



# HEALTH AND SAFETY MANAGEMENT SYSTEM

## *Health and Safety Policy*

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# TABLE OF CONTENTS

<b>AMENDMENTS</b> .....	<b>2</b>
<b>1 INTRODUCTION</b> .....	<b>6</b>
1.1 THE COMPANY .....	6
1.2 HEALTH AND SAFETY MANAGEMENT SYSTEM - MOTIVATORS .....	6
1.3 HEALTH AND SAFETY MANAGEMENT SYSTEMS .....	8
<b>2 PLAN – HEALTH AND SAFETY POLICY</b> .....	<b>10</b>
2.1 STATEMENT OF HEALTH AND SAFETY POLICY .....	11
2.2 ORGANISATIONAL HIERARCHY.....	12
2.3 DUTIES OF THE DIRECTORS WITH RESPONSIBILITY FOR HEALTH AND SAFETY .....	13
2.4 DUTIES OF EXTERNAL HEALTH AND SAFETY CONSULTANTS .....	15
2.5 DUTIES OF SITE SUPERVISORS .....	16
2.6 DUTIES OF EMPLOYEES .....	17
2.7 DUTIES OF CONTRACTORS .....	18
<b>3 DO - SAFETY MANAGEMENT</b> .....	<b>20</b>
3.1 ACCESS AND WORKING AT HEIGHT .....	20
3.2 ADVERSE WEATHER .....	21
3.3 COMPANY INSURANCES.....	22
3.4 COMPETENCY AND TRAINING .....	23
3.4.1 <i>Induction Training - Company</i> .....	23
3.4.2 <i>Induction Training - Sites</i> .....	23
3.4.3 <i>Modular Training – Tool Box Talks</i> .....	23
3.4.4 <i>Supervision</i> .....	23
3.4.5 <i>Training Records</i> .....	24
3.5 CONSULTATION, CO-OPERATION, COMMUNICATION .....	24
3.5.1 <i>Consultation</i> .....	24
3.5.2 <i>Co-operation</i> .....	24
3.5.3 <i>Communication</i> .....	24
3.5.4 <i>Special Arrangements</i> .....	25
3.6 CONTRACTOR SELECTION .....	25
3.7 DISPLAY SCREEN EQUIPMENT (DSE).....	26
3.8 ELECTRICAL SAFETY .....	26
3.8.1 <i>Electrical Systems</i> .....	26
3.8.2 <i>Portable and Transportable Electrical Equipment</i> .....	27
3.9 EMERGENCY ARRANGEMENTS .....	28
3.9.1 <i>Company Premises</i> .....	28
3.9.2 <i>On Site Operations</i> .....	28
3.10 ENVIRONMENTAL MANAGEMENT .....	29
3.11 FIRE ARRANGEMENTS .....	29
3.11.1 <i>Company Premises</i> .....	29
3.11.2 <i>On Site Operations</i> .....	30
3.12 GAS SAFETY .....	30
3.13 GOOD ORDER AND SECURITY .....	31
3.13.1 <i>Housekeeping</i> .....	31
3.13.2 <i>Security</i> .....	31
3.14 LIFTING OPERATIONS AND EQUIPMENT (LE) .....	31
3.14.1 <i>Lifting Operations</i> .....	31
3.14.2 <i>Lifting Equipment (LE)</i> .....	32
3.15 LONE WORKING .....	32
3.16 PERSONAL PROTECTIVE EQUIPMENT (PPE) .....	32
3.17 PRESSURE SYSTEMS .....	35
3.18 RELATIONSHIPS WITH OCCUPIERS AND NEIGHBOURS.....	35
3.19 RISK ASSESSMENT .....	35
3.19.1 <i>Generic</i> .....	36

3.19.2	<i>Specific</i> .....	36
3.19.3	<i>Review</i> .....	36
3.20	SAFE SYSTEMS OF WORK (SSoW) .....	37
3.21	SAFETY SIGNS .....	37
3.22	TRAFFIC MANAGEMENT .....	38
3.23	UNMANNED AERIAL VEHICLES (UAVs) .....	38
3.24	UTILITIES .....	39
3.24.1	<i>Overhead Utilities</i> .....	39
3.24.2	<i>Underground Utilities</i> .....	40
3.25	VEHICLE SAFETY .....	41
3.25.1	<i>Use of Company Vehicles</i> .....	41
3.25.2	<i>Use of Employee-owned Vehicles</i> .....	41
3.25.3	<i>Use of Mobile Phones</i> .....	41
3.25.4	<i>Use of Satellite Navigation Systems</i> .....	42
3.26	VENTILATION/EXTRACTION SYSTEMS .....	42
3.27	VIOLENCE .....	42
3.28	WORK EQUIPMENT (WE) .....	42
3.29	WORK SITES .....	43
<b>4</b>	<b>DO - OCCUPATIONAL HEALTH</b> .....	<b>45</b>
4.1	BIOLOGICAL HAZARDS .....	45
4.2	FIRST-AID PROVISIONS .....	45
4.2.1	<i>First Aiders</i> .....	45
4.2.2	<i>Appointed Persons</i> .....	46
4.3.3	<i>First Aid Equipment</i> .....	46
4.3	FITNESS FOR WORK .....	46
4.4	HAZARDOUS SUBSTANCES (COSHH) .....	47
4.5	HEALTH ASSESSMENT, SURVEILLANCE AND MONITORING .....	48
4.5.1	<i>Health Assessment</i> .....	48
4.5.2	<i>Health Surveillance</i> .....	48
4.5.3	<i>Health Monitoring</i> .....	49
4.6	INFECTIOUS DISEASES (COVID-19) .....	49
4.7	MANUAL HANDLING .....	50
4.8	NEW/EXPECTANT MOTHERS .....	51
4.9	NOISE .....	51
4.10	SMOKING .....	52
4.11	STRESS .....	52
4.12	VIBRATION .....	53
4.12.1	<i>Hand Arm Vibration (HAV)</i> .....	53
4.13	WELFARE .....	54
4.13.1	<i>On-Site Operations</i> .....	54
4.13.2	<i>Company Premises (Bradford)</i> .....	54
4.14	WORKING TIME .....	54
4.15	YOUNG PERSONS .....	55
<b>5</b>	<b>CHECK – MONITOR PERFORMANCE</b> .....	<b>56</b>
5.1	ACCIDENT AND INCIDENT MANAGEMENT .....	56
5.1.1	<i>Reporting</i> .....	56
5.1.2	<i>Recording</i> .....	57
5.1.3	<i>Investigating</i> .....	57
5.2	SAFETY INSPECTIONS .....	57
<b>6</b>	<b>ACT – REVIEW AND AUDIT</b> .....	<b>59</b>
6.1	REVIEW .....	59
6.2	AUDIT .....	60
<b>APPENDIX 1</b>	<b>ORGANISATION: SPECIFIC DUTIES</b> .....	<b>61</b>
<b>APPENDIX 2</b>	<b>ARRANGEMENTS - SPECIFIC DUTIES</b> .....	<b>62</b>

**APPENDIX 3    USEFUL CONTACTS .....65**  
**APPENDIX 4    HEALTH AND SAFETY DEFINITIONS.....67**  
**APPENDIX 5    HEALTH AND SAFETY LEGISLATION .....68**

# 1 INTRODUCTION

## 1.1 THE COMPANY



Blade Wind Services Ltd provides specialist services to the wind energy sector. With a truly global service our team of expert technicians provide a range of services for wind turbine generators (WTG) including, but not limited to:

- Wind turbine inspections.
- Rotor blade and tower cleaning.
- Rotor blade repairs.
- Wind turbine performance upgrades.
- Wind turbine planned maintenance programme.

The Company has a focus on safety and quality having a professional yet personal approach to ensure we understand our Clients and their site objectives.

Our support enables our Clients to reduce their site downtime, maximise their asset performance and increase their overall medium to long-term margins.

## 1.2 HEALTH AND SAFETY MANAGEMENT SYSTEM - MOTIVATORS



There are many reasons why Blade Wind Services Ltd should establish an effective Health and Safety Management System. The first reason is to ensure that risks are sensibly and proportionately controlled so as to prevent accidents and injuries.

The Company understands that proportionate Risk Management essentially means that our response and effort to control an identified level of risk presented by our operations should be proportionate to the level that the risk presents.

It is understood that some operations may present lower risks than others and as such will not need an excessive volume of time, effort and resources in controlling those risks.

The Company is aware that there are common assumptions that the Health and Safety Executive (HSE) are responsible for all of the compliance pressures that businesses may feel themselves under and also understands that this is not always the case. The Company is fully aware that the motivators to demonstrate effective management of Health and Safety issues come from many sources.

These motivators have informed why the Company has to develop, and demonstrate, its Health and Safety Management System. This is a "beyond compliance" approach and is critical to demonstrate how Health and safety is integrated into business processes.

Although not an exhaustive list, these motivators are represented in the following diagram.



**Pre-Qualification Questionnaires (PQQ), such as Safety Schemes In Procurement (SSIP) facilitate acceptance between competing schemes, such as CHAS, SMAS, Constructionline, etc.**



**Commercial Clients, as part of their own due diligence, normally wish to see evidence of effective Contractor health and safety management.**



**Insurance Companies require companies to manage health and safety so that their own financial risk is limited. This is reflected in the size of their premiums.**



**The Health and Safety Executive (HSE) enforce workplace health and safety legislation.**



**Local Authorities (LA) enforce health and safety in the retail, wholesale distribution, warehousing, hotel, catering, offices, consumer and leisure industries.**



**Solicitors act on behalf of injured parties wishing to see whether a Company has been negligent with respect to civil law.**



**The Fire and Rescue Service enforce the suitability of fire safety measures.**



**The Police enforce workplace fatalities (along with HSE) as well as other areas of criminality such as substance misuse in the workplace, violence, etc.**

The diagram illustrates many of the motivators that inform the decision to document a comprehensive Health and Safety Management System. Although these motivators do not always have their roots in legal compliance the Company is aware that the issues and requirements have to be addressed in order to operate the businesses successfully.

The Company is aware that addressing these issues can assist in:

- Implementing systems to manage risk in a proportionate manner.
- Avoiding accidents and adverse events.
- Ensuring legal compliance.
- Avoiding criminal prosecution and instances of civil liability.
- Avoiding high staff turnover rates and attracting motivated and skilled staff.
- Operating more economically, efficiently and morally.
- Reducing overheads including reducing insurance premiums.
- Demonstrating Health and Safety competence to Clients and Contractors to assist in contract winning.

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### 1.3 HEALTH AND SAFETY MANAGEMENT SYSTEMS



Under Section 2(3) of the *Health and Safety at Work etc. Act 1974* there is a requirement on all companies or organisations employing more than five (5) persons to have a written statement of general Health and Safety Policy.

This Health and Safety Policy must cover all Employees, explain the arrangements for carrying out the Policy, be revised as appropriate and explain how the statement and any revisions are brought to the attention of all Employees of the Company.

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

This document is the general Health and Safety Policy of Blade Wind Services Ltd (the Company) and meets the statutory requirements outlined above. It is the policy of the Company to ensure that, as far as reasonably practicable, Employees are provided with safe and healthy working conditions.

Blade Wind Services Ltd regard Health and Safety as being an important function of management at every level, with responsibility for the observance of good standards and practices resting firmly with the Managing Director, supported by all Employees.

Therefore, a positive culture can only be maintained with the cooperation of all those who work in it.

The HSE publication **HSG65 Successful Corporate Social Responsibility Management** methodology is followed in order to establish a framework for a Corporate Social Responsibility Management System of which this Policy is the cornerstone.

The "Plan, Do, Check Act" framework allows the organisation to identify the key actions needed in each part of the cycle and relate them back, where appropriate, to leadership, management, worker involvement and competence. The framework is based on a plan that is proportionate to the risks. A summary of the steps involved is given below:







- ✓ An effective Health and Safety Policy sets the strategic direction of the organisation.
- ✓ Planning and coordination of the Policy is essential for the Management System to be effective.



- ✓ Identify the risk profile of the organisation.
- ✓ Coordinate the actions of those responsible for controlling the risks.
- ✓ Implement the Risk Control System (RCS).



- ✓ Monitoring the effectiveness of the Risk Control System is vital to measure performance.
- ✓ Investigating accidents and incidents will help prevent recurrence and improve performance.



- ✓ Regular audit and review will enable confirmation if existing arrangements are still valid.
- ✓ Incorporating results will allow learning lessons for personnel and the organisation.

## 2 PLAN – HEALTH AND SAFETY POLICY

A Health and Safety Policy is:



*A written statement by an employer stating the company's commitment for the protection of the health and safety of employees and to the public. It is an endorsed commitment by management to its employees regarding their health and safety*

- Identify the company's current position and where it needs to be.
- Identify what needs to be achieved, who will be responsible for what, how identified aims will be achieved, and how success will be measured.
- Decide how performance will be measured. Consider methods that go beyond accident figures, look for leading indicators as well as lagging indicators.
- Consider fire and other emergencies. Co-operate with anyone who shares the workplace and co-ordinate plans with them.
- Plan for changes and identify any specific legal requirements that apply.



There are cost-effective approaches to preserving and developing physical and human resources, which reduce financial losses and liabilities. An effective management structure and arrangements are in place for delivering the Health and Safety Policy. Staff are motivated and empowered to work safely and to protect their long-term health, not simply to avoid accidents. The arrangements are:

- Underpinned by effective staff involvement and participation.
- Sustained by effective communication and the promotion of competence that allows all Employees to make a responsible and informed contribution to the Health and Safety effort.

There is a shared common understanding of the organisation's vision, values and beliefs. A positive Health and Safety culture is fostered by the visible and active leadership of management.

### Overall Responsibility

Blade Wind Services Ltd is controlled by its Directors, namely Steve Robinson, Mark Bell and Jamie Bairstow. Steve Robinson is identified as the Director with the Director with Responsibility for Health and Safety.

### Delegation of Duties

Steve Robinson is identified as the Director with the Director with Responsibility for Health and Safety. Where and when appropriate, there may be delegation of some Health and Safety duties to the Health and Safety Coordinator or to a specifically nominated person on a defined basis.

### Staff Duties

All other Staff, not specifically identified in this Policy, have duties as Employees as laid out in the *Health and Safety at Work etc. Act 1974* and other subordinate Statutory Instruments.

### Contractor Duties

Some of the work undertaken by the Company may be contracted to other firms with which the Company has established and satisfactory relationships. Contractors to the Company have specific duties as defined in this Health and Safety Policy.

We confirm the commitment of Blade Wind Services Ltd (the Company) to a management framework which pursues continual and progressive improvement in health and safety performance and incorporates, so far as is reasonably practicable, the provisions of the *Health and Safety at Work etc. Act 1974* and all other relevant items of health and safety legislation.

In fulfilment of Section 2 of the *Health and Safety at Work etc. Act 1974*, Blade Wind Services Ltd will ensure, as far as is reasonably practicable, that the following requirements are established:

- Safe plant and systems of work.
- Safe methods for the use, handling, storage and transport of articles and substances.
- Adequate information, instruction, training and supervision to ensure competence.
- A safe and well-maintained workplace, including safe access to and egress from it.
- A safe and healthy working environment with adequate welfare facilities.


The Company considers its health and safety objectives to be equally as important as its other business objectives and as a result we are committed to the principle that the effective management of health and safety makes a significant contribution to our overall business performance by reducing injuries, ill health and other losses.

