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HSE&Q POLICY & PROCEDURES MANUAL

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THIS DOCUMENT HAS BEEN SPECIFICALLY PRODUCED FOR THE PURPOSES OF USE OF FIRE SHIELD LTD, AS A HEALTH, SAFETY, ENVIRONMENTAL AND QUALITY POLICY AND PROCEDURES. IT IS THEREFORE ONLY SUITABLE FOR USE IN CONNECTION HEREWITH.

This Health, Safety, Environmental and Quality (HSE&Q) Policy has been designed to be a living document and should always reflect how the Company's business operates. Copies of the HSE&Q Policy and Procedures will be made available to all employees at all sites and workplaces.

It is made up of the three following sections: -

Section 1: POLICY STATEMENTS

The Policy Statement of Intent summarises the Company's commitment to HSE&Q, details general responsibilities and gives information relating to arrangements for implementing the policy and ensuring that it is kept current.

This Statement of Intent will be signed by the Director with particular Responsibility for HSE&Q and displayed prominently.

Section 2: ORGANISATION AND RESPONSIBILITIES

This section describes the structure of the business in terms of HSE&Q responsibilities. There will be a section relevant to everyone in the Company. This section will summarise how external HSE&Q assistance will fit into the business structure.

All employees need information from this section in so far as it relates to them.

Section 3: ARRANGEMENTS & PROCEDURES

This section details and provides guidance on the specific day-to-day arrangements and responsibilities for controlling or eliminating the types of hazards to health and safety that may arise as part of the business activity.

Each employee will need the information set out in this section so far as it relates to them and this information will also be included in:-

- HSE&Q and Safety Induction Training.
- HSE&Q and Safety booklets and handouts (employee handbooks etc).
- Refresher Training, Task Briefs and Toolbox Talks etc.

ISSUE No.	DATE	SECTION(S)	COMMENTS
0001	10th Aug 2009	All Sections	Draft issued for comment
0002	5th Oct 2009	All Sections	Final issue for circulation
0003	26th July 2009	Policy Statements	Policies reviewed and updated
0004	26 July 2010	Policy statements	Policies reviewed and updated
0005	18th April 2011	1.1.1; 2.2.3; 2.2.4; 3.17; 3.3;	Annual review & changes to legislation. Added new CDM section
0006	27 th April 2012	Plant section	Review & updated
0007	20 th May 2013	Accident & Incident Procedure, added Ethics Policy	Annual Review & changes made
0008	20 th May 2014	Reviewed	Annual Review & changes made

Next review: May 2015 (*no later than*).

NB: Any reference in this document to "safety" is also a reference to "health, welfare and environment."

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INTRODUCTION

Under Section 2(3) of **The Health and Safety at Work etc Act 1974** there is a requirement on all companies, or organisations, who employ more than 5 persons, to have a written statement of general Health and Safety Policy. This Health and Safety Policy must cover all employees, explain the arrangements for carrying out the Policy, be revised as appropriate and explain how the statement and any revisions are brought to the attention of all employees of the Company.

The Management of Health and Safety at Work Regulations 1999 also require that Risk Assessments be undertaken. The Risk Assessments are an integral part of the basis of the Policy document as they form the basis of Health and Safety arrangements within the organisation.

This document is the general Health and Safety Policy statement of the Company and meets the statutory requirements outlined above.

It is the policy of the company to ensure that, as far as reasonably practicable, employees are provided with safe and healthy working conditions.

The Company regards HSE&Q as being an important function of management at every level, with responsibility for the observance of safe working practices and good housekeeping standards resting firmly with the Director responsible for HSE&Q, supported by other Directors and Staff alike.

In co-operation with Management, every Employee also has a legal duty under regulations to observe safe standards and practices. Therefore a safe and healthy working environment can only be maintained with the co-operation of those who work in it.

For clarification, this statement is divided into the following sections:

- Policy Statements (statements of intent).
- Organisational Structure within the Company for carrying out this Policy.
- Arrangements and Procedures for Implementing HSE&Q.
- Arrangements and Procedures for Monitoring and Reviewing this Policy.

1.1 HEALTH & SAFETY POLICY STATEMENT

Fire Shield Limited is fully committed to undertake its business in such a way as to minimise the risk of injury or ill health to people, damage to property and/or the environment.

The Company recognises that it has a moral and legal obligation to safeguard, so far as is reasonably practicable, the health, safety and welfare of their employees and anyone who may be affected by the actions of the Company, its employees, or as a result of the Companies activities.

The Company fully accepts their obligations and responsibilities, which will be achieved by:


- 1.1.1 Allocating adequate resources and funds in order to meet its responsibilities as an employer and to do all that is reasonably practicable to prevent accidents, injuries and damage to health.
- 1.1.2 Ensuring that all the required insurances are in place and are appropriate for the undertakings of the company, such as Employers Liability, Public Liability etc.
- 1.1.3 Providing and maintaining safe working environments that minimise the risks to health, safety and welfare. Limiting adverse effects on and adjacent to the area in which those activities are carried out.
- 1.1.4 Ensuring all employees play an active part in the health and safety of the Company by consulting with them and providing them with adequate information, instruction, training and supervision for them to understand their role within the Company.
- 1.1.5 Setting standards that comply with the statutory requirements relating to health, safety and welfare with regard to the effect on employees, contractors, visitors and the public.
- 1.1.6 Safeguarding employees and others from foreseeable risks connected with work activities, processes and working systems.
- 1.1.7 Ensuring that hazardous areas are kept secure from the public, employees or tenants, or contractors not required to enter them.
- 1.1.8 Ensuring that when new substances, plant, machinery, equipment, processes or premises are introduced, adequate guidance, instruction, training and supervision are provided for safe methods of work to be developed.
- 1.1.9 Ensuring that all plant and equipment is maintained in a safe condition and is subject to routine and statutory inspections and examinations.
- 1.1.10 Ensuring that any contractors undertaking work for the Company are informed of the relevant standards required and are monitored to ensure compliance without detracting from the contractors' legal responsibilities to comply with statutory requirements.

This Policy, supported by Instructions, Procedures and Organisational Arrangements, is to be applied to all activities carried out by the Company.

Gary Wicks, the Managing Director, has been designated as having overall responsibility for Health, Safety, Environment and Quality within the Company.

The Company will communicate the HSE&Q Policy to all employees, and will make it freely available to Client's, on request. All Directors, Managers, Supervisors and Foremen will ensure that it is adequately enforced. And all employees will be required to fully cooperate with it.

This Policy will be reviewed annually and updated as required to conform to current legislation.

Signed:

May 2014

Gary Wicks
(Director with Particular Responsibility for HSE&Q)

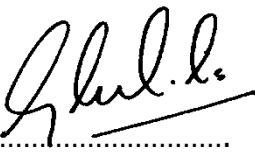
1.2 ENVIRONMENTAL POLICY STATEMENT

It is the intention of the company to establish and maintain procedures to specify its environmental objectives.

The company is committed not only to meet all relevant regulatory and legislative requirements but also to seek to secure continual improvement in environmental performance.

In pursuance of this policy **Fire Shield Limited** will endeavour to:-

- 1.2.1 Minimise any disturbances to both the local and global environment and to the quality of life of the local communities in which the company operates; generally, for the company to be a good neighbour and responsible member of society.
- 1.2.2 Comply fully with all statutory regulations controlling the company and the sites on which it operates.
- 1.2.3 Maintain the appearance of the company premises to the highest practical standards.
- 1.2.4 Take positive steps to conserve resources, particularly those which are scarce or non-renewable.
- 1.2.5 Assess, in advance where possible, the environmental effects of any significant new development and adjust the company's plans accordingly.
- 1.2.6 Provide the information necessary to enable the company's products to be properly used, stored and disposed of so as to avoid unacceptable effects on man or the environment.
- 1.2.7 Provide the necessary information to enable employees to operate the processes properly and with the minimal effects on man or the environment.
- 1.2.8 When Disposing Waste material ensure that the product is assessed from the Manufacturer, and that waste is disposed at a licensed tip.
- 1.2.9 Keep the public informed of major new projects in their locality.

Signed: 

May 2014

Gary Wicks
(Director with Particular Responsibility for HSE&Q)

1.3 SUSTAINABILITY POLICY STATEMENT

Fire Shield Ltd is committed to promoting sustainability. Concern for the Environment and promoting a broader sustainability agenda are integral to our activities and the management of the organisation. We aim to follow and to promote good sustainability practice, to reduce the environmental impacts of all our activities and to help our clients and partners to do the same.

Principles

Our Sustainability Policy is based upon the following principles:

- 1.3.1 To comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice. To integrate sustainability considerations into all our business decisions.
- 1.3.2 To ensure that all staff are fully aware of our Sustainability Policy and are committed to implementing and improving it. To minimise the impact on sustainability of all office and transportation activities.
- 1.3.3 To make clients and suppliers aware of our Sustainability Policy, and encourage them to adopt sound sustainable management practices.
- 1.3.4 To review, annually report, and to continually strive to improve our sustainability performance.

Practical steps

In order to put these principles into practice we will:

Travel and meetings

- 1.3.5 Walk, cycle and/or use public transport to attend meetings, site visits etc, apart from in exceptional circumstances where the alternatives are impractical and/or cost prohibitive.
- 1.3.6 Travel within UK where possible normally will be undertaken by train. As visits to sites are required by personnel to car share as best possible.
- 1.3.7 Include the full costs of more sustainable forms of transport in our financial proposals, rather than the least cost option which may involve travelling by car or air. Where the only practical alternative is to fly, we will include costs for full air fares rather than budget airlines in our financial proposals, and appropriate offsets.
- 1.3.8 Avoid physically travelling to meetings etc where alternatives are available and practical, such as using teleconferencing, video conferencing or web cams, and efficient timing of meetings to avoid multiple trips. These options are also often more time efficient, while not sacrificing the benefits of regular contact with clients and partners.
- 1.3.9 Reduce the need for our staff to travel by supporting alternative working arrangements, including home working etc, and promote the use of public transport by locating our offices in accessible locations.

Purchase of equipment and consumption of resources

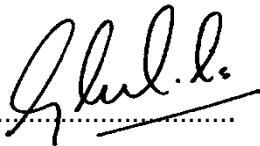
- 1.3.10 Minimise our use of paper and other office consumables, for example by double-siding all paper used, and identifying opportunities to reduce waste.
- 1.3.11 As far as possible arrange for the reuse or recycling of office waste, including paper, computer supplies and redundant equipment.
- 1.3.12 Reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping.
- 1.3.13 Purchase electricity from a supplier committed to renewable energy. Seek to maximise the proportion from renewable energy sources, whilst also supporting investment in new renewable energy schemes.
- 1.3.14 Ensure that timber furniture, and any other timber products, are recycled or from well-managed, sustainable sources and are Forest Stewardship Council (FSC) certified.

1.3.15 Produce budgets for each project with a pre-measure for all resources. From this minimise buying waste and reduce deliveries of material and plant to project sites.

Working practices and advice to clients

1.3.16 Undertake voluntary work with the local community and / or environmental organisations and make donations to seek to offset carbon emissions from our activities.

1.3.17 Ensure that any associates that we employ take account of sustainability

Signed: Handwritten signature of Gary Wicks in black ink, written over a dotted line.

May 2014

Gary Wicks
(Director)

1.4 **EQUAL OPPORTUNITIES POLICY STATEMENT**

It is the policy of the Company that all current, and any future employees of the Company are protected in accordance with the requirements of the Employment Equality Act 1977, both in the spirit of the act itself and its legal obligations.

The board of directors shall ensure that discrimination shall not occur on the grounds of Sex, Race, Colour or Creed, or in any other way which may appear to be discriminatory.

We believe that any persons can be employed at Fire Shield Ltd, based upon an atmosphere of trust and openness. The Company encourages all employees to take an active part in the successful running of the business. We actively promote all employees to realise the Company's and their personal potential with training, experience, and encouragement from others.

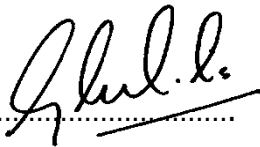
We have, and will in future, employ any person for their performance ability without any reference to their Gender, Racial Background, Age, or Disability.

Currently the Company is following the CITB initiative for Blueprint for Business Performance, with the ultimate aim of achieving "Investors in People" recognition.

Where there is evidence that this policy has been breached by any member of the company, appropriate disciplinary action will be taken.

The equality rights of all employees are encompassed within the Companies Standard Conditions of Employment.

