicating the location of the first-aid kit and identity of the trained First Aiders.

One person holding a either a valid First Aid certificate or an Emergency First Aid at Work certificate will be responsible for making regular checks of the first-aid kits contents to ensure that it remains fully stocked and that the expiry date of the equipment is not expired.

Arrangements may be made with the Principal Contractor at projects for the shared usage of such facilities when employees are working on site.

HEALTH SURVEILLANCE

Health surveillance is a system of on-going health checks. These health checks may be required by law for employees who are exposed to noise or vibration, ionising radiation, solvents, fumes, dusts, biological agents and other substances hazardous to health, or work in compressed air.

Health surveillance is important for:

- Detecting ill-health effects at an early stage, so employers can introduce better controls to prevent them getting worse;
- Providing data to help employers evaluate health risks;
- Enabling employees to raise concerns about how work affects their health;
- Highlighting lapses in workplace control measures, therefore providing invaluable feedback to the risk assessment;
- Providing an opportunity to reinforce training and education of employees (e.g. on the impact of health effects and the use of protective equipment).

Our risk assessment will be used to identify any need for health surveillance. We will not use health surveillance as a substitute for undertaking a risk assessment or using effective controls.

Health surveillance can sometimes be used to help identify where more needs to be done to control risks. Where early signs of work-related ill health are detected, employers should take action to prevent further harm and protect employees.

Health surveillance is a particular legal requirement and should not be confused with:

- Activities to monitor health, where the effects from work are strongly suspected but cannot be established;
- Workplace wellbeing checks; such as promoting healthy living;
- Fitness to work examinations e.g. fitness to operate cranes, forklift trucks, other large plant and machinery;
- Health assessments requested by night working employees.

The starting point is our risk assessment. Through this, we will have found out the hazards in our workplace; identified who is at risk and taken measures to control the risks.

Where some risk remains and there is likely to be harm caused to our employees, we will need to take further steps.

We will consider health surveillance if our employees are at risk from:

- Noise or vibration;
- Solvents, dusts, fumes, biological agents and other substances hazardous to health;
- Asbestos, lead or work in compressed air;
- Ionising radiation.

Control measures may not always be reliable, despite appropriate checking and maintenance, so health surveillance can help make sure that any ill health effects are detected as early as possible.

HOUSEKEEPING AND SITE TIDINESS

There are a number of Regulations that deal with the need for workplaces and access and egress routes to be kept clear of debris and other materials, particularly Regulation 17 and 18 of the Construction (Design and Management) Regulations 2015.

In addition to the statutory requirements a tidy site results in increased efficiency and better public relations. Therefore, site tidiness will be considered at all stages of the work and good co-operation is expected between REL Maldon Limited and all other Contractors.

The Site Manager will ensure that before the site commences, access routes are agreed, storage areas are defined, compounds are planned and employees and others are made aware of REL Maldon Limited requirements with regard to storage, cleaning up and tidiness etc.

Waste material, especially combustible materials, will be controlled and either deposited in an agreed area or removed from site. Spillages of oil, diesel and other substances will be dealt with immediately.

The Site Manager will ensure that all operatives are made aware of the need to maintain the site in a tidy condition for the duration of the contact. Storage areas will be agreed to enable materials to be called off in quantities which will not create difficulties on site.

When working as a sub-contractor, the Site Manager will ensure that working areas and access on sites where employees are required to work are safe. Where difficulties are experienced, the Site Manager will discuss improvements with the Principal Contractor.

INSURANCE

In recognition of its statutory and common law duties, REL Maldon Limited has taken out insurance with an approved insurer. The certificate of insurance will be prominently displayed where our Employees can easily read it, however, we reserve the right to store it electronically, and instruct our employees how to access it. This will be made available for inspection at all reasonable times by employees and regulatory authorities e.g. the Health and Safety Executive.

LADDERS AND STEPLADDERS

REL Maldon Limited will ensure that only adequate types of Ladders and Stepladders are used at places of work with all ladders and stepladders meeting the requirements of BS EN 131 Professional.

Ladders and steps will never be used unless all other forms of access have been dismissed as not being suitable or not adequate to undertake the work e.g. due to space constraints.

Ladders will only to be used for very light work of a short duration and there will be three points of contact with the ladder at all times.

REL Maldon Limited will ensure that if a ladder is used for work at height it is only used if a risk assessment has made in accordance with regulation 3 of the Management of Health & Safety at Work (Amendment) Regulations 2006.

The risk assessment will demonstrate that the use of more suitable equipment is not justified because of the low risk and short duration of use or that existing features on site cannot be changed (space constraints). The main requirement of the risk assessment will be to justify why safer access equipment is not being used.

Ladders, if used, will be used in accordance with Schedule 6 of The Work at Height (Amendment) Regulations 2007. The Supervisor will oversee all works on site to ensure compliance i.e. that the ladder remains footed at all times and that the ladder is not upside down etc. The Supervisor and workers will have adequate training and information to ensure their competence in the inspection and use of the equipment i.e. that ladders are not twisted or damaged in any way and that only one person climbs a ladder at one time with small tools carried in a belt.

Ladders must be set at an angle of 75% or the 1 in 4 rule (one out for every four up) used. At the top of an access ladder the overlap needs to be at least five rungs if a suitable handhold is not provided. All ladders will be removed to storage once the task is complete to prevent their use for intrusion by trespassers etc. and it will prevent the hazard of leaning ladders being displaced.

Ensure that when ladders and steps are used, that you do not overreach and always grip the ladder when climbing. The top three steps should never be used as a working platform and when using step ladders ensure that the locking devices are in place. In addition; ensure that the steps are placed horizontal to the wall and not sideways on i.e. that the steps cannot be pushed over if you push against the wall.

Remember:

- Ladders and steps must only be used for short duration work (maximum 30 minutes);
- Ladders and steps must be the last resort;
- Ladders and steps must be inspected prior to use;
- Ladders and steps must only be used where there is a specific risk assessment in place for their use.

MANUAL HANDLING OPERATIONS

The Manual Handling Operations Regulations 1992 (MHOR) apply to the manual handling or lifting of materials by persons.

The main injuries associated with manual handling and lifting are:

- Back strain, slipped disc;
- Hernias;
- Musculoskeletal disorders;
- Lacerations, crushing hands or fingers;
- Tenosynovitis;
- Bruised or broken toes or feet;
- Various sprains and strains etc.