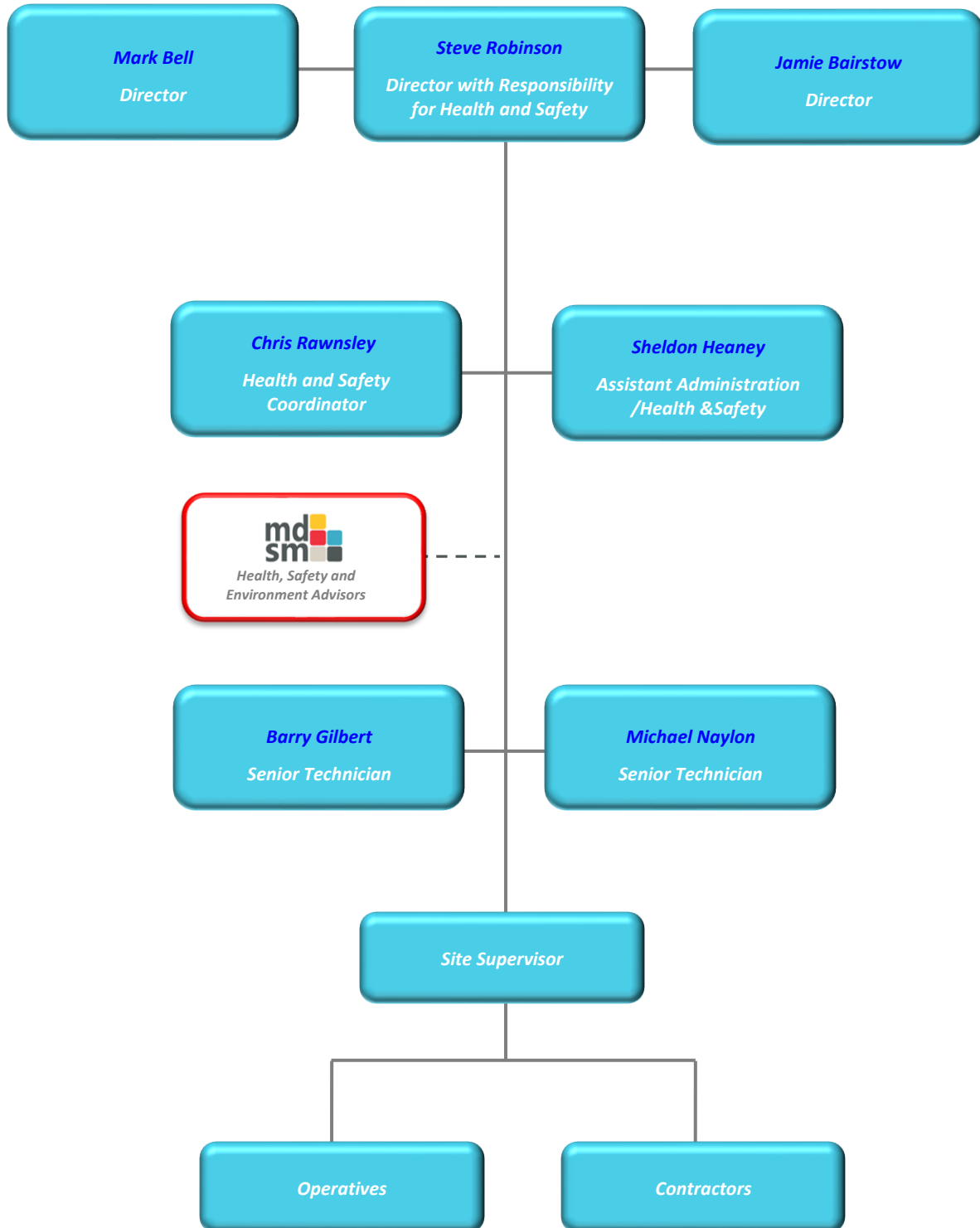
The Company appreciates that the management of health and safety cannot be effective unless it actively involves and gains co-operation and commitment from all employees. Communication and consultation with employees on health and safety issues is seen as a vital part of this process, therefore provision has been made for the active consultation with employees on all health, safety and welfare issues. The management of health and safety is seen by Blade Wind Services Ltd as an essential part of the role of the Company's management team, as it deals with the Company's most important and valuable asset, its employees.

The Company recognises that accidents are not necessarily the fault of an individual employee and could be the result of insufficient management control. It therefore places a responsibility on the management team to ensure the health, safety and welfare of all employees who are in their charge. This responsibility includes a general 'duty of care' to all other persons who may be affected during the Company's undertakings.

The Company will, as far as is reasonably practicable, ensure that adequate resources (e.g. people, time, money and facilities) are made available to enable all employees to meet the requirements of the Policy.

Blade Wind Services Ltd will ensure the continuous monitoring and the regular review of the Company's Health and Safety Policy to ensure its objectives are met. To this aim the Company will ensure that the Policy is revised at least annually.

<b>Name:</b>	<b>Steve Robinson</b>
<b>Signature:</b>	
<b>Position:</b>	<b>Director with Responsibility for Health, Safety and the Environment</b>
<b>Date:</b>	<b>7<sup>th</sup> August 2020</b>



The Directors with Responsibility for Health and Safety will, so far as is reasonably practicable:

1. be ultimately responsible for all safety arrangements and ensuring that they are effectively implemented.
2. ensure that sufficient resources are made available for duty holders to enable them to fulfil their Health and Safety duties.
3. ensure that arrangements for the Policy are reviewed as often as appropriate, and as a minimum at least once a year.
4. ensure that monitoring of the Policy is undertaken as necessary.
5. ensure that when amendments are made to the Policy these amendments are circulated to, and signed off by, all Employees.
6. ensure that Health and Safety is an agenda that will be suitably discussed at regular Management Meetings.
7. ensure that Health and Safety Consultants employed by the Company are given sufficient advice regarding the Company operations and ensure that suitably knowledgeable Employees are allocated to assist in them supplying Health and Safety Services, as required.
8. establish a system of Employee Induction into Blade Wind Services Ltd. This will be a process whereby all new Employees will be required to attend an Induction where all relevant Company information and Management Systems will be explained.
9. ensure that Employee Contracts of Employment contain information regarding failure to abide by Health and Safety Rules and Regulations, give examples of poor practice and Gross Misconduct and outline the system for discipline where Rules are contravened.
10. ensure the arrangement and implementation of a system of discipline for cases where a breach of this Policy occurs or where duties are not undertaken.
11. ensure the arrangement of an adequate system of accident reporting and investigation in accordance with the requirements of the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013* (RIDDOR).

It is also the duty of the Directors with Responsibility for Health and Safety to ensure that the Accident Book is fully completed where necessary, including such details as name, date, nature and any additional information that is required.

12. ensure that information is given to Employees on general safety topics and any necessary specific information concerned with day-to-day operations.
13. ensure that in furtherance of its common law and statutory duties such as the *Employers' Liability (Compulsory Insurance) Act 1969* Company Insurances are kept up to date and prominently displayed so as to be available for inspection at all reasonable times by both Employees and a Health and Safety Inspector.

The Directors with Responsibility for Health and Safety will also ensure that, in accordance with the *Employers Liability (Compulsory Insurance) Regulations 1998*, that the level of cover shall in aggregate not be less than £5 million.

14. ensure that, when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and are subject to, the Health and Safety Policy of the Company.

15. ensure the suitability of Contractors by assessing their submitted Health and Safety Policies, Risk Assessments and other Safety Arrangements (such as Method Statements), where relevant.
16. ensure that Employees are provided with any necessary information, instruction and training to fulfil the requirements of Safe Systems of Work (SSoW).
17. be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that they are counselled and/or disciplined as necessary.
18. ensure that suitable and sufficient Risk Assessments are undertaken in compliance with the *Management of Health and Safety at Work Regulations 1999*.

The Directors with Responsibility for Health and Safety is also ultimately responsible for ensuring that the results of these are communicated to all Employees.

19. delegate (where appropriate) Health and Safety duties to the Directors with Responsibility for Health and Safety or to a competent person.

It is also the responsibility of the Directors with Responsibility for Health and Safety to ensure that this information is communicated to all relevant persons to ensure that all relevant persons are aware of the duty changes.

20. ensure the provision of suitable and sufficient arrangements for First-Aid during the Company's undertakings. For example, provision of suitable persons, who have received appropriate training and acquired the relevant qualifications (First-Aiders), competent persons to take charge in an emergency situation (Appointed Person), etc.
21. ensure the provision of suitable and sufficient arrangements for Fire prevention and control during the Company's undertakings. For example, provision of appropriate Fire Fighting Equipment (FFE) and means of warning of fire.
22. ensure that all Emergency arrangements, including First-Aid and Fire, are communicated to all relevant persons.

The Directors with Responsibility for Health and Safety will also ensure that all Emergency facilities, such as First-Aid Kits and Fire Extinguishers are regularly inspected and maintained.

23. ensure that new Employees are asked if they have any particular health needs (in terms of disability or recurring illness) and appropriate arrangements are implemented for this health need if required.
24. ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
25. ensure the arrangement of a suitable traffic control system during the Company's undertakings to ensure Employee and Public safety.
26. ensure that adequate instruction is given for the operation and use of Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE).
27. ensure that all Work Equipment (WE), including any relevant safety apparatus and Personal Protective Equipment (PPE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.
28. ensure that arrangements are implemented to address the requirements of the *Working Time Regulations 1999*.
29. observe all Company Health and Safety Rules.

Health and Safety Consultants (MD Safety Management) are employed by Blade Wind Services Ltd on a demand basis to advise on:

- General Health, Safety and Welfare.
- Environmental Management.

When Consultants are used, they shall, so far as is reasonably practicable:

- ✓ Ensure they are competent to perform the services required.
- ✓ Ensure enrolment on a programme of Continuing Professional Development (CPD) or other lifelong learning scheme.
- ✓ Carry appropriate Professional Indemnity (PI) Insurance.
- ✓ Report to a Director.
- ✓ Advise Company Management to an agreed level.
- ✓ Remind Blade Wind Services Ltd in good time when issued documentation should be reviewed and updated.

The Consultant services can include:

1. advice regarding current UK Health and Safety Legislation.
2. assistance in producing, reviewing or updating Company Health and Safety documentation.
3. assistance in advising on the legally required notification to the Enforcing Authority following accident or injury, incident or dangerous occurrence.
4. assistance in undertaking Health and Safety Inspections and Audits.
5. assistance in accident or dangerous occurrence investigation to determine root causes and to prevent recurrence.
6. assistance in providing information on request to the Company regarding best practice for Health and Safety Management.

Site Supervisors will, so far as is reasonably practicable:

1. work closely with the Directors with Responsibility for Health and Safety on all matters of on-site Health and Safety.
  2. make suggestions to the Directors with Responsibility for Health and Safety whereby the safety of current working arrangements could be improved and to suggest ways of eliminating hazards.
  3. ensure that any injury, near-miss incident or damage involving Employees, Contractors or members of the General Public is reported immediately to the Directors with Responsibility for Health and Safety.
  4. ensure that any Employee or Contractor wishing to work on-site has satisfied the requirements of the Company Site Induction process.
  5. ensure that all safety instructions are obeyed by all Employees and Contractors working on-site.
  6. ensure health and safety standards are monitored throughout the working day and any unsafe acts or conditions identified are rectified at the earliest opportunity.
  7. be responsible for setting a good personal example and ensure that when others fail to consider their own well-being and that of others around them, they are counselled and/or disciplined as necessary.
  8. ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
  9. ensure Employees are provided with adequate information, instruction and training for the operation of Work Equipment (WE).
  10. ensure Employees carry out the regular inspection of Work Equipment (WE) to ensure its suitability for its intended purpose.
  11. ensure Employees are provided with adequate information, instruction and training in the correct use of Personal Protective Equipment (PPE).
  12. ensure Employees carry out the regular inspection of Personal Protective Equipment (PPE) to ensure its suitability for its intended purpose.
  13. report to the Directors with Responsibility for Health and Safety any item of Work Equipment (WE) and/or Personal Protective Equipment (PPE) which has been reported as missing, damaged or faulty and arrange for its appropriate replacement.
  14. monitor the availability of the Company's on-site First-Aid arrangements to ensure they remain easily accessible and fully stocked at all times.
  15. monitor the availability of the Company's on-site Fire arrangements to ensure they remain easily accessible and fully stocked at all times.
  16. where appropriate, delegate Health and Safety duties to a competent person.
- It is also a duty of Site Supervisors to ensure that this information is communicated to all relevant site personnel to ensure that all site personnel are aware of the duty changes.
17. observe all Company and Site Rules.



Employees can include Technicians and Operatives. The Company expects that each of its Employees observe the requirements identified within the *Health and Safety at Work etc. Act 1974*.

The Company also understands that no financial charge is to be made on any Employee of the Company to meet any of the requirements of the Health and Safety Policy of the Company, in accordance with the *Health and Safety at Work etc. Act 1974*.

All Employees have a duty, so far as is reasonably practicable, to:

1. read and understand the Company Health and Safety Policy and sign, as read and understood *Appendix 4 - Policy Declarations* of this Health and Safety Policy.
2. avoid injury to themselves, or to others, whilst undertaking their work activities.
3. not interfere with, or misuse or abuse anything provided to protect their Health, Safety and Welfare that is in compliance with the *Health and Safety at Work etc. Act 1974*.
4. cooperate fully with the Company in respect to the Health and Safety Policy.
5. report immediately to the Company, any un-controlled hazard that has the potential to cause injury or ill health to Employees, Contractors or members of the General Public.
6. report immediately to the Company, any injury, near-miss incident or damage involving Employees, Contractors or members of the General Public during the Company's undertakings.
7. make suggestions whereby the safety of current working arrangements could be improved and to suggest ways of eliminating hazards.
8. comply fully with the requirements of Risk Assessments and associated Method Statements and to report to the Company any issues or safety related matters relating to their use.
9. ensure that workplaces are kept tidy and any debris, waste material, etc. is cleared as work proceeds.
10. comply with any mandatory or information signs erected during the Company's undertakings.
11. be aware that only suitably trained and, where relevant, certified Employees are allowed to operate Work Equipment (WE).
12. ensure that Work Equipment (WE) is inspected prior to use to ensure it remains fit for its intended use. Faulty or damaged WE must be reported immediately to the Company and appropriate action taken.
13. ensure that Personal Protective Equipment (PPE) is worn as necessary and maintained in good condition to ensure it remains fit for its intended use. Faulty, damaged and/or missing PPE must be reported immediately to the Company and appropriate action taken.
14. not engage in "horse-play" or dangerous practical jokes.
15. observe all Company and Site Rules.

Health and Safety Information is passed to, and received from, Contractors. Contractors should note that the requirements given below form the basis of the Safety Rules for Blade Wind Services Ltd Contractors (please also refer to the Company Contractor Control Policy)..

All Contractors have a duty, so far as is reasonably practicable, to:

1. comply with the Blade Wind Services Ltd Policy on Health and Safety and, where appropriate, ensure their own Company Policy and Arrangements are made available.
2. provide Blade Wind Services Ltd with appropriate Method Statements and relevant Risk Assessments for their intended operations.

Method Statements must be agreed with Blade Wind Services Ltd before work begins and copies of Method Statements and Risk Assessments made available so that compliance with the agreed arrangements can be monitored.

3. report immediately to Blade Wind Services Ltd, any un-controlled hazard that has the potential to cause injury or ill health to Employees, Contractors or members of the General Public.
4. comply with any reasonable directions issued by Blade Wind Services Ltd.
5. ensure that their Employees do not interfere with, or misuse or abuse anything provided by Blade Wind Services Ltd in relation to their Health, Safety and Welfare.
6. ensure that their work is properly planned, managed and monitored to ensure the Health and Safety of their Employees and others affected by their undertakings.
7. ensure that anyone they appoint to provide contracted services are competent and adequately resourced to undertake the work.

Blade Wind Services Ltd must be provided with the details of any Contractor appointed.

8. provide their Employees with appropriate information, instruction and training, including induction, to ensure the work can be undertaken without risk to health and safety.
9. co-operate and co-ordinate their operations in such a way as to not place themselves or any other persons at risk.
10. report immediately to Blade Wind Services Ltd, any death, injury, ill health condition or dangerous occurrence involving its Employees, Sub-Contractors or members of the General Public.
11. ensure that any Work Equipment (WE) provided for use is regularly maintained and inspected to ensure it remains fit for its intended use.

Appropriate records of test and/or inspection may be requested by Blade Wind Services Ltd to ensure compliance with legislative requirements.

12. ensure that Work Equipment (WE) is only operated by competent persons and that those persons make available for inspection to Blade Wind Services Ltd, as appropriate, relevant documentation to support their competency claims.
13. ensure the assessment of risk associated with any Hazardous Substances used during their undertakings.

Appropriate records of such assessments may be requested by Blade Wind Services Ltd for inspection.

14. ensure that their Employees are provided with the necessary Personal Protective Equipment (PPE) to undertake their duties without risk to health or safety.

Appropriate steps must also be taken to ensure that any PPE provided is worn when required and maintained in good condition to ensure it remains fit for its intended use.

15. ensure appropriate steps are taken to prevent unauthorised access to their operations.
16. ensure that workplaces are kept tidy and any debris, waste material, etc. is cleared as work proceeds.
17. comply fully with the Blade Wind Services Ltd Site Safety Rules.