The operation of this policy will be monitored by the Companies directors and managers with assistance from external advisors who are able to advise on matters relating to Employment Equality.

Signed: 

May 2014

Gary Wicks
(Director)

1.5 WORKING TIME DIRECTIVE POLICY STATEMENT

We believe that any persons can be employed at Fire Shield Ltd. based upon an atmosphere of trust and openness. We also believe that as an Employer we ensure that within our work environment we will apply this Directive for all of our employees.


This provides for all employees;

- 1.5.1 To work a maximum of 48 hours average per week as laid out in your Contract of Employment with us. (Employees can decide to work longer hours if they so wish).
- 1.5.2 Entitlement to rest breaks during the working day.
- 1.5.3 Entitlement to paid holiday, currently at a minimum of 24 Days annual leave (although this will shortly increase from April'09 to 28 Days)

When working for Fire Shield Ltd the majority of our work is on piecemeal rates and as such on any site project rates will be agreed with you prior to your start on each site specific to the work you are required to carry out. This in no way affects the Directive.

Fire Shield Ltd will issue all employees with a Contract of Employment when employment commences.

Should you wish to view further information on the Working Rule Directive please visit the governments own website: www.direct.gov.uk.

Signed: 

May 2014

Gary Wicks
(Director)

1.6 **QUALITY ASSURANCE POLICY STATEMENT**

The Company is engaged in the Passive Fire Protection industry on a supply and installation basis, and as such we operate in a fiercely competitive market place. Our customers demand and expect the highest levels of quality of service in order to maintain an efficient operation on their own account. This requires a pro-active approach and awareness of our customer’s needs and expectations.

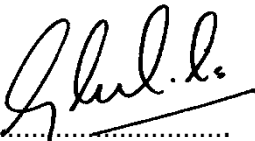
To continue to be successful we must meet and exceed the increasing demands and expectations of our customers. We must be constantly aware of the changing demands in the market place and of regulatory requirements in order to project the correct company profile, and to ensure that the Company’s organisational goals, i.e., customer satisfaction, are effectively achieved.

In order to meet the requirements of our customers in a cost effective manner, the company will operate a quality assurance system dedicated to the “Right First Time Approach”. It is a prime requirement of our approach to quality that each person recognises and accepts the company philosophy and accepts the responsibility for the quality of his/her own output.

The company recognises that objectives for quality cannot be achieved without the cooperation and commitment of employees, customers and suppliers and will ensure that adequate resources are available to achieve this end.

Fire Shield is a member of FIRAS, a 3rd Party Accreditation scheme for Passive Fire protection.

To facilitate and ensure such success **Fire Shield Limited** operate within our client’s documented Quality Control Systems and its supporting procedures all of which would be documented in their Quality Manuals. Systems have been compiled around the requirements of BS EN ISO 9000: 1994. Requirements as specified within the documented systems are expected of all personnel.

Signed: 

May 2014

Gary Wicks
(Director)

1.7 **ETHICS POLICY**

The business philosophy of **Fire Shield Ltd** has been developed around a core set of values which are fundamental to the organisations development and success. One of these is integrity which means we can always be trusted to do the right thing. Set out below is an Ethics Code we expect our employees to conform to, to achieve its core values.

Being Safe & Secure	<ul style="list-style-type: none"> • Putting Health & Safety first • Protecting the security of our clients, public and our employees • Carefully following company rules and procedures
Being honest and trustworthy	<ul style="list-style-type: none"> • Always following the law • Reporting any wrongdoing • Never offering or taking a bribe • Avoiding any conflict of interest
Being fair and considerate	<ul style="list-style-type: none"> • Showing respect and consideration for others • Treating people fairly • Considering our local communities • Thinking about the environment
Being professional and proud	<ul style="list-style-type: none"> • Doing the best job you can • Looking smart and professional • Being a good role model • Safeguarding the Fire Shield name

In support of this code, the purpose of this Ethics Policy is to ensure that all directors, managers and employees have a detailed understanding of the group's minimum standards of operation and the expectations of our clients and suppliers.

It is essential that the standards set out in this policy are applied throughout our operations. Our directors and senior management are therefore asked to show personal commitment by regularly endorsing this policy and confirming compliance within their own areas of responsibility. All are expected to ensure this policy is conveyed to all managers and employees whose roles have a direct bearing on these standards.

We are committed to these standards and routinely monitor compliance across the company, taking necessary action if in the unlikely event that they are not being met.

1. Our approach to being a good corporate citizen

Fire Shield Ltd is committed to being a good corporate citizen, taking into account the economical, social and environmental impact of our business and minimise any negative impact of our operations.

1.1 Human Rights - Respect for human rights is and will remain integral to our operations.

1.2 Racial Discrimination - Fire Shield Ltd will show no discrimination against the employment of any foreign national; however they must be legally entitled to work in the UK and are competent to carry out their duties of employment. They must also have a reasonable understanding of English to comply with Health & Safety Regulations.

1.3 The Environment - We will conduct our business with respect and consideration for the environment. We will strive actively to reduce the company's overall impact on the

environment by targeting annual reductions in our carbon intensity through the management of waste, vehicle emissions and energy consumption.

1.4 Local Communities - Fire Shield Ltd is committed to supporting and assisting the local communities, in which it operates through a variety of means, taking into account any steps to minimise any disturbance as a result of our operations, and serving local interests by providing employment opportunities to suitably qualified personnel.

2. Our standards of business practise

We are committed to high ethical standards in our business operations to ensure the integrity of our employees and organisation is maintained.

2.1 Bribery and Corruption - Fire Shield Ltd is resolutely opposed to bribery and corruption in whatever form it may take. Any payments, gifts or inducements made by or on behalf of Fire Shield Ltd and which induce or are intended to induce someone to act improperly are matters which are likely to result in disciplinary action, including summary dismissal against the employee concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practise in the relevant territory and cannot be interpreted as inducements to trade.

Sales of the company's services and products and purchase of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the company and never on the basis of giving or receiving inducements.

Employees should not accept gifts, money or entertainment from a third party organisation where these might be considered likely to influence business transactions.

2.2 Treatment of customers - Mutual trust and confidence between Fire Shield and our customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customer expectations and anticipating their changing requirements.

2.3 External Suppliers - All external suppliers are entitled to fair treatment and all potential suppliers have a reasonable opportunity to bid for Fire Shield business. It is our policy to pay suppliers on time in accordance with agreed terms of trade.

2.4 Competition - Fire Shield Ltd will always compete vigorously, but in a fair and ethical way, with competitors. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt should be made to improperly acquire competitor's trade secrets or any other confidential information. Employees must not publicise, discuss or share with competitors, pricing strategies that would conflict with laws applicable to the business.

3. Our approach to corporate governance

3.1 Compliance with the law - Fire Shield Ltd will comply fully with all relevant national and International laws and will act in accordance to local guidelines and Regulations.

3.2 Accounting Standards and Records - All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false,

distorted, incomplete or suppressed. Employees must not materially mis-state, or knowingly misrepresent management information for personal gain or for any other reason.

3.3 Policies and Procedures - Fire Shield Ltd recognises that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

4. Our commitment to our employees

Fire Shield Ltd is committed to optimising individual and business performance through employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the company's success. To achieve a working environment in which team spirit and commitment to the goals and values of the company are maintained. The company will ensure that individual employees are treated with dignity and respect.

4.1 National Regulation - In dealing with our employees, we will act in compliance with national regulatory bodies and employer's obligations under labour or social security laws.

4.2 Rights at work - Employment will be freely chosen with no use of forced or child labour. We will not discriminate on the grounds of gender, colour, ethnicity, culture, religion, sexual orientation or disability.

4.3 Harassment - Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving harassment (racial, sexual, or any other kind) of any employee is unacceptable. Any employee who believes that he or she has been harassed the matter should be reported to a senior manager who should arrange for it to be investigated.

4.4 Equal Opportunity - We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, develop their careers further with the company.

4.5 Health & Safety - Fire Shield Ltd places the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect those who work in a high risk environment. If you have any concerns regarding your health & safety or of others please do not hesitate to contact supervision, management or the Health & Safety manager, who will treat it in the strictest confidence.

4.6 Terms of Employment - The Company and their employees will work towards creating permanent long term relationships. Employees will be paid for and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

4.7 Pre employment screening - In order to protect the interests of employees and clients and because the nature of the business, Fire Shield Ltd will apply pre-employment screening and selection techniques.

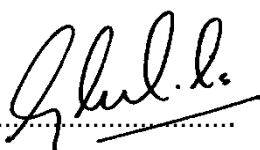
5. Our employees commitments

5.1 Confidential Information - Employees must not make use of confidential information for personal gain.

5.2 Conflicts of interest – Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the company, or which divides his or her loyalty to the company. Any activity which even appears to present a conflict must be avoided or terminated, unless after disclosure to the appropriate level of management, it is determined that the activity is not detrimental to the reputation and standing of the company.

5.3 Social Networking – Any employee who engages in social networking on websites which show an association with Fire Shield Ltd, are expected to behave in ways that are consistent with Fire Shield Ltd value and policies. Employees must therefore insure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and suppliers are not undermined.

6. Implementation – All employees’ contracts will include the Ethics Policy and Ethics Code. These will be signed off and be retained on file and be auditable. Any action by an employee which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted

Signed: 

6th May 2014

Gary Wicks
(Director)

2. ORGANIZATION & RESPONSIBILITIES

Fire Shield Ltd are based in Surrey with their principal office at **The Old Forge, The Street, Ewhurst, Surrey GU6 7QD** and are established as a **Fire Protection & Fire Stop Contractor**.

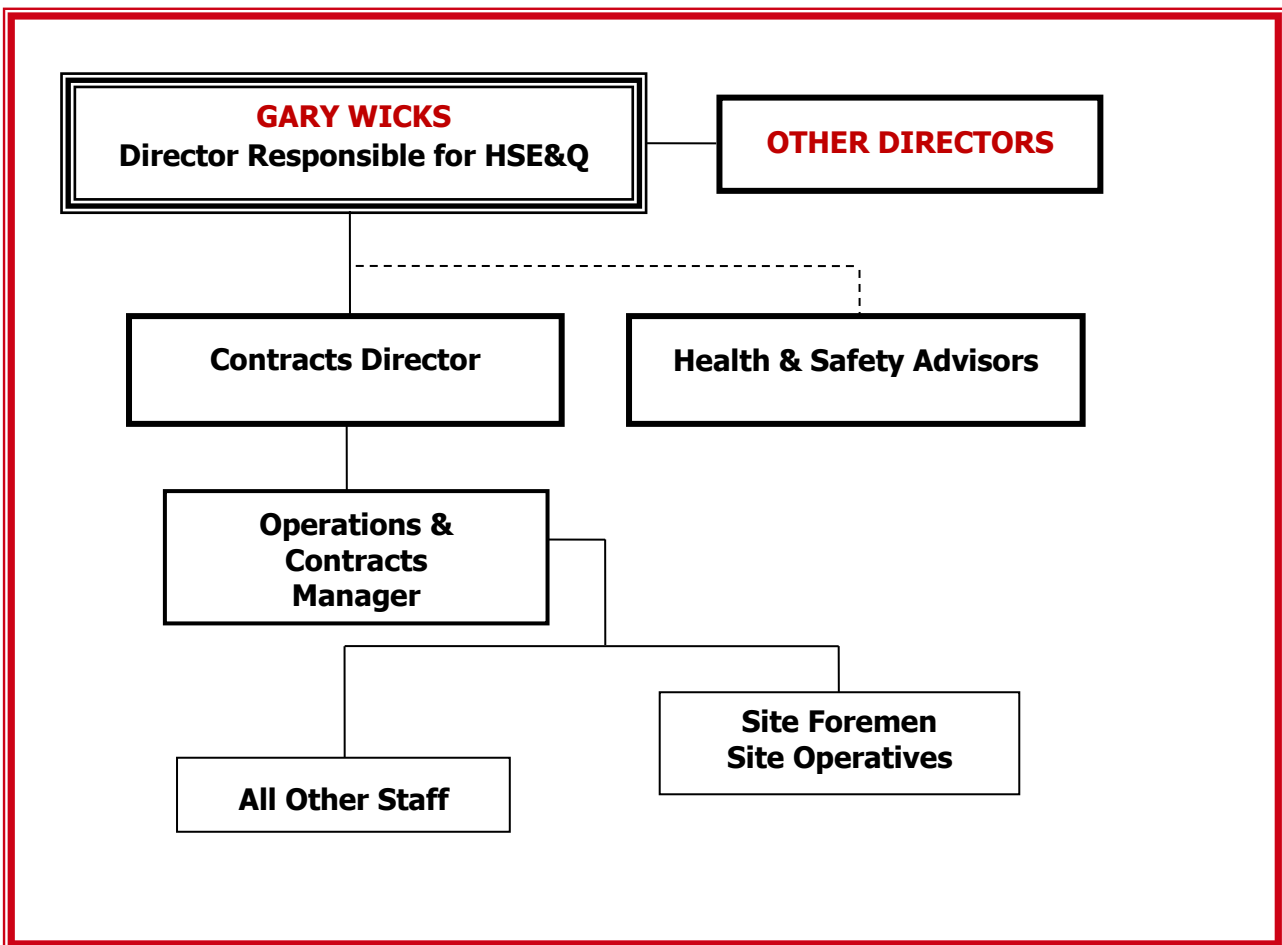
The Company is controlled and operated by a Board of Directors; the Company Hierarchy is shown below, together with an organisation/responsibility chart. This chart will show the Director responsible for HSE&Q.