Under the MHOR regulations, employers have a duty to prevent employees from handling loads that are likely to cause injury. Injuries may be caused by the weight of the load, but it is not sufficient just to think of manual handling hazards only as a function of weight. Other factors should be considered such as:

- The physical size of the load;
- The provision of carrying handles or lifting straps;
- The position of the centre of gravity within the load;
- Is the load rigid or will the load move; i.e. partially filled fluid containers;
- Where is it being moved from and to where;
- If the load is being moved outside consider the weather conditions;
- Consider the ground condition over which the load has to be moved etc.

Planning

REL Maldon Limited will undertake manual handling assessments in all situations where a risk remains after the implementation of controls, in accordance with The Manual Handling Operations Regulations 1992. The assessment will follow the format of Schedule 1 (task, individual, load, environment and other factors i.e. PPE), and it will be reviewed if there is any reason to suspect that it is no longer valid.

All work will be tendered for or negotiated taking into account the above Regulations and the schedules of those regulations. Employees will ensure that materials are landed as close as possible by machine or truck to the area of works. Where the use of a machine is available to handle any heavy or awkward loads, instructions must be issued to site on the handling of these loads.

Where an avoidance of a manual handling task is not possible an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual to perform the task in hand. The selection of individuals to carry out manual handling or lifting tasks will be based on the training given, age, physical build etc.

Where loads have to be manually handled, the need to ensure that access and egress are safe is especially important.

Supervision

All Supervisors will be given training in the correct methods of handling and lifting loads as part of their normal safety training. The training provided should be based on the physical structure of the body and the effect of attempting to handle loads in various positions.

Employees will be instructed in the correct handling and lifting of loads when mechanical means are not practical. Supervisors will ensure that there are suitable gloves available for issue, as required for the handling of materials, which may cause injury to hands through physical or biological means e.g. sharp edges or chemicals.

Safety footwear will be worn at all times on site and the Supervisor will caution any Employee or Contractor wearing unsuitable footwear. The Supervisor will not require any operative, particularly a young person to lift without assistance, a load which is likely to cause injury. REL Maldon Limited must reiterate that in the first instance mechanical means must be used to lift all materials and loads.

MENTAL HEALTH

At REL Maldon Limited we are committed to improving mental health within the construction industry.

Our aim is to create a working environment that supports and promotes the mental wellbeing of all employees. We realise that certain working conditions and practices may negatively affect our employees mental-wellbeing, including aspects of the organisation or management of our work as well as environmental and social conditions.

In order to achieve our aim, we will strive to develop a culture where employees are able to talk openly about their job and/or mental health issues and feel confident that they can report difficulties without fear of discrimination or reprisal.

To this end we will:

- give non-judgemental and pro-active support to employees who may be experiencing poor mental health issues;
- deal sympathetically with employees suffering poor mental health due to circumstances outside of the workplace;
- ensure new employees receive a comprehensive induction to enable them to gain an understanding of the organisation, roles, responsibilities, policies and procedures;
- develop toolbox talks to raise awareness and start conversations about mental health;
- deliver mental health awareness training to our employees;
- provide information on mental health helplines, phone-lines and Apps:
 - www.constructionindustryhelpline.com
 - www.lighthouseclub.org
 - Construction Industry Helpline - 0345 605 1956
 - Construction Industry Helpline (free App)
 - www.nhs.uk/mental-health/
 - www.nhs.uk/every-mind-matters/

MIGRANT WORKERS

REL Maldon Limited ensures compliance with the requirements of the UK's immigration laws and states our commitment to providing a safe working environment for employees and contractors whose first language is not English.

Management will be responsible for ensuring that this policy is implemented throughout the company and that a safe working environment is achieved and maintained at all times. Where there are risks to the safety of Non-English speaking persons under their control the appropriate control measures will be adopted.

REL Maldon Limited will continue to check passports and national identity cards until 30th June 2021. Where EU, EEA or Swiss citizens are appointed after 30th June 2021 REL Maldon Limited will appoint the following employees to make the licence application and manage the sponsorship process where the company applies for a licence:

- Authorising officer – a senior and competent person responsible for the actions of staff and representatives who use the Sponsorship Management System (SMS);

- Key contact – your main point of contact with UK Visas and Immigration (UKVI);
- Level 1 user – responsible for all day-to-day management of your licence using the SMS.

In order to comply with its legal requirement the company will check the digital status of the individual on the EU Settlement Scheme online checking service to verify that the applicant has one of the following right to work documents in place prior to providing a job offer:

- Permanent Residence Document issued by the UK Government;
- 'Indefinite Leave to Remain' or 'Indefinite leave to enter' status from the UK Government;
- Settled or Pre-Settled Status;
- British Citizenship.

The responsible manager will check the validity of documents:

- Check that photographs are consistent;
- Cross-check dates of birth;
- Check expiry dates of 'Indefinite leave to enter' ;
- Check 'Indefinite leave to remain' in the UK have not passed;
- Check any UK permanent residence documents (certificate inside the 'residence documentation' booklet, certificate inside the passport or biometric residence card, stamp or visa etc.) to see if the person is able to do the type of work we are offering. The document must state 'Document Certifying Permanent Residence' or 'Permanent Residence Status' and not 'registration certificate';
- Satisfy the company that the documents are genuine and have not been tampered with;
- If the names are different on any of the documents, ask for an explanation and further documentary evidence i.e. marriage certificate.

Take a photocopy or scan:

- For passports or travel documents, a copy will be taken of the document's front cover and any page containing the holder's personal details. In particular, the responsible manager will copy pages that provide details of the nationality, date of birth, signature, date of expiry or biometric details and a copy of the photograph; and
- Any page containing UK Government endorsements, noting the date of expiry and any relevant UK immigration endorsement which allows the person to do the type of work you are offering.

Record keeping:

- The copies will be filed in the individual's personnel file and reviewed annually.

Any EU, EEA or Swiss employees working for REL Maldon Limited prior to the 1 January 2021 deadline, will be advised of the requirement to apply to the EU Settlement Scheme, to enable them to continue working in the UK after 30 June 2021 and provide confirmation of Settled Status or Pre-Settled Status to enable a check to be made on the EU Settlement Scheme portal.

Ensuring Safety

The company will ensure the health and safety of migrant workers under their responsibility by:

- Providing information, instruction, training and supervision and making sure all workers can understand it;
- Ensuring overseas workers have the necessary knowledge and skills to do the work for which they have been employed, competently and safely;
- Ensuring workers understand that the REL Maldon Limited have responsibilities for their health and safety;
- Providing translators for groups of workers where required;
- Monitoring this procedure for its compliance by line management.