### 3 DO - SAFETY MANAGEMENT

Safety Management Arrangements are those that:



*comprise the framework of processes and procedures used to ensure that an organisation can fulfil all tasks required to achieve its objectives through a process of continuous improvement*

#### Identify the risk profile of the organisation

- Assess the risks, identify what could cause harm, who and what could be harmed and how, and what will be done to manage the risk.
- Decide what the priorities are and identify the biggest risks.

#### Organise activities to deliver the plan

- Involve the entire workforce and ensure that everyone is clear on what is required. Develop clear communications between employees and management to help develop positive attitudes and behaviours.
- Provide adequate resources, including competent advice where needed.



#### Implement the plan

- Decide on the preventive and protective measures needed and put them in place.
- Provide the right tools and equipment to do the job and keep them maintained.
- Train and instruct, to ensure everyone is competent to carry out their work.
- Supervise to make sure that arrangements are followed.

Detailed in this section are the general arrangements that have been put in place to manage safety. The arrangements are based on the requirements of current safety legislation as well as the company's risk profile. The arrangements are communicated to all Employees (*Management of Health and Safety at Work Regulations 1999*) and any necessary additional information or training that has been identified is also provided.

#### 3.1 ACCESS AND WORKING AT HEIGHT



The Company appreciates that Operatives are likely to undertake work at height and as such could be exposed to significant risk. Operators may need to:

- Obtain access at height via use of fixed access equipment such as external ladders, internal staircases, etc.).
- Obtain access at height via use of portable access equipment such as Truck-mounted Platforms, Aerial Platforms, Mobile Elevating Working Platforms (MEWPs), etc.

The *Work at Height Regulations 2005* defines work at height as:



- *Work in any place, including a place at or below ground level;*
- *Obtaining access to or egress from such place while at work, except by a staircase in a permanent workplace, where, if measures required by these Regulations were not taken, a person could fall a distance liable to cause personal injury.*

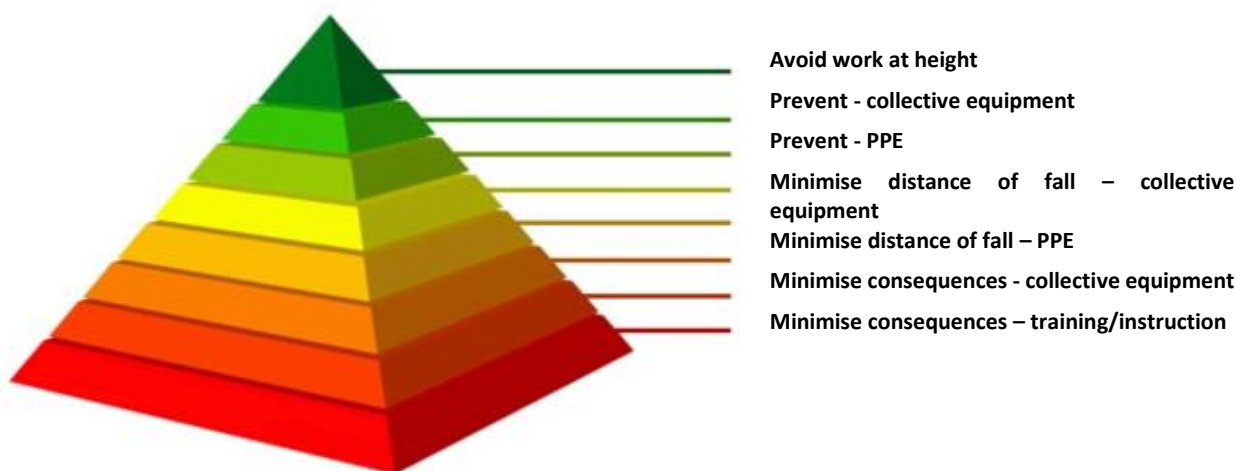
In accordance with the *Work at Height Regulations 2005*, and as far as is reasonably practicable, the Company will ensure that:

- Work is not carried out at height where it can be undertaken otherwise.
- A suitable and sufficient assessment is made of the risks posed by those operations undertaken at height.

The Company will take into consideration the following, during the process of risk assessment:

- Time and duration of the work.
- Height at which the work is to be carried out.
- Hazards associated with falling objects and fragile materials.
- Local restrictions present (e.g. overhead power lines, adjacent buildings, etc.).
- Choice of access equipment (e.g. access towers, Mobile Elevating Work Platforms (MEWPs)).
- Ground conditions, weather and other environmental considerations.
- Training and experience.
- Requirements for additional safety equipment.
- Other work being undertaken in the vicinity.
- Contracting out the work.
- A Safe System of Work (SSoW) is established for any work that requires access to be undertaken at height.

The process of work at height will follow the hierarchy given below:



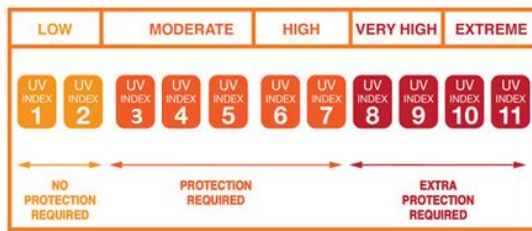
Information regarding Access and Working at Height is given in *Appendix 2 - Arrangements - Specific Duties (Work at Height)*.

### 3.2 ADVERSE WEATHER



As part of normal operations, the Company regularly works in external areas. This can result in exposure to a number of hazards associated with the weather. This can include:

- **Sunlight (Skin).** Exposure to this can be apparent when working in external areas without any appropriate skin covering or protection. The Ultraviolet (UV) radiation effects on the skin range from redness, burning and accelerated ageing through to various types of skin cancer (such as Melanoma). The Company uses the following scale to understand the requirements for protection against UV:



The Company avoids working in direct sunlight without suitable protection such as sunscreens with a high Sun Protection Factor (SPF).

- **Sunlight (Eyes).** Exposure to this can be apparent when working in external areas without any appropriate eye protection. Exposure can damage the cornea and produce pain and symptoms similar to that of sand in the eye.

The Company avoids working in direct sunlight without suitable eye protection.

- **High winds.** Exposure to high winds can result in a number of hazards including working at height, undertaking lifting operations, carrying and moving large items, etc.

The Company consults weather forecasts and schedules work to avoid work in high winds.

- **Cold weather.** Working when external temperatures are low can cause workers to become distracted from their tasks and can also increase the risks associated with Manual Handling. The Company ensures that suitable cold weather clothing (such as Jackets and Gloves) is provided for Employees.
- **Hot weather.** Working in external areas in high temperatures can increase the risks associated with exhaustion dehydration.

The Company encourages Employees to take regular breaks and to drink plenty of fluids to ensure that hydration levels remain suitable.

- **Snow and ice.** Where areas become icy during the Winter months numerous hazards are presented to Employees and others.

In such conditions the Company ensures that suitable precautions are taken to clear regular pedestrian routes to ensure safe passage.

### 3.3 COMPANY INSURANCES



The Company will ensure that all necessary Insurances are provided. In particular the Company will provide cover under the requirements of the *Employers' Liability (Compulsory Insurance) Act 1969* and the *Employers' Liability (Compulsory Insurance) Regulations 1998* to a value of not less than £5 Million. Other Insurances provided can include, but may not be limited to:

- Buildings and Contents.
- Public Liability.
- Professional Indemnity.
- Contractors All Risks.
- Vehicles.
- Work Equipment (WE).

The Company recognises the importance of Employee training, technical knowledge, etc. and consider this to be a necessary requirement in the process of risk reduction. A Director with Responsibility for Health and Safety are ultimately responsible for identifying and implementing the necessary training requirements of appropriate Health and Safety Legislation as well as for on the job proficiency in the workplace.

All Employees will so far as is reasonably practicable, be provided with suitable information, instruction and training in relation to their job requirements. This can include:

- Health and Safety Training.
- Work Equipment Training.
- Systems of Work Training.
- Refresher Training.
- Other specific Training.



Special emphasis is given to work that the Company infrequently undertakes so as to ensure that any danger to Health and Safety is minimised.

Certification and documentation is obtained and recorded as appropriate for the training supplied and in accordance with the *Management of Health and Safety at Work Regulations 1999*. Records of both official and "on-the-job" training will be kept by the Company and made available for inspection where and when necessary.

#### 3.4.1 Induction Training - Company

Every new Employee will receive induction training as soon as possible after commencing work with the Company. The training will include a tour of the premises and processes so that Health and Safety considerations can be explained, and hazards and controls identified. An induction-training package is maintained to ensure that all essential information is covered.

The induction is recognised as an opportunity to convey the management beliefs and company values for Health and Safety Management and to help positively influence the attitudes of all new Employees. A signed record of induction is kept as an acknowledgement that they have understood the content and this is kept in Employee files.

#### 3.4.2 Induction Training - Sites

Delivery staff working on site may be required to attend an induction by the Client on whose premises they are to undertake work. Depending on the site hazards and location the depth of the induction may differ. The Company always ensures that an in-house induction is also undertaken to ensure that specific hazards relating to the nature of the work are highlighted and discussed by those involved before work is started.

#### 3.4.3 Modular Training – Tool Box Talks

Tool Box Talks (TBT) are undertaken on an ad-hoc basis depending on the type of work to be undertaken. They cover a range of topics. A record of attendance is kept.

#### 3.4.4 Supervision

Supervision (on-the-job training) is undertaken so that any Employees who are unfamiliar with a task or a particular item of equipment are mentored and shown established and safe ways of working. This may or may not be subject to a specific Risk Assessment depending on the nature of the work.

All Employees who are unsure of how a process works or how equipment is operated are encouraged not to participate until further instruction is obtained. Supervision is based on the needs of each

individual and will last for as long as is required to ensure that the individual has become competent in that particular task.

#### **3.4.5 Training Records**

Training Records are maintained in the Employees personal files with copies of certification where relevant. The Company training matrix is updated on a regular basis and used to identify future training requirements.

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### **3.5 CONSULTATION, CO-OPERATION, COMMUNICATION**



The Company are aware of the requirements of the *Health and Safety at Work etc. Act 1974* and the *Management of Health and Safety at Work Regulations 1999*, to establish appropriate communication channels with Employees so as to enable the promotion and development of Health and Safety in the workplace and monitor its effectiveness.

#### **3.5.1 Consultation**

The *Health and Safety (Consultation with Employees) Regulations 1996* require Employers in the situation where there are Employees, who are not already represented by Safety Representatives under the *Safety Representatives and Safety Committees Regulations 1977*, to consult with those Employees on matters of Health and Safety.

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (Consultation with Employees) Regulations 1996*, ensure that:

- Direct consultation channels are available to Employees.
- A process is established by which Employees are able to elect suitable candidates to represent them with respect to Health and Safety and other issues.

Representatives (representatives of employee safety) will then report any Health and Safety issues to the Company so that discussions can occur to ensure effective resolution. the Company will as far as is reasonably practicable, provide representatives with suitable resources to facilitate effective employee consultation.

Information regarding Employee Consultation is given in *Appendix 1 - Organisation - Specific Duties (Employee Consultation)* and in *Appendix 2 - Arrangements - Specific Duties (Employee Consultation)*.

#### **3.5.2 Co-operation**

The *Construction (Design and Management) Regulations 2007* require duty holders (e.g. Principal Contractors and Contractors) to actively seek the full co-operation of all those involved in construction work. Therefore, the Company will as far as is reasonably practicable, and in accordance with the Regulations, seek the full co-operation of:

- Company Management.
- Company Employees.
- Client Representatives.
- Contractors.
- Others.

Information regarding Employee Consultation is given in *Appendix 1 - Organisation - Specific Duties (Liaison with Senior Management)*.

#### **3.5.3 Communication**

The *Health and Safety Information for Employees Regulations 1989* require Employers to provide Health, Safety and Welfare information in the form of an approved Poster or an approved Leaflet.

Therefore, the Company will ensure:



- An approved Poster is provided in appropriate workplaces; or
- A leaflet is provided to relevant Employees.

The Company will also, as far as is reasonably practicable, ensure the effective communication with Employees regarding:

- Any changes to the Health and Safety Policy.
- Requirements for specific site working.
- Requirements for Health and Safety Training.
- New work methods or requirements for use of new Work Equipment (WE).

The Company will communicate such information by way of:

- Management Meetings.
- Tool Box Talks.
- Memos to Employees.

### 3.5.4 Special Arrangements

Although not a common occurrence, the Company may employ people from Europe or other parts of the world. These people may speak a different language or have little or no understanding of English. There may be barriers to effective communication and this may be apparent in the verbal or written form. This can cause potential Health and Safety issues if not considered and addressed.

As part of the employment process the Company, as far as is reasonably practicable, would consider the need for:

- Translators (to ensure effective verbal communication).
- Translations (of Health and Safety documents, instructions, signs, etc.).

the Company will also ensure that, where appropriate, special arrangements are made for Employees who may have identified learning difficulties such as those associated with reading or writing.

The Company understands that people with a learning disability can have trouble performing specific types of skills or completing tasks if left to figure things out by themselves or if taught in conventional ways.

Depending on the type and severity of the disability, the Company may be able to intervene to help the individual learn strategies to help them cope with the challenges of the workplace.

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## 3.6 CONTRACTOR SELECTION



The Company may employ the services of various Contractors as part of normal operations. Where this occurs as far as is reasonably practicable, only those Contractors considered competent with regards to Health and Safety will be selected.

The Company ensures that all Contractors are selected by a process including the assessment of the Contractor Company submitted items, including, but not limited to:

- Health and Safety Policy.
- Risk Assessments.
- Method Statements.
- Training and Experience.
- Insurances (Employer's Liability, Public Liability, etc.).
- Prosecutions/Accident Records.

This process helps to ensure that all Contractors working for the Company are competent and have made adequate provision for Health and Safety within their own discipline. Additional items may be required to demonstrate competency for specific projects such as Risk Assessments and Method Statements (RAMS) for example.

**Please refer to the Company Contractor Control Policy and Questionnaire.**

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### 3.7 DISPLAY SCREEN EQUIPMENT (DSE)



The Company are aware of the requirements under the *Health and Safety (Display Screen Equipment) Regulations 1992*, to undertake a suitable and sufficient assessment of workstations to enable the reduction of risk to as low a level as is reasonably practicable. The Company will, as far as is reasonably practicable, and in accordance with the Regulations:

- Undertake Risk Assessments of computer workstations used at workplaces.
- Identify those Employees classed as 'Users' and the control measures required to reduce the levels of risks presented to those 'Users'.
- Arrange and pay for eye and eyesight tests (carried out by a competent person such as an Optometrist or Medical Practitioner) if requested by 'Users'. Further eye and eyesight tests will be arranged at regular intervals if requested by 'Users'.
- Arrange payment for specialist corrective eyewear if required by 'Users'.
- Ensure that Employees are provided with any information, instruction and/or training requirements identified during Risk Assessments, etc.

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### 3.8 ELECTRICAL SAFETY



#### 3.8.1 Electrical Systems

The Company are aware of the significant risks posed by the inappropriate installation, maintenance and inspection of electrical systems. The Company will ensure, as far as is reasonably practicable, that electrical systems at the Company's premises conform to the requirements of:

- *BS 7671:2018 Requirements for Electrical Installations: IEE Wiring Regulations 18<sup>th</sup> Edition;*
- *The Electricity at Work Regulations 1989;* and
- *The Building Regulations 2000 (Approved Document P).*

The Company appreciate that the provision of suitably maintained and inspected electrical systems, includes:

- Ring Circuits.
- Fused plugs and switched sockets.
- Wiring colours.
- Isolation and switching.
- Inspection and testing (i.e. formal and periodic inspections).
- Protection against fire.
- Protection against electric shock (e.g. earthing, use of Residual Current Devices (RCDs), insulation material, etc.).
- Protection against over-current (e.g. Fuses, Circuit Breakers (CB's), etc.).