The Director responsible for HSE&Q may delegate some of this responsibility to the Health and Safety Advisor. Where and when appropriate, he may also delegate some of his responsibility to a specifically nominated person such as a Site Manager or Foreman/Supervisor. In turn, responsibility may then be delegated to a particular, identified employee on a daily basis.

All other staff have duties as employees as laid out in **The Health and Safety at Work etc Act 1974** and other subordinate statutory instruments.

Some of the work undertaken by the Company may be sub-contracted to other firms with which the Company have established and satisfactory relationships. Contractors to the Company can include safety consultants and general contractors and all have specific duties as defined in this HSE&Q Policy and Procedures Document.

2.1 ORGANIZATIONAL HIERARCHY



THE RESPONSIBILITIES OF EMPLOYEES FOR HSE&Q ARE IDENTIFIED AS FOLLOWS:**2.2 DUTIES OF THE DIRECTOR RESPONSIBLE FOR HSE&Q**

- 2.2.1 Implement the Policy and ensure that the responsibility allocated to each level of employee is discharged.
- 2.2.2 To initiate and periodically review company policy for the prevention of accident and injury.
- 2.2.3 Allocate adequate resources and funds in order to meet the requirements of all applicable legislation and so as to achieve and maintain a high standard of compliance.
- 2.2.4 To ensure that all the required insurances are in place and are appropriate for the undertakings of the company, such as Employers Liability, Public Liability etc.
- 2.2.5 Know the requirements of the Health & Safety at Work Act and other regulations relevant to the company's activities.
- 2.2.6 Work with the Safety Advisor to ensure that employees at all levels receive adequate and appropriate training in Safety.
- 2.2.7 Reprimand and/or discipline any employee failing to discharge their responsibility for safety.
- 2.2.8 Ensure that safety is on the Management Meeting Agenda.
- 2.2.9 Investigate all accidents, injuries and dangerous occurrences and revise as necessary practices of work on site.
- 2.2.10 Liaise with Health & Safety Executive and other relevant authorities.

2.3 DUTIES OF THE CONTRACTS DIRECTOR

- 2.3.1 Set a good example.
- 2.3.2 Understand and implement Policy and legal requirements within their area of operation.
- 2.3.3 Complete COSHH assessments prior to any start on site, and provide COSHH data on substances/materials to be used to relevant parties.
- 2.3.4 Ensure that working methods & conditions are in accordance with the Policy and statutory requirements.
- 2.3.5 Ensure that plant & equipment is properly maintained.
- 2.3.6 Ensure that Operatives and Supervisors/Foremen receive safety training, especially Induction training if a New Start.
- 2.3.7 Investigate all accidents, injuries or dangerous occurrences and submit appropriate reports to the Safety Director.
- 2.3.8 Liaise with the Health & Safety Executive and other relevant authorities as delegated by the Safety Director.

2.4 DUTIES OF SUPERVISORS & FOREMEN

- 2.4.1 Set a good example.
- 2.4.2 Understand and implement the Policy and current regulations.
- 2.4.3 Confirm Safety Arrangements and Welfare facilities to be provided by the Main Contractors/Clients prior to commencement of work.
- 2.4.4 Instruct operatives in their responsibilities and ensure they are understood. Encourage suggestions for improvement of Safety for discussion at Management Meetings.
- 2.4.5 Ensure that COSHH assessment information is understood by each operative.

- 2.4.6 Ensure that Safety Arrangements are maintained throughout each contract and remedy any dangerous situation as soon as it is known.
- 2.4.7 Stop work where operatives are in danger.
- 2.4.8 Ensure inspection of Scaffolds and other equipment in accordance with statutory requirements, including completion of registers.
- 2.4.9 Ensure that adequate protective equipment is issued, signed for and used.
- 2.4.10 Investigate all accidents and injuries, and submit appropriate reports to the Contracts Manager.

2.5 DUTIES OF SITE OPERATIVES

- 2.5.1 Comply with Foremen/Supervisors, Contracts Managers and Safety Directors instructions and all Company rules and current regulations.
- 2.5.2 Use correct tools & equipment and always wear protective equipment as necessary.
- 2.5.3 Ensure that COSHH assessments are read and understood prior to working on site.
- 2.5.4 Maintain plant, tools and protective equipment in good order and report any defects to Supervisor/Foreman.
- 2.5.5 Do not take unnecessary risks and avoid unsafe practices.
- 2.5.6 Develop a personal concern for your Safety and that of others.
- 2.5.7 Refrain from irresponsible behaviour on site.
- 2.5.8 Report all accidents and injuries to Supervisor/Foreman.
- 2.5.9 Do not misuse anything provided for Health, Safety and Welfare.
- 2.5.10 Co-operate with Management on all matters relating to Safety, Health and Welfare

2.6 DUTIES OF ALL OTHER EMPLOYEES

- 2.6.1 Understand and comply with the Company Policy and current legislation.
- 2.6.2 Develop a concern for personal safety and that of others.
- 2.6.3 Do not take unnecessary risks and avoid unsafe practices.
- 2.6.4 Refrain from irresponsible behaviour.
- 2.6.5 Report all accidents and injuries.
- 2.6.6 Do not misuse anything provided for Health, Safety and Welfare.
- 2.6.7 Ensure that all necessary precautions are maintained when using, handling, storing & transporting hazardous articles or substances.
- 2.6.8 Understand Fire Rules applicable to where you are working and the action to be taken.
- 2.6.9 Have a well stocked First-Aid kit available at the place of work.
- 2.6.10 Always use protective clothing and protective equipment when required.

2.7 DUTIES OF HEALTH & SAFETY ADVISORS

- 2.7.1 Liaise with the Safety Director to ensure all Company operations are carried out safely.
- 2.7.2 Review, comment on and make recommendations in respect of existing or proposed Company Safety Management control procedures when so requested.
- 2.7.3 Update the Company on developments in the management of Health & Safety at work with all latest thinking and procedures for Safe Working.
- 2.7.4 Provide telephone support and information on Safety Management issues.
- 2.7.5 Investigate any incident, and provide a report for the Safety Director, and the Board of Directors, to review and action.

3.0 ARRANGEMENTS & PROCEDURES

3.1 INTRODUCTION

In order to ensure compliance with the current Health and Safety legislations The company has produced a system to enable the management of the business to meet the duties placed under them under the current Health and Safety legislation, in an ever demanding working environment.

Any Management System relies upon the people using it to follow the guidance given in the Policy Statement and supporting procedures, the completion of any documents, i.e. assessments or inspections, should be viewed as a positive measure by anyone wishing to see evidence of the competence of the management as well as enforcing the control of health and safety issues, in the event of a serious failure in any work activity in which they are responsible for.

As technology and general understanding progresses, so continual improvement in health and safety practices can assist in reducing the risk of injury and disease in the work place. It is therefore the aim of this Company that this policy be reviewed and amended on a regular basis, at least annually.

3.2 SAFE SYSTEMS OF WORK

A Safe System of Work will be instigated where a risk assessment identifies a hazard that cannot, so far as is reasonably practicable, be eliminated.

Where a task(s) requires access to hazardous areas, (e.g. a confined space) a Permit to Work system will be established and implemented. Where a hazard cannot be eliminated, a hazard warning sign will be displayed.

Personal protective equipment will be issued, free of charge, to all employees, where necessary.

3.3 RISK ASSESSMENT

As a requirement of the Management of Health & Safety at Work 1999, risk assessments of the Company's activities will be undertaken by the relevant manager/s and where there are significant findings they will be documented. These will be monitored, reviewed periodically (quarterly) and updated in line with new technology, legislation and codes of Practice.

Where Generic Risk Assessments are not suitable for specific work activities (i.e. unforeseen construction work etc) appropriate specific risk assessments will be produced.

The findings of the risk assessments and their prescribed safety measures will be effectively communicated to all personnel likely to be effected by the work activity. Communication will be achieved by means of task briefs and regular training sessions, such as toolbox talks.

3.4 TRAINING

Safety training is regarded as an absolute ingredient to an effective health and safety programme. It is essential that every worker in the organisation be adequately trained to perform their job safely and to a high standard, with respect to quality.

The Company will therefore ensure that all workers are trained in Health & Safety Legislation, safe working practices relating to their working activities and prior to being allocated any new role.

In order to ensure that all personnel are suitably trained and competent to carry out their assigned tasks safely, the company will produce and maintain a Training Matrix in which the names of all company personnel will be recorded and their current training achievements, including dates of achievement and expiry dates where applicable, and will endeavour to keep their appropriate

certification of training achievements maintained up to date. Additionally, the Training Matrix will identify any further training needs and will outline a plan, at least one year in advance, for future training.

Managers and Foremen/Supervisors will also present Toolbox Talks on a regular basis (typically fortnightly), as well as Task Briefing. This type of training will include advice on the use and maintenance of personal protective equipment (PPE) appropriate to the tasks concerned, the safe implantation of emergency procedures and the explanations required so as to understand method statements and risk assessments necessary for their assigned tasks.

The Construction Skills Certification Scheme (CSCS) certification will be a minimum standard for all site personnel (employees and/or sub-contractors). Additionally, the Site Safety Plus (Construction Skills) training for Managers, Supervisors and Operatives will be achieved and maintained as necessary.

3.5 SAFE PLACES OF WORK

The company will make adequate arrangements to ensure that all workplaces are maintained in a clean, orderly and safe condition.

A safe means of access and egress from all workplaces, where practicable, will be provided and maintained. And where necessary, all workplaces will have appropriate arrangements for the storage and use of hazardous substances, without risk to health (See: 4.7 ACCESS & EGRESS).

3.6 CHILDREN ON CONSTRUCTION SITES

It is the policy of the company to ensure, as far as is reasonably practicable, children will be prevented from entering any site or work area that the company is in control of.

Where the company is working for another contractor all employees will be expected to co-operate with that contractor in order to maintain the provisions in place to keep out unauthorised visitors, particularly children.

In particular, the company will attempt to ensure that protection is provided to the following: -

- Tools and equipment stored securely and correctly so as to be out of reach to children
- Hazardous materials and/or waste are removed from site at the end of each working day or secured in a suitable lockable container.
- Stacks of material are stabilised to prevent collapse.
- Sand and other granular material is stockpiled in such a way as to discourage children from tunnelling into it.
- Scaffolds and other elevated areas are secured to prevent children from gaining access.
- Electrical supplies will be secured and switched off wherever possible when the site is unattended.
- Water supplies and/or containers are secured or emptied as appropriate

The hazards of work place, particularly construction sites, are such that children should not be permitted on site except for properly supervised, educational visits. Subcontractors and visitors to site will be made aware before they start work that children are not permitted on site.

Note: A child for the purposes of this Arrangement is anyone under the age of 18 years.

3.7 ACCESS & EGRESS

The company is committed to providing a safe place of work and a safe means of access and egress within all parts of the workplace. Safe access and egress includes movement in and out of the workplace, and safe access within the workplace.

- Access and egress from the workplace and routes through working areas.
- Accessibility of storage areas.
- Emergency exit routes.
- Use of access equipment, such as ladders, steps, hop-up's and lifts.
- Limitations of access to hazardous/high security areas.
- Access to hoists, tower cranes and other mobile structures.
- Temporary arrangements for access.
- External pathways and roadways around the workplace.
- Common parts of the building, e.g. communal corridors, reception, staircases etc.