MOBILE ELEVATING WORK PLATFORMS (MEWPS)

MEWP's should be used where reasonably practicable, taking into account, cost, availability and site accessibility. Pre-planning of operations involving MEWPS will take into account floor surfaces and obstructions, overhead services, other overhead obstructions and third parties, etc.

REL Maldon Limited will ensure that where MEWPS are used for working at height, the machine complies with the Lifting Operations & Lifting Equipment Regulations 1998 and is thoroughly inspected by a competent person at least every six months. Records of the Test of Thorough Examination Certificates will be kept with the machine or within the Health and Safety folder on site. REL Maldon Limited will only allow, fully trained competent (IPAF trained) Employees to operate the MEWPS. The plant operator will inspect the MEWP on a daily basis and record his findings within a register which will also be kept in the site Health and Safety folder.

Traffic Marshalls will be supplied to direct the MEWPS in areas populated by other Contractors or third parties. The Traffic Marshall will also advise and direct third parties as to the movements of the MEWPS.

Where third parties are present in the work area, an exclusion zone will be erected around the base of the MEWP to prevent collisions by other plant and to prevent third parties from entering the area under the basket. All MEWPS will be fitted with an anti-trapping device or will have guards fitted around the scissor mechanism. Emergency override switches need to always be facing away from walls being worked on so that the button can be accessed in an emergency.

In the event that boom lifts are used all operatives must be correctly attached to the personnel cage/basket using a 'Restraint Harness' with a short lanyard to a dedicated proprietary attachment point.

MOBILE TOWERS

REL Maldon Limited will ensure that if mobile towers are used in the workplace that they are only erected, altered or dismantled by a competent person who has been trained to a recognised training provider, example PASMA trained etc.

The mobile tower will only be erected in accordance with the manufacturer's instruction manual. The Site Supervisor is responsible for making sure that the manufacturer's instruction manual is made available to the competent person. If the manufacturer's instruction manual is not available for the mobile tower then it must not be erected.

Before Use of a Tower

After a tower has been erected, the following checks should be undertaken before it is used to ensure that:

- It is vertical and square and that the horizontal braces and platforms are level;
- Outriggers or stabilisers, where required, are correctly positioned and secured;

- All base plates or castor wheels are fully in contact with the ground, including those on stabilisers or outriggers.
- All castors should be properly locked;
- All the spigot and socket joint locks holding the frames together are secured;
- The bracing members have been located exactly in accordance with the erection plan;
- All guardrails and toe boards are in position as required;
- Access stairways and ladders are in position and are firmly located;
- The height of the tower does not exceed the manufacturer's instructions on the height to base ratio when used both internally and externally;
- Adjustable legs are not extended to gain additional height.

During Use of Tower

During use, the tower should be kept in good order. A competent person should inspect the tower regularly to see that the structure has not been altered in any way. Should parts become damaged they should be replaced before the tower is used again.

Inspection of Mobile Towers

The mobile towers will be inspected by the competent person. In accordance with the Work at Height Regulations, work at height equipment will need to be inspected by a competent person at separate intervals.

The inspections will be carried out:

- After assembly or significant alteration;
- Before use and following any event likely to have affected the towers stability or structural integrity;
- At least every 7 days with a new report being issued each time.

All records of inspection carried out by the competent person will be made available for inspection.

REL Maldon Limited will ensure that an inspection tag (Scaf Tag) is fixed and displayed on each mobile tower as a visual indicator to show the tower's inspection status. If the mobile tower is not tagged or it does not have an in-date inspection tag then the tower must not be used.

Adverse weather

The Site Supervisor is responsible for monitoring the wind speed. Should the wind speed exceed 17 mph then the works on the mobile tower will be stopped.

If the wind speed is likely to reach 25 mph then the mobile access tower will be properly tied to a suitable adjacent rigid supporting structure capable of supporting the additional loads imposed by the mobile tower.

The connections (ties) between the tower and the supporting structure must be rigid in compression and tension i.e. you should NOT use rope, webbing, wire etc.

If the wind speed is likely to reach 40mph, the mobile tower will be dismantled by the competent person.

MONITORING OF PERFORMANCE

Within the company as a whole, implementing the policy in the working environment is just the first step. Health and Safety management changes continually and therefore REL Maldon Limited will be proactive in monitoring the effectiveness of our policy. In real terms, this means being able to identify potential problems and taking action to prevent them becoming reality. There is also a need to be reactive to any breaches or near-breaches of health and safety, by investigating why an incident has occurred.

Proactive monitoring means taking action before accidents happen e.g.:

- Regular safety inspections to check that our standards are being implemented and management controls are working and the extent to which our company complies with the relevant Health and Safety legislation;
- Detailed safety audits that tell us whether the Health and Safety standards in our business remain acceptable and whether standards have improved or deteriorated since the last audit.

As a company we recognise that proactive monitoring is the preferred method and despite reactive monitoring being the result of a failure there are benefits from learning from mistakes – whether they have resulted in injuries, illness or damage to property or just near misses. Incidents will be thoroughly investigated to ensure that actions are taken to prevent a similar occurrence. This type of monitoring involves a systematic collection of information about the incident and it is an important aspect of health and safety performance measurement.

The Company will conduct a review of Health and Safety performance during site meetings with Clients, Designers, Principal Designers, Principal Contractors and others and any corrective actions advised or suggested will be investigated and appropriate actions implemented.

Health and Safety matters to be monitored by the Company during a project are:

- First Aid - First Aider, First Aid Box (s);
- Welfare - Clean and Satisfactory;
- Fire Precautions - Adequate escape measures, equipment and Instructions;
- Housekeeping - Access and Egress, materials properly stored;
- General hazards - Created by bad practices, design, material or substances;
- Documentation - Health and Safety registers, notices and information;
- Safety Equipment - Fit for use and inspected;
- Personal Protective Equipment - Fit for use;
- Access Equipment - Scaffolding, Ladders, Steps used appropriately;
- Plant and Machinery - Suitable and safe, also well maintained;
- Training - Suitably trained staff and supervision for the task.

Mr Robert E Lee monitors any accidents and will compile the supporting documentation for the authorities and keep records should an accident occur on site. Where there are reportable accidents that require notice to the HSE, REL Maldon Limited will comply with the requirements of RIDDOR 2013. Reportable and more serious incidents will be reviewed by the external consultant at the request of Mr Robert E Lee to see what corrective or preventive action, if any, is required to prevent a similar accident occurring again.

