

HEALTH & SAFETY POLICY



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Health and Safety Policy Revision Record

Health and Safety Policy Issue.			
08/03/2022	Revised Health and Safety Policy Rev 2.0 Issued.	D. Ternent H&S Manager	
Policy Amendments			
Date	Amended Section (s)	Amendments Made	Completed by

SECTION ONE

Group Health and Safety

Policy Statement

Group Health and Safety Policy Statement

Gelder Group is committed to providing a work environment that is safe and healthy for all employees and those affected by our activities. Gelder Group's operations shall be carried out to ensure, so far as is reasonably practicable, that the Health, Safety or Health, Safety or Conditions of any person or property will not be adversely affected.

Gelder Group in order to comply with the associated regulations will:

- Identify hazards in the workplace, assessing the risks related to them and implementing appropriate preventative and protective measures.
- Provide and maintain plant and equipment with systems that are safe and without risk to health, a safe place of work and a safe system of work
- Ensure that effective planning, control, and monitoring of all sites are maintained
- Make sure we have effective arrangements in place to deal with injuries and reduce the effects of any incidents that could result in injury, ill health, or damage to the environment.
- Recruit and appoint personnel who have the skills, knowledge, and experience commensurate with their role and level of responsibility
- Ensure that tasks given to employees are within their skills, knowledge, and ability to perform
- Ensure that technical competence is maintained through the provision of refresher training as appropriate
- Promote awareness of health and safety and of good practice through the effective communication or relevant information
- Ensure that suitable and sufficient resources, time, and finance are provided for health, safety, and environmental management.

All employees have a duty to take reasonable care for their own safety and the safety of anyone else who may be affected by their acts or omissions. Employees must also co-operate with the company in its arrangements to meet statutory safety obligations.

This Policy is monitored and reviewed on a regular basis by the Senior Management Team as required. Mr Steve Gelder M.B.E has nominated each Director to take responsible for Health and Safety within their department. Management and supervisory staff have the responsibility for implementing the organisational arrangements set out in the Company Health and Safety Manual. To assist them in this respect, the company, have appointed external Safety Advisers to visit our sites and workplaces and to give advice on the requirements of the relevant statutory provisions and safety matters generally.

The policy will be amended and updated to take account of business changes, methods, size, and personnel. To ensure this, the policy, and the way in which it has operated will be reviewed annually.

Our objectives are set to surpass the needs and expectations of our stakeholders, inspire a new generation in construction and exceed our commitment to our Vision.



Steve Gelder

CEO – Gelder Group

March 2022

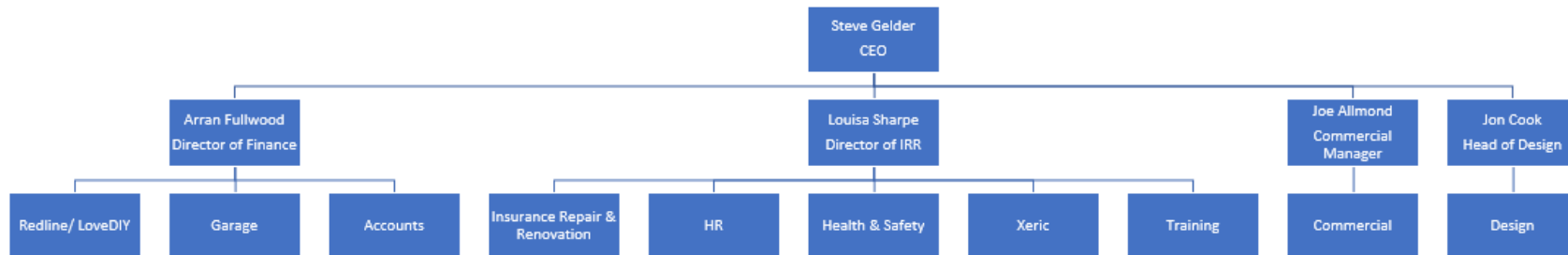


SECTION TWO

Organisation and Responsibilities

2.1 Gelder Management Reporting Structure – March 2022

Gelder Group Organisation Chart



Responsibilities for Health, Safety and Welfare Matters

2.2 Chief Executive Officer (CEO) – Mr Steve Gelder

The Chief Executive Officer who has overall responsibility for health and safety is responsible for ensuring that the policy enables Gelder Group to fulfil its legal duties and emphasises the determination to manage its activities so that standards of health and safety are continuously improved. The CEO will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements

The Chief Executive Officer Responsible for Health and Safety is responsible for ensuring the following:

- Prepare, display, and keep up to date the Company's Policy for Health and Safety ensuring it is brought to the attention of all employees.
- Ensure each member of staff is aware of their duties and responsibilities and the means by which they can carry them out.
- To ensure that the necessary appointments are made in the company to fulfil the requirements of this safety policy, this will include the appointment of each Director with specific responsibility for the implementation of the Health and Safety Policy within their department.
- Appoint an internal HSE Manager with responsibility for continuous improvement of HSE management within the business and ensuring the senior management team are kept up to date with changes in legislation that may affect the business.
- Know the appropriate statutory requirements affecting the Company's operations.
- Ensure that appropriate training is given to all staff as necessary.
- Ensure that sound working practices are observed as laid down by Codes of Practice, industry standards etc., and that our work is planned, the risks assessed, as appropriate, control measures implemented, and the work carried out in accordance with the statutory provisions.
- Ensure that tenders are adequate to allow for proper, safe working methods, equipment necessary to avoid injury, welfare facilities, damage and wastage and health and safety factors are fully considered in the selection of subcontractors.
- Ensure a close liaison is maintained on all health and safety related matters between the Company and others working on site.
- Implement the investigation, reporting and costing of injury, damage, and loss; encourage analysis of all investigations to discover trends and eliminate hazards.
- Reprimand any member of staff who fails to discharge satisfactorily their responsibilities for health and safety.

- Maintain a close liaison with external accident prevention organisations and encourage the distribution of safety literature throughout the Company.
- Arrange for regular meetings with the Safety Adviser to discuss Company accident prevention, near-miss trends, performance, possible improvements, etc.

2.3 The Directors Responsible for Health and Safety

The Chief Executive has delegated each director with the responsibility for implementing and co-ordinating all aspects of health, safety, and welfare within their department. Each department Director will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements.

Main responsibilities for Health and Safety, within their department are:

- Ensure the adoption and maintenance of proper standards of safety, health, and welfare in all areas of activity under their control to meet the requirements of the company Safety Policy, the Health, and Safety at Work etc. Act 1974 and all relevant legislation and Codes or Practice.
- Ensure effective safety communications within their department. They are required to advise the Senior Management Team (SMT) on matters that they feel need its attention.
- Appoint a suitably trained and competent person to assist them in to carry out their Health and Safety duties.
- Ensure the availability of expert advice on Health and Safety matters. i.e., HSE, Approved Codes of Practice Trade Associations, circulars.
- Ensure that, the SMT, Managers and Supervisors are adequately trained to carry out their Health and Safety duties effectively.
- Ensure the safety performance of Gelder Limited is monitored and take action to remedy any identified deficiencies.
- Establish procedures to deal with office and site emergencies.
- Before entrusting work tasks to employees and sub-contractors, consider their capabilities as regards Health and Safety and ensure that suitable risk assessments are carried of any hazardous activity.
- Ensure that all necessary PPE is provided to employees, within their department, and engaged subcontractors
- wear PPE (Personal Protective Equipment) as required.
- Ensure that adequate provision is made for welfare facilities on site that meet the relevant regulations and that adequate first aid provisions are made.
- Ensure that employees and others, within their department, receive sufficient information, training, and advice so that they can carry out their duties safely and competently. Ensure adequate resources and facilities are available for this purpose.
- Co-operate with and support the HSE Manager to enable the continuous improvement of the HSE management system.
- Attend Health and Safety Consultative Meetings when requested.

- Set a personal example when visiting sites by wearing appropriate personal protective clothing
- Set a personal example and promote an interest and enthusiasm for health and safety within their department.
- Ensure prior to appointment of any works, all contractors and Sub-contractors will have been assessed through the Gelder Safe Partnership Scheme and found to be competent for the job that they have allocated sufficient resources and are aware of their responsibilities for health and safety.

2.4 Senior Management Team (SMT)

The Senior Management Team (SMT) will monitor conditions and the health and safety performance to determine whether the policy is adequately resourced, effective and is being developed to meet changing requirements. In order to protect the Safety and Health of employees and others affected by the Company's operations, the SMT will:

- Understand the company's Health and Safety policy.
- Have personal knowledge of the broad requirements of the Health and Safety at Work Act 1974 and Health and Safety Regulations and the HSE Approved codes of Practice.
- Ensure adequate resources are available to ensure compliance with the Health and Safety standards.
- To ensure that the Health and Safety Policy is updated as required.
- To ensure that safety is on the agenda at each SMT meeting.
- To ensure that professional safety advice is available as required.
- Set a personal example and promote an interest and enthusiasm for health and safety within the Gelder Group.
- Safe systems of work are in operation, and staff receive adequate and appropriate training
- Support and assist the Directors, Responsible for Safety. in the execution of their duties.
- Take reasonable steps to familiarise themselves with the hazards and risks associated with the work of Gelder
- Limited and with the precautions which need to be taken to eliminate or control those risks.
- Attend Health and Safety Consultative Meetings when requested
- Ensure that all employees satisfactorily discharge their Health and Safety responsibilities allocated to them.
- Set a personal example when visiting sites by wearing appropriate personal protective clothing.

2.5 Health and Safety Manager

As required by Regulation 7 of the Management of Health and Safety at Work Regulations the internal HSE manager will provide competence health and safety guidance to the business. The health and safety manager will be responsible for the following:

- The maintenance and continuous improvement of the companies HSE management system in line with company objectives and relevant legislation.

Provide advice on the following as required.

- Further improvement in existing safe working methods.
- Legal requirements affecting safety, health, and welfare.
- Provision and use of protective clothing and equipment.
- Suitability from a safety viewpoint, of new and hired plant and equipment, and validity of all appropriate test certificates.
- Potential hazards on new contracts before work starts on the site and safety organisation and fire precautions required.
- Changes in legislation and any implications they may have on the business.
- Advise the Director of each department, Responsible for Safety, on an annual plan sufficient to meet the company's needs.
- Advise on the application and maintenance of the Company Health, Safety and Welfare Policy arrangements.
- Encouraging a high profile for Health, Safety and Welfare within the company at all levels and review health and safety suggestions received from employees.
- Advise the SMT on training needs of employees and ensure they are competent to carry out their delegated duties. Support and advise the companies training coordinator.

The health and safety Manager will perform the following functions:

- Maintain and review the Health and Safety Policy to ensure compliance with all current legislation.
- Maintain and assist with the issue of Health & Safety documentation to all personnel as appropriate.
- Maintain Health and Safety records and reports.
- Present a summary Health and Safety report upon request by each Director who is Responsible for Health and Safety
- Determine the cause of accidents or dangerous occurrences and recommend means of preventing recurrence.
- Liaise with the fire authority to ensure adequate fire precautions. Advising that such precautions are maintained, and that staff are trained in the use of fire precautions and are familiar with the fire emergency procedure. Review and ensure that Fire Drills are being carried out on a 6monthly basis and record they have taken place.
- Keep up to date with all Health and safety issues and inform all employees as appropriate.

- Maintain an up-to-date knowledge in matters of legislation and regulations as they affect the Company and its
- Health, Safety and Welfare Policy.
- Visit sites and premises at regular intervals in order to monitor the effectiveness of the Company Safety Policy and to advise the SMT and each Director on all aspects of Health and Safety.
- Investigate and report accidents and dangerous occurrences and recommend means of prevention.
- Maintain a close liaison with the Health and Safety Executive, its Inspectors, and other relevant departments,
- personnel and other relevant organisations.
- Assist and carry out the identification and arrangement of employee training requirements
- Review accident statistics, carry out investigation and create campaigns to promote awareness of injury prevention and damage control
- Maintain the companies third party accreditations.
- Provide help and support as necessary to maintain the companies ISO standards.

2.6 The External Health & Safety Advisers

Stallard Kane Associates Ltd have been appointed to advise and assist all related health, safety and welfare issues related specifically to the business. Stallard Kane Associates Ltd will be responsible directly to the Board of Directors and will also maintain a close relationship with all other employees as necessary.

Stallard Kane Associates Ltd will perform the following function:

- Undertake site audits when requested and provide a detailed site audit report on their findings.
- Provide training.
- Provide updates on changes in legislation.
- Provide H&S support to the business as requested by the divisional directors or SMT.