The requirements for regular formal inspection of electrical systems varies depending on its status. *BS 7671:2018 Requirements for Electrical Installations: IEE Wiring Regulations 18<sup>th</sup> Edition* provides guidance in this area as follows:

<i>Electrical System</i>	<i>Interval period (years)</i>
<i>Commercial Installation</i>	<b>5</b>
<i>Industrial Installation</i>	<b>3</b>
<i>External Installation</i>	<b>3</b>
<i>Fire Alarms</i>	<b>1</b>
<i>Short Term Installation</i>	<b>3</b>
<i>Site Installation</i>	<b>3</b>

### **3.8.2 Portable and Transportable Electrical Equipment**

The Company are aware of the significant risks posed due to the inappropriate maintenance and inspection of portable and/or transportable electrical equipment. The Company will ensure, as far as is reasonably practicable, that any electrical equipment available for use during the Company's undertakings, conforms to the requirements of:

- *BS 7671:2018 Requirements for Electrical Installations: IEE Wiring Regulations 18<sup>th</sup> Edition.*
- *The Electricity at Work Regulations 1989.*

The Company appreciate that the term 'portable or transportable' refers to any equipment that is not part of a fixed installation (electrical system) but is intended to be connected to a fixed installation or generator by means of a flexible cable and plug and socket or similar means.

The Company will, as far as is reasonably practicable, ensure that:

- Any item of portable and/or transportable electrical equipment available for use during the Company's undertakings is **inspected and tested** for electrical safety (Portable Appliance Testing (PAT)) at appropriate intervals by a competent person.
- Records of such **inspection and testing** are requested, filed and made available for inspection on request.

In addition to formal **inspection and testing** procedures, as far as is reasonably practicable, the Company will ensure that regular **formal visual inspections** are carried out as well as **pre-use checks** by equipment operators, as follows:

- **Pre-use checks (visual)** - These should be carried out by the operator prior to the use of the equipment to check for signs of damage, wear and tear, etc. For example, damage to the cable sheath or plug.
- **Formal visual inspections** - These should be carried out routinely by a competent person to identify potentially dangerous faults. Such inspections should include visual checks similar to the ones carried out during **pre-use checks**, but should also include:
  - Removing the plug cover to ensure that a fuse is present and has not been replaced by a piece of wire, nail, etc.
  - Checking that the cable grip is effective.
  - Checking that the cable terminations are secure and correct.

The Company will ensure that only those persons deemed to be competent undertake formal visual inspections and appreciates that such inspections should not include the dismantling of the equipment itself - this should be confined to the combined inspection and testing process (Portable Appliance Testing (PAT)).

The period between formal visual inspections will be dependent on the type of equipment, the conditions of use and the environment in which it is used.

The Company will also, as far as is reasonably practicable, ensure that all portable and/or transportable electrical equipment is provided with a secure and safe means of isolation from all sources of electrical energy, as follows:

- **Isolation of electrical equipment** - This should be carried out to prevent the unintentional reconnection of electrical equipment to a fixed installation (electrical system).

The Company will ensure this by means of Circuit Breakers (CB's) or Residual Current Devices (RCDs) located at the fixed installation.

Information regarding Electrical Equipment is given in *Appendix 1 - Organisation - Specific Duties (Plant and Equipment)*.

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## 3.9 EMERGENCY ARRANGEMENTS



### 3.9.1 Company Premises

Suitable and sufficient arrangements for dealing with serious and imminent danger at each of the Company's premises will follow the requirements of the *Management of Health and Safety at Work Regulations 1999*. The Company will as far as is reasonably practicable, and in accordance with the Regulations, ensure that in the event of an emergency, a suitable and sufficient response is executed. The Company considers the foreseeable emergencies to include, but not be limited to:

- Major Accidents.
- Incidents involving multiple casualties.
- Building and structure collapse.
- Fire and explosion.
- High winds and other abnormal weather conditions.

In establishing suitable emergency response procedures, the Company will take into consideration:

- The type of work being undertaken at the premises.
- The characteristics and size of the premises and the number and location of places of work at the premises.
- The type of Work Equipment (WE) in use.
- The number of persons likely to be present at the premises at any one time.
- The physical and chemical properties of any substances or materials on or likely to be at the premises.

Information regarding Emergency Arrangements is given in *Appendix 2 - Arrangements - Specific Duties (Emergency Procedures - Fire and Evacuation)*.

### 3.9.2 On Site Operations

Suitable and sufficient arrangements for dealing with foreseeable emergencies during the Company's on-site operations will ensure that in the event of an emergency, a suitable and sufficient response is executed. The Company considers the foreseeable emergencies to include, but not be limited to:

- Major Accidents.
- Incidents involving multiple casualties.
- Dangerous Occurrences, such as the collapse of a scaffold.
- Rescue of incapacitated persons at height and other areas where movement is restricted by the nature of the work.
- Building and structure collapse.
- Fire and explosion.
- High winds and other abnormal weather conditions.
- Uncontrolled release of a Hazardous Substance.

In establishing suitable emergency response procedures, the Company will liaise with Clients to ensure that the following is taken into consideration:

- The type of work being undertaken at the property and/or site.
- The characteristics and size of the property and/or site and the number and location of places of work at the property and/or site.
- The type of Work Equipment (WE) in use.
- The number of persons likely to be present at the property and/or the site at any one time.
- The physical and chemical properties of any substances or materials on or likely to be at the property and/or site.

Please refer to the Company Business Continuity Policy.

Information regarding Emergency Arrangements is given in *Appendix 2 - Arrangements - Specific Duties (Emergency Procedures - Fire and Evacuation)*.

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### 3.10 ENVIRONMENTAL MANAGEMENT



The Company appreciates that it has a duty to minimise any adverse impacts to the environment during its undertakings, in line with the *Environmental Protection Act 1990* and associated UK Environmental Legislation.

Therefore, the Company will, as far as is reasonably practicable, ensure every effort is made to prevent pollutants entering any recognised environmental media, including:

- Air.
- Land.
- Water.

Please refer to the Company Environment and Sustainability Policy.

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### 3.11 FIRE ARRANGEMENTS



#### 3.11.1 Company Premises

Fire risk prevention at the Company's premises will follow the requirements of the *Regulatory Reform (Fire Safety) Order (RRO) 2005*.

The Company will as far as is reasonably practicable and in accordance with the Regulations, carry out the process of Risk Assessment to ensure provision for:

- The identification of a 'Responsible Person' (the person who has control of or a degree of control of the premises).
- Prevention of fire, including appropriate flammable storage facilities, regular removal of combustibles, etc.
- Raising the alarm, such as manual bells, klaxons, automatic systems, etc.
- Means of escape, providing those persons on the premises with an appropriate number of clearly signed escape routes which lead to a place of safety, are free from obstruction, are provided with emergency doors which operate in the direction of escape, etc.
- Emergency lighting to illuminate emergency escape routes and exits.
- Emergency assembly point(s) where everyone can gather and be accounted for.

- Fire extinguishers, of the correct type, clearly identifiable, easily accessible, regularly maintained, etc.
- Emergency plans to ensure that everyone on the premises reaches a place of safety as quickly and efficiently as possible.
- Training to safeguard the safety of Employees, Contractors, etc. including the nomination of Fire Marshals, the correct operation of fire extinguishers, fire drill, etc.

Information regarding Fire Safety is given in *Appendix 2 - Arrangements - Specific Duties (Emergency Procedures - Fire and Evacuation)*.

### **3.11.2 On Site Operations**

Fire risk prevention will include liaison with Clients to ensure as far as is reasonably practicable, provision is made for:

- The identification of a 'Fire Marshal' (the person who will manage fire precautions and arrangements on-site).
- Prevention of fire, including appropriate flammable storage facilities, regular removal of combustibles, etc.
- Raising the alarm, such as manual bells, klaxons, etc. These must be able to be heard by everyone working on-site over normal background noise, etc.
- Means of escape, providing persons on-site with at least two escape routes in different directions, clearly signed, free from obstruction, etc.
- Suitable and sufficient lighting to illuminate recognised emergency escape routes and exits.
- Emergency assembly point(s) where everyone can gather and be accounted for.
- Fire extinguishers, of the correct type, clearly identifiable, easily accessible, regularly maintained, etc.
- Emergency plans to ensure that everyone reaches a place of safety as quickly and efficiently as possible.
- Training to safeguard the safety of Employees, Contractors, etc. including the nomination of Fire Marshals, the correct operation of fire extinguishers, fire drill, etc.

Information regarding Emergency Arrangements is given in *Appendix 2 - Arrangements - Specific Duties (Emergency Procedures - Fire and Evacuation)*.

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## **3.12 GAS SAFETY**



The Company appreciate that any work undertaken on Gas systems and associated equipment must be done so in compliance with the requirements of the *Gas Safety (Installation and Use) Regulations 1998*. Therefore, in accordance with the Regulations and, so far as is reasonably practicable, the Company will:

- Ensure that those people employed to carry out work on gas appliances are both suitably qualified and registered with *Gas Safe* which covers both piped Natural Gas and Liquefied Petroleum Gas (LPG).
- Ensure the competency of those people employed to carry out work on gas appliances through the process of assessment, as laid out in the Company's Contractor Control Policy and associated Contractor Pre-Qualification Questionnaire.

### 3.13.1 Housekeeping

The Company is aware that slips and trips resulting in falls on the same level are a major factor in sustaining workplace injuries. For this reason, the Company will as far as is reasonably practicable, ensure that acceptable housekeeping standards are maintained through proper organisation and regular cleaning.

### 3.13.2 Security

The Company will as far as is reasonably practicable, ensure that adequate steps are taken to segregate hazardous operations from those not directly associated with the work such as the general public, with particular emphasis given to children and young persons.

The Company also appreciate that risks may be presented to unlawful entrants to work areas and will therefore ensure, as far as is reasonably practicable, that on-going works are secured and present minimal risk when left unattended.

The segregation arrangements will depend on the risks presented by the work as well as the duration of the work. However, segregation is likely to consist of appropriate signs positioned at the entrance to properties, barriers placed at the perimeter of the workplace, etc.

The Company is also aware of the risks presented by the use of Work Equipment (WE) and vehicles. Where these items are not in use or left unattended, the Company will ensure, as far as is reasonably practicable, that such items are appropriately isolated and secured to prevent inadvertent access or operation

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## 3.14 LIFTING OPERATIONS AND EQUIPMENT (LE)

The Company ensures that the requirements of the *Lifting Operations and Lifting Equipment Regulations 1998* are addressed to ensure safe lifting operations.

### 3.14.1 Lifting Operations

The Company will, as far as is reasonably practicable, and in accordance with the *Lifting Operations and Lifting Equipment Regulations 1998*, ensure that:

- Lifting operations are pre-planned, supervised and carried out in a safe manner.
- Lifting operations are planned, supervised and carried out by people who are deemed to be competent (i.e. those who have acquired adequate practical and theoretical knowledge and experience of planning lifting operations).

The Company appreciate that the degree of planning is likely to vary considerably, depending on the findings of the Risk Assessment. Therefore, for complex lifting operations, a formal Lifting Plan will be developed to address any significant risks identified.

A Lifting Plan will, as far as is reasonably practicable, include, consideration of:

- The competency of the people involved in the lifting operation (e.g. Operators, Supervisors, etc.).
- The suitability of the Lifting Equipment (LE) for the task (e.g. Safe Working Load (SWL)).
- The details of the load (approximate weight, dimensions, etc.) and the height and radius of the lift.

- The areas affected by the lift (e.g. access requirements for other site users).
- Any environmental conditions that may affect the lifting operation (e.g. wind speed, direction, icy conditions, etc.).

### **3.14.2 Lifting Equipment (LE)**

Lifting Equipment (LE) is used by the Company during normal operations. The definition of Lifting Equipment (LE) is:



**any Work Equipment (WE) used for lifting or lowering loads, which includes a person**

Lifting Equipment (LE) includes 'accessories' used to attach loads for lifting (e.g. chains, slings, etc.).

The Company will, as far as is reasonably practicable, and in accordance with the *Lifting Operations and Lifting Equipment Regulations 1998*, ensure that:

- Any Lifting Equipment (LE) used during the Company's undertakings is of sufficient strength and stability for its proposed use and is suitably marked to indicate its Safe Working Load (SWL).
  - Prior to any Lifting Equipment (LE) being used for the first time, it is 'thoroughly examined' by a competent person.
  - In use Lifting Equipment (LE) is 'thoroughly examined' by a competent person at appropriate intervals (i.e. at least every six-months for lifting accessories and equipment used for lifting people and, at least annually for all other equipment).
  - The regular maintenance, servicing and inspection of Lifting Equipment (LE) is carried out by a competent person. Any such maintenance, servicing and inspections will be recorded and filed for future reference.
  - Employees are provided with any information, instruction and training deemed necessary during the process of Risk Assessment.

Information regarding Lifting Equipment (LE) is given in *Appendix 2 - Arrangements - Specific Duties (Plant and Equipment)*.

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## **3.15 LONE WORKING**



The Company appreciates that workplace risks can be exacerbated when Employees and Contractors are required to work alone as part of their job requirements. The risks from lone working are identified in the Company's Risk Assessments together with the current control measures employed.

The main hazards relate to communication and assistance in case of an emergency. Therefore, the Company will, as far as is reasonably practicable, ensure that appropriate measures are taken to facilitate communication, such as use of mobile phones, regular checking-in procedures, etc. Where identified hazards are assessed as having a high level of risk associated to them then the Company may determine that lone working is unacceptable.

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## **3.16 PERSONAL PROTECTIVE EQUIPMENT (PPE)**



The Company will, as far as is reasonably practicable, ensure that suitable Personal Protective Equipment (PPE) is provided to those Employees who may be exposed to a risk to their Health or Safety while at work, except where the risk has been adequately controlled by other means which are equally or more effective.



The Company appreciates that Personal Protective Equipment (PPE) should only be considered to be suitable if it is:

- Appropriate for the risks presented and the conditions at the place where exposure to the risk may occur.
- Compliant with ergonomic requirements and the state of health of the person or persons who may wear it.
- Capable of fitting the wearer correctly, if necessary, after adjustments within the range for which it is designed.
- Effective to prevent or adequately control the risk or risks involved without increasing overall risk.

### PPE Types and Hazards



#### Eye Protection

Eye protection can prevent eye injuries resulting from chemical or metal splashes, dust, projectiles, gases and vapours. There are a number of options available when it comes to eye protection, including Safety spectacles, goggles, face-shields and visors.



#### Head Protection

Head protection can prevent head injuries resulting from the impact of falling or flying objects, contact with overhead hazards, contact with rotating machinery, chemical drips or splash, etc. There are several options available when it comes to head protection, including Safety helmets and bump caps.



#### Hearing Protection

Hearing protection can prevent damage to hearing resulting from exposure to repeated and/or load impact noise. There are a number of options available when it comes to ear protection, including earplugs, earmuffs, semi-insert/canal caps.



#### Hand Protection

Hand protection can prevent abrasive, cut and puncture injuries, protect from temperature extremes, exposure to chemicals, and biological agents, as well as vibration and electric shock. There are numerous options available when it comes to hand protection, including Gloves, gloves with a cuff, gauntlets, etc.



#### Foot Protection

Foot protection can prevent slips, prevent crush, cut and puncture injuries, protect from Wet, hot and cold conditions, prevent exposure to chemicals, and biological agents, as well as electrostatic build-up. There are a number of options available when it comes to foot protection, including Safety boots and shoes with protective toecaps and penetration-resistant mid-soles, wellington boots, etc.



#### High Visibility Protection

High-visibility (HV) clothing has highly reflective properties and a colour that is easily discernible from any background. High-visibility features are necessary where workers are near moving vehicles or in dark areas. Different types may be specified for different sectors (e.g. Rail, Highways, etc.).



#### Body Protection

Body protection can offer protection from chemical splashes, spray from pressure leaks or spray guns, flying objects, as well as prevent the entanglement of clothing in rotating machinery. There are a number of options available when it comes to body protection, including conventional or disposable overalls, boiler suits, aprons, chemical suits, etc.



## Lungs

Respiratory protection can offer protection during work undertaken in oxygen-deficient atmospheres, contaminated atmospheres, protect from gases and vapours, as well as dusty environments. There are a number of options available when it comes to lung protection, including disposable respirators, reusable respirators, powered and supplied air respirators.

With regard to the issue of PPE, the company ensures compliance with the following principles:

### Assessment

The company will assess the suitability of PPE in respect of any risks to health or safety that have not been avoided by other means. This will include the characteristics that the PPE must have in order to be effective against the risks, taking into account any risks that the equipment itself may create.

### Purchasing

The Company will, in order to comply with the new EU PPE Regulations, ensure that PPE is only purchased from trusted sources (members of the British Safety Industry Federation (BSiF) Registered Safety Supplier Scheme). The Company is aware that a Company who has membership of the BSiF can demonstrate:

- A PPE declaration of conformity.
- Their process for sample testing.
- Their quality assurance process.