In order to achieve safe access and egress it is important that: -

- Articles or substances do not impede safe access and egress at the workplace and that objects that may restrict safe movement within the workplace are removed immediately.
- Any access restrictions are adhered to so that suitable and safe arrangements for work in confined spaces and other areas of high risk are guaranteed.
- Formalised systems of work are designed and implemented in all areas of significant risk, enlisting professional assistance where required.
- Employees are encouraged to report any situation where safe access and egress is restricted or obstructed and arrange for the appropriate remedial action to be taken immediately.
- Access equipment is regularly inspected to ensure that it is maintained in a safe condition.

3.8 CONFINED SPACES

A confined space is any area where access is restricted, has little or no ventilation, or it is possible that an operative will have difficulty due to a lack of oxygen, e.g. bathrooms without ventilation, storage containers, manholes and sewers etc.

Any work carried out in a confined space must not be started until a full Risk Assessment has been carried out.

It is the responsibility of the Site Manager / Supervisor to ensure that the necessary precautions are in place and that only suitably skilled/trained operative or specialist contractors are used.

3.9 COMMUNAL AREAS

Where work has to be undertaken in communal areas, such as hallways, passageways and staircases, provision will be made to ensure the safe access and egress of all users.

The Company will ensure that all work in communal areas is planned in advance so as to cause the least disruption. Where passageways or staircases cannot safely be used while work is in progress the Company will make arrangements for such work to be undertaken out of normal working hours or ensure that alternative routes for access and egress are arranged and notified to everyone who needs to know.

All surplus materials and waste will be cleared from the site on a regular basis, and all materials for use in communal areas will be stored away from the place of work, or in the work area and not allowed to encroach into the area set aside for access and egress.

Operatives will ensure that work areas are cordoned off or identified by warning signs at all times.

Where work in communal areas extend over a number of days, operatives will ensure that cordons and barriers are positioned and maintained so as to prevent accidental access to work areas.

3.10 ENVIRONMENTAL CONTROL

The company *are* committed to effectively managing all their activities' environmental aspects through compliance with legislation and company policy.

Appropriate arrangements to protect the environment, will be put in place at all workplaces, including:

- Approved storage and use of raw materials and substances.
- Waste minimisation. Promoting re-use, recover and recycle (e.g. taking old paint Tins to our Store for crushing and hazardous waste removal).
- Identified waste disposal routes under Duty of Care.
- Monitoring and review of environmental performance.
- Dust Suppression and/or Collection (specific to products used).
- Rubbish Removal, especially

For further information, see the companies Environmental Policy Statement and the Sustainability Policy Statement.

3.11 HOUSEKEEPING

It is a fundamental part of health and safety that all workplaces must be orderly and kept clean and tidy. Slips, trips and falls are a major contributor to industrial injuries. With this in mind the Company expect all employees to make proper use of the equipment and facilities provided to control working conditions and to ensure a safe and tidy workplace.

This means that:

- Work areas and access routes should be kept clear and in a clean and tidy condition.
- All rubbish and waste material should be disposed of using the waste facilities provided.
- The correct methods of disposal must be used when removing any article for waste.
- Clear up waste and spillages in the correct manner.
- Segregate waste to prevent contamination or reduce quantities sent to landfill.
- Recycle wherever possible to reduce the quantity of material going off site.

3.12 ACCIDENT/INCIDENT REPORTING & INVESTIGATION

It is the policy of the company to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 1995). The company will use Incident Investigation as a valuable tool in the prevention of future accidents/incidents.

All accidents or dangerous occurrences classed as reportable under RIDDOR 1995 will be investigated by the Director Responsible for Safety, the respective Site Manager / Foreman presiding at the place of work where the incident occurred, with the assistance of the appointed HSE&Q Advisor.

A report will be produced, based on the findings of the incident investigation and the recommendations therein will be adopted.

All injury accidents, dangerous occurrence and near misses will be reported to the Site Manager and to the respective principal contractor, where applicable, and an entry made in the accident book. The Director Responsible for Safety and the appointed HSE&Q Advisor will determine whether any further action is necessary.

See the Accident Reporting Chart (**Appendix A**) for further information and guidance.

3.13 PROCEDURE DURING/FOLLOWING HSE&Q ADVISER INSPECTION

On completion of the workplace HSE&Q and safety inspection and submission of the formal inspection report, the HSE&Q Adviser will discuss their findings with the Site Manager / Foreman, who will sign, acknowledging receipt of the report.

The action column on the report will at this stage be blank. As the Site Manager / Foreman actions the identified failings raised, they should indicate this in the action column with their initials and the date action was taken. After which they should send one copy to the safety director or nominated manager as confirmation that the items have been actioned appropriately.

The HSE&Q Adviser's office will also send the Director Responsible for HSE&Q a copy of the report. In this way the Director Responsible for Safety can monitor the Site Manager's actions.

If on a subsequent visit the HSE&Q Adviser is of the opinion that adequate action has not been, and will not be taken, he must inform the Director Responsible for Safety as quickly as possible.

If the HSE&Q Adviser is of the opinion that an operation constitutes a risk of serious injury to any person then he will take whatever action he feels necessary. If the Site Manager disagrees with this action, the HSE&Q Adviser will record his opinion in his written report and inform the Director Responsible for Safety as quickly as possible and copy him in with the report by the quickest possible means. The Director Responsible for Safety will then resolve the issue.

3.14 ALCOHOL AND DRUGS

The Company takes the view that the effects of taking or being under the influence of alcohol or any illegal substances at work constitutes an unacceptable Health and Safety hazard both to the Director and others who may be affected by their actions.

It is therefore against Company rules for any employee to be at their place of work whilst under the influence of such alcohol and/or drugs.

If an employee is using legally prescribed drugs for medical purposes they should inform the company if there are any possible side effects that may put them or their fellow workers at risk.

A specialist drug/alcohol testing specialist may be employed to carry out random screening of staff members. This may also occur on client's premises where staff members are employed, in which case full cooperation will be necessary.

Any member of staff who is tested positive or in the opinion of the person in charge of the work location, under the influence of alcohol or drugs will be suspended from duty and may be subject to disciplinary action, following thorough investigation.

3.15 PERSONAL HEALTH AND INFECTIOUS DISEASES

If an employee has an infectious or communicable disease such as AIDS/HIV, Hepatitis, Tuberculosis (TB) etc, or illness such as epilepsy, asthma or other health problem that may constitute a risk to themselves whilst at work, or may constitute a risk to the health and safety of others employed by the company, that person must bring this to the attention of the Director Responsible for Safety.

3.15.1 Confidentiality:

Any employee who becomes aware that a fellow worker/colleague has an infectious or communicable disease, such as AIDS/HIV, Hepatitis, Tuberculosis (TB) etc, or otherwise sickening from the affects of other possible infectious or communicable diseases, or ill health problems such as epilepsy, asthma or other health problems, will treat that information as confidential and will not disclose it to anyone else within or outside the organisation without the person's consent.

Any breach of this rule will be regarded as a serious disciplinary offence and may result in summary dismissal. If, however, the employee is concerned about the health and safety implications of non-disclosure, he or she should seek advice from the Directors only, who will then deal with the matter as necessary.

3.16 CONSTRUCTION DESIGN AND MANAGEMENT

Fireshield Limited will ensure that they comply with the requirements of the Construction Design and Management Regulations 2007 dependant on what role they are undertaking in pursuance of their activities:

3.16.1 General Management Duties:

All Duty holders under the regulations shall ensure that:

- They and all personnel appointed are competent to carry out their duties or under the direct supervision of a competent person.
- That effective cooperation is both sought and given to all parties involved in construction work and that all matters likely to affect the health and safety of all involved.
- Effective coordination between all parties to ensure, so far as is reasonably practicable, the health and safety of persons carrying out, or affected by the construction work.
- To take account of the "General Principals of Prevention" i.e., elimination, reduction and control for all duties during all stages of the project.

If Fireshield Limited takes on the role of any of the duty holders below they will ensure that they comply with the duties placed on them as specified in the regulations.

3.16.2 Clients Duties:

Managing Projects

- That arrangements are made to manage the project (including time and resources) for themselves and any duty holders, and that they are maintained and reviewed throughout the project.
- That construction work is carried out, so far as is reasonably practicable, without risk to the health and safety of any person.
- That Welfare Requirements as detailed in CDM 2007 Schedule 2 are complied with.
- That any structure designed as a workplace complies with the Workplace (Health, Safety and Welfare) Regulations 1992.
- That any person appointed is competent to carry out the duties imposed by CDM2007.

Information

- That pre-construction information is promptly given to all designers and contractors and where notifiable the CDM Coordinator appointed by the Client. The purpose of the information is to ensure, so far as is reasonably practicable, the health and safety of persons engaged in construction work, or likely to be affected the work and those likely to use the structure as a workplace. Such information will include:
 1. Any information affecting the site or the construction work.
 2. Information concerning the proposed use of the structure as a workplace.

3. The minimum amount of time allowed by contractors for planning and preparation of the Construction work and,
4. Any information in any existing health and safety file.

3.16.3 Notifiable Projects

Where the project is notifiable the Client will:

- Appoint a "CDM Coordinator" in writing to perform their duties under the regulations as soon as is practicable after initial design work or other preparation for construction work has begun.
- Appoint a "Principal Contractor" in writing as soon as practicable after he knows enough about the project to be able to select a suitable person.
- Ensure that the above appointments are renewed as necessary so as the appointments remain until the end of the Construction phase.
- Be appointed as the "CDM Coordinator" and "Principal Contractor" himself if he fails to make suitable appointments and attract all the duties of such appointments.
- Provide the CDM Coordinator with pre-construction information as detailed in the "Information" section above.
- Ensure that no construction work commences until the "Principal Contractor" has prepared a "Construction Phase Plan" and that he is satisfied that the welfare requirements under Schedule 2 have been complied with.

3.16.4 Health and Safety File

The Client will:

- Ensure that the "CDM Coordinator" is provided with all the health and safety information that is likely to be needed for inclusion in the file.
- Ensure that the health and safety file is available for inspection by anyone who may need it to comply with statutory provisions and that it is revised and updated as necessary so as to incorporate any new information.
- Dispose of his entire interest in the structure by delivering the health and safety file to the person who acquires his interest in it and that they are made aware of the purpose of the file.

3.16.5 Designers Duties:

- To ensure before they commence work that the Client is aware of his duties under the regulations.
- When preparing or modifying a design that foreseeable risks to the health and safety of any person are avoided when:
 1. Carrying out or affected by construction work.
 2. Cleaning or maintaining the structure.
 3. Using a structure designed as a workplace.
- When discharging their duty, shall eliminate hazards which may give rise to risk or reduce risks from any residual hazards.
- Provide design information in relation to the design, construction and maintenance of the structure to adequately assist the Client, other Designers and Contractors to comply with their duties under the regulations. Where it is not possible to avoid the hazards pass on information in relation to the residual risk to the Contractor or CDM Coordinator.
- When designing any structure for use as a workplace, ensure that the completed structure will comply with the Workplace (Health, Safety and Welfare) Regulations 1992.
- Provide information in relation to the design to the Client or CDM Coordinator for inclusion in the Health & Safety File.

3.16.6 Notifiable Projects

Where the project is notifiable the Designer will:

- Not commence work (other than initial design work) unless a CDM Coordinator has been appointed.
- Take reasonable steps to provide the CDM Coordinator with sufficient information about the design to assist the CDM Coordinator to comply with his duties.

3.16.7 CDM Coordinator Duties:

The CDM Coordinator shall:

- Provide suitable advice and assistance to the Client in complying with the regulations, in particular Regulation 9 – Managing Projects, and Regulation 16 (Notifiable Projects) in relation to the Construction Phase Plan and Welfare arrangements.
- Ensure that suitable arrangements are made and implemented for the coordination of health and safety matters during the planning and preparation for the Construction Phase Plan including cooperation and coordination between persons and the application of the general principles of prevention.
- Liaise with the Principal Contractor regarding the contents of the health and safety file, information needed to prepare the construction phase plan and any design development that may affect construction work.
- Take all reasonable steps to identify and collect pre-construction information and provide it in a structured form to every person designing the structure, every contractor who may be appointed including the principal contractor.
- Ensure that designers comply with their duties and ensure the cooperation between designers and the principal contractor during the construction phase in relation to design changes.
- Prepare the Health and Safety File containing information relating to the project which is likely to be needed during any subsequent construction work.
- At the end of the construction phase, pass the health and safety file to the Client.