If there are any corrective or preventive actions required on the project, these will be undertaken promptly to protect the health and safety of all those involved. Where appropriate, the Company will issue revised instructions to employees and amend written procedures to take account of any new or perceived risks to Health and Safety within the project.

Our independent Health and Safety advisor M.E.L. (Health and Safety) Consultants Limited will, when requested, undertake either full safety audits of the company or inspections of workplaces. A written report will be compiled after the audit or inspection. Audits and inspections will be referred to by those people in our management structure who have the authority to sanction the appropriate remedial action to be taken – particularly where it entails a high level of expenditure or organisational and policy changes. If there are any corrective or preventive actions required on a project, these will be undertaken promptly by the Site Manager to protect the Health and Safety of all those involved. With both audits and inspections, priority will be given where the risks are greatest.

Where appropriate REL Maldon Limited will issue revised instructions to personnel and amend written procedures to take account of any new or perceived hazard to Health and Safety within the company. With regards to projects, actions, when necessary, will be communicated to Site Managers on other projects to ensure controls are implemented throughout the company.

MUSCULOSKELETAL INJURIES

Musculoskeletal injuries are a range of disorders involving muscles, bones, tendons, blood vessels, nerves, and other soft tissues. The most common term used to describe these disorders is Repetitive Strain Injury (RSI). Some examples of musculoskeletal disorders are Carpal Tunnel Syndrome, Tendinitis, Tenosynovitis and Bursitis.

Who is at risk?

Every worker who:

- Maintains fixed positions;
- Performs repetitive movements of the limbs;
- Overloads particular muscle groups;
- Applies pressure on body parts;
- Uses forceful movement;
- Works with great speed along with repetitions.

What are the symptoms of musculoskeletal injury?

- Pain in the hands, arms, shoulders, neck, back, legs or feet;
- May include swelling, numbness, tingling and a feeling of heaviness and/or tiredness in the affected area;
- Some workers may experience multiple symptoms due to more than one injury.

Severity of symptoms varies from person to person:

- **Stage 1** — Dull aching pain/fatigue which disappears with rest;
- **Stage 2** — Recurrent aching/fatigue which begins after work starts and continues after work ceases. Fatigue often present due to intermittent night pain. Reduced capacity to perform repetitive daily tasks;
- **Stage 3** — Inability to perform daily tasks. Persistent aching and fatigue. Weakness while at rest as well as pain even with non-repetitive movement.

At the first signs of Stage 1 symptoms notify your supervisor.

At the first signs of stage 2 symptoms see your doctor or chiropractor. Ensure you are able to describe in detail your workplace and work practices to assist in a diagnosis.

- Do not continue any task that has caused injury unless adjustments have been made to prevent the injury from recurring. Ask that you be accommodated within your restrictions.

Each task that has the potential to cause injury should be evaluated thoroughly by both the operative and the supervisor, and following the evaluation adjustments should be made so the work is safe to continue, if the work is still not safe DO NOT START.

Note - No worker should do a task until it has been modified to prevent injury. You may exercise your Right to Refuse Unsafe Work. (See "Refusal to work on safety grounds").

In order to prevent musculoskeletal injuries REL Maldon Limited will ensure that the following has been carried out:

- An analysis of the ergonomics of the work you perform;
- Ergonomically designed work stations and tools;
- Training in lifting and carrying procedures;
- Avoidance of repetitive motion lasting longer than 10 minutes - take frequent short breaks;
- Use of safe lifting and carrying techniques, and assistance for lifting items that are beyond the capability of the individual.

NOISE SAFETY

Where noise levels are suspected of being above the statutory level, REL Maldon Limited will inform its external Health and Safety Consultants and request that they carry out full noise surveys. The Employees will be informed of the results and the required control measures will be detailed within an assessment. When there is reason to suppose that the assessment is no longer valid, or when there has been a significant change in the work to which the assessment relates, the noise levels will be re-assessed and any identified changes will be actioned.

Noise from the site to the public can be a nuisance when in close proximity.

Planning Procedures

At tender or negotiation stage the above standards will be taken into account.

The Supervisor will ensure that information on the noise level of any plant, which it is intended for hire or purchase is obtained and taken into account before hiring or purchase takes place.

REL Maldon Limited will assess noise levels for operations and where guidelines are given by manufacturers these will be adhered to.

Guideline: Can the person using the equipment talk to someone 2 metres away without having to raise their voice to be understood? If they have to raise their voice, the noise from the equipment or operation is probably loud enough to damage their hearing, so action must be taken, ear protection should be offered. If there is any doubt, employ competent people and equipment to assess the noise levels.

Action Levels:

The lower exposure action values are:

- A daily or weekly personal noise exposure of 80 dB (A);
- A peak sound pressure of 135 dB (C).

The upper exposure action values are:

- A daily or weekly personal noise exposure of 85 dB (A);
- A peak sound pressure of 137 dB (C).

The exposure limit values are:

- A daily or weekly personal noise exposure of 87 dB (A);
- A peak sound pressure of 140 dB (C).

Control Measures where the Action Value is likely to be reached:

If an Exposure Action Value is exceeded, REL Maldon Limited shall:

- Use other work methods which eliminate or reduce the exposure to noise;
- Select appropriate work equipment, taking into account the work to be done;
- Assess the design and layout of workplaces, workstations and rest facilities;
- Provide suitable and sufficient information, instruction, training and supervision for employees;
- Reduce the noise by technical means;
- Implement appropriate maintenance programmes for work equipment;
- Limit the duration and intensity of exposure to noise;
- Implement appropriate work schedules with adequate rest periods.

Control Measures where the Limit Value is exceeded:

If an Exposure Limit Value is exceeded, REL Maldon Limited shall forthwith:

- Reduce exposure to noise below the limit value;
- Identify reasons for that exposure limit value being exceeded;
- Modify the organisational and technical measures that are in place or implement new control measures to prevent it being exceeded again.

The Supervisor will ensure that any static plant to be installed on site or in the workshop is planned to be in a position, which takes accounts of effects of noise on the workers or the public. Where Employees are required to work in situations where high levels of noise are likely to be encountered, the Supervisor will ensure that full information is obtained before work commences on the levels and frequencies of noise. Any measures to reduce noise levels to below levels considered to be safe must be planned or, if this is not practicable, suitable hearing protection equipment must be selected for use by personnel.

Regular monitoring of noise levels and frequencies will be planned as required. Instruction and training will be provided to Employees required to work in premises or with plant which is likely to result in exposure to high noise levels. The Supervisor will ensure that all plant provided is fitted with silencers, mufflers, doors, canopies, etc. and that all equipment is used.