2.7 Managers and Supervisors

All managers and supervisors are expected to demonstrate by example their total commitment to health and safety matters.

Each manager and supervisor are responsible for their personal safety and that of all personnel under his or her authority, including others who may be affected by Gelder Group's activities.

In particular, they will:

- Understand and implement the Gelder Groups Health and Safety Policy
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows his/her responsibilities and are equipped to play their part

- Conduct risk assessments on activities within their department, ensuring that the methods and systems of work are safe and ensure that the necessary procedures, rules, and regulations designed to achieve this are formulated, published, and applied
- Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with
- Ensure accident and near-miss reporting procedures are understood and complied with, and assist with accident investigations where appropriate
- Ensure all employees and sub-contractors are suitably trained/competent to carry out the prescribed task and that the necessary licenses/certificates of competence are in force and appropriate
- Ensure the Statutory Notices, the Health and Safety Policy, Insurance Certificate, and the names of appointed First Aiders are displayed and maintained in prominent locations
- Ensure that all new employees in the company are provided with a copy of the Health and Safety Policy, through Breath, receive such induction training as may be laid down in procedures, are issued with personal protective equipment as required and are aware of their personal responsibilities as set out in this manual
- Reprimand any employee for failing to discharge their health and safety responsibilities
- Set a personal example with regard to health and safety matters.

2.8 Employees

The Management of Health and Safety at Work Regulations 1999 re-enacts the Health and Safety at Work etc. Act 1974, which places responsibilities on the employer and employees alike. In this connection Gelder Group reminds employees of their duties under Section 7 of the act: to take care of their own health and safety and that of others who may be affected by their acts or omissions. Additionally, employees must also co-operate with the Company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:

- Carry out assigned tasks and duties in a safe manner, in accordance with instructions, and to comply with safety rules/procedures, regulations and codes of practice
- Consult their manager/supervisor if aware of any unsafe practice or condition, or if in any doubt about the safety of any situation
- Obtain and use the correct tools/equipment for the work and not to use any that are unsafe or damaged
- Store all tools, equipment, and personal protective equipment in the approved place after use
- Ensure that all guards are securely fixed and that all safety equipment and personal protective clothing/equipment provided are used
- Not operate any plant or equipment unless authorised
- Report any accident, near-miss, dangerous occurrence or dangerous condition to their manager or supervisor – In accordance with ‘Accident Reporting & Emergency Procedure’
- Switch off and secure unattended plant or equipment
- Avoid improvised arrangements and suggest safe ways of eliminating hazards

- Bring to the attention of their supervisor or line manager any health and safety concerns.
- Set a personal example with regard to health and safety matters.

SECTION THREE

Arrangements for Implementing the Company Health and Safety Policy

3.1 Systems and Procedures

The Company recognises the importance of health, safety, and welfare, and will adopt a systematic approach towards ensuring that a healthy and safe environment is provided and maintained for all employees and other persons who could be affected by our work activities.

Equally important is the need for constant alertness by each department Director Responsible for Health and Safety and employees in identifying and eliminating potential hazards wherever possible.

It is our primary objective that in conducting our activities, account must be taken by all parties of the need to:

- Formulate and maintain safe working systems, including work carried out during maintenance
- Take all necessary steps to establish the causes of accidents and risks to health, which may occur, and to ensure that reasonable measures are taken to prevent recurrence
- Ensure that no process, chemical or equipment is introduced unless it complies (where required) with statutory testing or examination requirements. Also, to ensure that, so far as is reasonably practicable, the health and safety of employees etc. will not be affected
- Provide proper and adequate induction and training to ensure that all employees are fully competent in safe working methods applicable to their work
- Encourage the closest possible liaison between the Company and employees in matters relating to health and safety
- Ensure that all legal requirements relating to our activities are fully complied with, and progressively improve upon the levels of health and safety performance

Consult with employees, and advise them of their legal duties and responsibilities, including the requirement to:

- Abide by safe working systems.
- Make use of facilities and equipment provided for their protection.
- Refrain from any act which could endanger themselves or others.
- Refrain from intentionally or recklessly interfering with, or misusing, anything provided in the interests of health, safety and welfare.
- Report any known defect, which could endanger the health or safety of themselves or others.
- Cooperate as far as is necessary to ensure that we meet our legal requirements.

3.2 Permit's to Work

Works that are identified as being of higher risk must be controlled by the use of "Permit to Work". Standard procedures are available from the department Director and H&S manager, covering work recognised as having special risks, e.g. excavation, roof work, entry into confined spaces, some electrical work, hot work, and work involving asbestos etc.

These permits will be issued by a senior site member / operative to ensure safe systems of work are applied by Contractors. The person receiving the permit must acknowledge receipt of it and must ensure that the specified works is done safely in accordance with any imposed conditions. He/she must also confirm when the works are completed, and all areas or plant are safe. The permit must then be cancelled by the Issuer.

3.3 Sub-Contractors and Temporary Workers

The Gelder Safe Partner Scheme has been created in order to assess and ensure the competence of all contractors appointed by the Gelder Group and is a practical way of complying with the company's duties under Regulation 8 of the CDM 2015 Regulations (General Duties). The scheme requires all contractors to complete the Gelders Safe Partner application form and is required to meet specific standards (Application forms – Deem to Satisfy, Under 5 employees and Over 5 employees). The application form has strict standards to be met; and contractors are required to supply supporting evidence which is set out in these standards dependant on if they are SSIP accredited and the size of the company.

The completed application form and supporting evidence is audited internal. Contractors who meet the required standards will go onto the approved list of the Safe Partner Scheme and those who do not satisfy the standards will not be approved and will no longer be selected for future work. Sub-Contractors need to comply with all reasonable Company requirements as to the measures that they should take to discharge their responsibility and be aware and adhere to the Company policy on health and safety. Self-employed labour and other temporary workers will be assessed to determine their competency to operate safely prior to commencing work under company supervision.

During site inspections carried out by safety advisors, they shall also audit the undertakings of sub-contractors assigned to the particular project. Whilst on site, supervisors and managers shall monitor and supervise sub-contractor's activities to ensure they undertake their work safely. In addition to this, the safety advisor as part of his inspections shall ensure that sub-contractors are working in line with their provided safe systems of work, risk assessments along with site rules being enforced. As part of monitoring and auditing sub-contractor performance, safety advisors shall ensure that contractors being used for projects are current and approved on the companies approved list of contractors.

Where unsatisfactory circumstances arise, this shall be recorded and provided to site managers or supervisor and divisional director and H&S manager for action as necessary. Feedback will also be given to the contractors involved so they have the opportunity to address the issues raised. Contractors who perform unsafely on site shall be removed and no longer provided work.

3.4 Lone Working

Often in the course of our business, people are sent into a working situation on their own. This would be when it is deemed that the job is of such a nature that a single person could competently and safely complete the tasks required taking into consideration the scope of works and hazards present.

Where lone working is required, a risk assessment shall be carried out and appropriate controls defined and implemented. We must ensure that lone workers are not placed at more risk than other employees, so each individual assignment must be examined to assess all risks by considering certain points and guidelines.

If working alone cannot be avoided, extra care must be taken to ensure that the lone worker does not put themselves in any unnecessary danger. The tasks which must never be undertaken while working alone are those which involve any form of entry into a confined space, and any form of work involving live electrical conductors (even if you are qualified to do so).

Tasks which are best avoided when working alone if this is possible, include:

- Welding, burning and other hot work
- Handling dangerous substances
- Working in excavations
- Working at height
- Work involving excessive manual handling
- Working under vehicles or heavy plant.

Employees who have been appointed a lone working task must inform their contracts manager or site manager/supervisor if they have a medical condition which may make you unsuitable for lone working.

Lone workers will have access to adequate first aid facilities, have all the relevant emergency and nominated person contact numbers and have access to a fully charged mobile phone.

Regular communication to be undertaken between the lone worker the nominated person. Arrangements will be made between the contracts manager and the loner worker prior to works commencing.

If the nominated person receives no phone call at the arranged time, they will try to make contact with the lone worker. If no contact can be made, the nominated person will escalate this and attempt to get the nearest trade or manager/supervisor to attend their location to check on lone workers safety. The last point of call will be to the emergency services.

3.5 Hazard Identification

Controlling the risk associated arising from hazards offers the best chance for preventing injury or illness in the workplace (office, workshops, or site). Hazards must be actively identified and reported during all phases of our work, either as part of our processes or as part of our monitoring of our activities in a day-to-day sense. All areas of operations will have a defined method for gathering hazard information. Some general methods for gathering of hazard information includes:

- Risk Assessments.
- Company consumables – Material safety Data Sheets for substances used.
- Pre-construction information.
- Internal and external audits.
- Workplace Inspections.
- Accident and Incident Investigations.
- Consultation with employees.
- Complaints or direct feedback in a day-to-day sense.
- Observation by each and every one of us

Having identified the hazard (potential or existing) it is then necessary to manage the associated risks and that these risk mitigation strategies are documented, implemented, and communicated. Project and task planning before we commence any task we need to review and document the hazards associated with the activity. We need to identify each step of the process involved and identify hazards at each step, typically as per the Design or Activity Risk Assessment or during preparation of the Method Statement.

3.6 Hierarchy of Hazard Control

The hierarchy of Hazard Control to be used to reduce the risk of injury and ill health to employees and others who may be affected by our undertaking will be the application of the general principals of prevention:

- Avoid risks.
- Evaluate the risks which cannot be avoided.
- Combat the risks at source.

- Adapt the work to the individual, especially regarding the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work, work at a predetermined work rate and to reducing their effect on health.
- Adapt to technical progress.
- Replace the dangerous by the non-dangerous or the less dangerous.
- Develop a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment.
- Give collective protective measures priority over individual protective measures; and
- Give appropriate instructions to employees.

3.7 Risk Assessments

Risk assessments will be carried out to identify hazards in the workplace and assess the risk to employees who may be exposed to such hazards. Where hazards are identified, the Gelder Group will, where practicable, eliminate or reduce the risk following the application of the general principals of prevention. Where risk cannot be eliminated control measures will be introduced to develop and implement protective and preventative procedures to comply with the statutory requirements. Use is made of the risk Severity Matrix to prioritise the risks and to evaluate the reduction in risk through the strategies adopted the documents we use to define the Risk Control processes are:

- Method Statements
- Construction phase plan
- Design Risk Assessments
- Activity Risk Assessments
- Emergency Plans

These may make reference to Codes of Practice. The Activity Risk Assessment is particularly important as the tool we use to cover activities that may have been overlooked or not covered in sufficient detail in the Method Statement and to manage the many day to day 'out of the ordinary' circumstances we are confronted with.

Where activities change such that the original assessment becomes invalid or less relevant, a further assessment is to be carried out. Having defined the hazards and documented the risk mitigation strategies the outcomes must be clearly communicated to those involved.

3.8 Site Safety Rules

Site safety rules will be established for all sites, works and offices. The rules will be as a result of identifying site specific hazards and client requirements by the management team. They will be discussed at induction stage and included in the Gelder induction folder, construction phase plan and the van manuals as well as being posted about the site at appropriate points. All must adhere to site safety rules.

3.9 Personal Protective Clothing, Equipment and Facilities

Director of each department will be responsible for ensuring that only PPE to the correct standards has been issued and used.

Director of each department will ensure that all persons under their control are equipped with, and use correctly, any PPE provided to them. They will also ensure that risk assessments relating to their work are reviewed to enable them to identify what safety precautions (including PPE) should be in place.

In accordance with the Personal Protective Equipment at Work Regulations 1992, an assessment of the PPE requirements of each employee / trade will be made, the PPE assessment will be included in the Company's general assessment procedure detailed below.

It should be noted at this point that PPE would be used only as a last resort measure.

Protective clothing and equipment will be provided in hazardous areas and where there are statutory requirements, or where the accepted maximum permissible limits may be exceeded.

Where a hazard to an employee is identified, though the exact risk level is not known, then that employee will be given the maximum possible protection until an adequate risk assessment has been carried out.

An adequate supply of protective clothing and equipment will be readily available on sites or in the Works Stores. Records of all issues will be maintained. Where the use of clothing/equipment is subject to statutory or company requirements, this will also apply to visitors.

Managers and Supervisors must ensure employees are adequately informed of such dangers and of the necessity to wear the equipment provided. Such work areas must be clearly marked. Managers and Supervisors must ensure the equipment is adequate, used properly, kept in good condition and appropriate training given in its use.