3.16.8 Notification of project by CDM Coordinator

- Shall as soon as is practicable after his appointment ensure that notice is given to the HSE containing the information as specified in Schedule 1 of the Regulations (Form F10).
- Where a principal contractor has not been appointed, notice shall be given as soon as is practicable after the appointment has been made, but in all cases before construction work commences.
- All Form F10's must be signed by or on behalf of the client. If notice is sent electronically then the clients must demonstrate that he has approved the notice.

3.16.9 Principal Contractors Duties:

NB: Fireshield Limited will not normally function in the role as principal contractor (as defined in the CDM Reg's 2007). If this role is to be accepted by Fireshield Limited this policy will be reviewed in order to take this new role into consideration.

The principal contractor for the project shall:

- Plan, manage and monitor the construction phase to ensure that, so far as is reasonably practicable it is carried out without risks to health and safety.
- Ensure cooperation and coordination between all persons involved with the project.

- Ensure that the general principles of prevention are applied.
- Liaise with the CDM Coordinator during construction in relation to any design or design changes.
- Ensure that the welfare facilities comply with the requirements of Schedule 2 and provided throughout the project.
- Draw up and enforce site rules for the project.
- Ensure that reasonable directions are given to contractors and inform them of the minimum amount of time allowed to them for planning and preparation before they begin work.
- Consult with contractors on relevant parts of the construction phase plan applicable to their works and give them access to such relevant information.
- Ensure that adequate time is given to contractors to allow them to prepare properly for their work and ensure that adequate welfare arrangements are made and to enable them to carry out work without risk, so far as is reasonably practicable, to any person.
- Inform each contractor of what information is required from them in by the CDM Coordinator in relation to the Health and Safety File.
- Ensure that the F10 is prominently displayed where it can be read by any worker engaged on the project.
- Take reasonable steps to prevent unauthorised access onto site.
- Ensure that every worker carrying out work on site is provided with:
 1. A suitable site induction.
 2. Information and training for carrying out their works safely such as company inductions, risk assessments and method statements.
 3. Any further information or training which he needs to carry out his work safely.

In relation to the Construction Phase Plan the Principal Contractor shall:

- Before the start of the construction phase, prepare a construction plan which ensures that the construction work is planned, managed and monitored in a way which enables it to be carried out without risk to health and safety, paying particular attention to the information provided by designers and any pre-construction information provided by the CDM Coordinator.
- As appropriate and from time to time review, revise, update and refine the construction phase plan so that it continues to be sufficient in the way the construction work is planned, managed and monitored to enable such works to be carried out safely.
- Ensure that the construction phase plan is effectively implemented to ensure so far as is reasonably practicable the safety of all persons involved on the project.
- Ensure that reasonable steps are taken to ensure that the construction phase plan identifies risks arising from any construction work and the necessary measures to address such risks.
- Ensure the cooperation and consultation between workers by:
 1. Ensure arrangements are in place to enable all those involved in the construction works to cooperate effectively in promoting and developing measures to ensure the health and safety of all persons involved.
 2. Consult all workers or their representatives in good time on matters connected with the project which may affect their health and safety.
 3. Ensure that workers or their representatives can inspect or take copies of any information provided which may affect their health and safety. Except information that:
 - Would be against the interests of National Security.
 - Legal reasons.
 - Cause substantial injury to his undertaking or that of the original supplier of the information.
 - Relating to a specific individual unless consent has been given.
 - Information obtained for the purpose of prosecuting or defending any legal proceedings.

3.16.10 Contractors Duties:

- Not to commence construction work unless the Client is aware of their duties under the regulations.
- Manage and monitor construction work under their control, so far as is reasonably practicable, without risks to health and safety.
- Any contractor appointed is informed of the minimum amount of time that they will be allowed to him for planning and preparation before construction work begins.
- To ensure that every contractor provides any worker under their control with any information and training required to enable them to complete their works safely and without risk to health including:
 1. Site inductions and site rules.
 2. Information on risks to their health and safety identified by risk assessments and subsequent control measures, safe systems of work that need to be implemented in order for them to comply with statutory provisions.
 3. Emergency procedures for serious and imminent danger including personnel nominated to implement such procedures.
 4. Adequate health and safety training.
 5. Arrangements for the security of the site and prevention onto site of unauthorised persons.
 6. Ensure that so far as is reasonably practicable that the welfare arrangements under Schedule 2 are complied with.

3.16.11 Notifiable Projects

Where the project is notifiable Contractors will:

- Not undertake any construction work until he has been provided with the names of the CDM Coordinator and Principal Contractor for the project, and has been given access to such parts of the construction phase plan as is relevant to his works.
- Provide the Principal Contractor with any information that might affect the health and safety of any person carrying out construction work or who may be affected by such work, might justify the review of the construction phase plan or may need including in the health and safety file.
- Notify any sub-contractors appointed to the Principal Contractor.
- Comply with any directions issued by the Principal Contractor including site rules.
- Provide accident and incident information to the Principal Contractor in accordance with Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 1995.
- Carry out works in accordance with the construction phase plan, if this is not possible then notify the Principal Contractor to enable the plan to be altered.

3.16.12 Part 4 of the CDM Reg's 2007

Part 4 sets out the Duties relating to Health and Safety on Construction Sites (Revoking: The Construction, (Health, Safety and Welfare) Regulations 1996)

Fireshield Limited will ensure that the requirements of Part 4 are complied with in regard to matters under their control. Except for the duties under Regulation 33 "Reports of inspections", which states on whom the duties are imposed?

It is the duty of all persons at work on the site to report any defect that may endanger the health and safety of himself or others.

3.16.13 When working under a Principal Contractor, Fireshield Limited will:

- Ensure all operatives with the site rules as defined by the Principal Contractor
- Cooperate with the Principal Contractor and provide all necessary documentation, including risk assessments and method statements

The contents of the health and safety plan and health and safety file will be as per the guidelines produced by the Health and Safety Executive.

3.17 SELECTION OF CONTRACTORS OR SUB-CONTRACTORS

Any contractor or sub-contractor to be used by the company must first have been vetted and placed on the companies approved list. It is necessary to carry out this due diligence in order to ensure that all selected contractors or sub-contractors are competent and able to work safely.

The Company will carry out an assessment in the form of a Contractor Competency Assessment Questionnaire (*see Appendix B*) which must be completed by the contractor or sub-contractor in advance of their appointment. The response will be assessed by the Director responsible for safety with the assistance of the Safety Advisor. If the safety director feels it is appropriate he may ask for a more in-depth health & safety audit to be carried out on the company before granting approval. The contractor or sub-contractor will not be appointed until approved.

Following the successful appointment of any contractor or sub-contractor, Fireshield Limited will carry out regular HSE&Q monitoring of their activities, whilst they are carrying out works on behalf of Fireshield Limited. All such monitoring will be carried out by competent managers and with the assistance of the companies Health and Safety Advisors.

3.18 SUPPLY CHAIN MANAGEMENT

Fire Shield endeavour to provide good and mutually profitable working relationships with all of our customers. We believe that good communication plays an important part in realising a team player situation and we therefore put in place a specific team to run each project from receipt of a Customer's order. Generally, two people will liaise on all aspects of technical, production, and costings, to ensure that our customer has all the up to date information he requires.

Each Supply Chain Management system is instigated by our Customers with an emphasis on confidentiality. Therefore we do not to provide details of such to third parties. However, we can state that each Contractor has followed a different emphasis on tendering, costings, continuous improvement tasks/objectives, and there are follow up meetings between the Companies to ensure that both parties are progressing on agreed agendas.

We have worked within a framework of shared financial benefit on design rationalisation and detailing improvements, and we have successfully jointly worked on projects where there has been a Scope financial limit (GMP) set.

For our Suppliers, we monitor and check regularly the service, delivery and costs within our market and have good relationships with most of the fire protection manufacturers, as we are their licensed applicator. We also monitor Distributors and Plant Hire companies for their service.

We strive to gain and maintain good relationships with all of our Suppliers.

3.19 CONSULTATION & COMMUNICATION

Consultation and Communication between workers at all levels is an essential part of effective HSE&Q management. All workers must be given the opportunity to have their comments or concerns channelled through their respective line foreman and passed on to either the Clients representative or

the Director responsible for HSE&Q, who must then take the appropriate action as deemed necessary, so far as is practicable.

There will be ample opportunity for regular consultation and communication between management or supervisory staff and other employees. Typical opportunities will arise during toolbox talks and task briefing sessions.

Personal consultation with employees will also take place on a regular basis. This will normally be carried out by line management. Occasionally, Company Directors may be engaged in this activity.

3.20 CO-OPERATION & CARE

The Company wishes to build and maintain a healthy and safe working environment where co-operation and care between works at all levels is crucial to be able achieve this. All workers are expected to co-operate with their immediate Client or the Principal Contractor and any internal/external safety advisors/officers, and to accept their duties under this policy.

If the Company is to achieve and maintain a safe and healthy environment, all workers must co-operate with the senior management of the Company as well as the Client's representatives and take due care when undertaking their work activities.

3.21 CUSTOMER CARE & PUBLIC PROTECTION

When working in occupied premises priority must be given to the health & safety of the occupants. The must not be put at risk.

Particular care must be taken if children are present. Some basic precautions to be followed are:-

- All power tools must be isolated while left unattended, even for short periods of time.
- Whenever possible power should be provided through a 110volt transformer.
- Trailing extension leads and cables should be kept tidy and be routed over head where reasonably practicable or to one side and covered over with cable protection where persons are likely to walk over them.
- At the end of the working period, all tools, materials and equipment must be suitably stored, where reasonably practicable, off premises. If stored on the premises, they must be in a safe and secure place, out of the reach of children.

3.22 CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

It is the policy of the Company to comply with the Law as set out in the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

Assessments will be conducted of all work involving exposure to hazardous substances. The assessments will be based on manufacturers' and suppliers' health and safety guidance and our own knowledge of the work process.

The Company will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases. Where an assessment highlights a reasonably practicable less hazardous substitute substance, these must be used.

All workers who will be exposed to hazardous substances will receive comprehensive and adequate training and information on the health and safety issues relating to that type of work.

Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

3.23 WORK EQUIPMENT

The Company will endeavour to ensure that all work equipment used is safe and suitable for the purpose for which it is used.

The use of any work equipment, which could pose a risk to the well being of persons in or around the workplace, will be restricted to authorised persons.

Other than Company Vans (hired) and Cars (bought & hired), the Company owns no heavy plant or equipment. The only tools and equipment used by employees of the Company are as follows:

Site Use Tools and Equipment:

- Petrol & Electric (hired) Paint Pump & Spray Pumps
- Electric Waste Tin Can Crusher (Stores) - 240V.
- Electric Drills (hired)
- Battery/Cordless Screw Gun
- Electric Skill-saws (hired)
- Electric Grinders (hired)
- Electric Chop-saws (hired)
- Electrical Power Leads (hired)
- Gas Fired Nail Gun - Spit
- Gas Fired Staple Gun - Palsa
- Shot Cartridge Fired Hilti Gun

Office Equipment:

- Computers
- Scanner
- Printers, Plotter & Photocopiers
- Dish Washer, Kettle, Toaster, Microwave
- Water dispenser (hired in)
- Hand Dryers (Toilets)
- Fax Machines
- Projector
- Electrical Leads, UPS boxes
- Air Conditioning Units which provide cold & heat (Fixed)
- Electric Roof-lights
- Portable Lights

Typical Hired Tools and Equipment:

- MEWPs - Cherry Picker and Scissor Lift (hired)
- Proprietary Aluminium Mobile Towers, Podium Steps, Stepladders & Ladders (hired)
- Toolbox (hired)
- Electric Table Saw + Dust Extractor (hired)
- Electric Task Lights (hired)

All work equipment will be maintained in good working order and repair with regular inspections undertaken.

Work equipment provided by employees must be identifiable and have, where applicable, current test certification applicable that tool or appliance.

Any work equipment provided by the Company or a specialist plant supplier must have relevant test certification and records will be kept of this certification and be available for inspection.

Any small tools purchased by the Company for the use of their operatives will comply with the Provision and Use of Work Equipment Regulations, particularly in that all work equipment is chosen to ensure that it is suitable for the task.

Work equipment owned by the Company will be maintained in accordance with the manufacturer's instructions and/or tested and inspected on a regular basis.

Electrical tools, leads and transformers are all inspected regularly and PAT tested as required. These tests will be recorded and the equipment labelled. A copy of the test certificates will be kept by the site supervisor or the operative, for inspection on site if requested.