Supplies of ear defenders, or other hearing protection, will be made available on the site or for any operations where it is not practicable to reduce the noise level to a safe limit. These will be issued to Employees as required and must be worn at all times when the operative is exposed to noise.

Safe System of Work

The Safety Consultants can provide the following services:

- Carry out a noise survey to establish levels and frequencies of noise;
- Regularly monitor noise levels and frequencies;
- Give advice on noise control measures;
- Arrange for Audiometric testing of operatives;
- Arrange for individual monitoring of exposure;
- Provide training and instruction for personnel.

Hearing damage results from over exposure to noise. REL Maldon Limited will undertake to, as far as reasonably practicable:

- Reduce noise at source;
- Isolate the noise source;
- Reduce the time that operatives are exposed to the noise;
- Identify which employees are exposed;
- Keep adequate records of such assessment until a further assessment is made;
- As a long-term undertaking to reduce the noise levels to which employees are subjected;
- Provide the employee with such information as will enable them to carry out their statutory duties;
- To designate ear protection zones and post signage accordingly.

When there is reason to suspect that the assessment is no longer valid, or when there has been a significant change in the work to which the assessment relates, noise levels will be reviewed and changes made as recommended by the review.

PERSONAL PROTECTIVE EQUIPMENT

On 6th April 2022 the Personal Protective Equipment at Work (Amendment) Regulations 2022 (PPER 2022) come into force and extend the employers and employees duties regarding PPE to labour only contractors (limb (b) workers as defined in PPER 2022.

PPE suitably identified as necessary after an assessment of the various activities will be supplied free of charge by REL Maldon Limited to its employees and labour only contractors (all workers). Employees and labour only contractors will be fitted with equipment, trained in its use and maintenance, advised of the possible results of non-use and the reporting procedures for faulty equipment. REL Maldon Limited will operate an on-going policy of monitoring equipment use. Only PPE that conforms with the Construction Products Regulations (CE Marking) will be purchased.

It will be a disciplinary matter if Employees and labour only contractors do not adhere to the use of PPE and the associated controls that are to be implemented as part of the risk assessment. It will be mandatory that Employees and labour only contractors shall wear a safety helmet and safety boots at all times. Other PPE may be required according to the risk assessment and in accordance with the site rules.

PPE will be regarded as the last resort to protect against risks to Health and Safety. Engineering controls and safe systems of work will be considered first.

REL Maldon Limited will consider controls in the following order:

Elimination	Physically remove the hazard
Substitution	Replace the hazard
Engineering Controls	Isolate people from the hazard
Administrative Controls	Change the way people work
PPE	Protect the worker with PPE

Personal Protective Equipment - Visitors to Site

Official visitors to sites (e.g. Surveyors, Engineers and Inspectors etc.) will be required to wear a safety helmet and safety boots. Other PPE such as a high visibility waistcoat should be considered and used when required. Visiting Managers, Engineers, Supervisors or Contractors will be reminded that they should set a good example by wearing the appropriate protective clothing at all times whilst on site.

PODIUM STEPS

Where podium steps are provided for working at height, employees will be instructed to conform to the following guidelines:

- Check all components are available and operational;
- Inspect the unit components for signs of damage or incorrect functioning prior to use. Damaged or incorrect components (or components showing signs of excessive wear) must not be used and must be returned to your local supplier. Castors and adjustable legs should be periodically lubricated to keep them free running;
- The unit is designed for internal use only on flat level surfaces. Check that the ground is capable of supporting the weight of the Podium Step and equipment;
- Generally, the safe working load of the Podium Step is 115 kg (one man);
- Castors must be locked when unit is in use;
- Ensure that the platform is free of persons and equipment, and that brake locks are off prior to movement;
- Beware of soft or uneven ground and overhead obstructions;
- Mobile access units must only be moved by pushing at the base;
- Always beware of live electrical apparatus, cables or moving parts of machinery;
- To prevent accidental injury ensure safe positioning of hands and fingers when assembling and dismantling;
- Ensure that telescopic guardrail is free from contaminants and lubricated at regular intervals;
- Never jump onto platforms. Ensure platform is debris free;
- Check that Castor Locking Bolt (to frame tube) has not loosened through use of Podium Step. Tighten the bolt if necessary;
- Ensure guardrails and gates are locked and secure when platform is in use;
- Podium Step units are not designed to allow them to be lifted or suspended;
- Never use this equipment if you are ill, feeling tired, or under the influence of alcohol or drugs;

- Wear practical protective clothing, gloves and footwear;
- Avoid loose garments and jewellery that could catch in moving parts and tie back long hair;
- Ensure the work area is well lit and ventilated. If in doubt, ask about lighting and ventilation equipment from your Supervisor;
- Make sure that anyone in the immediate work area is warned of what you are doing;
- Keep children, animals and bystanders away from the work area. Cordon off a NO GO area using cones and either barriers or tape, available from your Supervisor;
- Do not use boxes, ladders or other such means to gain additional height at the platform;
- Care should be taken when using power tools, wash jets or other such tools which can cause a lateral force on the Podium Step.

This equipment should be used by an able bodied, competent adult who has read and understood the manufacturer's instructions. Anyone with either a temporary or permanent disability should seek expert advice before using it.

PRINCIPLES OF PREVENTION

REL Maldon Limited will, as a responsible employer, comply with The Management of Health and Safety at Work (Amendment) Regulations 2006 Regulation 4 as part of the overall strategy for reducing risk. REL Maldon Limited will implement any preventive and protective measures on the basis of the principles specified in Schedule 1 to the above Regulations and Appendix 1 of The Construction (Design and Management) Regulations 2015 i.e. by:

- Avoiding risks;
- Evaluating the risks which cannot be avoided;
- Combating the risks at source;
- Adapting the work to the individual; especially with regards the design of workplaces, the choice of work equipment and the choice of working and production methods. In particular, with a view, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;
- Adapting to technical progress;
- Replacing the dangerous with the non-dangerous or the less dangerous;
- Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;
- Giving collective protective measures priority over individual protective measures;
- Giving appropriate instructions to employees.