Where Personal Protective Equipment (PPE) has been issued, it should be worn in the appropriate manner for the task it has been provided for. All protective clothing/equipment will conform to British, European or statutory requirements, equipment which is not CE marked will not be used. To ensure it gives the right protection, advice should be sought from the health and safety manager, Department Director Responsible for Health and safety or external safety advisors before use.

All PPE will be replaced on a new for old basis. Re-issue or replacement of worn-out PPE will be requested on site or in the Works Stores and usage can be monitored.

Any PPE which is so worn or damaged that it no longer affords adequate protection will be replaced before the employee is allowed to continue work.

Where necessary employees will be trained in the correct use, storage and maintenance of PPE issued to them.

3.10 Respiratory Protective Equipment (RPE)

The Gelder Group is aware of the concerns regarding the correct and safe usage of Respiratory Protective Equipment (RPE), specifically in respect of facial hair. The below information makes clear The Gelder Group's position on RPE.

Where RPE is used as a control measure under Health and Safety Legislation (Control of Substances Hazardous to Health Regulations 2002 reg.7(3)(c), Control of Lead at Work Regulations 2002 reg.6(3)(c), Control of Asbestos Regulations 2012 reg.11(4)), it is vital that the selected RPE is adequate and suitable.

Many of the gases, vapours and dusts that cause serious damage to lungs and other parts of the body can be invisible to the naked eye and RPE is designed to protect employees from these hazardous substances that can cause serious illness and disease.

The Gelder Group must prevent or control the exposure of employees to hazardous substances at work, employees have a legal duty to cooperate with their employers and use control measures provided, including RPE, in accordance with the instruction, information and training provided.

RPE must reduce exposure to as low as reasonably practicable, and in any case to an acceptable level - below any applicable Workplace Exposure Limits or Control Limits. To ensure that the selected RPE has the potential to provide adequate protection for individual wearers, the Approved Code of Practice's (ACoPs) supporting COSHH, CAR and CLAW, which stipulate that tight-fitting RPE must be fit tested as part of the selection process. RPE Face fit testing should be conducted by a competent person. This will help to ensure that inadequately fitting facepieces are not selected for use.

Ill-fitting facepieces can create inward leakages of airborne contaminants. Facial hair / stubble and beards make it very difficult to get a good seal of the mask to the face and this renders the RPE ineffective exposing employees to the risk of hazardous substance inhalation and the associated damage to your lungs and health

Should employees choose not to be clean shaven when carrying out duties requiring RPE, subsequently preventing them from carrying out their duties safely, disciplinary actions may be taken. Please see section 7.6 of the Handbook. However, if there is a good reason preventing employees from being clean shaven, such as religious or medical requirements, then employees must report this to their Director and Gelder Group will make a decision whether or not to provide alternative RPE.

3.11 Alcohol and Drug Abuse

The Gelder Group operates a strict policy that Alcohol and Illegal Drugs are strictly prohibited in the workplace. For the full Policy please see the Staff Handbook section 12.

3.12 Young Workers

Young workers, (those under 18 years of age) are particularly at risk because of their immaturity, inexperience, and lack of awareness to existing hazards. The Gelder Group will carry out Risk Assessments on young workers before they start employment.

When the assessment process is carried out, we will consider the young workers':

- Physical and psychological capacity.
- Potential of exposure to cold, heat, noise, and vibration.
- Potential of exposure to harmful agents.
- Need for greater supervision of their activities.
- Need for additional training in order for them to carry out their work activities safely.

They will be treated as employees for the duration of their employment in that they will be provided with the same health, safety, and welfare protection. Young workers shall be provided with close supervision, information, training, and instruction at all times.

3.13 Inspections, Monitoring & Safety Audits

Individual responsibilities are detailed in Section 2 of this Policy for Managers and Supervisors to monitor and observe all activities, and to ensure that, so far as is reasonably practicable, all such operations and activities are safe and without risks to health. On construction projects where there is a large number of employees and the complexity of the activity justifies it, the Gelder Group will appoint an External Safety Adviser who will carry out regular safety inspections and produce written reports which will be distributed for necessary action. On construction sites where there is no appointed External Safety Adviser the company's health and safety manager will monitor the project. Details of his responsibilities are listed in Section 2. As similar philosophy will apply to the Works and to all of our Offices.

Sub-contractors are also required to monitor their activities and prepare periodic Health and Safety Inspection Reports and such reports are to be submitted to the Contracts Manager.

3.14 Continual improvement

It is the company policy to continually improve its Environmental, Health and Safety performance. Its performance is measured by a target accident incident rate which is set by the Chief Executive Officer and SMT.

To achieve this, specific objectives are agreed and set at company level by the Chief Executive Officer and each department Director Responsible for Health and Safety

In the company's efforts to improve performance, initiatives will be introduced and monitored for their effectiveness by the health and safety manager. Reviews will take place, which take into account company initiatives to improve performance.

3.15 Monitor & Review – Health and Safety Committee Meetings

The Health and Safety Committee Meeting will be arranged on a quarterly basis to discuss EHS performance. At these meeting current performance will be compared against objectives and targets. Meeting will include all levels of employees throughout the company. These will include Safety, Project, Board and Staff association meetings. Our External Safety Advisor will provide feedback on site audit findings.

Health and safety committee meeting minutes will be communicated to all employees following the meetings and copies placed on the company notice boards in all divisions for employees to view.

3.16 Inductions

All new staff will receive a comprehensive Gelder Group introductory induction as appropriate to their work location prior to commencement of employment that will include the standard introduction programme, making them aware of their statutory duties, the emergency procedures and an explanation of the Company Health and Safety Policy.

The requirements of any health, safety and environment training will be assessed at this stage and subsequently considered by their manager or supervisor. Staff will be issued with a copy of this policy and a company handbook on the first day of employment, through BreatheHR. Further to this, Site Managers or Supervisors will undertake induction of all operatives on the first day of working on their site whether our own direct labour, agency or subcontracted.

All employees shall be inducted on the dangers that apply to that particular place of work, the site rules will be discussed, and agreed Fire procedure, escape routes, location of extinguishers and Fire Assembly Point will be established. All employees will sign the register on completion of the induction programme. It is also a requirement that all staff and employees receive a refresher induction every 12 months if they remain at the one location for longer than this period of time.

3.17 Information

The Company's Health, Safety and Welfare Policy is issued to all staff and made available at all locations. The Company also issues to employees a Health and Safety booklet. Where sub-contractors are introduced to a Gelder Group workplace, the Health and Safety Information for Contractors, Sub-Contractors booklet is issued. This booklet details relevant statutory requirements and procedures which must be observed when working on Company sites or property. Information brought to the notice of the Company concerning Health and Safety will be monitored by the SMT and/or the Directors Responsible for Health and Safety, and if relevant to the Company's operations, appropriate advice and/or instructions will be circulated to staff and employees.

Relevant statutory notices, placards and safety posters and bulletins, etc. are posted in offices, Workshops, sites etc., to enhance the Company's safety awareness.

3.18 Training

Our training objectives and training procedures will be reviewed on a regular basis and any appropriate training necessary for our employees will be arranged and implemented. Additional training will be assessed and determined by any change in legislation, code of practice or when, any new item of work equipment is introduced, work procedure or technique is changed, or additionally when, either a new safe system of work is introduced or an existing one changed. As a minimum for Contracts Managers, Project Managers and Site Managers/Supervisors the CITB Construction Skills Site Safety Plus

Scheme - Site Management Safety Training Scheme (SMSTS), Site Supervisor Safety Training Scheme (SSSTS) will be the company standard. In addition, evidence of competence will be obtained such as CSCS cards (or similar), with trade specific qualification for the works to be carried out.

All training will be mandatory, and records kept of courses and qualifications. First Aider and fire training will be undertaken for all of our offices and site-based activities. In house training will be undertaken via staff meetings, team meetings and toolbox talks. Training procedures are identified in our quality management system which is subject to regular internal and external auditing.

The Gelder Group recognises that investing in an effective health, safety and welfare training programme has major benefits and is a substantial method of reducing and preventing incidents/accidents, injury, or ill health. Therefore, we will ensure our health safety and welfare training receives as high a priority in our overall strategic business planning as we would to any of our other business functions, accordingly, we will commit an appropriate amount of resource and management effort to this key area.

No person will be employed on work involving any reasonably foreseeable significant risk unless he/she has received adequate training to help him/her understand the hazards involved and the precautions to be taken.

We will undertake an annual training needs analysis for all our employees, on an annual basis as a minimum, to ensure all employees have the necessary training and level of competence for the scope of works they undertake.

The Chief Executive Officer is committed to providing sufficient funds and resources to ensure all necessary training is provided to employees.

3.19 Safety Consultation

The Gelder Group is committed to effective employee consultation on Health, Safety and Welfare issues and seeks to create an environment where everyone is valued, and all views are listened to. Every opportunity and encouragement are given to employees to discuss safety matters with the managers or supervisors and the visiting safety staff.

3.20 Project/Site Meetings

Project or Site Meetings are an extremely flexible method of consultation. The meetings are to be held internally amongst the project team and must be held with project clients, principal designers, designers, and contractors as appropriate on a regular basis. Regardless of the intent or purpose of such meetings, Safety is to be the first item on the agenda. Arrangements shall be put in hand for:

- Consultation upon Health and Safety issues with people within Company offices and on site.
- Coordinating, communicating, and implementing the results of such consultation into the Company Safety Management System.

3.21 Toolbox Talks

Toolbox talks are an extremely useful means of consultation, particularly as they relate to a particular topic or activity. They are mandatory within Gelder Group operations. To be considered as a method of consultation toolbox talks must invite employee participation. Subcontractors are required to undertake their own toolbox talks and Gelder must monitor this process to ensure the content is appropriate and to ensure that consultation does take place.

3.22 Job Start Briefings

All members of the workforce are to carry out daily workplace assessments prior to commencing work. The workplace Managers/Supervisor has to ensure that such Job Start Briefings have been undertaken with all employees.

At these briefings, reference is to be made to existing Method Statements and Activity Risk Assessments. If there is a new activity to be commenced an Activity Risk Assessment as a minimum must be prepared before commencing work on the new activity. The briefings should take into account any changes in the operating environment from that in place the day preceding. The provision and use of required PPE and Safety Equipment must be considered at all briefings.

Any changes to a previously agreed working method need to be agreed with Management before the changes are implemented. Managers/Supervisors are required to acknowledge the carrying out of Job Start Briefings in their Daily Diary.

3.23 Housekeeping

This is one of the most important items influencing safety. Poor housekeeping is associated with most workplace accidents as it disguises potential hazard, so it is therefore essential that a high standard is maintained. Trades have the responsibility of ensuring their workplace is maintained tidy before, during and after work commencement on a daily basis.

All waste is to be disposed of in clearly identified waste skips/bins. Managers and Supervisors are to ensure that the workplace they are responsible for is clean and free from obstacles that could result in trips, slips, falls or increase the fire risk on site.

3.24 Security & Control of Visitors on Site

Gelder Group recognises that its sites and premises should not only be safe to persons authorised to be there but should be safe, so far as is reasonably practicable, to unauthorised persons (trespassers) even if their intent is criminal. Each site controlled by the Gelder Group shall have adequate security measures. The site boundaries will be established and clearly identified. The site boundaries will be secured, as reasonably practicable, to prevent illegal access to the site.

Before sites are left unattended, they should be made as safe as possible (e.g., access to scaffolds removed or blocked off). Although it is understandable that attitudes towards trespassers are less than sympathetic, it should be noted that children are the group most likely to be trespassers, so where it is likely that children may be present extra precautions should be given full consideration.

Control of visitors on site will be in accordance with the company procedure i.e., Visitors should be asked to report to the site office, and they should be escorted when on the premises and wear the correct level of PPE.

3.25 Accident Procedures

Personnel are to follow the Accident and Near Miss Reporting Procedure (MCP.ANRP. 1115.v2.0) and report all incidents/accidents to their line Manager, details of all accidents will be recorded on the Accident Report Form (MCH.ACR. 0415.v4.0) and formally reported to Radar Ltd, and where appropriate, investigated by the health and safety manager (This is detailed in the induction process). Incidents / accidents and near-misses are to be reported and investigated according to the 'Accident Reporting and Emergency Procedure'. Employees are required to assist with any investigation of accidents and/or dangerous occurrences that take place within their work area.

On completion of accident or near miss investigations the findings will be issued the senior management team for consideration and action where necessary to help prevent a reoccurrence of the event.

The requirements of RIDDOR will be followed in respect of any recordable/reportable accident or dangerous occurrence.