All employees of the Company are required to ensure that their own personal tools and equipment are in a serviceable condition (including statutory testing) at all times.

All operatives will be subject to site safety inspections carried out by a Site Manager/supervisor or Safety Advisor. These inspections, including visual inspections, will be recorded and a record kept.

Faulty equipment belonging to the Company is to be labelled immediately to prevent use and returned to head office for repair/disposal. Tools belonging to employees of the Company are to be taken out of service as soon as the fault becomes apparent and not used again until they have been repaired and tested as required.

3.23.1 Use of Vibrating Equipment

All tools and equipment (e.g. abrasive wheels, drills, spit guns, Pulsa stapler guns etc) that may cause vibration related illness (Vibration White-Finger, Hand Arm Vibration Syndrome etc) will be subjected to a full and thorough Risk Assessment before they are used, the results of the assessments will be recorded and available for inspection as required.

All employees that are likely to use this equipment will be informed of the results of the assessment and where necessary an action plan will be introduced by the Site Supervisor to ensure that exposure limits set out in the Regulations are not exceeded.

Where reasonably practicable, vibrating tool will be avoided or else selected on a basis whereby the tools with the lowest vibration emission will be chosen over high vibration emission tools, e.g. anti vibration dampers and devices.

It is recognised by the Company that personal protective equipment has little or no use in preventing the risk of vibration white finger or HAV. However, gloves will be worn by operatives using vibrating tools. This may only slightly reduce the risk of exposure, but will nevertheless be adopted.

In order to reduce and control the exposure to vibration, a register will be used to record individual employees exposure times. The register will provide details of the vibrating equipment, the magnitude of vibration and the recommended maximum exposure times.

3.23.2 Use of Abrasive Wheels

The Company will take all reasonable steps to ensure the health and safety of Employees who work with chop-saws, grinding machines and disc cutters that incorporate abrasive wheels. Operatives will be given the appropriate training in the use of safe use and changing of abrasive wheels.

Abrasive wheels should only be operated in accordance with the manufacturer's instructions. Guards and other safety devices should not be removed or altered.

All abrasive wheels used by the Company will be maintained in good working order and inspected for electrical safety before use and at regular intervals by a competent person.

Operatives who are required to change wheels will be formally trained to do so in accordance with the Abrasive Wheels Regulations 1992 and a record of approved operatives maintained.

The use of abrasive wheels will usually be classed as 'Hot Works'. For further information on the company's procedure for hot works see HOT WORKS in section **4.23 FIRE & EMERGENCY EVACUATION**.

3.23.3 Use of Electrical Tools

A quarter of reportable electrical accidents are due to faulty equipment. The main hazards associated with electrical equipment include electric shock, fire, poor maintenance and tripping from trailing cables.

To avoid such electrical accidents it is essential that routine inspections, testing and maintenance be carried out on portable electrical equipment (any equipment with a lead and plug). Only the appointed competent person will carry out the required inspections and tests.

The following precautions must be put in place on every site:

- No person, other than a qualified electrician, may undertake work on electrical installations.
- All portable equipment, this includes hand tools, temporary lighting and some plant will be operated to a voltage not exceeding **110 volts**.
- No damaged or homemade 110-volt leads are permitted on the site
- Transformers switching down from 240-volt to 110-volt may be used but the 240-volt lead must not be longer than 2 metres and must not cross any area where it could be damaged
- All cables must be routed so as to be protected from damage and also to prevent tripping hazards. Preferably overhead.
- All leads must be properly made and comply with the current British standards.
- All 110 volt Equipment have a test (PAT) and inspection before first use when brand new and then every 3 months thereafter, once test completed a label shall be affixed to each item of equipment to state safe to use. Where certain 110 volt tools are seldom used, they will be tested (PAT) on a minimum 6 monthly basis.

3.24 FIRE & EMERGENCY EVACUATION

Whilst the Company does not have a set of procedures for Fire and Emergency on each site that it currently works on, we accept our Clients Emergency Evacuation Procedures including the fire action plan which every worker should be fully aware of during their induction by the Client or Principle Contractor's representative.

Adequate fire fighting equipment shall be provided by either by the Company *or by* the Principle Contractor for each site that we are subcontracted on.

There are various flammable substances used by the company, some of which may be stored on site. Generally, they are Toluene, Xylene and solvent based intumescent paints, thinners, adhesives and mastics. Materials storage will be kept to a minimum and will be stored correctly (according to manufacturers recommendations), typically in steel containers. Additionally, the combustible packaging (e.g. cardboard, polythene, empty mastic tubes etc) will be discarded (in skips etc provided) as soon as practicable, so as to reduce any unnecessary fire loading.

At no time should a fire be tackled unless you have received training in extinguishing a fire and it is only to be done when there is no risk to that particular operative. It is only recommended that fire extinguishers are used to enable safe exit from fire effected areas.

3.24.1 Hot Works

The only type of hot works carried out by the company is with respect to the use of abrasive wheels (e.g. chop-saws) and stud welders. The use of all such, or similar, equipment will require the issue of a Hot Works permit. The hot works permits will either be issued by the Site Manager/Supervisor or, in cases where a principal contractor has overall responsibility for a project; they will be obtained from the main contractor.

Before commencing work with chop-saws or similar, a hot works permit must be obtained. The area of use must be swept, a barrier put around and the saw fixed to the floor or bench. A suitable fire extinguisher will be kept nearby at all times during hot work and the operatives involved will be suitably trained in the use of fire extinguishers and fire prevention techniques.

Chop-saws are to be checked prior to use to ensure that they are in good order and that the correct abrasive wheel blade is fitted correctly (See Section 4.22.2 - ABRASIVE WHEELS).

The Fire Shield Ltd Site Manager will need to check the work area one hour after Hot Works ceases to ensure no fires have been started and to complete checklist of Permit to Work.

Hot works permits can only be issued for one week's work, so it will be necessary to arrange in advance for any other time they are needed.

3.25 FIRST AID

The Company has a policy of having at least one First Aider on site, where practicable, who is suitably trained and holds a current First Aid at Work certificate issued by an organisation whose training and qualifications are approved by the HSE, i.e. St. Johns, British Red Cross etc.

If the Company has no trained first aider on site, where a Principle Contractor is responsible for Health and Safety, then the Principle Contractor is to ensure that the appropriate trained personnel are at the workplace at all times.

First Aiders should have access to suitably stocked first aid equipment (First Aid Box). The box should be clearly marked with a white cross on a green background and be stored in a readily accessible location. A sign will normally indicate where First Aid is located and who First Aiders are.

When working on small projects, such as domestic premises, First Aid equipment will be provided to the appointed trained First Aider.

The Company will continue to provide the appropriate training as and when necessary.

3.26 WORK AT HEIGHT

The Company acknowledges its duty respecting the Work at Height Regulations 2005 and aims to achieve a high standard of compliance. Where work at height is involved a risk assessment will be carried out to identify the risks involved and the processes to eliminate or control the risks.

All work at height will be carried out as planned and in accordance with the relevant standards and risk assessments. The Company will provide any information, instruction and training that an employee may require to carry out his or her work in a safe manner when working at height. The Company will also arrange for the regular inspection of all equipment required for working at height, particularly where there is a statutory requirement to do so.

All safety equipment, staging's, restraint equipment, harnesses, anchorages, etc. will be inspected not less frequently than weekly and any defects noted during inspections or reported by operatives shall be attended to immediately. Employees must inspect their equipment immediately prior to use and ensure that any defective equipment is exchanged or repaired before further use.

Where work at height is unavoidable, the selection of methods for controlling work at height related risks will take place in the following order, as a hierarchy of control:

1. Working platforms (scaffolding, lightweight staging, mobile towers, podium steps etc) with double handrails, toeboards and a minimum working platform no less than 600mm wide.
2. Mobile Elevated Work Platforms (cherry pickers and scissor lifts etc)
3. Work restraint or work positioning equipment (harnesses with restraint lanyards etc)
4. Fall arrest equipment (harnesses with shock absorbing lanyards)

3.27 LADDERS & STEPS

Ladders and steps will NOT be viewed as a default means of access or for places of work. In most cases, Podium type mobile platforms or proprietary mobile towers will be used. Podium type access towers will be the preferred method of low level access (See Podium Platforms in 4.27.1).

When working with ladders and steps the correct precautions need to be taken.

The misuse of ladders and/or steps is the cause of many accidents. A ladder and/or steps should not be used as a place of work unless the work is of short duration and is such that it is within easy reach and can be carried out with one hand, the other hand being on the ladder for support.

- All ladders must be inspected to ensure that they are in good order.

- Steps/Ladders may only be used if they are of the correct class (BS EN131, Class 1).
 - Domestic type ladders and steps (Class 3) will not be used at any time.
 - Over-reaching must not be carried out.
 - The stays on steps must be locked out and locking bars in the proper position.
 - Ladder angles must not exceed 75° angles (1 to 4 ratios applied).
 - Ladders exceeding 4m in height are to be secured (tied or footed).
 - Each ladder or set of steps must be serial numbered and logged.
-
- Make sure there are three points of contact available at all times.
 - If you need to carry tools and equipment, make sure you do this safely.
 - Make sure you know the maximum safe loads on the ladder to be used.
 - Always position the ladder face-on to the work.
 - Wear the right footwear and make sure the soles are clean.

3.28 MOBILE TOWER SCAFFOLDS

Mobile towers and/or podium type mobile access platforms should only be erected or altered by authorised trained and competent persons.

The erection of the mobile tower and/or podium type mobile access platform must be in accordance with the manufacturers design instructions.

The configuration of bracing and ledgers varies according to the manufacturer. It is therefore essential to have a copy of the manufacturer's erection manual or instructions available on site. Some manufacturers have these instructions affixed to the actual tower.

Before any use, of mobile towers and/or podium type mobile access platforms, checks should be made to ensure that they are suitable and safe for use. During use they should be kept in good order. A competent person should inspect them regularly to see that the structure has not been altered or interfered with in any way. Should parts become damaged they should be replaced before the next planned use.

3.28.1 Podium Platforms

It is vital that everyone involved in working from a podium tower can do their work safely. Therefore, before using a podium, the following must be considered:

- Ensure that the podium is placed on a firm level surface, or if not level, adjust the adjustable base in order to be levelled effectively.
- Ensure that all the wheels or feet are in contact with a firm surface and that they are all locked and turned 90° to the work face.
- Ensure that the podium is set to the correct height for the work to be carried out.
- Position the podium so as to face the work and place it as close to the work face as possible, so as to avoid over-reaching.
- Make sure that all of the brace claws and knuckle joints are in position and locked securely.
- Put tools and materials onto the podium from ground level where possible.
- Wear the right footwear and make sure the soles are clean.
- Always close and lock the gate behind you before starting any work.
- Do not climb or lean on the guard rails.
- Do not move the tower or podium with a worker on it.
- Before moving a podium, reduce its height and check for any overhead hazards.

3.29 MOBILE ELEVATED WORK PLATFORMS (MEWP's)

This procedure covers all types of pedestrian controlled, self propelled and power operated elevating work and access platforms.

MEWP's can provide a safe way of working at height. They allow the worker to reach the task quickly and easily, have integrated guard rails and toe boards which prevent a person or equipment falling and can be used in-doors or out-doors. However, a risk of falling from height still exists and must therefore be properly assessed before use. Additionally, there are several other risks associated with MEWP's that must be considered and assessed. It is therefore essential to select the correct type of MEWP for the work planned and the environment for which it is to be used in and that only trained and authorized personnel use them.

The main types used by the company include "cherry pickers" and "scissor lifts", and the main hazards associated with these items of plant include:

- Collision with another vehicle and plant.
- Parts of the machine encroaching into a traffic and/or pedestrian routes.
- Proximity of overhead cables.
- Falls of persons or materials.
- Persons being caught or trapped in moving parts or "nip" points.
- Overturning.
- Incorrect use.

As previously mentioned, MEWP's will only be used subsequent to a full risk assessment. They will only be used on firm and level ground and not over any drain, basement etc.

All the manufacture records regarding inspections, maintenance and servicing will be available on site and maintained as appropriate.

All inspection, maintenance and servicing will be carried out to the manufacturers recommendations.

The thorough examination will be carried out by an independent authorised engineer at six monthly intervals in accordance with the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) for lifting equipment designed and used for people. The current test certificate will be made available with the machine along with the operating manual.

All machine operators will be fully trained and certificated by an accredited body (e.g. IPAF).