### Compatibility

Where the presence of more than one risk to health or safety makes it necessary to wear, or use simultaneously, more than one item of PPE, such equipment is compatible and continues to be effective against the level of risk presented.

### Information, Instruction and Training

Appropriate employees are provided with the level of information, instruction and training deemed necessary to enable the wearer to appreciate:

- The risks that the PPE will avoid or limit against.
- The purpose for which and the manner in which the PPE is to be used.
- The actions required to ensure that the PPE remains in an efficient state, in efficient working order and in good repair.

### Use

The company will ensure that any personal protective equipment provided is:

- Properly used.
- Used in accordance with any information, instruction and/or training given.
- Returned to the accommodation provided for it after use.

### Maintenance and Replacement

The company will ensure that any PPE provided is properly maintained in an efficient state, in efficient working order and in good repair. This includes the replacement and/or cleaning of such equipment.

### Accommodation

The company will ensure that suitable accommodation is made available for the safe storage of appropriate PPE when it is not required.

### Reporting loss or defect

The company expect employees to report to an appropriate person (e.g. Managers, Site Supervisors or Site Foremen) any loss of, or obvious defect in, any PPE issued.

Information regarding Personal Protective Equipment (PPE) is given in *Appendix 2 - Arrangements - Specific Duties (Personal Protective Equipment (PPE))*.

The Company may use pressurised Work Equipment (WE), such as compressors, during the course of its operations. Therefore, the Company will so far as is reasonably practicable, ensure (as required by the *Pressure Systems Safety Regulations 2000*) that:

- Such equipment is provided with suitable instructions for its use and the action(s) to be taken in the event of an emergency.
- Such equipment is regularly maintained, taking in to account the system and equipment's age, its use and its operating environment.
- A written scheme of examination is drawn-up by a competent person and that the scheme is adhered to.

The Company are often required to provide information, help and assistance to occupiers and neighbours of properties during its operations. The Company appreciates that problems may be experienced when occupiers and local residents, especially neighbours, become frustrated by congestion, noise and other disruptions or disturbances caused by surveying operations.

Therefore, the Company will, as far as is reasonably practicable, make every attempt to ensure that occupiers, local residents, etc. are informed of any activities that may affect them. The Company appreciate that compromise is essential if good relationships are to be made and maintained.

The Company will, as far as is reasonably practicable, ensure that any issues experienced by occupiers, local residents, etc. or anticipated to be an issue for such people, are reported to an appropriate Company representative to enable the Company to act accordingly. For example, reduce the level of risk presented or to investigate any incident that may have occurred.

The Company appreciates the significance of the *Management of Health and Safety at Work Regulations 1999* with regard to the assessment of risk.

The Health and Safety Executive (HSE) "**5 Steps to Risk Assessment**" is used as the basis of the approach to Risk Assessment.



### 3.19.1 Generic

The Company appreciates the significance of the *Management of Health and Safety at Work Regulations 1999* with regard to the assessment of risk. The Company will, as far as is reasonably practicable, ensure that:

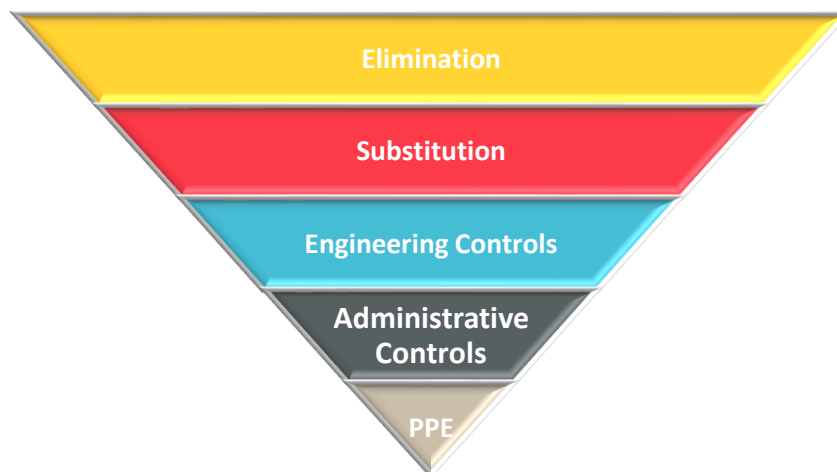
- A suitable and sufficient assessment is undertaken of the risks to Employees and any other persons who may be affected by our undertakings.
- Given that the Company employ five (5) or more persons, the significant findings of the assessments are recorded.
- The results of the assessments are communicated to all Employees and any other relevant persons.
- Arrangements are made for the regular review of such assessments at appropriate intervals (Ref: *Review* below); and
- Any additional information, instruction and/or training requirements identified during the assessment process is arranged.

Information regarding Risk Assessment is given in *Appendix 2 - Arrangements - Specific Duties (Risk Assessment (RA))*.

### 3.19.2 Specific

In line with the arrangements outlined above and in compliance with the *Management of Health and Safety at Work Regulations 1999*, The Company will, as far as is reasonably practicable, arrange for a Specific Risk Assessment to be undertaken when the level of detail presented in Generic Risk Assessments is not great enough to cover a particular set of unique circumstances or when persons are likely to be exposed to unacceptable levels of risk. This may be in conjunction with a specific Method Statement in a Risk Assessments and Method Statements (RAMS) document, for example.

The process of Risk Assessment follows the hierarchy in the diagram below:



Information regarding Risk Assessment is given in *Appendix 2 - Arrangements - Specific Duties (Risk Assessment (RA))*.

### 3.19.3 Review

Risk Assessments will, as far as is reasonably practicable, be reviewed at appropriate intervals (annually or as circumstances dictate), including:

- After the introduction of new work practices.
- After the introduction of new plant and machinery.

- After an accident.
- After a Dangerous Occurrence, etc.

### 3.20 SAFE SYSTEMS OF WORK (SSoW)



The Company appreciates that Safe Systems of Work (SSoW) are a key component in the elimination of risks to the Health and Safety of Employees, Contractors and the General Public. Therefore, the Company will ensure that Safe Systems of Work (SSoW) are developed.

The Company use the process of Risk Assessment to identify all the hazards associated with the task in question and develop Safe Systems of Work (SSoW) to eliminate the remaining hazards.

In the development of Safe Systems of Work (SSoW) due consideration is given to the following:

- **Task Analysis** - What plant and equipment is involved, who will be doing what, where the task will be undertaken, how the task will be undertaken, interaction with other site users and the general public.
- **Identification of the hazards associated with the task** - Consideration will be given to the use of plant and equipment, materials, substances, etc.
- **Assessment of the risk involved** - Consideration will be given to the assessment of the risks presented by the task.
- **Identification of existing methods of control and additional controls necessary** - Consideration will be given to whether existing control methods are adequate or whether additional controls are required.
- **Definition of the SSoW** - Consideration will be given to the component parts of the task (e.g. preparation, authorisation, planning and job sequences) and at each stage will specify safe methods of working (documented work instructions).
- **Implementation of the SSoW** - Consideration will be given to the supervision of Employees and instruction and training requirements.
- **Monitoring of the SSoW** - Consideration will be given to the regular monitoring to ensure the system is operating effectively and that accepted instructions are being followed.

### 3.21 SAFETY SIGNS



The Company will ensure that all Safety Signs displayed on-site comply with the requirements of the *Health and Safety (Safety Signs and Signals) Regulations 1996*. A Safety Sign is a sign that uses a pictorial symbol to provide Health or Safety information or instruction. The sign may also include a written message.

The Regulations do not specify where or when a Safety Sign must be used, but if a sign is displayed it should be one of five (5) types:



#### Prohibitive Signs

These signs are of a round shape, represented by a black pictogram on a white background, a red edge with diagonal line and are used to prevent an action where there is danger.



#### Warning Signs

These signs are triangular and have a black pictogram on a yellow background with black edging. They warn of a danger and for precautions and / or care to be taken to prevent harm.



### Mandatory Signs

Mandatory signs require that specified actions are to be followed. These signs are typically associated with the compulsory wearing of personal protective equipment. They are round in shape and have a white pictogram on a blue background.



### Information Signs

These signs are rectangular or square in shape and have a white pictogram on a green background and provide instructions on the safe way of doing something or where a safety item is located. The most common use of these signs is to provide directions as to the nearest fire escape route.



### Fire Fighting Equipment Signs

These signs are rectangular or square in shape and have a white pictogram on a red background and are used to identify and locate Fire Fighting Equipment and fire alarm activation points.

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## 3.22 TRAFFIC MANAGEMENT



The Company appreciates that workplaces need to be properly organised to protect both pedestrians and vehicle operators. The Company therefore ensures, so far as is reasonably practicable, that traffic routes are provided which are suitable for the persons and vehicles using them and that such traffic routes are provided in sufficient numbers in appropriate locations.

The Company will so far as is reasonably practicable, ensure that suitable and sufficient steps are taken to ensure that:

- Traffic routes are designed to allow vehicles to operate on them without causing a risk to the Health or Safety of pedestrians close by.
- Any pedestrian door or gate that opens out on to a vehicle traffic route is appropriately segregated from that traffic route to ensure pedestrians are able to see any approaching vehicles, etc. from a protected area.
- Sufficient separation is provided between pedestrians and vehicles operating in the workplace.
- Pedestrian and vehicle access points are kept separate, are clearly identified and are kept free from obstruction.
- Traffic routes are identified by clearly legible signs.
- Traffic routes are regularly checked, maintained and kept free from obstruction.

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## 3.23 UNMANNED AERIAL VEHICLES (UAVs)



As part of inspection practices, the Company may use Unmanned Aircraft Vehicles (UAV). UAV, commonly known as a drone and sometimes referred to as a Remotely Piloted Aircraft (RPA) by the International Civil Aviation Organisation (ICAO), is an aircraft without a human pilot aboard.

There are different kinds of drones - they can be fixed wing or multi rotor systems controlled either autonomously by on-board computers or can be controlled by the remote control of a pilot on the ground. Drones are used for aerial mapping and can be configurable with LiDAR (a remote sensing technology that measures distance by illuminating a target with a laser and analysing the reflected light) as well as with High Definition (HD) mapping cameras and visible sensors which enable the capture of high definition geo-referenced images which are suitable for post analysis of the survey area.

In planning precision flights Real-time Kinematic (RTK) operation for positioning with GNSS (Global Navigation Satellite System) is used to generate real-time-flight data display coordinated with a software programme from waypoint ground station system (e.g. Tablet PC).

The Company is aware that the use of UAV equipment falls under the requirements of the *Air Navigation Order 2009* which defines "small, unmanned surveillance aircraft" as those that are equipped to undertake any form of surveillance or data acquisition.

In order to satisfy legal requirements and to ensure the safe use of UAVs the operator (pilot) has to undertake a site-specific Risk Assessment to ensure:

- That any article cannot be dropped so as to endanger persons or property.
- That the aircraft is only flown if the pilot is reasonably satisfied that the flight can safely be made.
- That direct, unaided visual contact with the aircraft is maintained sufficient to monitor its flight path in relation to other aircraft, persons, vehicles, vessels and structures for the purpose of avoiding collisions. The visual line of sight is normally taken to be within 500m horizontally and 400ft vertically of the remote pilot.

The operator (pilot) must conform to Visual Flight Rules (VFR) where operations have to occur in weather conditions that generally clear enough to allow the pilot to see where the aircraft is going. Specifically, the weather must be better than basic VFR weather minima (i.e. in Visual Meteorological Conditions (VMC)). The pilot must be able to operate the aircraft with visual reference to the ground and by visually avoiding obstructions and other aircraft. If the weather is below VMC then the UAV must not be used.

- Understanding of any applicable aviation restrictions. Cross checking that the fly location with the CAA has to be undertaken to obtain permission and to understand the enforcement of applicable restrictions apply. A map of UK restricted airspace can be obtained via: [www.skydemonlight.com/](http://www.skydemonlight.com/)
- That the requirements of the *Air Navigation Order 2009* are complied with where the pilot must not fly the aircraft in any of the following circumstances:
  - Over or within 150 m of any congested area.
  - Over or within 150 m of an organised open-air assembly of more than 1,000 persons.
  - Within 50 m of any vessel, vehicle or structure which is not under the control of the operator/pilot.
  - Within 50 m of any person.
  - During take-off or landing, a small, unmanned surveillance aircraft must not be flown within 30m of any person.
- That the *Data Protection Act 1998* is understood where images of identifiable individuals, even inadvertently, when using surveillance cameras mounted on a small, unmanned surveillance aircraft are collected.

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## 3.24 UTILITIES



### 3.24.1 Overhead Utilities

The Company is aware of the serious risks posed by overhead power lines. Risk from electrical discharge may be apparent during work undertaken near to or below overhead power lines. For example, Mobile Elevating Working Platforms (MEWPs) or survey staffs may be capable of contacting or causing discharge from overhead power lines.

In order to comply with the requirements of the *Electricity at Work Regulations 1989*, the Company will ensure, as far as is reasonably practicable, that its operations are properly planned when work









is to be undertaken in the vicinity of overhead power lines. As such the Company will pre-plan its operations giving due consideration to:

- The Utility Company (who may have specific requirements as to how work can proceed).
- Due regard to the guidance contained within the HSE Publication: *GS 6 Avoidance of Danger from Overhead Electrical Lines*.
- The premises owner (who may have specific requirements relating to access, parking, materials storage, etc.).

### **3.24.2** *Underground Utilities*

The Company is aware of the serious risks posed by the presence of underground utility supplies. Risks arising from exposure to such supplies may be apparent during surveying operations. For example, Work Equipment (WE) may be capable of penetrating shallow buried cables, pipes, etc.

Underground utility supplies can include:

	<b>Red</b> - Electric power lines, conduit and cables
	<b>Orange</b> - Telecommunication, alarm or signal lines
	<b>Yellow</b> - Gas, oil, steam, petroleum or other flammable substance
	<b>Green</b> - Sewage and drain lines
	<b>Blue</b> - Drinking water
	<b>Purple</b> - Reclaimed water, irrigation and slurry lines
	<b>Pink</b> - Temporary survey markings
	<b>White</b> - Proposed excavation limits or route

The Company will ensure, as far as is reasonably practicable, that excavations are properly planned to prevent accidental contact with underground utility supplies. As such the Company will pre-plan its operations giving due consideration to:

- The consultation of current maps, drawings and plans from relevant Utility Suppliers. However, the Company is aware that there may well have been a progressive development of services over many years in those areas affected by the works.

This can result in a situation where some underground utilities are not correctly mapped or at worst are not mapped at all. In these circumstances there is a greater potential for an accident. Therefore, it should be noted that utilities maps are not always up-to-date and reliance on maps for purposes of utility identification is never sufficient.

- The use of Cable Avoidance Tools (CAT) to ensure the location of buried services are identified and avoided during the works.
- The development of procedures to be followed in the event of serious and imminent danger.



### 3.25.1 Use of Company Vehicles

The Company possesses vehicles for the transportation of Employees, Work Equipment (WE) and other materials. It is important for the proper and safe functioning of this transport that proper maintenance and care is given to these vehicles so as to not only protect Employees but other workers and members of the General Public.

If any vehicles used by the Company are leased then suitable and regular maintenance and repair of them is arranged, if necessary, to ensure a high degree of protection for Employees and the General Public. These vehicles are then checked for any defects (e.g. worn tyres or defective brakes) and maintenance to be undertaken at the prescribed periods is also arranged. Each Employee has a duty to check the roadworthiness of the vehicle prior to embarking on any journey.

All Employees are trained in the use of such vehicles and are certificated where appropriate. All Employees, when working on-site must observe the transport rules imposed for that site.

Any traffic offences incurred by Employees must be notified to a Director with Responsibility for Health and Safety.

### 3.25.2 Use of Employee-owned Vehicles

When Employees are required to use their own vehicles for undertaking work for the Company, it is important for the safe functioning of this transport that proper maintenance and care is given to these vehicles on a regular basis.

The Company therefore requires employees to supply MOT Certificates and/or Service Book entries, Insurance details, etc. When, for example, working on the premises of a Client, all employees have to observe the transport rules imposed for that site.

### 3.25.3 Use of Mobile Phones

The Company does not ask an Employee to use a mobile phone when driving and would only recommend a call is made when the vehicle is stationary and parked safely with the engine switched off. Subject to the criteria given below, the Company will allow an Employee to use a mobile phone whilst driving.