3.26 Statutory Notification of Accidents/Dangerous Occurrences

When a specified injury or dangerous occurrence has occurred, the HSE will be notified via, either the Incident Control Centre, or by the online notification form F2508 which will be completed without delay, and not exceeding 10 days of the incident. Others to be notified as soon as possible are Radar Ltd, and the Company's insurers.

Notifiable occupational diseases will be reported to the HSE via the online notification form.

Where a person is absent from work or unable to perform their normal working duties as a result of a work-related incident/accident over seven consecutive days, the HSE will be informed within 15 working days from the day of the accident, by use of the HSE's online report form, F2508.

We will still record all over-three-day accidents, just no longer report them to the HSE. The entry into the Accident Report Form of over-three-day accidents will be a sufficient means of recording them.

All reportable accidents or dangerous occurrences will be investigated by the health and safety manager, and a report issued to the senior management team for consideration and action where necessary. If required assistance will be requested from the companies external H&S advisors.

Recording requirements

Records of incidents covered by RIDDOR are also important. They ensure that we (The Gelder Group) have collected sufficient information to allow us to properly manage health and safety risks. This information is a valuable management tool that can be used as an aid to risk assessment, helping to develop solutions to potential risks. In this way, records also help to prevent injuries and ill health, and control costs from accidental loss.

Records of the following will be maintained:

- Any accident, occupational disease or dangerous occurrence which requires reporting under RIDDOR
- Any other occupational accident-causing injuries that result in a worker being away from work or incapacitated for more than three consecutive days (not counting the day of the accident but including any weekends or other rest days).

When requested, we produce RIDDOR and accident book entry records when asked by the HSE, the local authority or any other statutory inspectors.

3.27 First Aid

Certificated First Aid personnel will be provided at offices and contracts sites as required by the Health and Safety (First Aid) Regulations. Numbers of first aiders are dictated by the hazards present on site, geographical location of employees and location of local emergency services. All places of work shall be equipped with an appropriate level of First Aid

Equipment, to be stored in a location made known to all staff. (Each van is equipped with a kit, and adequate supplies of first aid materials are readily available at all locations).

The appointed person will be responsible for the care and supervision of First Aid on site, care, and maintenance of the sites first aid kit. Accidents/incident to be logged following the Accident and Near Miss Reporting Procedure (MCP.ANRP. 1115.v2.0) and the details to be recorded on the - Accident Report Form (MCH.ACR. 0415.v4.0). All accidents/incidents must be reported to the health and safety manager and Contracts Manager or in his absence any senior Manager or Director shown in the organisational chart. The health and safety manager must ensure all accidents are reported via Radar.

3.28 Welfare Provisions

Provision is made at all workplaces for the health and welfare of employees. The Gelder Group will ensure that:

- The welfare facilities for company offices, stores, yards etc. meet the requirements of The Workplace (Health and Welfare) Regulations.
- Facilities on site will meet the requirements of Schedule 2 of The Construction (Design and Management) Regulations 2015. It is incumbent upon the project client & Principal Contractor to allocate suitable Health and Welfare facilities at sites under their management. Where the Company has this obligation, the following requirements will be adhered to:
- The Contracts Manager responsible for the site will allocate all Health and Welfare facilities required.
- All site canteens allocated for site use will be adequate and suitable for the total number of persons likely to use them at any one time. They will be provided to site in a clean and tidy condition.
- Toilets and Washing facilities will be provided at an adequate and suitable ratio to the number and sex of persons employed on site. They will be equipped with an adequate supply of hot/cold/warm running water for washing and adequate supply of towels for drying. Drinking water will be supplied and clearly labelled.
- Facilities will be provided for rest breaks and the making hot drinks and the eating of food. A sufficient number of chairs with backs and tables will also be provided.

When in use, all site facilities will be maintained in a clean and tidy condition.

3.29 Special Welfare Arrangements - Transient workers.

When short-term work is to be carried out on a site and there is no provision of huts or mobile units, the minimum of equipment to be carried in vehicles is:

- Drinking water container (Wholesome water)
- Hot/warm and cold water for washing, so far as is reasonably practicable
- Hand cleanser in dispenser.
- Paper towels or other suitable means of drying hands.
- Storage facilities for protective clothing.
- Adequate first aid equipment.
- Details of the nearest welfare facilities, such as public toilets and café's will also be identified as part of the planning of the works for employees to use should they wish.

3.30 Visual Display Equipment and Eye Tests

In line with the requirements of the Display Screen Equipment Regulations 1992, The Gelder Group shall ensure that all employees deemed as a 'users' of display screen equipment, as defined by the Regulations, are provided with information, instruction, and training in the safe working with such equipment. Assessments of all workstations shall be carried out to establish the equipment requirements for the particular operation and the correct setting of workstation apparatus hardware and software.

Appointed and trained assessors will carry out the assessments and record the results on the Company assessment sheets. Eye tests shall be carried out for 'users' who so request them, on a regular basis and where necessary corrective appliances to the minimum basic requirement shall be provided. Following assessments of workstations, the Gelder Group shall provide any equipment found necessary to comply with the Regulations and shall ensure that the required working practices and methods are in place to meet the statutory requirements. Periodic reviews will be undertaken of all assessments undertaken to ensure they remain relevant for employees.

3.31 Manual Handling

The Chief Executive Officer Responsible for Health and Safety will ensure that adequate resources are provided in order that manual handling can be avoided wherever possible and will also provide training to any employee who is required to carry out manual handling operations as part of their work.

Many work activities include the need for manual handling of materials, etc. Further to the risk assessment requirements under the Management of Health and Safety Regulations 1999, The Gelder Group shall ensure that all manual handling operations are identified and addressed according to the requirements of the Manual Handling Operations Regulations 1992.

As far as reasonably practicable, manual handling operations shall be avoided, but where this is not possible, the operations shall be assessed, and the risk of injury reduced by the use of mechanical means or the provision of other suitable means.

Manual Handling Risk Assessment

Manual Handling Risk Assessments will be carried out as part of the General Risk Assessment procedure. For the purpose of risk assessment and identifying precautions, manual handling will be defined as the movement of any item using bodily force including:

- Lifting

- Lowering
- Pulling
- Pushing
- Twisting
- Turning
- Supporting

Handling and Stacking

When handling, employees must use mechanical devices wherever possible. Managers or Supervisors will ensure that mechanical handling devices are available and that materials are correctly stacked so that mechanical devices can be used safely. Where manual handling of material is unavoidable, then it must be ensured that it is carried out by trained employees using the best possible method to avoid injury. Manual handling methods to avoid injury should include:

- The planning of all manual handling activities
- The weight of the load being known
- Heavy items being positioned so that they can be slid rather than lifted
- Employees not being allowed to manually handle any materials which are too heavy
- Workstations being designed to avoid the necessity to bend down or twist the torso repeatedly or overreach when carrying out any operation
- All materials being free from burrs or sharp edges where possible
- Wherever possible, materials being stacked so as to avoid handling them twice and also avoid creating any additional hazards.
- The use of PPE to avoid hand injuries.

Personal Protective Equipment will be issued as a result of the findings of the relevant risk assessment, having regard for the hazardous nature of the material being handled.

Manual Handling Training will be provided to all employees who are required to carry out manual handling operations. All training provided will be in accordance with the Company’s Safety Training and Information Procedure

3.32 Confined Spaces

The Manager or Supervisor, at the initial risk assessment stage, will identify working environments that are classed as confined spaces under ‘The Confined Space Regulations 1997’. Wherever possible work in confined spaces will be avoided and when only absolutely necessary.

The hazards of working in a confined space are well documented. Regulations and guidance exist informing management of the actions necessary to eliminate, reduce or control the risks. The main consideration is the identification of a confined space, some are obvious, a vessel, tank, pit, sewer etc. Others are not, especially in the fabrication of component parts. Size and configuration, although meaningful do not on their own decide what is or is not a confined space. Natural ventilation is the key, if natural ventilation is stopped or restricted then the area must be considered a confined space. Other considerations must be the process being carried out. Each process adding its own hazard. If entry to a confined space is unavoidable, a safe system of work/method statement shall be followed, and emergency arrangements will be put in place prior to commencement of work in confined spaces.

Once the confined space has been identified then precautions must be taken. These precautions will be set out in a permit to work system, in accordance with company procedures /guidance i.e., suitable arrangements shall be put in place to ensure that all work to be carried out in confined spaces is done so in line with the requirements of the Confined Spaces Regulations 1997, eg, sewers, ducting, silos, etc.

No person shall be allowed to enter a confined space unless they have received the correct level of confined space training and an adequate assessment of the conditions has been made and suitable control measures introduced and communicated before entry. Air sampling and monitoring shall be carried out and suitable rescue and escape arrangements put in place.

Toolbox talks will provide information, instruction, and training for those exposed to the risks from confined spaces.

3.33 Lifting Operations

Lifting operations are undertaken both in the main yard and on construction sites. The lifting appliances may be company owned or hired in from external sources. Whichever the case may be, all lifting operations will be planned and effectively controlled in accordance with statutory requirements and Codes of Practice. A competent person will be appointed to carry out this task.

All lifting equipment shall be checked and tested at the required intervals by the relevant competent persons and suitable, adequate, and readily available records shall be maintained i.e., 6monthly for lifting accessories and equipment for lifting persons and 12 monthly for lifting appliances. Valid test certificates will be available in all locations where lifting appliances are in use. Where equipment is hired, the required certification shall be obtained from the hiring company to ensure that checks and tests are up to date. Within Part 2 of the Policy responsibility is assigned to individuals to maintain, inspect, and keep records of all items whether company owned or hired.

The Company will ensure that employees are aware of the correct weight of any object to be lifted and the correct Safe Working Load (SWL) also known as WLL (Working Load Limit) of the lifting equipment and accessories to be used. Lifting equipment means any chain, sling, shackle, crane or hoist or any other piece of equipment designed to raise or lower a load. Also included is equipment that is designed to raise or lower persons such as lifts, mobile elevated work platforms. All those persons who use lifting equipment whilst carrying out work for this company and those who supervise them will at all times have adequate health and safety information available to them.

A competent person will plan all lifting operations and only those persons who are specifically trained and authorised will be allowed to operate the equipment. Cranes must only be operated by trained and competent drivers over 18 years of age.

Methods of handling and transportation of materials other than by cranes may be with forklift trucks, side loaders, transporters etc. Operators of these items of plant will receive the required training and be issued with certificates of appointment. Tests, thorough examinations and inspections of all lifting equipment, i.e., chains, wire ropes, webbing strops, shackles etc. will be carried out in accordance with statutory requirements. Records of all such tests etc. will be maintained by the Vehicle/Plant maintenance manager. When equipment is found to be defective it will be quarantined until it has been repaired and retested or destroyed. For those employees who have no evidence of being trained but are required to bank cranes or act as slingers, appropriate training will be given in the correct techniques.

3.34 Working Near Overhead Lines

Extreme personal danger can result from contact or near contact with live conductors of overhead lines. The main hazards associated with overhead electrical cables are contact with the cables by plant, vehicles or by operatives handling long objects, e.g., scaffold tubes, cladding sheet, ladders etc. The local electricity company must be consulted if work is to take place within 15 metres of overhead lines on steel towers or 9 metres of overhead lines on wood, concrete, or steel poles. Where plant or vehicles are required to work adjacent to or pass under, or any work activity takes place in the vicinity of overhead power cables the following should be adhered to:

- Suitable barriers will be erected in order to maintain a safe distance from the cables.
- Power cables will have protection sheaths fitted by the relevant electricity company.
- Care will be exercised when handling long objects such as scaffold tube, ladders etc. which may be outside the barriers provided but may protrude a sufficient distance into the areas to allow the object to touch the power cables. Electricity can “arc” across a gap, and this must also be taken into account.
- Where specified work has to take place beneath overhead cables then the cables may need to be isolated, and a Permit-to-Work system operated. The H&S manager must be consulted for advice in these circumstances.
- The H&S manager must be consulted for specialist advice before work commences.
- The Company will issue suitable notices for use as required.

The Gelder Group is aware that in certain situations, capacitor or induced AC voltages can be created in fences and pipelines which run parallel to overhead cables which carry a voltage of more than 30KW. Any person involved in work in the vicinity of overhead lines should seek guidance from HSE Guidance GS6 Avoidance of danger from overhead electric power lines.

The control measures required for working safely on site where overhead power lines are present will be outlined within the project construction phase plan and communicated to all project workers before works commence.