3.29.1 MEWP Operation

Ensure that the MEWP has adequate guard rails around the edge of the basket and that there are toe-boards around the edge of the platform.

The operator must ensure that the safe working load and gradient are displayed on the machine and that he is working within these perimeters.

The operator will ensure that all outriggers are deployed during use.

The machine should never travel with the platform occupied or boom extended, unless the manufacturer's guidelines state that this is acceptable.

When working next to roadways, railways or other operation, ensure that barriers, cones, lights, etc. are provided.

If working near to overhead power lines, ensure that full risk assessment is produced in conjunction with electrical supply company and suitable method statement produced including all relevant precautions taken to prevent an accident

A full body harness with a work restraint lanyard must be used by all personnel within the MEWP and secured to a suitable anchor point within the basket (normally indicated by manufacturer).

When not in use, the machine should be immobilised with the keys removed in order to prevent unauthorised use.

3.30 LIFTING OPERATIONS

Many accidents are caused by lifting incorrectly; Lifting operations involving the use of lifting Equipment (slings, chains, shackles etc.) can only be carried out by trained authorised employees.

- Safe working loads must be displayed on hoists and lifting tackle and should not be exceeded.
- The item must be identified by a lifting gear register number and colour coded correctly.
- Wire rope slings should be free of cuts, excessive wear, kinking and general distortion.
- All hooks, chains, roll pins, split pins and locking nuts must be checked daily for security of attachment.
- Chains should be free of mechanical defects in Director links, distorted hooks (caused by overloading) should not be used.
- Avoid carrying loads over the heads of other people. If necessary, give warning for them to keep clear.
- If you are in control of a load being lifted, always keep it in clear view and make sure you are in continuous contact with the operator of the lifting machine.
- Never use lifting gear if its Safe Working Load (S.W.L.) cannot be established.
- Never make up a sling or alter any lifting gear without instruction from your supervisor.

3.31 LIFTS & HOISTS

The Company will, in accordance with its general statement of health and safety policy, take all reasonable steps to secure the health and safety of employees and others who use lifts and hoists in the workplace. Suitable and sufficient risk assessments will be made to minimise the risk that may be involved with the use and operation of such equipment.

Full consultation, in accordance with the existing procedures laid down, will be undertaken with employee representatives in determining the control measures necessary.

The Company will in consultation with its employees and/or their representatives: -

- Carry out assessments of risks to users, maintenance staff and others, of lifts and hoists both when the lift is in use and when it is being maintained.
- Implement any control measures found necessary to minimise the risks identified
- Obtain adequate information from the installer on the safe and proper use of the equipment.
- Ensure that hoists or lifts are suitable for the task (and the site conditions to be encountered in the case of hoists) and are properly installed. Hoists shall be suitably enclosed
- Arrange for adequate maintenance examinations and tests of lifts and hoists to be carried out at regular or prescribed intervals by competent persons and ensure that records are kept
- Before maintenance work starts on a lift or hoist, ensure that the lift has been taken out of service and that a safe system of work has been agreed and clearly understood by all personnel involved in testing or examination.
- During maintenance work display warning notices and erect barrier at the landing entrances of lifts (specifications for suitable barriers are given in HSE Guidance Note PM26 Safety at Lift Landings).
- Make employees aware of the Company's arrangements for reporting defects to a responsible person.

The Company will provide users of lifts and hoists with suitable information, instruction and training to ensure that there is no risk to their own or others' health and safety whilst working with them.

Other persons not in direct employment, visitors and temporary staff will also be provided with adequate information to ensure their safe use of the equipment.

Those responsible for the management and supervision of the workplace will be given appropriate training to ensure the proper use and maintenance of the equipment. Employees will be provided

with such additional information that is deemed necessary where equipment or job specification changes significantly.

3.32 MANUAL HANDLING OPERATIONS

It is the policy of the Company to comply with the Law as set out in the Manual Handling Operations Regulations 1992.

Manual handling operations shall be avoided as far as reasonably practicable where there is a risk of injury. Mechanical means will be used so far as is reasonably practicable.

Where it is not possible to avoid manual handling a Risk Assessment (manual handling assessment) of the operation will be made taking into account the task, the load, the working environment and capability of the personnel concerned. Such assessments will be reviewed if there is any reason to suspect that it is no longer valid.

All possible steps will be taken to reduce the risk of injury to the lowest level possible.

All site based employees will be trained in the safe methods of manual handling appropriate the tasks they are assigned to do.

3.33 WORKPLACE NOISE

The Company acknowledges its duty to fully comply with The Control of Noise at Work Regulations 2005 (NAWR 05). However, detailed guidance on implementation will be used to supplement this arrangement.

This has been obtained from the following Health and Safety Executive guidance notes;

Controlling Noise at Work: Guidance on the NAWR 05 - L108.

The Section of the NAWR 05 for which this document provides summary guidance includes;

- Assessment of Exposure.
- Assessment records.
- Reduction of risk of hearing damage.
- Reduction of noise exposure.
- Hearing protection.
- Hearing protection zones.
- Maintenance and use of equipment.
- Provision of information to employees.
- Health Surveillance

The NAWR 05 include the assessment of noise at work and protection from damage to hearing. However, there are other requirements laid down in the Management of Health and Safety at Work Regulations 1999 concerning the exposure of Young Persons (<18years) to noise.

The Company acknowledges this and will therefore include noise within any risk assessments produced specifically for young persons.

3.33.1 Action Required:

- Identify those activities and areas where noise levels are significant e.g. difficulties with normal conversation.
- Identify those persons or groups who may be exposed to this noise.
- Where noise exposure varies markedly from day to day then weekly exposure figures will be used in place of daily exposures
- Arrange for a competent noise assessor to carry out, an assessment of the activity/area.
- Provide assessor with such information as he requires to carry out assessment.
- Arrange review of assessments in the event of any significant changes in the work to which the assessment relates.

- Arrange for health surveillance (audiometry testing) through Occupational Health, for those staff members at risk of hearing damage.

Records of all noise assessments and subsequent reviews shall be made by a competent person and stored in a retrievable format. Any such record will be kept, until a subsequent assessment has been undertaken, and archived in a retrievable format.

The risk of damage to the hearing of employees from noise exposure will be kept as low as is reasonably practicable. Employees will be advised when a hearing protection zone is in operation.

- Enforce the wearing of hearing protection.
- Identify hearing protection zones by use of approved signage.

All PPE provided by the Company for the benefit of employees in compliance with these regulations shall be fully and properly used.

Where practicable noise levels will be maintained below the first action level of 80dB(a) (decibels). All persons likely to be effected will be provided with suitable hearing protection and advised to wear it.

When noise levels reach or exceed 85dB(a), all reasonably practicable means of reducing the noise will be employed. Until the noise levels become acceptable (i.e. 80dB(a) or below), a Noise Protection Zone will be identified and suitable signage will be displayed (e.g. a blue mandatory sign stating: Warning – Ear Protection Required).

All persons working in this zone, who are likely to be effected by the excessive noise, will be provided with suitable hearing protection and requested to wear it. Additionally, compliance with this requirement will be monitored. Any non-compliance may result in disciplinary action.

The company will ensure:

- Plant and equipment is selected and maintained to minimise noise levels and employees have been instructed in their use.
- Suitable ear protection is supplied for the conditions of exposure.
- Adequate means of communication in noisy environments, especially if relevant alarm sounds may need to be heard.

Workplace management, Foreman and Supervisors will ensure compliance with any noise levels and periods of permitted noise activities laid down by local authorities, in order to prevent noise pollution.

All employees, contractors and visitors will obey any instructions and warning notices with regard to wearing of hearing protection in designated areas.

3.34 THE OFFICE ENVIRONMENT

It is the policy of the Company to comply with the Workplace, (Health, Safety & Welfare) Regulations 1992. While it is understood that the majority of the risks associated with the activities of the Company are likely to be site based, the Company recognises that there are risks associated within the Office environment.

Therefore, the following points will be adhered to:

All walkways (corridors, open office spaces) are to be kept clear of slip and trip hazards and other obstructions. In particular:

- Computer and telephone cables should not lie across the floor
- Loose floor coverings, stairs and handrails, worn treads, etc., shall be reported to the Supervisor for immediate action
- Remove any loose items left on the floor
- Clean up all spillages

Ensure that all equipment, including desks and chairs, are in sound condition, suitable and properly placed. When sitting keep all legs of a chair on the floor - do not tilt backwards or stand on chairs.

All filing cabinets should be fitted with anti-tipping devices and not be overloaded in order to prevent them from tipping.

Use handles to open and close drawers to prevent pinching fingers. To avoid back injury, jammed drawers should not be pulled excessively.

Ensure sufficient lighting is available to carry out work in a safe and proper manner.

Maintenance of office equipment, including computers, word processors, communication systems and electric's etc should only be carried out by an appointed competent person. 240V office equipment will be appropriately tested (PAT) on an annual basis, and labelled as such.

All regular users of Visual Display Screen Equipment/Units (VDU) will be assessed annually. The Director responsible for safety will ensure that any identified issues are suitably managed.

3.35 PERSONAL PROTECTIVE EQUIPMENT (PPE)

It is the policy of the Company to comply with the Law as set out in the Personal Protective Equipment at Work Regulations 1992. Therefore, all workers who may be exposed to a risk to their health and safety while at work will, where necessary be provided with suitable, properly fitting and effective personal protective equipment.

All personal protective equipment provided by the Company will be properly assessed prior to its provision and shall be maintained in good working order.

All workers provided with personal protective equipment by the Company will receive training and information on the use, maintenance and purpose of the equipment.

The Company will endeavour to ensure that all personal protective equipment provided is stored correctly and used properly by its workers.

The Company issues protective equipment as follows:

- Safety Helmet with Company Logo
- Overalls
- Hi-Visibility Vest/Jacket
- Gloves (task suitable)
- Steel Toe-capped Safety Boots
- Specific Eye Protection
- Dust Masks
- Safety Harnesses
- Respirators
- Air Fed Safety Hoods

Where required, all employees will wear hard hats, Hi-Visibility vest/clothing and suitable safety footwear (e.g. steel toe-capped) while they are undertaking their assigned tasks.

3.35.1 Task suitable hand gloves must be worn at all times when on site.

The Company expects that Employees and Operatives supply their own personal items. However, the Company will provide these FOC if the Employee cannot obtain them.

3.35.2 Prescription Safety Glasses

Should an operative arrive on site without his basic items then the Company will provide personal equipment. All protective equipment must be cared for by the operative to whom it is issued.

Any Subcontractors and their Operatives, used by the Company, will be expected to provide their own PPE, and should Fire Shield be required to provide this there will be a charge.

3.36 PERSONAL SAFETY (Lone Working)

The Company is committed to taking all reasonable precautions necessary to secure the health and safety of those carrying out work activities. This commitment extends to the protection of those employees who work away from Company premises or in lone worker situations.

Safe working procedures have been devised for all work activities which pose a significant risk to health and safety. This must be complied with at all times. Failure to work in accordance with agreed procedures reduces the safety of people at work, is in contravention of the Company Safety Policy and may constitute a criminal offence.

The Company will ensure that the need for employees to work alone will be avoided wherever reasonably practicable. Where employees do work alone, personal safety must be a priority at all times. This includes ensuring that there is regular communication with a responsible person before, during and upon completion of the work.

Lone workers must take all the necessary steps to ensure that they do not put themselves at significant risk during the work activity, when using work equipment or as a consequence of the work environment.

Radios, 'walkmans' and other items which cause distraction may only be used with the knowledge and approval of a responsible person. In any event, audio systems for personal entertainment must not be used where these could prevent audibility of alarms. Exposure to excessive noise levels from personal stereo equipment may damage the hearing mechanism. Other personally owned equipment or tools must be approved by the management before use.

Managers are responsible for the adequate supervision of employees to ensure that they do not endanger themselves or others by work activities, practical jokes or horseplay. This requires the prevention of unapproved systems or practices, unauthorised work activities and all other unsafe acts.

Attitudes to personal safety should be reviewed as part of a formal performance appraisal. Appropriate records must be kept. Employees must be prevented from using equipment or undertaking a task which could be detrimental to their health and safety.

Additional consideration is required by managers of employees whose duties take them away from the normal workplace or where employees are required to work alone. Any special arrangements will depend upon the nature of the risk, but may include provision of personal alarms, communication equipment or other safety devices.

Professional advice on or assistance with personal safety should be obtained where required.

Managers must ensure that employees have received sufficient information and training regarding their personal safety to enable them to work without risk, so far as is reasonably practicable.