Company Employees will strictly comply with the *Road Vehicles (Construction and Use) (Amendment) (No. 4) Regulations 2003*, in that it is an offence whilst driving to use a handheld device to:

- Speak or listen to a phone call.
- Use a device interactively to access any sort of data - including Internet, text or other images.
- To hold a hands-free phone or other mobile device at any point whilst driving.
- The use of a hand-held phone, even when stationary (i.e. in a traffic jam, at the traffic lights) will remain an offence.

Where the use of mobile phones may be required the Company will require Employees to:

- Use a hands-free kit, providing the phone is being held in a "fixed" cradle.
- Only make or receive calls whilst the phone is being held in a cradle.
- Make a call on a hand-held phone for a genuine emergency call to 999, if it would be unsafe for the driver to stop.
- Keep calls short - and not to argue or to enter into intense negotiations.
- Tell callers you are driving and may need to break off your conversation suddenly.
- Save any numbers you may need to a shortcut dial before starting your journey.

The Company understands that drivers may continue to receive data on their phone when on the move, providing that the driver does not hold the device whilst in operation. It is also understood that there will be no requirement for the handset to be switched off when in the vehicle.

#### **3.25.4 Use of Satellite Navigation Systems**

Satellite Navigation Systems or Global Positioning Systems devices (GPS) should be used safely. As many of the devices are retrofitted the safe use and positioning of such a Device should also be considered:

- The device should be programmed when the vehicle is stationary in a safe location.
- The device should be within the driver's field of vision whilst not obscuring the view of the road around the car, including the driver's peripheral vision.
- The device should not provide an unnecessary distraction and any settings should not be changed whilst the vehicle is moving.
- Drivers should understand what the device icons mean so that it can be read quickly without taking concentration away from the road.
- The device should be placed away from any airbags to prevent it causing injury if an airbag were to deploy.
- The device should be secured firmly and should be kept out of the way of a vehicle's controls.

**Further details are contained in the Company Vehicle Safety Policy.**

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### **3.26 VENTILATION/EXTRACTION SYSTEMS**



The Company appreciates that the workplace needs to be properly ventilated. The Company therefore ensures, as far as is reasonably practicable, that each of the Company's premises are:

- Provided with a suitable ventilation system capable of providing workplace occupants with a sufficient quantity of fresh air. Air allowed into the building from outside (e.g. by opening a window) can be considered to be "fresh".
- Provided with a regularly maintained ventilation system. If windows are inoperable (e.g. jammed or have been painted shut) then this should be reported to the Company to ensure such issues are rectified at the earliest opportunity.

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### **3.27 VIOLENCE**



The Company recognises that people who come into contact with members of the General Public at any time are at risk from aggressive or violent behaviour. The Health and Safety Executive (HSE) defines Work Related Violence (WRV) experienced by an Employee as:



*Any incident in which an Employee is abused, threatened or assaulted in circumstances arising out of the course of his or her employment*

The Company requires Employees to report any aggressive or violent incident, with immediate effect, to a Director with Responsibility for Health and Safety.

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### **3.28 WORK EQUIPMENT (WE)**



The Company will ensure, as far as is reasonably practicable, that all Work Equipment (WE) provided for use during the Company's undertakings, complies with the requirements of the *Provision and Use of Work Equipment Regulations 1998*. As such the Company will ensure that all available WE remains suitable for the purpose for which it was intended, in compliance with the following principles:

- **Selection.** WE whether purchased or hired will, as far as is reasonably practicable, be assessed with regard to its suitability for its intended use.
- **Maintenance.** WE will, as far as is reasonably practicable, be maintained at appropriate intervals (as recommended by the manufacturer). Consideration will also be given to the frequency and conditions of use when formulating maintenance schedules.
- **Inspection.** Where the safety of WE depends on its installation conditions, as far as is reasonably practicable, the Company will ensure that it is inspected:
  - After its installation and before being used for the first time.
  - After assembly at a new site or in a new location.

Due consideration will also be given during an inspection to any conditions that could result in the deterioration of the WE. Any formal inspections carried out will be recorded, filed and made available for inspection (as may be required), until the next formal inspection has been carried out and subsequently recorded.

- **Information and Instruction.** Employees will be provided, as far as is reasonably practicable, with appropriate information and instruction on the operation of WE to ensure that it is able to be operated without risk to health or safety.
- **Training.** Suitable and sufficient training will, as far as is reasonably practicable, be arranged to ensure competency during the operation of WE. The training provided may be:
  - Formal (e.g. Certificated Training delivered by an Approved Organisation).
  - Informal (e.g. delivered in-house by a competent person following safe operating procedures (manufacturers operating instructions)).
  - A mixture of both formal and informal training.
- **Supervision.** Suitable levels of supervision will, as far as is reasonably practicable, be provided to those who are not proficient in the use of specific items of WE.
- **Guarding.** All necessary guarding of dangerous parts will be undertaken. Where guards are installed the Company will, as far as is reasonably practicable, ensure their regular inspection to ensure they remain suitable for their intended purpose (e.g. free from defect).
- **Specific Risks.** Specific risks associated with the operation of WE will, as far as is reasonably practicable, be assessed and suitable control measures identified to reduce the level of risk presented to operators and others who may be affected during their operation.
- **Controls.** All WE will, as far as is reasonably practicable, be provided with clearly identified start and stop controls as well as emergency stop controls where deemed necessary. Where appropriate, suitable methods by which WE can be isolated from sources of energy will also be provided.

Information regarding Work Equipment (WE) is given in *Appendix 2 - Arrangements - Specific Duties (Plant and Equipment)*.

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### 3.29 WORK SITES



The vast majority of work undertaken by The Company is carried out on-site. Therefore, it is essential that all Employees and any Contractors working on behalf of the Company comply with, where necessary, the requirements of the Client.

The Company will, as far as is reasonably practicable, ensure that:

- The Company remains fully aware of any requirement and/or any local site rules that may be relevant during the works.
- Employees are made fully aware of any such requirements and/or any local site rules and instructed to comply with them when working on-site.
- Any amendments made to any on-site requirements and/or any local site rules are obtained by the Company and communicated to all relevant Employees via Toolbox Talks, etc.

## 4 DO - OCCUPATIONAL HEALTH

Occupational Health is:



*The promotion and maintenance of the highest degree of physical, mental and social well-being of workers in all occupations by preventing departures from health, controlling risks and the adaptation of work to people, and people to their jobs*

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### 4.1 BIOLOGICAL HAZARDS



The Company appreciate that Employees may be exposed to Biological Hazards during Company operations. The Company recognise that exposure to such hazards can present considerable risks to the health of Employees. Therefore, as far as is reasonably practicable, the Company will ensure that:

- Risk Assessments are undertaken for any work that is liable to expose its Employees to Biological Hazards. The Company consider foreseeable Biological Hazards to include, but not be limited to:
  - Leptospirosis (Weil's Disease).
  - Tetanus.
  - HIV/AIDS.
  - Hepatitis (A, B, C).
  - Legionella.
  - Toxocariasis.
- Suitable risk control measures are developed to reduce the risk of harm to levels that are "as low as is reasonably practicable" (ALARP).
- The results of Risk Assessments are communicated to appropriate Employees and any other relevant persons.
- Employees are provided with any information, instruction and/or training requirements identified during the Risk Assessment.
- Employees are provided with suitable Personal Protective Equipment (PPE) where the risk of exposure cannot be controlled at an acceptable level by any other means.

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### 4.2 FIRST-AID PROVISIONS



The Company are aware of the requirement, under the *Health and Safety (First-Aid) Regulations 1981*, to provide adequate and appropriate equipment, facilities and personnel to ensure Employees receive immediate attention if they are injured or taken ill at work.

#### 4.2.1 First Aiders

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (First-Aid) Regulations 1981*, ensure that:

- Employees, Contractors and Visitors to the premises and/or operational sites are instructed as to the location of the First-Aid post and any Employees who are proficient in First-Aid.
- 'Suitable' persons are identified to administer First-Aid. 'Suitable' persons are those who have received training and acquired the First Aid at Work (FAW) qualification.
- Any First-Aid Training arranged, is undertaken by persons or organisations qualified to do so.

Information regarding First-Aid Provision is given in *Appendix 2 - Arrangements - Specific Duties (First-Aid, Accidents and Work-Related Ill Health)*.

#### **4.2.2 Appointed Persons**

In accordance with the *Health and Safety (First-Aid) Regulations 1981*, for low risk tasks such as those carried out at the Company's premises, the Company may provide an 'Appointed Person'.

The Company appreciate that 'Appointed Persons' are required to take charge of an emergency situation (e.g. summon assistance from the Emergency Services) if a serious injury or emergency situation develops.

The Company understands, however, that 'Appointed Persons' should not attempt to give First Aid for which they have not been trained. It is recommended by the HSE that Appointed Persons still undertake Emergency First Aid at Work (EFAW) training.

#### **4.3.3 First Aid Equipment**

The Company will as far as is reasonably practicable, and in accordance with the *Health and Safety (First-Aid) Regulations 1981*, ensure that:

- Specific First-Aid requirements are determined (assessed) for the operations undertaken from the premises.
- Suitably stocked First-Aid Kits are provided in appropriate locations at the premises.
- Specific First-Aid requirements are determined (assessed) for work undertaken during the Company's on-site operations.
- Suitably stocked First-Aid Kits are provided for use during the Company's on-site operations. These may be stored within Company vehicles.
- The contents of First-Aid Kits are checked on a regular basis and re-stocked as appropriate.

Information regarding First-Aid Provision is given in *Appendix 2 - Arrangements - Specific Duties (First-Aid, Accidents and Work-Related Ill Health)*.

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### **4.3 FITNESS FOR WORK**

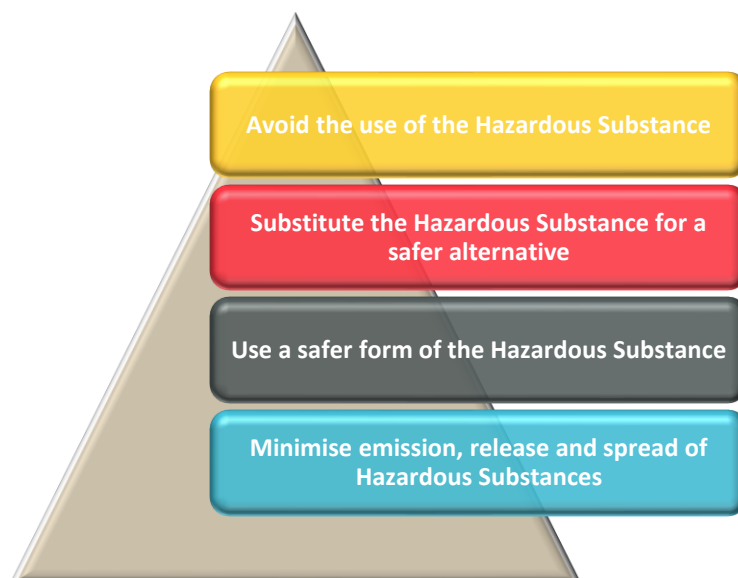


Company Employees must ensure that they are fit to undertake the work required of them by the company. This includes not being under the influence of illegal drugs or alcohol whilst at work. As outlined in the Company Substance Misuse Policy it is expected that all Employees

- Inform them of the nature of any medical treatment they are receiving. This may include divulging information relating to the issue of prescription drugs by a general medical practitioner.
- Inform their prescribing medical practitioner of the nature of work undertaken by themselves, such as the operation of work equipment, vehicles, etc.
- Ensure adequate breaks are taken in between those times working for the company. This will involve tiredness incurred as a result of work undertaken outside of company hours which can affect both quality and safety performance for the individual and hence the company.

The Company appreciates that its Employees may be exposed to Hazardous Substances during Company operations. The Company recognise that these Substances can present serious risks to the safety and health of Employees.

Therefore, in accordance with the *Control of Substances Hazardous to Health Regulations 2002*, and as far as is reasonably practicable, the Company will:



The Company will as far as is reasonably practicable, and in accordance with the *Control of Substances Hazardous to Health Regulations 2002*, ensure that:

- COSHH Assessments are undertaken for any work that is liable to expose its Employees to any substance considered hazardous to health.
- All relevant routes of exposure (e.g. inhalation, skin absorption and ingestion) are taken into account during any COSHH Assessment.
- All relevant routes of exposure (e.g. inhalation, skin absorption and ingestion) are taken into account during the development of suitable risk control measures. As such, procedures will be established to ensure such measures are designed to reduce the risk of harm to levels that are "as low as is reasonably practicable".

For example:

- A purchasing strategy to control the volume and type of Substances purchased.
- Exposure rates maintained below the recognised Workplace Exposure Limit (WEL), where one exists.
- Exposure prevention to those Substances that cause cancer, asthma or genetic damage.
- Effective storage and handling procedures to minimise the potential for accidental release or inadvertent contact.
- Effective emergency procedures, including those for Fire, First-Aid, Accidental Release, etc.
- The use of Hazardous Substances is monitored to ensure that exposure is being suitably controlled, in line with the requirements of COSHH Assessments and associated procedures.
- The results of COSHH Assessments are communicated to appropriate Employees and any other relevant persons.

- Employees are provided with any information, instruction and/or training requirements identified during the COSHH Assessment.
- Employees are provided with suitable Personal Protective Equipment (PPE) where the risk of exposure cannot be controlled at an acceptable level by any other means.

Information regarding Hazardous Substances (COSHH) is given in *Appendix 2 - Arrangements - Specific Duties (Safe Handling and Use of Hazardous Substances)*

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## 4.5 HEALTH ASSESSMENT, SURVEILLANCE AND MONITORING



### 4.5.1 Health Assessment

The Company will ensure that Employees' health is assessed prior to employment to establish whether:

1. They are medically fit to perform their proposed duties and are reasonably likely to remain so, taking into account company policy on equality.
2. There is any pre-existing condition or impairment that would necessitate a restriction of duty or adjustment in the workplace or might later be confused with the effects of future employment.
3. Any periodic Health Assessment or Health Surveillance that will be required in the future.
4. They are medically eligible for company benefits (e.g. pension).
5. The Employee would be classed as a disabled person under the *Equality Act 2010*.

Health Assessment is any assessment of an individual's health that is intended to determine whether the individual is fit to perform a particular task or whether the individual's health has been (or may be) affected by performing a particular task.

The Company will arrange for a Pre-placement Health Assessment for prospective Employees. Although this is a Company policy, this may also be as a requirement of existing Clients (such as Energy Sector). A Pre-placement Health Assessment will:

1. Take place after successful interview or selection process but before a final offer of employment is made.
2. Take into account the outcome of Risk Assessment in order to protect health and safety.
3. Include an assessment of fitness to perform night-work, where relevant.
4. Not have the effect of treating disabled persons less favourably in seeking or retaining employment, unless this can be justified.

The Company will ensure that all information is treated in the strictest confidence and where necessary and where permission is granted, will liaise with Medical Practitioners to ensure that a Safe System of Work (SSoW) can be developed to ensure safe and healthy working.

### 4.5.2 Health Surveillance

The main aim of Health Surveillance is to detect early indications of a disease or condition to allow the Employer to introduce measures to prevent further harm to Employees.

As Health Surveillance is likely to further the protection of Employee health, the Company will arrange formal Health Surveillance by an Occupational Health Practitioner for Employees where:

- Specific Legislation requires it.



- An Employee reports in confidence of a health concern or a diagnosed medical condition that may necessitate further and specific action.
- It is identified within Company Risk Assessments. The process of Risk Assessment may show that:
  - There is an identifiable disease or adverse health condition related to the work.
  - Valid techniques are available to detect indications of the disease or condition.
  - There is a reasonable likelihood that the disease or condition may occur in the particular conditions of work.

#### **4.5.3 Health Monitoring**

The Company will inform Employees of the requirement to divulge information relating to their general health and well-being where it may impact their own safety or that of others when working on behalf of the Company. For example, a visit to a General Medical Practitioner may result in obtaining a "Fit Note". If the Fit Note states that an Employee is "not fit for work" then the Fit Note must be given or sent to Blade Wind Services Ltd as it provides evidence that an Employee cannot work because of a health condition. The Company can then use this information to plan work and also to arrange Employee sick pay.

If the Fit Note states that an Employee "may be fit for work", this means an Employee may be able to return to work with some help from the Company. This would be after confidential discussion with the Company to see if a return to work is possible, taking into account the effects of the illness or injury.