3.35 Working Near Buried Services.

The presence of buried services on site poses a significant risk of injury to employees, contractors and other third parties who may be affected by our undertakings. All works on site where buried services pose a risk will be in accordance with HSG47 Avoiding Dangers from Buried Services. Before any works are undertaken on site the pre-construction information provided by project client & principal designer will be reviewed for information regarding the risk of buried services. Where no information is provided, and the risk of buried services is present then no works will commence on site and the client will be asked for further information.

Where the client is not able to provide the requested information on buried services on site then the Gelder Group will undertake the following steps to help ensure the safety of all project workers.

- Appoint a competent contractor to undertake a site survey for buried services using ground penetrating radar and identification of visual markers such as service ducts.
- Undertaking online searches of known services providers assets, such as Line Search Before You Dig.
- CAT scanning by hand.

Before any ground is broken the area will be CAT scanned by a competent person using calibrated equipment. Services identified on site will then be marked with shallow timber pegs and paint to highlight their presence to all on site. All breaking ground will be under the control of a permit to break ground issued and closed out by the site supervisor / manager. All works will be undertaken by trained and competent employees or contractors from our approved Safe Partner Scheme.

3.36 Excavations

Excavations will not be carried out on site until the site manager or supervisor, or his/her nominee has given permission following the review of available information on the risk of buried services. All work involving excavations will follow the HSE guidance and industry best practice.

Prior to any excavation the area to be excavated must be thoroughly surveyed, relevant service authorities consulted, and service plans/drawings examined to check for the presence of any underground services. In addition to this, CAT Scanning will also be carried out to identify any hidden services prior to commencement of excavations.

Where identified, they shall be marked and finding communicated to all operatives.

Where such services are identified, hand excavation must be carried out until the identified services have been located using insulated tooling and by trained and competent works only. No mechanical excavations should be undertaken within 600mm of known buried services.

The following hazards will also be taking into consideration when undertaking excavations on site:

- The stability of any adjacent buildings or structures including scaffolding or other temporary structures present.
- Existing ground conditions / type on site.
- Requirements for inspection by a competent person
- Risk of collapse of the excavation sides
- Falling or dislodged materials
- Inflow of ground or surface water
- Damage to tree roots
- Safe storage of excavated spoil
- Movements of vehicles and plant on site and measures required to prevent vehicles / plant falling into excavations.
- Materials stored on site.
- Protection of pedestrians, visitors and unauthorised third parties – requirements for edge protection
- Provision of safe access and egress and supervision.
- Provision of signage

Wherever possible work in excavations will be avoided and advances in technology will be adopted to reduce the risk to project workers.

3.37 Work Near/Over Water

The danger of falling into water and being carried away by currents or being drowned is ever present when working over or near water. It is necessary therefore to take the following precautions:

- Access and egress are provided from which persons will not trip or slip into the water.
- Make sure that platforms are secure and level to avoid tripping.
- Make sure that toe boards and handrails are fitted and firmly fixed to prevent dislodgement in high winds and swell conditions.

- Make sure that ladders are securely lashed to prevent movement.
- Safety harnesses must be always available and used.
- Safety nets will be used as appropriate in accordance with the Risk Assessment.
- Life jackets of an approved type must be available and used as required.
- Make sure that Lifebuoys fitted with grab lines of appropriate length are positioned at the work front
- Use a buddy-buddy system.
- Provide an adequately equipped rescue boat, which is in radio contact at all times.
- Carry out rescue drills at regular intervals.
- Undertake daily reviews of weather conditions which may have an effect on water levels and flow rates.

3.38 Construction Design Management Regulations 2015 (CDM 2015)

Gelder Group will undertake the role of a number of duty holders as identified within The Construction (Design and Management) Regulations 2015. The company arrangements for complying with the duties undertaken by the company for Client, Principal Designer, Designer, Principal Contractor, and Contractor are outlined below.

3.39 Client Duties.

Whilst undertaking the role of Client on site we will ensure the following:

- Appoint the principal designer and principal contractor in writing as soon as possible.
- Notify the HSE of the construction project, if necessary, by completing the online F10 form.
- Make suitable arrangements for managing a project, including the allocation of sufficient time and other resources.
- Make suitable arrangements for the monitoring of the construction phase.
- Suitable welfare provision in accordance with Schedule 2 of the CDM 2015 Regulations is provided on site from commencement of works.
- Provide the necessary preconstruction information to any designer and contractor being considered for appointment.
- The principal designer complies with their duties.
- The principal contractor complies with their duties.
- Ensure a construction phase plan is developed by the contractor or principal contractor.
- The principal designer prepares the health and safety file.
- The requirements of Regulation 8 General Duties are complied with.

3.40 Principal Designer Duties.

Whilst undertaking the role of Principal Designer on site we will ensure the following:

- Ensure the client is made aware of their CDM Responsibilities
- Plan, manage and monitor the pre-construction phase and coordinate matters relating to health and safety during the pre-construction phase to ensure that, so far as is reasonably practicable, the project is carried out without risks to health or safety.
- Take into account the general principles of prevention and, where relevant, the content of any construction phase plan and health and safety file
- Identify and eliminate or control, so far as is reasonably practicable, foreseeable risks to the health or safety of any person:
 - (a) carrying out or liable to be affected by construction work.
 - (b) maintaining or cleaning a structure; or
 - (c) using a structure designed as a workplace.
- Ensure designers comply with their duties.
- Ensure that all persons working in relation to the pre-construction phase cooperate with the client, the principal designer and each other.
- Assist the client in the provision of the pre-construction information.
- so far as it is within our control as principal designer, provide pre-construction information, promptly and in a convenient form, to every designer and contractor appointed, or being considered for appointment, to the project
- Liaise with the principal contractor for the duration of our appointment as principal designer and share with the principal contractor information relevant to the planning, management and monitoring of the construction phase and the coordination of health and safety matters during the construction phase.
- Assist the principal contractor in preparing the construction phase plan by providing to the principal contractor all information the principal designer holds that is relevant to the construction phase plan including:
 - (a) pre-construction information obtained from the client.
 - (b) any information obtained from designers.
- Prepare a health and safety file appropriate to the characteristics of the project which must contain information relating to the project which is likely to be needed during any subsequent project to ensure the health and safety of any person.
- Ensure that the health and safety file is appropriately reviewed, updated, and revised from time to time to take account of the work and any changes that have occurred
- On completion of the project issue the project health and safety file to the client.
- The requirements of Regulation 8 General Duties are complied with.

3.40 Designers Duties.

Whilst undertaking the role of Designer on site we will ensure the following:

- Ensure the client is made aware of their duties
- When preparing or modifying a design take into account the general principles of prevention and any pre-construction information to eliminate, so far as is reasonably practicable, foreseeable risks to the health or safety of any person—
 - (a) carrying out or liable to be affected by construction work.
 - (b) maintaining or cleaning a structure; or
 - (c) using a structure designed as a workplace
- Where it is not possible to eliminate these risks, Gelder Group as a designer must, so far as is reasonably practicable:
 - (a) take steps to reduce or, if that is not possible, control the risks through the subsequent design process.
 - (b) provide information about those risks to the principal designer; and
 - (c) ensure appropriate information is included in the health and safety file.
- Take all reasonable steps to provide, with the design, sufficient information about the design, construction, or maintenance of the structure, to adequately assist the client, other designers, and contractors to comply with their duties under these Regulations

3.41 Principal Contractor Duties.

Whilst undertaking the role of Principal Contractor we will ensure the following:

- Ensure the Client is made aware of their duties.
- Ensure we have the right skills, knowledge, training, experience, and organisational capacity necessary before accepting the role of principal contractor
- We will liaise and co-operate with the principal designer to ensure information is provided to assist when considering health and safety in their design at both the pre-construction phase and design work during construction
- Ensure the client is aware of their duties and liaise with the client regarding their client brief and expectations for the project
- Request the necessary preconstruction information from the client to enable us to develop the construction phase plan for the project
- Manage the construction phase of the project ensuring health and safety standards are maintained and risks eliminated where possible and where risks cannot be eliminated suitable control measures are implemented on site
- Ensure all site operatives have a documented site induction before commencing work on site
- During site set up ensure suitable and sufficient site security arrangements are established before allowing work to commence on site and ensure the site is secure at the end of each working day
- Take steps to ensure our employees and appointed contractors have the necessary skills, knowledge, training, and experience for the work they are carrying out
- Provide suitable and sufficient site supervision and management depending on the size and complexity of the scope of works to be undertaken
- Engage with workers and contractors on site ensuring effective communication of information and that any health and safety ideas or concerns are given due consideration

- Effectively monitor health and safety risk on site ensuring it is reduced to the lowest level possible where possible and where the risk cannot be eliminated control measures are implemented and communicated to affected parties
- Provide the necessary information to the principal designer so the health and safety file can be completed in good time. In projects where the principal designer appointment finishes before the end of the construction phase, we will take on the responsibility for the file and for handing it over to the client
- The requirements of Regulation 8 General Duties are complied with.

3.42 Contractors Duties.

Whilst undertaking the role of Contractor on site we will ensure the following:

- Ensure the Client is made aware of their duties.
- We manage our work in order to ensure the health, safety and welfare of all our employees, any subcontractors we may engage and other third parties who may be affected by our work activities.
- Cooperate with other duty holders. We will cooperate with the principal contractor and other contractors on site to ensure cooperation between all parties involved, ensuring that the risks which cannot be eliminated are reduced and properly managed and controlled
- Consult with employees our appointed contractors and other parties in good time ensuring all persons under our control have the necessary information at the right time.
- On a project where we are the only contractor, we will develop the construction phase plan for the project and ensure it is communicated to all relevant employees.
- Before works commence on site we will ensure the principal contractor has provided suitable and sufficient welfare facilities for the project. Where we are the only contractor on site, we will ensure welfare provision is available in line with schedule 2 of the CDM 2015 Regulations.
- Ensure all persons working on site under our control have a documented site induction before commencing work on site.
- Take the necessary steps to ensure site security and prevent access by unauthorised third parties and cooperate with the principal contractor regarding site security on projects with more than one contractor appointed
- During the planning stage for all projects and before any works commence on site, we will ensure that we provide suitable and sufficient supervision and resources for all employees and contractors under our control working on site
- We will ensure all employees and contractors under our control on site have the necessary skills, knowledge, training, and experience for the work they are carrying out
- Where more than one contractor has been appointed, we will cooperate with the designer or principal designer providing requested information for the safety file in good time
- The requirements of Regulation 8 General Duties are complied with.

3.43 Domestic Clients.

Domestic Clients

When working for a domestic client the Gelder Group will undertake the client duties, unless the domestic client has a written agreement with a Principal designer to undertake the client duties on their behalf or chooses to undertake the role of client themselves.

3.44 Fire

A written Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 (FSO) will be undertaken and kept up to date. The control measures identified will be issued to relevant employees. Training and information will be given as necessary.

Detailed procedures for evacuations including exit routes and information on good practice are held, and available on request to any member of staff. Equipment checks and evacuation drills will be held at regular intervals. Fire Warden will be appointed, and another member of staff will act as an evacuation "Roll Caller".

Staff will be trained in fire Safety and the use of fire equipment. They will also be briefed on the role of individuals and the action to take in the event of a fire or other emergency.

The arrangements for managing fire risk on construction project will be outlined within the project construction phase plan.

3.45 Control of Substances Hazardous to Health (COSHH)

The requirements of the COSHH Regulations 2004 and other related legislation will be satisfied. All necessary precautions will be taken in the use, storage and transportation of any material or substance. The least hazardous type of any substance will be used or purchased in order to minimise any associated Risk. There will be regular Assessments and monitoring to ensure that this is achieved.

No new substances will be introduced into the workplace until the information regarding possible hazards and the necessary precautions to be observed have been fully evaluated by the health and safety manager or other competent person. As part of the company's continuous improvement in H&S management the company will review substances used on a regular basis and wherever possible replace the dangerous with less dangerous, so reducing the risk to employees and the environment.

Responsibilities:

Directors of each department will be responsible for ensuring that this section is implemented and that all employees are given adequate information about any substances which are to be used.

Directors of each department must ensure that the significant findings of any COSHH Assessment, including the Safety precautions to be adopted, are communicated to all operatives who will be exposed to the substances

All employees are responsible for ensuring that they have read and understood any COSHH Assessment relating to their working activity.

Hazardous Substances Register:

A central Hazardous Substance Register will be created and reviewed on an annual basis as a minimum. The Register will contain Material Safety Data Sheets (MSDS) for every substance purchased by the Company. These data sheets will be supplied by the supplier of the substance and must be formatted so as to provide clear Health and Safety information, including first aid, fire precautions, emergency action, correct storage and safe handling.