PROCEDURE FOR NEW EMPLOYEES ENGAGED BY THE COMPANY

The procedure is to be carried out by the Site Manager where the new employee will be required to work. He should:

- Explain to the new Employee what they will be required to do and to whom they will be directly responsible;
- Issue the new Employee with a copy of the Company Statement of Safety Policy and details of their responsibilities for safety matters. Also show the new employee where the complete Company Policy for Health, Safety and Welfare is kept and explain its purpose;
- Ascertain if the new Employee has any disability or illness which could prevent them carrying out certain operations safely or require additional protective measure;

- Show the new Employee where copies of regulations are kept;
- Warn new Employees of any potential dangerous areas of operations on jobs or in the workplace;
- Warn the new Employee of any prohibited actions, e.g. entering specific areas without correct PPE, operating plant unless authorised etc.;
- Ascertain whether there is any training or instruction required and liaise with M.E.L. (Health & Safety) Consultants, as appropriate, to arrange, e.g. abrasive wheels, cartridge tools, scaffold inspections etc.;
- Issue to the Employees any protective clothing or equipment necessary, e.g. safety helmet, eye protection, ear defenders/plugs, wet weather clothing etc., and obtain their signature for the items issued;
- Where necessary, inform the new employee of vehicle servicing procedures etc.

Additional procedure for new employees under 18 years of age:

- Inform them that they must not operate any plant, give signals to any crane driver and use any power tools or equipment unless being trained under the direct supervision of a competent person.

PROTECTION OF PERSONS IN WORK AREAS

All necessary measures required for the protection of others will be allowed for and planned, taking into account Section 3 of the Health and Safety at Work etc. Act 1974.

Consideration will be given at the planning stage to ensure the protection of others and when necessary, barriers, screens, etc. will be provided to ensure their protection.

REFUSAL TO WORK FOR REASONS OF HEALTH AND SAFETY

REL Maldon Limited are committed to providing safe systems of work for all our Employees whilst carrying out their activities and undertakings and do not expect any member of staff to work in an unsafe manner.

Full consideration will be given to the situation whereby a member of staff refuses to work on safety reasons.

Our Employees possess confidence in their ability to question the safety of working arrangements without fear of victimisation, in the knowledge that points they raise will be given serious consideration. If any employee has reason to believe that the task they are required to undertake or have already commenced will endanger either themselves or others, they are required to cease work and report the matter to their immediate supervisor.

The Site Manager or Site Supervisor after consulting with Mr William O'Hara and any relevant rules and instructions as necessary must decide whether grounds for refusal to work are justified. He will then consult with the working group and the system of work will either be confirmed or changes agreed after considering all circumstances.

All cases of refusal to work are logged at the relevant site office for inspection by management, and will be made available to the client if requested. Mr William O'Hara is responsible for reviewing all cases of refusal to work and instigating any follow up action. Follow up action may involve consultation with our Health and Safety Consultants.

RESPIRATORY DISEASES

The inhalation of dust can lead to respiratory diseases including diseases of the lung, pleural cavity, bronchial tubes, trachea, and upper respiratory tract and of the nerves and muscles of breathing.

At the earliest stage, designers should try to eliminate foreseeable health risks that are involved in construction and building maintenance work. For example, designers should avoid specifying the use of materials or processes that contain or require the use of high levels of asthmagens or are likely to produce a dust exposure.

The next step is to eliminate hazardous materials or processes. If this is not feasible, an attempt should be made to manage the risk by substituting with safer materials and / or changing the process.

Know the materials to be used and see if safer materials can be used.

Examples of dust control techniques include:

- Using water to suppress dust during cutting, drilling, and grinding etc.;
- Using dust extraction on power tools;
- Controlling waste - use closed bags, or containers. Don't let wet waste dry out - remove it frequently from site;
- Vacuum cleaning avoiding the use of brushes or compressed air;
- Segregation - either separate the dusty activity from other parts of the site physically, or do the dusty work at a time when others are not around.

RISK ASSESSMENTS / METHOD STATEMENTS

The company will ensure that competent persons carry out on-going risk assessments for operations that may harm employees or third parties. Suitable controls will be implemented to eliminate risk, or reduce it to an acceptable level, in accordance with The Management of Health and Safety at Work (Amendment) Regulations 2006 and other relevant Regulations. The risks and controls to be implemented will be communicated to all staff to enable them to undertake their work safely. This procedure will be continuous and assessments will be updated as required by situations or statutory requirements.

REL Maldon Limited recognise that the workplace, tasks and personnel will vary from time to time e.g. we may purchase new equipment, the working environment may change, we may employ new staff or new procedures could lead to new hazards. REL Maldon Limited are committed therefore, to review what we are doing on an ongoing basis particularly when there are any changes. Every year, we will formally review risk assessments to ensure that controls are suitable and that we improve controls and do not overlook their implementation. Employees are encouraged to bring to the attention of Mr Robert E Lee any improvements that they feel may reduce or eliminate risk. However, Employees must never make changes to the safe system of work prior to notifying the Site Manager.

Employees will ensure that they are familiar with Method Statements and Risk Assessments before commencing their activities and that they are competent to undertake the work. All Employees will be supervised by the Site Supervisor to ensure that the risk assessments are being adhered to and that assessments are a true reflection of the risks. Site Supervisor will always be present in situations whereby a Method Statement is to be followed to ensure the safe system of work is not deviated from.

Should the assessments not be of an adequate quality, the Site Supervisor is in a position to insist to the Directors that a reviews of the assessment is required. When used, generic risk assessments will be checked to ensure their complete relevance at each work site prior to the works being undertaken.

Risk management using risk assessments will be the basis of the Company's objective of achieving safe working places. REL Maldon Limited will use the 'Five Steps to Risk Assessment' in order to manage risk and develop safe systems of work:

Five Steps to Risk Assessment:

- 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 the findings and implement them
- Step 5 Review the assessment and update if necessary

The following definitions will be used in this process:

Hazard – Any situation (e.g. chemicals, electricity, working from ladders etc) that has potential to cause damage or injury.

Risk – Likelihood (or chance) that somebody could be harmed.

Severity – An estimation of how serious the potential problem might be in terms of harm to people and/or damage to property.

Severity of Harm x Likelihood of Occurrence = Risk Rating

When determining controls or considering changes to existing controls, consideration shall be given to reducing the risk according to the following hierarchy:

- Elimination
- Substitution;
- Engineering controls;
- Signage/warnings and/or administration controls;
- Personal Protective Equipment.

SLIPS, TRIPS AND FALLS

It is the policy of REL Maldon Limited to ensure all Employees, visitors and contractors at our places of work feel that they are protected from the risks associated with slips, trips and falls. This policy provides the framework through which we ensure this by prevention through risk assessment and maintenance programmes.

Slips, trips and falls can be minimised through planning and positive management. Good housekeeping is an essential part of the prevention of slips, trips and falls.