If it is possible for the Employee to return to work it will be agreed as to how this can happen, what support the Employee will receive and how long the support will last. If it is agreed that it is not possible for the Employee to return to work until further recovery is made then the Employee does not need to return to the Medical Practitioner for a new Fit Note.

Specific Clients (e.g. Energy Sector) may require Employees to complete a medical self-assessment or divulge other information relating to their health as part of their conditions for working in safety critical environments.

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## **4.6 INFECTIOUS DISEASES (COVID-19)**



The Company adopts sensible procedures with respect to infection control including:

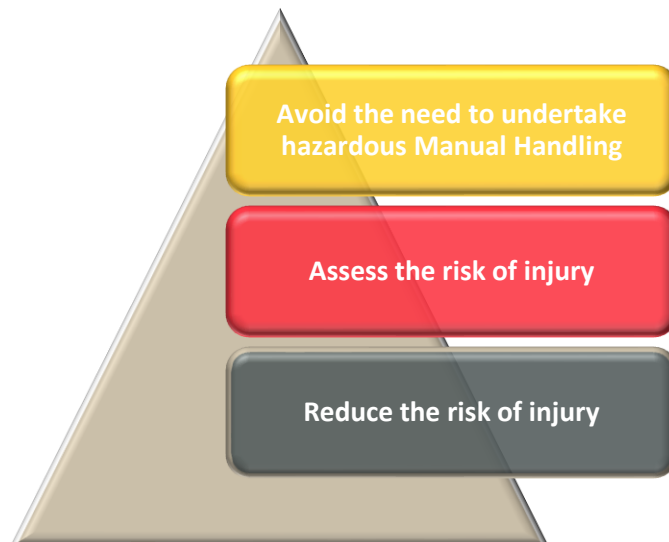
- Undertaking a Risk Assessment to identify specific hazards and control measures.
- Ensuring that suitable welfare facilities are available to enable the practicing of infection control (e.g. soap, hand sanitising products, etc.).
- Ensuring Employees familiarise themselves with the standards for infection prevention and control at the Company premises and for on-site working.
- Ensuring Employees are aware of the latest guidance established by Public Health England (PHE) or the Government with respect to specific viruses.
- Ensuring Employees implement best practice in infection prevention and control in the workplace.
- Ensuring, where necessary, that specific information regarding infection control is incorporated into Company Risk Assessments, Method Statements and other instructions or procedures.
- Ensuring that where infection prevention and control advice changes this is routinely updated and briefed to Employees.

- Providing Employees with information regarding appropriate protection (e.g. immunisation, vaccination, etc.).
- Providing any additional information, instruction and training as required to support awareness and good practice in infection prevention and control.
- Implementing mechanisms to monitor and review infection prevention and control procedures.
- Taking appropriate care of any Employees affected as a result of infection or as a consequence of coming into contact with infections.
- Ensuring that Employees are offered protection from discrimination if they are infected.

## 4.7 MANUAL HANDLING



The Company appreciates that tasks involving Manual Handling have the potential to cause Musculoskeletal Disorders (MSDs). In accordance with the *Manual Handling Operations Regulations 1992*, the Company will ensure that appropriate arrangements are adopted to eliminate and/or reduce the hazards associated with Manual Handling, including:



This can involve:

- Use of mechanical lifting aids.
- Team Lifting procedures.
- The delivery of materials as close as possible to their point of use.
- Storage of materials used most commonly, close to the working area.

The Company expects that its Employees make proper use of any equipment provided to assist in Manual Handling tasks and to report any Manual Handling issues to an appropriate representative of the Company.

The Company will, as far as is reasonably practicable, and in compliance with the *Manual Handling Operations Regulations 1992*, ensure that:

- Employees are provided with suitable and sufficient information relating to the hazards associated with Manual Handling and the results of any Risk Assessments undertaken.
- Employees are provided with the necessary information, instruction and training to promote safe handling and lifting techniques.

Information regarding Manual Handling is given in *Appendix 2 - Arrangements - Specific Duties (Manual Handling)*.

## 4.8 NEW/EXPECTANT MOTHERS



The Company will so far as is reasonably practicable, arrange to undertake a Risk Assessment for any Employee who has become a new or expectant mother, as required by the *Management of Health and Safety at Work Regulations 1999*. New and expecting mothers can be defined as:

 *women who are pregnant or have given birth within the previous six months, or are breastfeeding*

The Company will, as far as is reasonably practicable, and in compliance with the *Management of Health and Safety at Work Regulations 1999*, ensure that:

- Significant hazards for new and/or expectant Mothers are identified and assessed as risks.
- Female Employees of childbearing age are provided with any relevant known risk information.

The Company understands that if an identified risk cannot be designed out then the new/expectant mother will be entitled to a change in work conditions or be offered suitable alternative work.

If a change of duties cannot be arranged, then the new/expectant mother may be suspended from work on full paid leave for as long as is deemed necessary.

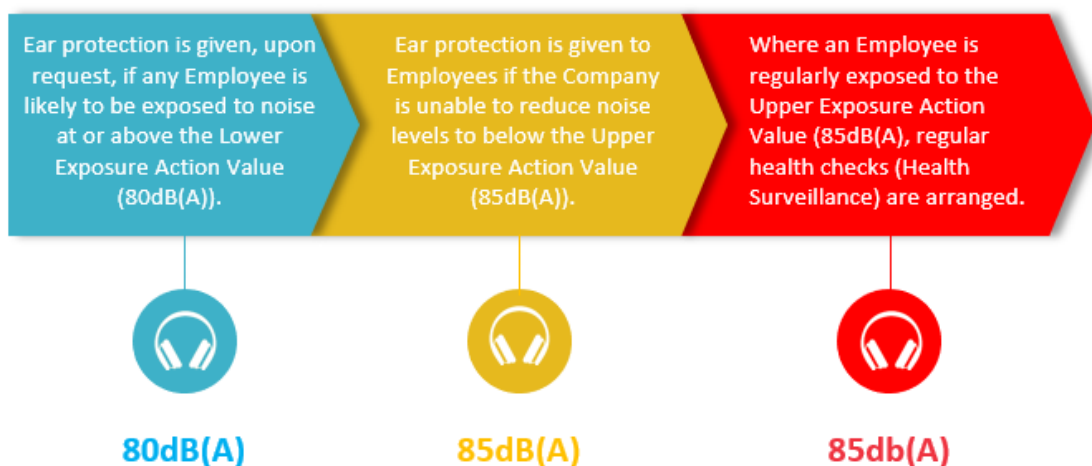
This action may be taken once an Employee has given the Company notice in writing that she is pregnant, has given birth within the last six months or is breastfeeding. If the Employee continues to breastfeed for more than six months after the birth then additional arrangements can be made with the Employee.

## 4.9 NOISE



The Company appreciates that certain tasks carried out on-site are likely to result in the generation of excessive noise. When this situation occurs, the Company will, as far as is reasonably practicable, arrange for a suitable Noise Assessment to be carried out in line with the requirements of the *Control of Noise at Work Regulations 2005*.

The Company will, as far as is reasonably practicable, and in compliance with the *Control of Noise at Work Regulations 2005*, ensure that:



The main aim of Health Surveillance is to detect early indications of noise induced hearing loss to allow the Employer to introduce measures to prevent further harm to the Employee.

- None of its Employees are exposed to the Exposure Limit Value of 87dB(A).

- Noisy Work Equipment (WE), before purchase or supply, is assessed as regards its noise output and where necessary, alternative items are selected.
- Regular maintenance of WE is undertaken so as to limit the possibility of such items producing increased noise levels over their lifetime.

Such maintenance may include ensuring that holding down bolts and housings are secure to reduce additional noise due to reverberation and vibration.

- Its operations are properly planned so as to limit the number of noisy items of WE in use at any one time.

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#### 4.10 SMOKING



The *Smoke-free (Premises and Enforcement) Regulations 2006* and the *Smoke-free (Signs) Regulations 2007* ban smoking in all enclosed public spaces, such as workplaces (including vehicles used for business purposes). The Law bans smoking in all enclosed or "substantially enclosed" public space places and workplaces by making it an offence to:

- Smoke in "No Smoking" premises (or shared company vehicles).
- Permit others to smoke in "No Smoking" premises (or shared company vehicles).
- Fail to display warning notices in "No Smoking" premises (or shared company vehicles).

The Company will ensure, where appropriate:

- Provide external stubbing out bins at entrances to premises.
- "No Smoking" notices will be erected so that they are clearly visible to all employees, contractors and visitors, including at each entrance, in toilets, staff rooms (or shared company vehicles).
- Take all reasonable measures to ensure that employees or visitors to its premises do not smoke.
- Encourage and provide employees with information regarding stopping smoking. This would be via Tool Box Talks and would include the hazards associated with nicotine withdrawal.
- Employees are reminded that the company policy regarding the use of electronic cigarettes is the same as that as standard cigarettes containing tobacco in that they are only permitted in designated areas.

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#### 4.11 STRESS



Well-designed, organised and managed work helps to maintain and promote individual health and well-being. Pressures exist in the workplace that can positively affect performance. However, conditions can exist where prolonged exposure to high levels of pressure can result in negative performance (human error) and can ultimately lead to work-related stress.

Work-related stress can arise where work demands of various types and combinations exceed a person's capacity and capability to cope. Work-related stress can become apparent due to prolonged levels of pressure associated with:

- Insufficient attention to job design.
- Poor work organisation.
- Poor management techniques.

The Company has a general duty under the *Health and Safety at Work etc. Act 1974* to ensure, as far as is reasonably practicable, the health of their Employees at work. This includes taking steps to ensure they do not suffer stress-related illness as a result of their work.

The Company understands that stress can also originate from a person's home and personal life and that this can have a significant impact on their safety at work and will encourage Employees to report in confidence any issues that may have a bearing on safety and can be taken into consideration when allocating work, duties and responsibilities to Employees.

The Company will as far as is reasonably practicable, assess the risks to the Health and Safety of their Employees from the hazards they are exposed to whilst at work, this includes the risk of Employees developing stress-related illness because of their work, in accordance with the *Management of Health and Safety at Work Regulations 1999*.

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## 4.12 VIBRATION



### 4.12.1 Hand Arm Vibration (HAV)

The Company appreciates that certain tasks may involve the use of vibration emitting Work Equipment (WE) and as such, expose the operator to hand transmitted vibration. The Company recognise that the regular exposure to Hand Arm Vibration (HAV) can present considerable risks to the health of Employees. Therefore, in accordance with the *Control of Vibration at Work Regulations 2005*, and as far as is reasonably practicable, the Company will:

- Attempt to eliminate vibration risk totally during its undertakings and where the risk cannot be totally eradicated, the Company will reduce the risk of harm from exposure to HAV to levels that are "as low as is reasonably practicable".
- Arrange Health Surveillance for those Employees who are exposed to levels of hand-transmitted vibration that exceed the recognised 'Exposure Action Value' (EAV).

The main aim of Health Surveillance is to detect early indications of a disease or condition, such as Vibration White Finger (VWF), to allow the Employer to introduce measures to prevent further harm to the Employee.

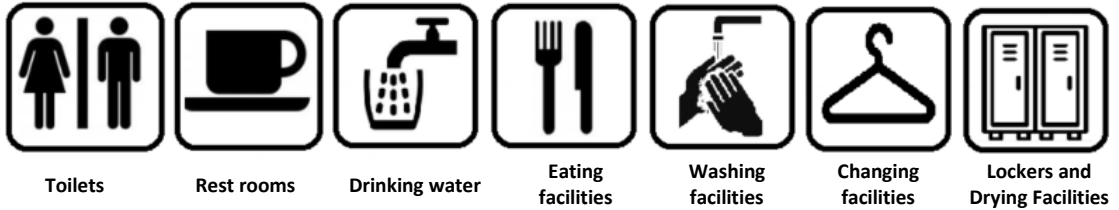
- Ensure that operators of vibration emitting Work Equipment (WE) are not exposed to levels of hand-transmitted vibration above the recognised 'Exposure Limit value' (ELV).
- Ensure that exposure to hand-transmitted vibration is monitored to check whether or not such exposure is being suitably controlled, in line with the requirements of Risk Assessments and any associated procedures.
- Ensure that Employees are provided with any information, instruction and/or training requirements identified during Risk Assessments, etc.

The Company, as far as is reasonably practicable, select Work Equipment (WE) on the basis of its suitability for long-term use as certain tasks may be undertaken over an eight (8) hour working day.

The Company encourage Employees to report, to a Director with Responsibility for Health and Safety, any early signs of HAV, such as tingling sensations in the fingers, often referred to as "pins and needles", or any other adverse reactions to periods of exposure to hand transmitted vibration. The Company, as far as is reasonably practicable, select Work Equipment (WE) on the basis of its suitability for long-term use as certain tasks may be undertaken over an eight (8) hour working day.

**4.13.1 On-Site Operations**

Arrangements for on-site facilities will be established in accordance with the *Construction (Design and Management) Regulations 2015*, including, but not limited to:



Where it is not the responsibility of the Company to provide such facilities, the Company will ensure that they are set up by the Client and/or the Principal Contractor, as appropriate. The Company will also ensure that Employees are supplied with protective clothing for outdoors.

**4.13.2 Company Premises (Bradford)**

In accordance with the *Workplace (Health, Safety and Welfare) Regulations 1992* special emphasis is given to ensure that Employees, Contractors and others are supplied with suitable welfare facilities, including:



The Company ensures that the Company premises are maintained in a clean and efficient state, with a sufficient and properly maintained ventilation system, a reasonable temperature and a suitable and sufficient lighting arrangement.

In compliance with the *Working Time Regulations 1999*, the Company will ensure, as far as is reasonably practicable, that a limit is placed on individual Employees working time of forty-eight (48) hours per week, averaged out over a seventeen (17) week period (unless otherwise agreed by the individual).

The Company will also ensure that additional requirements of the *Working Time Regulations 1999* are implemented, such as minimum daily and weekly rest periods, breaks at work and also paid annual leave. The Company appreciate that any changes required to the number of working hours (i.e. as part of the seventeen (17) week reference period), can only be made following agreement with both the Company and the individual Employee concerned.

The Company will not exert undue pressure on any individual to accept working hours which fall outside of the seventeen (17) week reference period.

The Company will also establish procedures to manage issues associated with Employee fatigue when working on Energy Sector managed sites. The Company will ensure that any excesses are authorised only after a suitable and sufficient Risk Assessment has been undertaken to comply with Energy Sector protocol.

The Company may employ persons under eighteen (18) years of age. As a requirement of the *Management of Health and Safety at Work Regulations 1999*, as far as is reasonably practicable, the Company will ensure that:

- The risks to young people at work are assessed before they start work.
- The parents of school-age children are informed of the key findings of the Risk Assessment and the control measures taken, as required.

The Company appreciate that young workers (over minimum school leaving age and under 18) may not ordinarily work more than eight (8) hours a day, or forty (40) hours a week, nor work at night between 10pm - 6am or 11pm - 7am.

The Company will ensure, as far as is reasonably practicable, that:

- Apprentice workers are provided with suitable training at appropriate intervals.
- Apprentice workers are supervised by a competent person and are excluded from work activities that are regarded as too hazardous. For example, the use of Work Equipment (WE) with exposed dangerous parts.

## 5 CHECK – MONITOR PERFORMANCE

### Measure your performance

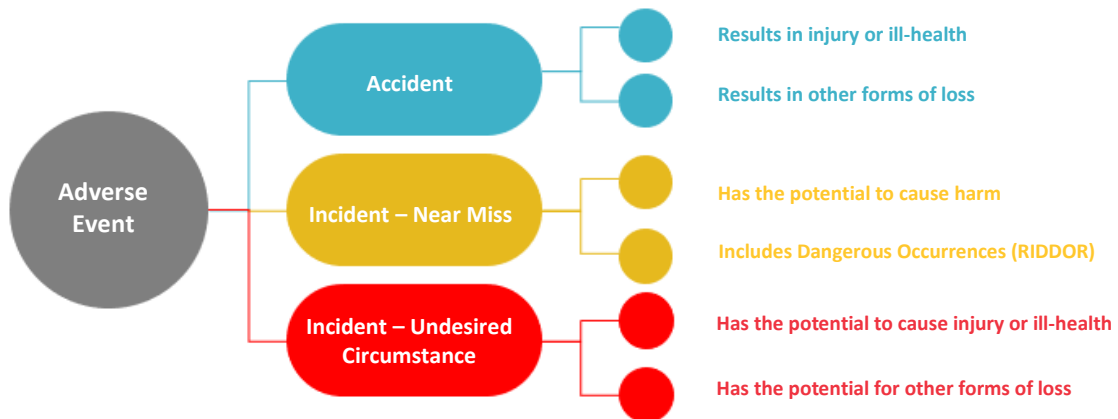
- Make sure that your plan has been implemented – ‘paperwork’ on its own is not a good performance measure.
- Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.
- Investigate the causes of accidents, incidents or near misses.