COSHH Assessment:

A COSHH Assessment will be carried out for every substance, or where practicable on substance groups i.e., solvent based paints grouped onto one Assessment following a review of the produce MSDS.

All COSHH Assessments will be carried out on the standard Gelder Group form. The format of the Assessment is such that it takes the following factors into account:

All Assessments will be in writing and will be held available for inspection at all times at an appropriate point in the workplace. A copy of each COSHH Assessment will be contained within the central hazardous substance file along with the produce MSDS.

COSHH Assessments will be reviewed at the following times:

- If the work environment changes
- Following any incident of ill health or concerns by employees using the substance.
- Changes in the composition of the substance being used.
- Changes in legislation
- In any case every 12 months

Any review must be recorded on the Assessment with a review date and the name of the person who carried out the review.

Substance Substitution:

Wherever possible hazardous substances will be replaced with less hazardous ones, following the general principles of prevention. It will be the responsibility of each department Director to investigate the availability of replacement substances and put them to use as soon as possible. Substances must also be assessed as necessary. Advice from the health and safety manager shall be sought where applicable.

Engineering Controls:

If a hazardous substance cannot be eliminated or substituted with a less hazardous one; then the hazardous substance will be controlled by engineering controls, such as on-tooling dust extraction on wood / MDF working tooling.

Safety Precaution Advice:

Any Safety Precautions recommended as a consequence of a COSHH Assessment must be adhered to at all times while the substance is in use.

Handling and Storage:

All hazardous substances will be stored in correct storage facilities away from the work area. Storage facilities will be kept secure at all times and will be constructed as such that they do not pose a Risk to the substance and will not allow any spillage to leak out.

Safety notices will be posted on all storage facilities warning of the dangers associated with the substances being stored together.

COSHH assessments for all substances being stored will be readily available on site.

Only the minimum quantity required for immediate work will be removed from the storage facility. Persons required to handle hazardous substances will be given training in both correct handling techniques, Safety precautions for hazardous substances and any personal protective equipment required.

All spillages will be soaked up using sand or chemical dry granules, contaminated materials are then to be disposed of in accordance with local authority rules. Hazardous substances are not allowed to enter any drain, watercourse, or any other environmental sensitive areas on site.

The Manager or Supervisor is to be informed of any substantial spill immediately.

Information and Training:

All employees who may be exposed to any Hazardous Substances will be informed of the existence of the Hazardous Substances Register and COSHH Assessment files at their Safety Induction.

They will be instructed to use these documents as reference to ensure that Safety precautions are adhered to.

3.46 Smoking

The Gelder Group is committed to protecting the health, safety, and welfare of its employees, by providing a safe place of work and protecting all staff, services user, customers, and visitors from exposure to smoke and vapours from E-Cigarettes. For the full Policy please see Staff Handbook section 12.

3.47 Safe Working at Height

Responsibilities

Managers and Supervisors will ensure that all persons under their control, including any sub-contractors, have adequate knowledge of this procedure and comply with it at all times. They must also ensure that all operatives under their control are correctly trained in the safe use of any equipment which is used to gain access to work at height.

Managers and Supervisors will also have responsibility for correctly identifying work activities and providing all necessary equipment for working safely at height.

Work activities and compliance with this procedure will be monitored by SMT on an on-going basis.

Employees must comply with this procedure and ensure that all access and working areas are used correctly and their integrity is not compromised. Employees must not use any unauthorised access or working platform, improvised systems for access to height is strictly forbidden.

Purpose

This procedure provides a guide for the correct means of safe access which must be used when working at height. It will, when used correctly, prevent the risk of injury in the event of a fall from height or the risk from falling objects and will ensure that suitable and sufficient steps are taken, so far as is reasonably practicable, to prevent persons from gaining unsafe access to any workplace.

The introduction of the Management of Health and Safety at Work Regulations 1999 reinforced the general obligations placed on employers by the Health and Safety at Work Act 1974 to provide a safe place and safe system for work. This obligation has been further enforced by the introduction of the Working at Heights Regulations 2005 (WAH). The procedure detailed below is aimed at implementing the requirements of this legislation.

Scope

This procedure will apply to all Gelder Group activities where work at height is undertaken and will include the activities of any sub-contract companies under our control.

Risk Assessment

Work at height will be included in the Gelder's General Risk Assessment Procedure as appropriate. Where task or site-specific working at height activities are required, these activities will be risk assessed as individual tasks and communicated to employees involved in undertaking the activity.

Safe means of access provided will be in accordance with the hierarchy detailed below.

Definitions

Working at Height

Working at height means work in any place, including a place at or below ground level where a fall could result in injury or harm. Working at height also includes obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace.

Access/Egress

The terms are comprehensive and refer to anything that can reasonably be regarded as means of entrance to, or exit from, a place of work, including ascent and descent. This access must be safe and kept properly maintained for any person working there.

Permanent Working Platform

This is part of an existing structure having a permanent floor with secure handrails or fencing on all sides, it will also have protection against falling off.

Temporary Access Platform

This means any temporarily structure on or from which persons perform work and any temporarily structure which enables persons to gain access to, or allows materials to be taken to, any place included in the following:

- Scaffold
- Mobile scaffold towers
- Trestles
- Mobile elevated work platforms
- Crane box, man baskets
- Ladders, steps, and podium steps.

All of the above shall be assessed prior to works being undertaken.

Inspections

All the above forms of access equipment require inspections in accordance with statutory duties. These inspections must be carried out by competent persons and will be recorded in the appropriate inspection register. Inspections will be co-ordinated by the Contracts Managers and Site Managers who are responsible for ensuring that all equipment is recalled for inspection and passed as safe. Equipment will be colour coded tagged to indicate that it is safe to use.

Procedure

General Rules

Wherever possible, it is the policy of the company that working at height will be avoided and other avenues shall be explored and adopted where reasonably practicable.

Where working at height cannot be avoided, the hierarchy of control will be followed.

Work at height will be carried out from permanent platforms where they exist.

Where permanent platforms do not exist, a temporary form of access will be provided to prevent, as far as is reasonably practicable, the risk of falling.

Work at height on any platform must be carried out from within the confines of the correct access provided.

All working platforms must be so constructed as to prevent objects from falling off.

Prevention from falls by using a safety harness with fall arrest system will only be considered as a last resort where no other means of safe access is possible.

Every scaffold must be suitable for the task for which it was constructed. Employees must not under any circumstance step outside the confines of the safe access provided.

At no time should the integrity of any means of access be altered or tampered with by employees. All alterations or any other maintenance will be carried out by approved persons who have been authorised to carry out the work.

Every scaffold must be securely tied to the structure or building unless it has been constructed to create its own stability. The form of safe access selected must be adequate for the range of tasks that are to be carried out from it.

Only approved access equipment will be used to work at any height above or on floor level. Improvised access will not be permitted. Employees will only be allowed to work on, or operate, access equipment for which they are adequately trained. **Specific Training**

Specific training will be required for the following forms of access equipment:

- The construction of any scaffold
- The erection of any mobile scaffold tower
- The operation of:
 - o Mobile elevated work platforms/cherry pickers
 - o Scissor lifts
 - o Man baskets
 - o Crane baskets

In addition, operatives will be given specific safety awareness training for roof work and the correct use of safety harnesses. This training will be provided by approved training organisations in accordance with statutory requirements.

Ladders

Ladders will be used for temporary access and egress only and must be secured by being tied to the structure to prevent them from falling. All ladders must be inspected and marked as safe (see above).

Fall Arrest Systems

All fall arrest systems must conform to EN361 and must be a full body type with the correct length lanyard attached which conforms to EN355. Fall arrest systems must be secured to an anchorage that is capable of withstanding shock load.

All persons who are required to use fall arrest systems must be trained in pre-use inspections, correct fitting, and storage. Fall arrest systems must be tested and issued with a test certificate, they must be inspected before use every time.

Safe Access Hierarchy

The list of safe access detailed below is intended as a guide to the order in which the provision of access to height should be considered. When considering the means of access, start with the safest. If that is impractical, consider the next safest option until the most practicable solution has been found.

- Permanent platform
- Fixed scaffold
- Mobile elevated work platform
- Scissor Lift
- Tower scaffold
- Safety netting

- Fall arrest system (only as a last resort)
- Ladder/steps (temporary access / egress only).

3.48 Stress & Mental Wellbeing

The Gelder Group is committed to protecting the health, safety and welfare of its staff and recognises that workplace stress and mental wellbeing is a health and safety issue. The importance of identifying and reducing workplace stressors is also acknowledged. This includes:

- Improving the organisational environment through effective and consistent management
- Enabling individuals to cope successfully with their work
- Providing support to employees whose health and well-being are affected by stress
- Manage and control factors which might result in excessive or sustained levels of stress
- Increase awareness of stress & mental health issues and their causes and methods to combat it
- Assist staff in managing stress & mental wellbeing in themselves and others

As far as reasonably practicable the Gelder Group will:

- Provide managers or supervisors with advice and support to help identify specific causes of stress
- Develop programmes for those with people management responsibilities to promote good management and team building skills
- Provide support through the Employee Assistance Programme
- Provide suitable training such as time management, assertiveness and dealing with difficult/sensitive situations
- Monitor the occurrence and levels of absence associated with stress
- Provide information & support to all employee

3.49 Driving Company Vehicles

When using a vehicle supplied by the company all employees must conform to all requirements of the Road Traffic Acts, associated legislation, and the Highway Code. Where employees are driving in the course of their employment or driving vehicles supplied by the company they must:

- Ensure that the vehicle is serviced, maintained, and operated in accordance with the manufacturer's guidelines
- Be in possession of a UK driving licence. This must be checked via www.gov.uk/view-driving-licence by your manager every year and endorsements notified to the insurers (for company vehicles and when driving your own vehicle on company business)
- Ask their GP if any prescribed medicine will affect their driving ability; if so, employees must refrain from driving and inform their immediate manager/supervisor
- Employees are not permitted to operate a hand-held mobile phone whilst driving company vehicles, the punishment for such an offence is a £200 fine and three penalty points on your driving license. Therefore, do not operate your hand-held mobile phone whilst driving; it is dangerous
- Wear glasses or lenses if prescribed for this activity

- Never drive company vehicles under the influence of alcohol or illegal drugs or perception medication which may affect your ability to drive safely
- Ensure that they are fit to drive at all times, as the employee is in the best position to judge their own health, level of tiredness and other factors that may impair their driving. Employees driving vehicles should avoid over-the-counter medications such as anti-depressants, antihistamines for hay fever, nettle rash, asthmas, eczema or travel sickness preparations or cough and cold remedies, which can adversely

affect driving. Before setting off:

- Plan your journeys in advance and make sure you leave plenty of time to arrive at your destination on time. If you feel tired at any time on your journey you should stop at a safe location and take at least 15 mins break out of the car. If taking a break means that you will be late for an appointment then it's better to stop, phone and explain that you will be late, rather than taking risks and continuing to drive whilst tired.
- Visually check over your vehicle - check tyre pressures, tread depth (cuts or obvious damage, especially to the tyre walls) and general vehicle condition
- Check seat belts – working and in good order and worn by all vehicle occupants where provided
- Adjust driving techniques to suit weather and traffic conditions
- Ensure you have read through the driving company vehicles section in employees' handbook

On arrival to destination or site:

- Beware of un-metalled roads and soft ground on sites, where possible park off site (not in an area causing an obstruction to highway, site traffic or the emergency services)
- Observe all traffic management arrangements in place for the site
- Make sure the vehicle is secured and any valuable items stored out of site such as satellite navigation systems and mobile phones.

When driving on business on behalf of the company and the vehicle is not supplied by the company you must have full comprehensive insurance cover to cover the driver and any passengers in the course of such business use. A copy of the insurance certificate will be required before driving on company business.

3.50 Plant/Equipment/Electrical Appliances & Power Tools

All plant and machinery used and operated by the company is manufactured to approved safety standards and must be used in accordance with the manufacturer's instructions and the guidance notes.

It is the responsibility of the relevant Manager or Supervisor to ensure that plant and equipment are only operated by those employees who have the authority to do so, and who are sufficiently trained and competent in the handling/operation of the particular machine.

Any machine fitted with a guard or guards to protect moving parts, must not be operated if any guards have been removed. Machines must not be adjusted when they are running unless the manufacturer has made specific provision for such adjustment.