The risk factors to consider include:

- Environmental (floors, slopes, stairs, lighting, temperature, equipment etc.);
- Contamination (water, food, litter, bags etc.);
- Organisational (task, safety culture, communication etc.);
- Footwear (e.g. 'Sensible shoe' policy as part of DSE assessment);
- Individual factors (training, induction, exit interviews, information, supervision, workplace pathways etc.).

Uneven surfaces

Many slips and trips occur when people are walking on uneven surfaces. The risk can be reduced by providing walkways that are:

- Clearly designated as a walkway;
- Provided with good conditions underfoot;
- Signposted and provided with adequate lighting.

We will also use mechanical lifting aids rather than carrying unwieldy loads that block the view ahead and make sure everyone wears suitable footwear with a good grip.

Obstacles

Other slips and trips happen because there is something in the person's way, such as building materials or waste.

We will endeavour to avoid these incidents by:

- Housekeeping - everyone keeping their work and storage areas tidy;
- Deliveries - planning deliveries to minimise the amount of materials on site;
- Waste - designating areas for waste collection, providing skips and bins where needed and making clear the responsibilities for waste removal.

Trailing cables

Where possible, cordless tools shall be utilised. Where we need cables for temporary lighting or mains-powered tools, we will attempt to run them at high level, especially along corridors.

Wet or slippery surfaces

We will treat slippery surfaces with grit (for ice) or provide temporary covering.

Signage will be erected for all slippery areas.

Changes in level

Where changes in level cannot be avoided such as in doorways, we will consider installing ramps.

STRESS AT WORK

All employees are requested to inform their line manager if at any time they feel that they are suffering the symptoms and effects of stress while at work. This may be due to personal matters; the effect of work load, a particular problem or an accumulation of all of these matters.

There is an open door policy at REL Maldon Limited to ensure that any person requiring help and assistance can approach management in order that a confidential meeting can be conducted and a suitable solution can be found.

Employees are reminded that often stress is the result of an accumulation and build up over time whereby relief from the symptoms of stress will result in immediate improvement. To wait often causes unnecessary anguish which may result in long term effects.

REL Maldon Limited work towards implementing the HSE Management Standards that cover six key areas of work design that, if not properly managed, are associated with poor health, lower productivity and increased accident and sickness absence rates. The Management Standards are:

Demands	this includes issues such as workload, work patterns and the work environment
Control	how much say the person has in the way they do their work
Support	this includes the encouragement, sponsorship and resources provided by the organisation, line management and colleagues
Relationships	this includes promoting positive working to avoid conflict and dealing with unacceptable behaviour
Role	whether people understand their role within the organisation and whether the organisation ensures that they do not have conflicting roles

Change how organisational change (large or small) is managed and communicated in the organisation

TRAINING

Safety training is regarded as an indispensable ingredient of an effective Health and Safety programme. It is essential that all persons are trained to perform their task effectively and safely. It is the opinion of Mr Robert E Lee that a task, if not undertaken safely, is not performed correctly.

All Employees will be trained in safe working practices and procedures prior to working on site. Where Employees are required to carry out key tasks they will be provided with the necessary training.

Contractors will need to demonstrate that their Employees, where required, have the necessary training and proof of competency.

All Employees are to be trained in accordance with the Management of Health and Safety at Work (Amendment) Regulations 2006.

The Company will provide adequate Health and Safety training:

- On recruitment and when exposed to new or changed risks;
- On site, in the form of Tool Box talks that will cover all aspects of Safe Site Working Procedures and specific Contract requirements;
- On-going with regards to appropriate refresher training.

The Company undertakes to provide Induction Training for general education and additional training for specific jobs as they occur and any additional specialised courses or Employee training as is appropriate and necessary for the requirements of their duties. All training deemed to be beneficial to Employees will be provided and paid for by REL Maldon Limited in the interests of Employee Health and Safety. Training will be mandatory with records of training being kept within the main office.

The Company has a firm commitment to the training of its Employees in matters relating to Health, Safety and Welfare. The objective of these is to ensure that the obligations of the Company in these matters are fully complied with.

Training and improvement in the understanding and application of Health, Safety and Welfare matters is seen as a continuous process. There is no defined training agenda but rather a flexible approach whereby training is provided in whatever areas are required by individual Employees.

Training is provided in both a formal and informal manner and all Employees are encouraged to positively identify any areas where they feel they require training or retraining in Health and Safety matters.

On-site training will be provided in the form of induction courses and toolbox talks. This instruction will, where necessary, include familiarisation with the place of work e.g. welfare facilities, provision of and explanation of any information contained in risk assessments or method statements and it will also deal with the use of any personal protective equipment together with instructions on maintenance of the equipment.

The Company has a firm commitment to the training of its Employees in matters relating to absolute competency, Health, Safety and Welfare. The objective of this is to ensure that the obligations of the company in these matters are not only fully complied with but are exceeded in order that locations of works are as safe as is reasonably practicable.

VIOLENCE TO EMPLOYEES

The Company will assess the risks and evaluate the work and the places where we work to identify possible "at risk" Employees and to implement effective procedures and precautions to protect them from possible violence whilst at work.

Employees will be trained in any specific procedures required and will familiarise themselves with all arrangements outlined by clients to reduce the possible risk of violence and follow them as appropriate to each situation where violence may occur.

Where there are known risks, a preventative strategy will be invoked before undertaking any work. These will differ in each case and the Supervisor and Employees will agree on how to handle the situation and use appropriate safeguards.

Where there is any suspicion that violence may occur, the Employees will contact a Director and seek assistance before undertaking any work or compromising their position. All violence or abuse towards Employees e.g. verbal or physical intimidation, threat, assault by a member of the public, etc. in circumstances arising out of or in the course of their employment, will be investigated by the Company and, as appropriate, reported to the Police and local authorities.

WELFARE FACILITIES AND SITE ACCOMMODATION

Projects undertaken differ in their duration from very short term to long duration with the Principal Contractor supplying all welfare facilities. On larger projects any site accommodation and temporary buildings required by REL Maldon Limited will be agreed with the Principal Contractor before being placed on site.

Welfare arrangements will be provided by the Principal Contractor or REL Maldon Limited as agreed in the contract document, or as required by The Construction (Design and Management) Regulations 2015. Facilities will include the provision of shelter, toilets and washing facilities and will comply with The Construction (Design and Management) Regulations 2015 as an absolute minimum. Fire extinguishers of an agreed type (i.e. AFFF, water, dry powder or carbon dioxide) will be provided and maintained in any welfare provided.