Employees must ensure that they do not compromise their own health and safety whilst at work. If there is a perceived shortcoming in the arrangements for the work activity which could affect the personal safety of any individual, this must be reported to a responsible person. Employees must work in accordance with safe working procedures at all times and comply with Company policy.

Thought and attention must be given to any hazards that are present in and around the working area. Employees must familiarise themselves with safe working procedures, including emergency arrangements, applicable to all premises which they enter. They should report any situations presenting a risk to personal safety to a responsible person immediately, so that measures can be taken to rectify the situation.

3.37 YOUNG PEOPLE AT WORK

It is the policy of the Company to comply with the Law as set out in the Management of Health & Safety at Work Regulation 1999.

The safety of young people at work is maintained by the Company through specific assessment of their work activities and the risks that they are likely to be exposed to and implement the necessary controls, i.e. suitable supervisor cover, training and relevant equipment/PPE they require to undertake their duties.

3.38 WELFARE

In accordance with the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992, the Company will provide workplaces, e.g. the office, with adequate provision for their ventilation, temperature and lighting.

Appropriate levels of cleanliness should be maintained and arrangements made for the disposal of any waste in accordance with the environmental protection arrangements laid down.

Floors and traffic routes (for pedestrians and vehicles) will be of suitable construction, well maintained and free from obstructions. Arrangements will be put in place to ensure that pedestrians and vehicles can circulate in a safe manner.

The Company will provide suitable and sufficient sanitary conveniences with washing facilities as required for all employees at all workplaces. An adequate supply of wholesome drinking water will be provided together with appropriate facilities to change and dry work clothing, rest and take refreshments, as well as prepare and heat food and boil water.

Welfare provisions on construction sites are normally provided by the Principal Contractor on a shared welfare arrangement basis. The Company will ensure that the facilities provided are adequate for the use of their employees. Where works are carried out in domestic premises, other appropriate arrangements will be made.

If and when the Company acts as Main Contractor, welfare facilities complying with the Construction Design and Management Regulations 2007 will be provided.

3.39 WEILS DISEASE (Leptospirosis)

Weils disease is caused by a parasite from rats (*Leptospira Icterohaemorrhagiae*) and is a notifiable disease reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995. It is present in the kidney and urine of the rat and is apparently not harmful to them.

The parasite may enter the human body through the skin, mucous membranes or skin abrasions, following contact with water contaminated with the urine of infected rodents. It is also possible that infection may follow ingestion of food or water contaminated by infected rodent urine and cases of infection have followed rat bites.

Infection with the *Leptospira* bacterium is called Leptospirosis or Weil's Disease. It is a reasonably rare condition with a low infection rate, but can be highly dangerous if not treated correctly or in time. The *Leptospira* bacterium is carried by rats (and other infected animals) which excrete the organism in their urine. If the urine then enters areas of freshwater, lakes, streams, rivers (or sewage works/pipework) that commonly provide habitats for rats, the bacteria is then able to survive in the water and is able to infect animals and humans who enter/work with it.

The bacterium enters the body through breaks in the skin (cuts, blisters, abrasions) and via the lining of the nose, throat and alimentary tract. The incubation period for the disease is typically from 3 - 15 days (though cases have been known after 30 days and to appear in under 48 hours).

Symptoms include fever, chills, muscular aches and pains, loss of appetite and nausea. In its starting stages it can be commonly mistaken for influenza, meningitis or a fever of unknown origin. The infection becomes more violent in its later stages with symptoms such as bruising of the skin, sore eyes, anaemia, nose bleeds and jaundice. The fever can last for around five days followed by a marked deterioration. Most people will recover completely with treatment, but there are cases where the illness causes serious damage to internal organs and can lead to death.

Weil's disease is commonly treated by antibiotics. Recovery from the condition (once the serious stages are passed) can take from 6 to 12 weeks.

Any employee experiencing fever after exposure to high-risk water should contact their GP immediately. Always tell your doctor you suspect Weil's disease to avoid miss-diagnosis (many urban GP's may not have seen the disease before so alert them to the possibility).

If you think you have flu and then develop the later symptoms after exposure to water that might have been contaminated, go directly to a hospital and tell them you suspect Weil's disease.

The rats that spread the disease commonly live near water and places where there is easy access to food such as farms and stables. Those at high risk include sewage workers, abattoir workers, farm workers, miners and those who have an increased contact with water such as cavers and water sports enthusiasts. The *Leptospira* bacteria do not live long in dry conditions but can survive in fresh water up to a month (in salt water the bacteria only survives for a few hours). If you work (or play) with water that has a high risk of rat infestation take great care not to ingest the water or let any wounds come into contact with it.

The most effective way to protect one's self from Weil's disease is to avoid contact with infected water. However, there are steps you can take to lower your risk of infection if you have to come into contact with water in lakes, streams, rivers or sewage works/pipework:-

- Wear splash-proof clothing and gloves.
- If you have cuts do not allow them to be submerged in the water.
- Cuts or grazes must be covered with a waterproof dressings.
- Never swallow water unsuitable for drinking.
- Do not immerse your head.
- Complete and carry on your person the Weils Disease Information Card (Rat Card).

3.40 HOURS OF WORK

The Company acknowledges that excessive working hours can lead to ill health and increased risk of accidents and will therefore do all that is reasonably practicable to ensure that tasks and operations can be carried out without unreasonable demands being made on the time of the employee.

This will require the Company to assess the level of risk and to plan work and provide sufficient resources. Where there are statutory requirements for limits on working hours, e.g. driving goods vehicles. The Company will ensure that records are kept and regularly inspected.

Similarly it is the duty of all employees involved in these activities not to exceed the permitted hours of work. Should employees feel that their health or welfare is put at risk by the hours they are expected to work, they should report to their immediate supervisor.

The Company will liaise with employees and any trade union representatives to ensure that adequate discussion takes place.

3.40.1 Out of hours working

Where an employee is required to work outside the normal hours of work, special attention will be paid to the need for safety in respect of lighting, access and egress, First Aid and the need for supervision of employees working on their own or in isolated areas of the workplace. Should these hours extend beyond that stated in the Working Time Directive employees will be consulted with regard to their willingness to exceed these hours.

A Risk Assessment should be made of the operation before work commences and the necessary precautions or Supervision must be available before work commences/continues.

3.41 CLOSING MESSAGE

Our HSE&Q Policy and Procedures are designed to ensure that you fully understand the role that you and the Company must play in helping to provide a safe and healthy working environment.

Together we must seek to identify and eliminate hazards at work and to reduce the number of accidents to zero.

With your personal help and co-operation we firmly believe that we can achieve this.

4. MONITORING & REVIEW

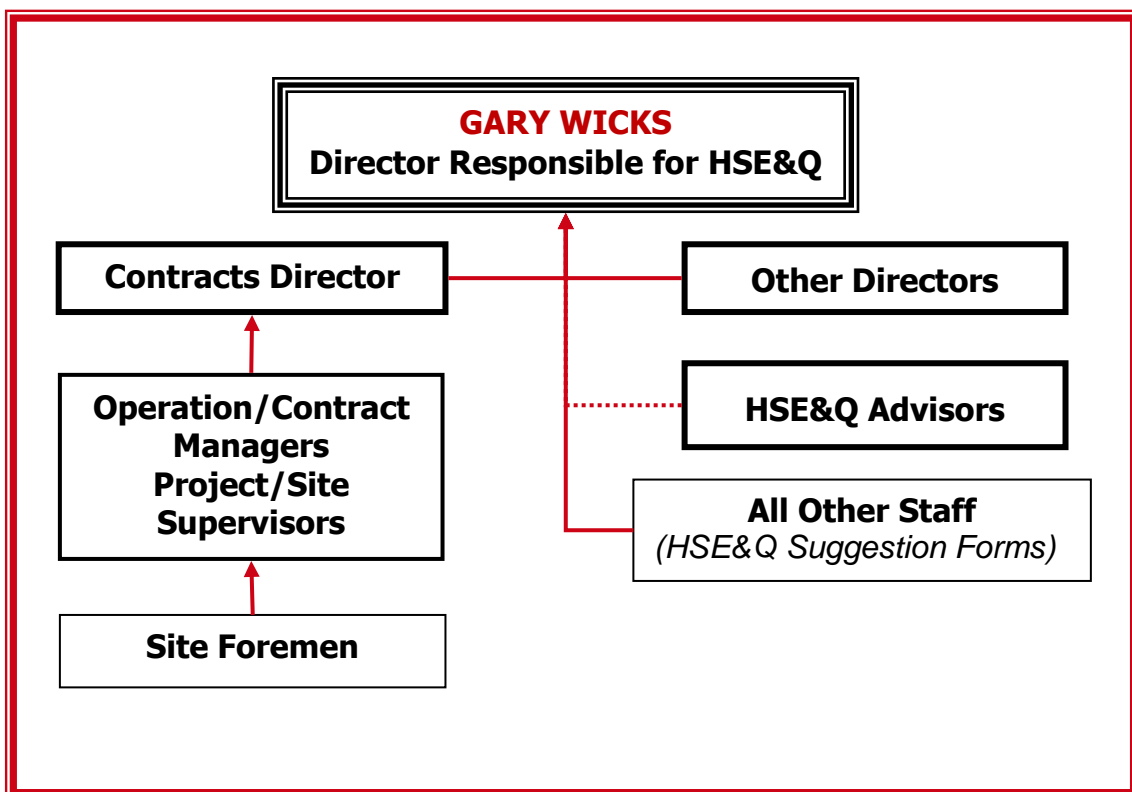
Regular Health, Safety, Environmental and Quality Performance Monitoring and Operational Inspection will be undertaken by the Company and appointed HSE&Q Advisors. By reviewing the findings of inspections, audits and incident reports etc, the sound management of HSE&Q issues relating to the Company’s activities will reduce the potential for accidents and provide for continually improved performance.

The monitoring will now include management systems, work activity inspections and site inspections by all senior management and the appointed Safety Advisors.

The aim of the performance monitoring is to relay to management areas of concern whilst also offering assistance and advice at all levels to achieve the standards expected.

The HSE&Q Monitoring will be carried out by all senior management and the appointed Safety Advisors. All non compliance findings and/or recommendations are to be noted on the HSE&Q Performance Monitoring Form. The responsible person (e.g. respective Project/Site Supervisor) must ensure that the appropriate corrective action is carried out promptly.

All HSE&Q Performance Monitoring Reports must be forwarded through the appropriate management chain as follows:



All members of staff will be encouraged to make suggestions for the improvement of HSE&Q. This will be done by completing and submitting Health, Safety, Environmental and Quality Suggestion Forms. These may be done anonymously or by name, and should be forwarded to the Director Responsible for HSE&Q.

All findings or recommendations will be reviewed by the Director Responsible for HSE&Q, who will ensure that appropriate corrective action has been carried out promptly.

4.1 HSE&Q Policy and Procedures Review

The HSE&Q policy and Procedures will be audited, reviewed and amended to suit the following:

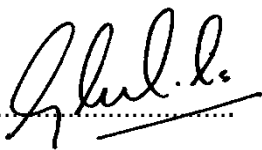
- Any changes which may substantially affect health & safety at work (e.g. in procedures or ways of working).
- The health & safety consequences of new technology.
- Changes brought about following reviews of procedures, brought about by an accident or incident.
- Changes in Legislation and Codes of Practise.
- As a result of audit findings and recommendations.

As a minimum, HSE&Q policy and Procedure compliance will be audited annually by an external auditor. The results of the audit will be actioned as necessary and the HSE&Q policy and Procedures manual updated if necessary.

5. DECLARATION

On behalf of **Fireshield Ltd**, I hereby declare that I have read and understand the above-mentioned Company HSE&Q Policy and Procedures and that I will observe the conditions and provisions contained therein.

Signed:



May 2014

Gary Wicks

(Director with Particular Responsibility for HSE&Q)

APPENDIX A

CONTENTS

HSE&Q FC.01 – Accident & Incident Reporting Flow Chart

APPENDIX B

CONTENTS

- HSE&Q F.01 – Accident & Incident Report Form
- HSE&Q F.02 – Contractor Competency Assessment Questionnaire Form
- HSE&Q F.03 – H&S Inspection Report Form
- HSE&Q F.04 – HSE&Q Suggestion Form
- HSE&Q F.05 – Hot Works Permit Form
- HSE&Q F.06 – Risk Assessment Form
- HSE&Q F.07 – Method Statement Form
- HSE&Q F.08 – PPE Issue Record Form