All electrical equipment which the company uses in all workplaces will be supplied, installed, maintained, or used in accordance with current regulations. The Directors will plan any temporary electricity and distribution in accordance with regulations. All temporary supplies are to be installed by competent electricians and tested in accordance with the I.E.E. Regulations, and records maintained.

Director of each department will ensure that all power tools provided for use on site or other workplace, are in accordance with the relevant Electricity at Work Regulations and British Standards and have the appropriate supporting documentation.

No power tools or electrical equipment of voltage greater than 110 volts (CTE) shall be used on sites unless special arrangements are made and discussed with the relevant Company official. Lower voltage tools, lighting, etc. may be required in damp or confined situations. Portable electrical appliances will be PAT tested to ensure their safety. Site based tooling will be PAT tested every six months, office equipment annually and hired tooling before every issue.

All operators of mechanically propelled plant must hold a Certificate of Training Achievement. No person shall operate any vehicle, dumper, crane, forklift, excavator of any kind, or any other item of mechanically propelled plant on a public road unless they hold a current and appropriate driving licence, have had formal training and can produce the necessary documentation. Drivers using vehicles or plant on public roads will observe road traffic laws.

All drivers and plant operators must drive with care and consideration for other drivers/ operators, site personnel and members of the general public.

Drivers and plant operators are responsible for basic maintenance of their vehicles/ plant and must report any defects to their line manager or supervisor. The minimum age limit for site driving is 18 years.

In cases where a driver needs to carry out a difficult manoeuvre (such as reversing) a trained banksman / vehicle supervisor must be used.

No person shall operate any mechanical plant, power tools or other equipment without explicit permission and unless they understand the appropriate precautions for use.

Where appropriate, copies of manuals and instructions for safe use of Company plant and equipment will be held on site for reference.

When purchasing or hiring any item of plant or equipment it is important that, as well as economic factors such as cost, consideration should be given to the safety and health implications of the operation of that equipment. Some of the things that may need to be considered are:

- Hazardous substances
- Adequacy for task
- Skills of employees required to operate it
- Ease of maintenance
- Electrical safety
- Compatibility with existing equipment and environment
- Noise emissions
- Adequate guarding of dangerous parts
- Site constraints.

This is not an exhaustive list but a brief guide to some of the points to be considered. Most importantly safety should be considered before any purchase is made or any hiring agreement signed. It would not be acceptable for equipment to be obtained before some assessment of the risks involved in its operation had been made.

Where equipment is hired in there is a duty under The Provision and Use of Work Equipment Regulations 1998 to ensure that:

- The equipment hired is suitable for the task and conditions that it is to perform.

- It has been properly maintained and inspected before work commences, with proof in the form of an inspection certificate or similar form.
- It is supplied with all relevant information (maintenance schedule, etc.) and operating instructions.
- Any necessary instruction and training is given to site operatives.
- A qualified or competent person is available to use the equipment.
- Any maintenance/inspection that is required, is carried out at the correct intervals by a competent person.
- Any equipment hired complies with The Provision and Use of Work Equipment Regulations 1998.

3.51 Health Surveillance

Responsibility: The Chief Executive Officer Responsible for Health and Safety shall ensure that health surveillance is provided where necessary for all employees and records maintained in line with data protection and health and safety legislation. Where necessary, reasonable adjustments will be made for employees with any existing health conditions that may be aggravated or made worse by any work activities undertaken by the Company.

In order to monitor the health of all employees, an annual medical questionnaire will be issued and reviewed, and action taken in the event that an employee or employees have recorded any health issue or an increase/worsening of an existing condition due to the work environment.

Procedure: Where known occupational health risks exist within the Company’s scope of works, a suitable and sufficient Risk Assessment and Safe System of Work will be developed for the work activity, and control measures implemented to ensure the health, safety and welfare of all employees affected. Where health surveillance is required, this will be outlined in the Risk Assessment and Safe System of Work and communicated to affected employees.

Directors shall, where work activities could cause health problems, regularly review the work activities and where possible implement engineering controls, or substitute existing substances for less hazardous ones, and so reduce the occupational risk to employees and other third parties affected by the Company’s scope of works.

Should any person have a health problem which could affect their health, safety, and welfare while at the workplace, they shall inform their immediate manager or supervisor.

3.52 Noise

Responsibilities:

The Chief Executive Officer Responsible for Health and Safety will ensure that this procedure is implemented and complied with in all areas of work where a hazard is identified. The Chief Executive Officer will ensure that the persons under their control are aware of the requirements of this procedure and that they are always complied with. They will also ensure that the correct protective equipment is provided as required. All employees will be required to co-operate with the Company in its attempts to reduce or control noise exposure.

Noise Surveys:

In accordance with the Control of Noise at Work Regulations 2005, the Company will take all reasonable steps to identify workplace noise levels. The list, once created, will form part of this procedure.

Noise surveys will be carried out by competent persons using correct equipment and will be recorded in writing. Tool manufacturers will be consulted to establish individual noise levels.

Noise surveys will be reviewed at the following times:

- If work patterns change significantly
- If machinery is moved or if new machinery is installed
- At any other time, it is believed that the survey is no longer valid

Where the exact noise level created on site or by an individual tool cannot be established, the maximum possible protection will be provided until the matter is resolved.

Risk Assessment

Wherever possible, noise assessment for site activities will be included in the risk assessment procedure. Information supplied by manufacturers will be used to determine whether a tool used in a work activity is creating a noise hazard. Site environment noise levels will also form part of the assessment.

Noise Action Levels

The Control of Noise at Work Regulations 2005 have established noise action levels above which hearing will be damaged. These are based on dosage averaged over a working day.

The action levels are expressed as dB(A):

- First Action Level – 80 dB(A)
- Second Action Level – 85dB(A)

Where the Company operates a permanent workshop, the following actions will apply:

If the First Action Level (80 dB(A)) is reached or exceeded the Directors of each department will:

- Reduce the risk of damage to hearing to the lowest possible by other means than issuing PPE
- Inform all persons who may be exposed of the risk to their hearing and of the availability of hearing protection
- Provide hearing protection at the employee's request.

If the Second Action Level (85dB(A)) is reached or exceeded the Directors of each department will:

- Reduce the exposure to noise to the lowest level possible other than issuing PPE
- Identify all areas where the Second Action Level is reached and post notices at all entrance points to those areas. The notices must warn that the area they are about to enter is a hearing protection zone and the wearing of hearing protection is mandatory by all persons.
- Post notices on all machinery which creates noise at or above the Second Action Level.
- Issue correct hearing protection to all persons who may be exposed, **WHICH MUST BE WORN**
- Issue hearing protection to all persons in less noisy areas at their request
- Implement occupational health surveillance for employees exposed to noise levels above 85dB(A)

All site equipment having a noise level at or above the First Action Level will have a warning notice affixed stating that hearing protection is mandatory when the tool is being operated. This rule will apply to all persons who are within 12 metres of the tool. Where, as a result of a risk assessment, the general site is deemed to be a noise hazard, the Directors will ensure that all persons who enter or remain on site wear hearing protection at all times.

Personal Protective Equipment:

Where the need for PPE is identified as a result of any noise survey or risk assessment, it will be issued as soon as possible. Without prejudice, any hearing protection provided will reduce the amount of noise reaching the ear to an acceptable level – specialist advice will be obtained where necessary.

Training:

All employees will receive general noise awareness training as part of the Company's safety programme. However, where hearing protection is issued, specific training in its correct use, storage and maintenance will be given.

3.53 Vibration

Under the Control of Vibration Regulations 2005 we will look to eliminate or control the exposure to vibration in the workplace to the lowest level that is reasonably practicable. Hand arm vibration and whole-body vibration can be a significant health risk wherever powered hand tools and certain items of plant are used for significant lengths of time. The Company will look to eliminate vibration risk where possible at the planning stage by engineering out the risk at source.

Where this is not possible the risk will be reduced to as low as is reasonably practicable with regular monitoring of exposure levels and risk to employees. Health surveillance will be carried out on employees where regular and frequent exposure to vibration risk is evident using the Tier System Questionnaires. The aim will always be to be PROACTIVE rather than REACTIVE when addressing vibration risk.

The Company will follow good practice controls, currently promoted by the HSE, to help to eliminate or reduce vibration risk in our industry which are:

Acknowledgement of exposure levels – Hand arm vibration

- The daily exposure limit value is $5 \text{ m/s}^2 \text{ A(8)}$
- The daily exposure action value is $2.5 \text{ m/s}^2 \text{ A(8)}$

Daily exposure shall be ascertained on the basis set out in Schedule 1 Part I of the Control of Vibration at Work Regulations 2005

Acknowledgement of exposure levels – Whole-body vibration

- The daily exposure limit value is $1.15 \text{ m/s}^2 \text{ A(8)}$
- The daily exposure action value is $0.5 \text{ m/s}^2 \text{ A(8)}$

Daily exposure shall be ascertained on the basis set out in Schedule 2 Part I of the Control of Vibration at Work Regulations 2005

Selection of Work Equipment

Tool selection can make a substantial difference to the vibration level, but the tool must be suitable for the task and used correctly. We will demonstrate a sound procurement policy for power tools and hand-guided machines considering the following:

- There is no reasonably practicable alternative method with no (or less) vibration exposure.
- Equipment is generally suitable for the job (safety, size, power, efficiency, ergonomics, cost, user acceptability, etc.)
- Reduced vibration designs are selected provided the tools are otherwise suitable
- Declared vibration emission is not high compared with competing machines of similar capacity to do the job

- Information on likely vibration emission is available (e.g., from manufacturer, hire company, databases)
- Available information from the manufacturer or elsewhere on control of vibration risks through:
 - o Maintenance (e.g., servicing grinders, sharpening drills, and chisels)
 - o Selection of consumables (abrasive discs, chisels, drills, etc.)
 - o Correct operation and operator training (see below)
 - o Maximum daily trigger times or maximum daily work done with the tool.

Limiting Exposure Time

Restricting exposure time (“trigger time”) will be carried out to ensure exposure remains below the Exposure Limit Value (ELV), even after all reasonably practicable measures to reduce vibration levels are in place.

We will determine the maximum times using the exposure points system or supplier’s “traffic lights” tool category.

Regular testing and monitoring using HAVI Meters will be carried out to ensure the ELV is not exceeded.

The Company will ensure that the exposure will be reduced to the lowest level that is reasonably practicable so the ELV will not be used as a target, if a lower exposure is reasonably practicable.

Other Risk Controls

The Company, where possible, will look to control HAV risk by means other than reducing vibration exposure, this will be done by:

- The use of ergonomic aids, such as supporting the weight of the tool which reduce forces applied by operator
- Ensuring a suitable workplace temperature or provision of warm clothing and gloves
- Regular breaks from work involving vibration and encourage operators to exercise fingers.
- Embracing advances in technology and working practices.

Information, Instruction and Training

The Company will ensure employees at risk from vibration shall have received information on:

- The risks from HAV and how to help reduce them (see above)
- Arrangements for health surveillance and their duty to cooperate.

Managers/Supervisors will look for evidence that tools are being used correctly, as recommended by the manufacturer. This may require operators to receive specified training which will be provided.

Health Surveillance

The Company will provide health surveillance where the Exposure Action Value (EAV) is likely to be exceeded. As a minimum we shall:

- Use of a periodic health screening questionnaire, both annually and for new employees (TIER system)
- Have arrangements in place for referral of relevant cases to an occupational health provider with HAVS expertise for diagnosis and ongoing monitoring
- Have arrangements in place to receive medical advice on management of affected employees
- Have arrangements in place for RIDDOR reporting of HAVS cases.

Personal Protective Equipment

Where the need for PPE is identified as a result of any vibration survey or risk assessment, it will be issued as soon as possible.

3.54 Leptospirosis (Weil's Disease)

The Gelder Group recognises the seriousness of the disease and will take all precautions to prevent exposure to its employees. The symptoms include severe headaches, fever, vomiting, jaundice, and skin haemorrhages. Some persons may suffer meningitis, encephalitis or renal (kidney) failure. It is therefore important that personal hygiene is of a high standard. Hands and arms must be washed before eating, drinking, or smoking.

Where there is a potential risk to employees on site the arrangements for reducing, the risk to the lowest level possible will be outlined within the project construction phase plan and communicated to all employees. All projects will have suitable and sufficient welfare facilities available on site from the commencement of work.

3.55 Asbestos

In the event of asbestos being discovered, disturbed or suspected, work will immediately stop, and the company's asbestos disturbance / discovery procedure will be followed. The disturbance or discovery of asbestos or suspected asbestos material will be reported immediately to the Contracts / Site Manager and company health and safety manager, assuming he is not aware of the circumstances at that point.