They will be positioned in an appropriate location and be kept free of obstruction and available for use at all times. At each site, there will be facilities readily available for summoning assistance from the emergency services (i.e. telephone or mobile phone) and for raising the alarm and administering First Aid.

Welfare facilities provided within the Head Office will meet the requirements of The Workplace (Health, Safety and Welfare) Regulations 1992, as a minimum, with the aim of exceeding these requirements. The Office Manager will be responsible for ensuring that the welfare is maintained in good order and is responsible for reporting any deficiencies to the Directors if the standards are not met.

WORK AT HEIGHT

REL Maldon Limited will invariably be required to work at height.

Due to the hazardous nature of the activity any work at height is to be restricted to those Employees that have received appropriate training and are experienced in such work. In construction, 50% of all serious accidents are due to falls and a further 20% occur due to the fall of materials onto operatives. A full assessment of the activity will be undertaken by REL Maldon Limited for the Employees undertaking the works prior to commencement to ensure that all controls are applied in accordance with The Work at Height (Amendment) Regulations 2007.

REL Maldon Limited provide a safe working environment for all employees who may be required to work at height.

REL Maldon Limited achieve this by:

- Identifying work activities that may involve working at height;
- Eliminating the need to work at height whenever it is reasonably practicable to do so;
- Ensuring that, where work at height cannot be eliminated, we use the risk assessment process to evaluate and manage risk;
- Implementing a safe system of work that will prevent falls of persons, materials and equipment;
- Providing suitable plant and equipment to allow safe access for persons and materials;

- Ensuring working platforms and any supporting structures are appropriate and designed in accordance with current standards;
- Ensuring that regular inspections of all equipment required for working at height are undertaken;
- Providing adequate information and training to ensure that only competent persons are engaged in working at height.

All Employees are responsible for ensuring that the intentions of this policy are effectively implemented on our projects with the Site Manager ensuring the necessary appropriate action is determined and acted upon.

It is the responsibility of each Employee to:

- Abide by the requirements of any risk assessments or systems of work designed to protect them;
- Utilise any work at height equipment in a safe and responsible manner;
- Report defects immediately.

Failure to comply with this policy may result in disciplinary action.

WORK EQUIPMENT

In the first instance, consideration will be given by REL Maldon Limited to purchase tools and equipment that is low risk i.e. that the hazardous nature of equipment is considered together with cost e.g. the purchase of tools that produce less noise and vibration. The company will then ensure that work equipment is maintained in an efficient state, in working order and in good repair. Where the equipment has a maintenance log, this log will be kept up to date. REL Maldon Limited will provide work equipment that complies with the statutory provisions contained within the Provision and Use of Work Equipment Regulations 1998 and the work equipment will be fit for purpose and only used for the job it is designed to do.

Prior to using work equipment within the workplace, it shall be visually inspected to ensure that guards are fitted as required and that it is safe and suitable for the purpose for which it is to be used. REL Maldon Limited will provide adequate supervision, information, training and instruction to ensure that there is compliance with any safety procedures or risk assessments.

Employees must report any faults, damage, defects or malfunctions in work equipment to their Supervisor without delay. Employees are never to use defective equipment or equipment that has guards missing. Defective equipment is to be taken out of use and identified as awaiting repair. Only use tools and equipment if you are competent and trained in its use and inspect the equipment thoroughly before you use it. Never use tools or work equipment to undertake a job that it is not intended to do and do not misuse them e.g. applying pressure or not changing blunt blades. All repairs that are required need to be undertaken by a competent person and Employees must not undertake makeshift repairs themselves.

The company has a duty to maintain its tools and work equipment to avoid risks to Health and Safety. Plant will be inspected by the user but when used regularly a weekly register will be kept of a formal inspection. This inspection may be undertaken when a piece of equipment is used if it is not used regularly and remains in the store unused between jobs.

To ensure safety in the use of tools and equipment REL Maldon Limited will provide adequate supervision, information, training and instruction and safety procedures. Safe systems of work will be developed in the form of risk assessments that will identify risk and hazards and the controls required to eliminate the risk or reduce it to an acceptable level. Personal Protective Equipment will only be used as a last resort but when it is indicated, as required due to signage on the equipment or as a result of the risk assessment, it is mandatory that it is worn. In situations where PPE is required ensure that you give consideration to third parties in your work area at all times as they too may be affected by the hazards e.g. noise, dust, ejected materials etc.

THE WORKING TIME REGULATIONS

REL Maldon Limited recognise our responsibilities under the Working Time Regulations and will implement the following:

- A maximum average working week of 48 hours over a 17 week period;
- A daily rest period of at least 11 consecutive rest hours;
- An uninterrupted rest period of 24 hours every 7 days;
- A compulsory rest break where the working day is over 6 hours;
- Health surveillance (if requested) for those who work at night.

Under the Regulations, Member States can allow individuals to opt out of the 48 hour working time limit. Even if an Employee agrees to work for more than 48 hours, they will not be allowed to do so unless they sign an “opt out” which can be cancelled at any time. REL Maldon Limited will not force any Employee to sign an “opt out”.

MONITORING OF THE POLICY

Employees are encouraged to bring to the attention of the Director, areas, which in their opinion this policy appears inadequate. All such comments will be passed to our Independent Safety Advisors for their consideration and review.

This Policy and Arrangements will be reviewed on at least an annual basis, provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

HEALTH AND SAFETY POLICY REVIEW

To ensure that we comply with the requirements imposed by the Health and Safety at Work etc. Act 1974, our Health and Safety Policy Statement and Documentation will be reviewed periodically and at least annually.

DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	NEXT REVIEW DATE
March 2019	M.E.L. (Health & Safety) Consultants Ltd	Initial Policy	March 2020
March 2020	M.E.L. (Health & Safety) Consultants Ltd	<p>Sections Amended: Responsibilities of the MD, Enforcement, Fees For Intervention, Complaints Procedure, Conveying information in own Language, Electrical Work Equipment, First Aid and RIDDOR Incident Contact Centre Risk Assessments / Method Statements.</p> <p>Sections Added: Mental Health</p>	March 2021
March 2021	M.E.L. (Health & Safety) Consultants Ltd	<p>Sections Amended: Data Protection and Record Keeping, Removed Conveying Information in own Language and replaced with Migrant Workers</p> <p>Section Added: Mobile Towers, Slips Trips and Falls and Working Time Regulations</p>	March 2022
March 2022	M.E.L. (Health & Safety) Consultants Ltd	<p>Sections Amended: Enforcement, Ladders and Stepladders, and Mental Health.</p> <p>Sections Added: Bullying / Harassment.</p>	March 2023