A specialist company will be appointed who will determine the next course of action which should, in the first place, be to take a sample for analysis. The next course of action will be dependent on this result.

In compliance with the Control of Asbestos at Work Regulations 2012, and subsequent legislation, adequate information, instruction, and training is given to employees to enable them to be aware of the health hazards of asbestos; how controls, protective equipment and work methods can reduce these hazards; and the correct use of maintenance of control measures. Periodic refresher training will be given to all employees at risk of exposure to asbestos. The refresher training provided will be developed following an assessment of employees work activities, work environments and individual abilities and needs. All initial and refresher training will be documented.

Prior to commencing work on projects that may contain asbestos containing materials (ACMs) the following methods of assessment will be deployed:

- A risk assessment shall be carried out on the task and areas of work in the first instance, and dependant on the findings of the risk assessment:
- Where insufficient information is available to undertake works safely, a Refurbishment & Demolition (R&D) Survey shall be undertaken by competent persons.
- A subsequent Asbestos Management Plan shall be developed and implemented for the management of any remaining asbestos or ACMs. The plan will be reviewed on an annual basis as a minimum or as advised by the asbestos surveyor

Any asbestos survey undertaken will be in accordance with HSG 264: Asbestos the Survey Guide and incorporate the advice and guidance within the Control of Asbestos Regulations 2012. Approved code of practice and guidance, obtaining client knowledge and registers of ACMs will be located in the premises.

Please see Asbestos Emergency Procedure for the Discovery and Disturbance of Asbestos.

3.56 Asbestos on the Premises

In compliance with the Control of Asbestos at Work Regulations 2012, and subsequent legislation, adequate information, instruction, and training will be given to employees to ensure that they are aware of the health hazards of asbestos and how controls and work methods can reduce these hazards.

In respect of our duties under the Control of Asbestos Regulations 2012, a risk assessment for the presence of asbestos containing materials (ACMs) present within the building(s) will be undertaken.

An Asbestos Management Survey will be completed in conjunction with a competent Asbestos Surveyor to determine the type, quantity and condition of any ACMs located in the premises.

Within the Asbestos Management Survey, where an asbestos product is identified, a subsequent Asbestos Management Plan will be created to detail how we will effectively manage the risks for the identified asbestos containing materials.

The asbestos survey will be undertaken in accordance with HSG 264: Asbestos the Survey Guide and will also incorporate the advice and guidance within the Control of Asbestos Regulations 2012, Approved Code of Practice and guidance, and any existing registers of ACMs located in the premises.

The asbestos management survey / register will be reviewed on an annual basis as a minimum as the condition of known asbestos and asbestos containing materials are assessed. If the condition of any asbestos or asbestos containing material has deteriorated, then guidance from a competent asbestos professional will be obtained and the material removed or encapsulated to ensure the safety of all employees and visitors as per their recommendations.

3.57 Legionnaires Disease

All reasonable steps will be taken to identify potential legionellosis hazards and to prevent or minimise the risk of exposure. At risk systems include the hot and cold-water storage and distribution systems.

To achieve control of legionella bacteria the company will implement the following:

- Conduct a suitable and sufficient risk assessment to identify potential risks and implement measures to either eliminate or control risks.
- From the above, establish measures to ensure avoidance of conditions favouring growth of organisms.
- As far as practicable, water systems will be operated at temperatures that do not favour the growth of legionella.
- The use of materials that may provide nutrients for microbial growth will be avoided.
- Corrosion, scale deposition and build-up of bio films and sediments will be controlled, and tanks will be lidded.

3.58 Environmental controls

Employees, who are responsible for establishing a working environment, which is safe and without risk to health, shall consult the department Director and health and safety manager who is available to give advice as necessary. In some cases, outside specialist assistance maybe required.

Instrumentation is available from the department Director / health and safety manager to monitor the workplace and to establish a satisfactory environment e.g., satisfactory levels of lighting, humidity, temperature dust and noise etc. The Gelder Group, so far as is reasonably practicable, proposes to pay particular attention to:

- To minimise disturbance to the local and global environment, and to the local communities and wildlife.

- Follow the waste management hierarchy as outlined in the Waste (England and Wales) Regulations 2012. The Gelder

Group will follow the hierarchy outlined below:

- o Prevention
- o Preparing for re-use
- o Recycling
- o Recovery
- o Disposal
- To minimise use of energy and raw materials and to adhere to the principles of sustainability.
- To consider the environment in the design of processes and products and the maintenance of equipment.
- To provide information on the use and final disposal of products.
- To ensure that all employees and suppliers are adequately informed about the company's environmental policy.
- To minimise the use of product related materials and services such as packaging or transport.

3.59 Office Safety

An office is only as safe (or unsafe) as the people who work in it. Office accidents follow a similar pattern to those that happen in the warehouse or on location and generally result from the same basic causes:

- Falls and trips
- Knocking into objects
- Handling and lifting goods
- Fire
- Electricity

The above areas may have been covered earlier in this Health and Safety manual but here are a few additional control measures that are specifically relevant to the office environment

Office Tidiness

- Untidiness can contribute to accidents and could also be the cause of fires.
- Do not obstruct Fire Exits or firefighting equipment.
- Ensure that fire extinguishers are in the correct place before you need them.
- Check you fire drill notice and know your assembly point.
- Keep floors, passages and stairs clear of trip hazards, i.e., goods, cables, litter etc.
- Place litterbins where they are not a tripping hazard.
- Ensure to put all wastepaper in the bins provided.
- Spillages should be cleaned up immediately.
- Broken glass or other dangerous waste should be carefully disposed of, not put into wastepaper bins.

- Do not overload filing cabinets, open one drawer at a time and close any drawer before you walk away. Cabinets can tip over quite easily.
- Keep your desk tidy.
- Keep articles of clothing and other combustible materials away from heaters.

Falls and Collisions

Falls are the most common form of office accidents and often result from untidiness.

- If something is spilled, have it cleaned up immediately.
- Report any turned up or worn carpets, rugs, and stair treads.
- Always use the handrail when ascending or descending stairs.
- If you have to reach high shelves do not use office chairs, desks or boxes. Use a suitable stepladder or step stool.
- Always look where you are going, never read whilst you are walking about the offices or using the stairs.
- Don't run, walk. It's safer for everybody.
- Always wear suitable footwear.

Equipment and Machines

Most of the office equipment is not particularly dangerous, as the working parts are usually well enclosed. Even so machines should always be treated with respect and used in accordance with the manufacturer's instructions. Where machines are electrically operated never tinker with the electrics if there is a breakdown. Report the problem immediately and a competent engineer may be called if necessary; this also applies to broken switches, loose connections, and damaged cables.

Take particular care with smaller office equipment such as knives, scissors, and stapling machines. All are capable of inflicting painful injuries. Do not use razor blades and pins; they are not suitable for office use. When using photocopiers try to avoid contact with toners or other chemicals, if you must add toner wash your hands when you are finished.

Always keep the document cover down when photocopying. Telephones and electrical appliances should be safely sited, and cables kept as near as possible to prevent them becoming trip hazards. Before leaving work switch off all electrical appliances.

Lifting and Carrying

It does not need to be a very heavy weight to strain your back; it's the way you lift or carry it that does the damage. If the load is too heavy for you to carry alone get help. For detailed instruction on good handling technique refer to the manual handling sections of this policy. If you find anything in your office that is likely to be a danger and can't do anything about it yourself, report it so that appropriate action can be taken.

3.60 New and Expectant Mothers

Elimination of Activities Hazardous to New and Expectant Mothers

Gelder Group will ensure that work activities exposing new and expectant mothers to unacceptable risks are eliminated, so far as is reasonably practicable. Measures to achieve this include preventing exposure to such risks by ensuring:

- Relevant legal standards (dependent on the risk involved) are met
- Official guidance and good practice are followed
- Working conditions and/or hours are adjusted if necessary
- If necessary, new and expectant mothers are removed from hazardous activities, i.e., the employer will provide suitable
- Suitable facilities are provided and maintained for new and expectant mothers.

alternative work or, if this is not possible, will place the employee on paid suspension

Assessment of Risk

Where hazardous activities cannot be eliminated, risk assessments carried out by a competent person, together with the new and expectant mother, will be undertaken to identify residual risks and to reduce them to the lowest level reasonably practicable. The assessments will consider the actual risks associated with the work activities and whether these risks are increased, due to any particular problems experienced by a new or expectant mother during her pregnancy or postnatal period.

Specifically, the assessment will consider risks associated with exposure to:

- Physical agents
- Biological agents
- Chemical agents

The assessment will also consider working and welfare conditions. Risk assessments relating to new and expectant mothers will be reviewed, and if necessary revised, regularly.

Duties of Managers and Supervisors

Managers and supervisors must ensure that:

- New and expectant mothers are encouraged to disclose their pregnancy at the earliest possible opportunity in writing.
- The highest level of confidentiality is always maintained.
- Risk assessments are carried out for all work activities undertaken by new and expectant mothers and associated records and documentation maintained
- Necessary control measures identified by the risk assessment are implemented, followed, monitored, reviewed and, if necessary, revised
- New and expectant mothers are informed of any risks to them and/or their child and the controls measures taken to protect them.
- Any adverse incidents are immediately reported and investigated.
- Appropriate training is provided where suitable alternative work is offered and accepted

- Provision is made to support new and expectant mothers who need to take time off work for medical reasons associated with their condition

Duties of New and Expectant Mothers

New and expectant mothers must:

- Inform their general practitioner or midwife of the nature of their work
- Notify their employer in writing, as soon as possible, if they are pregnant, have just given birth or are breastfeeding
- Follow any safety arrangements implemented for their protection, including attending training sessions, complying with control measures, etc.
- Not act in a manner that adversely affects their own health and safety, that of their child and/or anyone else
- Report any perceived or real shortcomings in protection to their employer Information and Training

Suitable information, instruction and training will be provided to new and expectant mothers to ensure their health and safety. Training needs will be identified and reviewed by a competent person and support given to allow new and expectant mothers to attend any required training sessions. The effectiveness of any training provided will be monitored and training regularly reviewed. Training should also include ensuring that those people responsible for carrying out risk assessments are competent to do so.

3.61 COVID–19 Pandemic Policy

Managing the health and safety of our staff, customers, suppliers, and business partners is of utmost importance to the Gelder Group. Accordingly, following advice provided by H M Government and authoritative bodies such as Public Health England, Construction Leadership Council, and the NHS the company have implemented a robust approach to risk management and adopted several precautionary measures to protect so far as is reasonably practicable, the health of our employees, everyone using our facilities and of those we come into contact with.

Following easing and repealing of some Coronavirus legislation Gelder Group will continue to take steps to reduce the risk of infection to our employees and other third parties who may be affected by our activities by implementing and maintaining the following:

- Briefing all staff on the latest medical and government advice and recommendations for managing exposure to Covid-19 and continuing to communicate with staff regarding latest developments.
- The provision of hand sanitisers and cleaning products within our offices and on site with appropriate signs placed in key places to encourage recommended hygiene practices.
- Maintaining a high standard of welfare within our office and site welfare facilities with regular cleaning.
- Managing social distancing and interaction with others on site.
- Equipping all mobile workers with sanitising products and wipes for the tools and equipment together with issuing updated safe systems of working regarding housekeeping, more regular cleaning and managing interaction with customers and suppliers safely.
- Strict adherence to any remaining Government legislation which impose a duty on the company and adherence to advice regarding self-isolation and safety precautions.
- Reduced requirement for mobile workers, homeworkers, and visitors to attend site and increasing flexible working and video conferencing.

- The maintenance of the company Covid-19 risk assessment to identify possible threats and hazards to staff, business partners and customers and to reduce the impact of these as far as possible.
- Undertaking regular review of government legislation and guidance by professional and construction industry bodies.

In view of the uncertainty surrounding Covid-19 and the rapidity of developments Gelder Group will be continually reviewing company policies, practices and procedures and this policy will therefore evolve in line with this.

3.62 Hybrid working

Where employee's roles allow for hybrid working and the company agrees for this practice to continue post the removal of Covid-19 restrictions, subject to agreement with the relevant director and / or line manager.

Arrangements will be in place to ensure hybrid workers have their home working arrangements assessed using the homeworking risk assessment document. On completion the document will be reviewed and signed off by a member of the senior management team. Where additional equipment is required, for example for display screen usage the company will provide it.

Arrangements will also be in place for regular communication with line managers and to ensure hybrid workers are kept up to date with company information. Arrangements for hybrid working will be reviewed on an annual basis.