### 5.1 ACCIDENT AND INCIDENT MANAGEMENT



The Company will as far as is reasonably practicable, ensure that appropriate systems are in place to manage Accidents and Incidents during the Company's undertakings. Definitions are as follows:



#### 5.1.1 Reporting

The Company require Employees, Contractors, Visitors, etc. to report any Accident or Incident occurring during the Company's operations. In the event of a Reportable Injury or Dangerous Occurrence (e.g. over seven (7) day injury) or a person contracting a Reportable Work-related Disease, the Company will, as far as is reasonably practicable, and in accordance with the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*, ensure that:

- The Health and Safety Executive (HSE) is notified without delay by the quickest practicable means (e.g. using the online Forms on the HSE Website).
- In addition to the initial notification, the Company will forward to the HSE, a report on the appropriate and approved form F2508 (Injury or Dangerous Occurrence) or F2508A (Disease) within fifteen (15) days of the Injury or Dangerous Occurrence occurring or of the person being diagnosed as suffering from a reportable Work-related Disease.

Information regarding Accident Investigation is given in *Appendix 1 - Organisation - Specific Duties (Accident Reporting and Investigation)*.



### 5.1.2 Recording

The Company will, as far as is reasonably practicable, ensure that:

- All reported injuries are recorded via use of loose leaf A4 forms (following the format of the Accident Book Form BI 510), as required by the *Social Security (Claims and Payments) Regulations 1979*, the *Social Security Administration Act 1992* and the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*.
- The Accident Book is held with a Director with Responsibility for Health and Safety and will be made readily available at all times.

The Company will also, as far as is reasonably practicable, ensure that any entry made in the Accident Book is removed and held confidentially so as to ensure compliance with the *Data Protection Act 1998*.

Information regarding Accident and Incident Management is given in *Appendix 2 - Arrangements - Specific Duties (First-Aid, Accidents and Work-Related Ill Health)*.

### 5.1.3 Investigating

The Company will, as far as is reasonably practicable, ensure that all adverse events (Accidents and Incidents) are investigated. The nature and outcome of an adverse event will determine whether a formal documented investigation is warranted. For example, an over seven (7) day injury will warrant a higher degree of investigation than an over three (3) day injury.

The Company will identify underlying or root causes and where lessons to be learnt are identified, the Company will ensure that these are fed back to Employees so as to reduce the possibility of a recurrence.

Information regarding Accident Investigation is given in *Appendix 1 - Organisation - Specific Duties (Accident Reporting and Investigation)*.

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## **5.2 SAFETY INSPECTIONS**



The Company undertakes regular Health and Safety inspections and is aware that they are important to:

- Identify workplace hazards.
- Identify unsafe acts and conditions
- Help prevent loss or injury.
- Promote workforce consultation with management.
- Reinforce management commitment to Health and Safety.
- Identify standards on which future Health and Safety performance can be measured.

The Company will undertake informal and formal inspections. Formal inspections, however, are more valuable as they provide a record of the process and can assist in obtaining statistics to use in a programme of improvement.

The inspections may be regular or random in frequency but are undertaken with respect to the level of risk associated with the type of work. The Company documents inspections against a standard Inspection Checklist to allow for performance comparisons to be made.

Formal inspections may be carried out at all levels within the Company - this provides a useful way to monitor safety standards through the Company hierarchy and also increases ownership and understanding of Health and Safety.

Formal inspections will include looking at those arrangements in place including, but not limited to:

- **Documentation.** This can include Policies, Assessments, Checklists, Permits, Examination Records, Training Certificates, etc.
- **Workplace.** This can include the physical arrangements established for the work. Essentially a hazard spotting exercise it will identify areas where there are potential breaches of Health and Safety Legislation.
- **Behaviour.** This can include an observation of how people are working and can provide an insight into the effectiveness of training programmes and individual and group attitudes to Health and Safety.

The results of the inspection process will include:

- **Items requiring immediate attention.** Where conditions exist as to present a serious risk to Health or Safety then immediate action may be required to control it.
- **Items requiring attention in a defined timescale.** Depending on the observation, a specific date may be set by which the remedial action should be taken.

As part of the process the Company will also check whether those who have been actioned in an Inspection Checklist have undertaken the remedial action to a suitable level and within the timescale specified. As well as to identify any unsafe acts or conditions, the Company uses the process of inspection to promote and reward good practice.

## 6 ACT – REVIEW AND AUDIT

### Review your performance

- Learn from accidents and incidents, ill-health data, errors and relevant experience, other organisations, etc.
- Revisit plans, policy documents and risk assessments to see if they need updating.

### Take action on lessons learned, including those from audit and inspection reports



### 6.1 REVIEW



The organisation learns from all relevant experience and applies the lessons. There is a systematic review of performance based on data from monitoring and from independent audits of the whole Health and Safety Management System. These form the basis of self-regulation and of complying with Sections 2 to 6 of the *Health and Safety at Work etc. Act 1974* and other relevant statutory provisions. There is a strong commitment to continuous improvement involving the constant development of policies, systems and techniques of risk control.

Performance is assessed by:

- Internal reference to key performance indicators.
- External comparison with the performance of business competitors and best practice, irrespective of employment sector.
- Performance is also often recorded in annual reports.

It is the duty of a Director with Responsibility for Health and Safety to arrange for the Policy to be reviewed as often as appropriate and as a minimum at least once a year. Circumstances, which may cause the Policy to be reviewed, could include:

- New work practices, which can cause a change in the nature of Company operations and can, lead to changes in training requirements.
- New hazards in the workplace that require addition to the Risk Assessment and control measures identified. This in turn, may lead to additional responsibilities and duties of Employees being identified.
- Working experience that requires addition to the old Policy.
- New Legislation requirements, which require addition to the Policy and may require the identification of further duties within the Company.
- Company re-organisation that can lead to the redefinition of duties and responsibilities.

Monitoring of the Policy is the responsibility of a Director with Responsibility for Health and Safety. Observation of the workplace, feedback from Employees, noting any increase in accidents, sickness, etc. will be used by a Director with Responsibility for Health and Safety as important indicators to monitor the success of the Health and Safety Policy.

Each Employee is made aware of the location of the Company Health and Safety Policy. Each Employee is given a suitable timescale in which to read the Health and Safety Policy in order to fully understand the duties and arrangements that are contained in it.

Company Management is available to answer queries or issues that any Employee may have regarding its contents. Where clarification is required then the Company may also enlist the services of Health and Safety Advisors to ensure that the query can be answered in the most effective way that can be most easily understood.

After reading the Health and Safety Policy and ensuring that he/she is satisfied that they understand the contents, each member of staff signs and dates the "Declarations".

When amendments are made to the Policy Employees are informed of the change in issue status of the document and are given time to understand the changes made and any implications arising out of them. Subsequently Employees are required, once again, to sign and date the "Declarations".

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## 6.2 AUDIT



All control systems tend to deteriorate over time or to become obsolete as a result of change. Auditing supports monitoring by providing Team Leaders with information on how effectively plans and the components of the Health and Safety Management System are being implemented. It should also provide a check on the adequacy and effectiveness of the management arrangements and Risk Control Systems (RCS).

Auditing is an essential element of a Health and Safety Management System and is no substitute for the other essential parts of the system. Blade Wind Services Ltd understands that systems need to be managed health and safety on a day-to-day basis and that a regular audit is vital to ensure that this can be maintained. The aims of auditing are to establish that:

- Appropriate management arrangements are in place.
- Adequate risk control systems exist, are implemented, and consistent with the hazard profile of the organisation.
- Appropriate workplace precautions are in place.

In conjunction with our Health, Safety and Environment Advisors (MD Safety Management) an annual documents audit is also undertaken to ensure that all documentation comprising the Health and Safety Management system is reviewed and updated to reflect changes in the Company as well as Health, Safety and Environmental Legislation and also industry best practices.

The auditing process involves:

- Collecting information about the Health and Safety Management System.
- Interviews with relevant Blade Wind Services Ltd staff.
- Making judgements about adequacy and performance.

## APPENDIX 1 ORGANISATION: SPECIFIC DUTIES

AREA OF RESPONSIBILITY	DETAILS
<i>Management of Health and Safety</i>	
The person responsible for monitoring the day-to-day management of Health and Safety, and instigating improvements where necessary is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The person responsible for communicating Health and Safety information to Employees is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The person responsible for initially assessing and then monitoring the on-going Health and Safety performance of Contractors is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> </ul>
The person responsible for compiling and comparing annual Health and Safety accident statistics is:	<ul style="list-style-type: none"> <li>• Steve Robinson</li> </ul>
<i>Liaison with Senior Management</i>	
The person responsible for keeping senior management informed of the day-to-day Health and Safety performance of the Company is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<i>Employee Consultation</i>	
The person responsible for ensuring effective consultation on Health and Safety matters is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<i>Accident Reporting and Investigation</i>	
The person responsible for ensuring that accidents are properly recorded in the Accident Book is:	<ul style="list-style-type: none"> <li>• Steve Robinson</li> </ul>
The person responsible for reporting reportable injuries, diseases and dangerous occurrences (RIDDOR) to the Health and Safety Executive (HSE)/Local Authority (LA) is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> </ul>

## APPENDIX 2 ARRANGEMENTS - SPECIFIC DUTIES

AREA OF RESPONSIBILITY	DETAILS
<i>Competency and Training</i>	
Office based induction training will be carried out by:	<ul style="list-style-type: none"> <li>Stephanie Ineson.</li> </ul>
On-site induction training will be carried out by:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> </ul>
Employee training records are held with:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
Employee training needs will be assessed and identified by:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
Where specific training needs are identified, the necessary training will be arranged by:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
<i>Employee Consultation</i>	
Employee Health and Safety Representative:	<ul style="list-style-type: none"> <li>Direct communication.</li> </ul>
Health and Safety consultation with Employees will be carried out by:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
<i>Emergency Procedures - Fire and Evacuation</i>	
The person responsible for ensuring that a Fire Risk Assessment (FRA) is carried out at the Company premises is:	<ul style="list-style-type: none"> <li>Stephanie Ineson.</li> </ul>
Maintenance of Fire Fighting Equipment (FFE) is the responsibility of:	<ul style="list-style-type: none"> <li>Stephanie Ineson.</li> </ul>
The person responsible for carrying out emergency evacuation drills (fire drills) is:	<ul style="list-style-type: none"> <li>Stephanie Ineson.</li> </ul>
<i>First-Aid, Accidents and Work-Related Ill Health</i>	
First-Aid Box(es) located at:	<ul style="list-style-type: none"> <li>Offices/Vehicles.</li> </ul>
First-Aid Box(es) will be maintained/replenished by:	<ul style="list-style-type: none"> <li>Steve Robinson</li> </ul>
The person responsible for ensuring that First-Aiders and/or Appointed Persons receive appropriate training is:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
Accident Book located at:	<ul style="list-style-type: none"> <li>Office.</li> </ul>
Management of the Accident Book is the responsibility of:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> </ul>
First-Aiders:	<ul style="list-style-type: none"> <li></li> </ul>
The person responsible for investigating accidents, incidents and instances of work-related ill health is:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>
<i>Information, Instruction, Training and Supervision</i>	
The Health and Safety Law Poster is displayed in:	<ul style="list-style-type: none"> <li>Office.</li> </ul>
Supervision of new and young Employees will be arranged and monitored by:	<ul style="list-style-type: none"> <li>Steve Robinson.</li> <li>Chris Rawnsley.</li> </ul>



AREA OF RESPONSIBILITY	DETAILS
<b>Manual Handling</b>	
The person responsible for ensuring that Employees are trained in correct manual handling techniques, and that these techniques are used, is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The person responsible for ensuring that Manual Handling Assessments are carried out, is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> </ul>
<b>Personal Protective Equipment (PPE)</b>	
The person responsible for ensuring that only suitable PPE is issued and that such issuing of PPE is appropriately recorded, is:	<ul style="list-style-type: none"> <li>• Steve Robinson</li> </ul>
The person responsible for ensuring that Employees are instructed in the correct use of PPE and that such PPE is worn as required, is:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<b>Plant and Equipment</b>	
The suitability of plant and equipment will be assessed prior to purchase or hire by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The person responsible for electrical Portable Appliance Testing (PAT):	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The person responsible for ensuring the arrangement of thorough inspection of Lifting Equipment (LE): <ul style="list-style-type: none"> <li>• For materials - every 12 months.</li> <li>• For accessories - every 6 months.</li> </ul>	<ul style="list-style-type: none"> <li>• Steve Robinson</li> <li>• Chris Rawnsley.</li> </ul>
The maintenance, inspection and testing of plant and equipment will be arranged by:	<ul style="list-style-type: none"> <li>• Steve Robinson</li> <li>• Chris Rawnsley.</li> </ul>
Pre-use inspections of plant and equipment will be carried out by:	<ul style="list-style-type: none"> <li>• All Employees.</li> </ul>
Defective plant and equipment should be reported with immediate effect to:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<b>Risk Assessments (RA)</b>	
RA's will be arranged to be undertaken by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
Requirements identified to reduce the level of risk presented will be managed by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
Risk Assessment reviews will be arranged to be undertaken by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<b>Safe Handling and Use of Hazardous Substances</b>	
All Hazardous Substances requiring a COSHH Assessment will be identified by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
COSHH Assessments will be arranged to be undertaken by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> </ul>

AREA OF RESPONSIBILITY	DETAILS
COSHH Assessment reviews will be arranged to be undertaken by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<i>Welfare Facilities</i>	
Provision of suitable welfare facilities for on-site working will be arranged by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
<i>Work at Height</i>	
Provision of suitable access equipment will be arranged by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
The regular inspection of access equipment will be arranged by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>
Work at height training will be arranged by:	<ul style="list-style-type: none"> <li>• Steve Robinson.</li> <li>• Chris Rawnsley.</li> </ul>



## APPENDIX 3 USEFUL CONTACTS

Organisation	Website	
Advisory, Conciliation and Arbitration Service		<a href="http://www.acas.org.uk">www.acas.org.uk</a>
Asbestos Removal Contractors Association		<a href="http://www.arca.org.uk">www.arca.org.uk</a>
Association for Project Safety		<a href="http://www.associationforprojectsafety.co.uk">www.associationforprojectsafety.co.uk</a>
British Safety Council		<a href="http://www.britsafe.org">www.britsafe.org</a>
Communities and Local Government		<a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
Companies House		<a href="http://www.companieshouse.gov.uk">www.companieshouse.gov.uk</a>
Contractors Health and Safety Scheme (CHAS)		<a href="http://www.chas.gov.uk">www.chas.gov.uk</a>
Department for Environment, Food and Rural Affairs		<a href="http://www.defra.gov.uk">www.defra.gov.uk</a>
Department for Transport		<a href="http://www.gov.uk/government/organisations/department-for-transport">www.gov.uk/government/organisations/department-for-transport</a>
GOV.uk		<a href="http://www.gov.uk">www.gov.uk</a>
Driving for Work		<a href="http://www.gov.uk/government/organisations/department-for-transport">www.gov.uk/government/organisations/department-for-transport</a>
Environment Agency		<a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>
Equality and Human Rights Commission		<a href="http://www.equalityhumanrights.com">www.equalityhumanrights.com</a>
Health and Safety Authority (HSA) (Ireland)		<a href="http://www.hsa.ie">www.hsa.ie</a>
Health and Safety Executive (HSE)		<a href="http://www.hse.gov.uk">www.hse.gov.uk</a>
Health and Safety Executive for Northern Ireland (HSENI)		<a href="http://www.hseni.gov.uk">www.hseni.gov.uk</a>
Health and Safety Legislation		<a href="http://www.hse.gov.uk/legislation">www.hse.gov.uk/legislation</a>
Highways Agency		<a href="http://www.highways.gov.uk">www.highways.gov.uk</a>
HSE Area Offices		<a href="http://www.hse.gov.uk/contact/maps/index.htm">www.hse.gov.uk/contact/maps/index.htm</a>
HSE Books		<a href="http://www.hsebooks.co.uk">www.hsebooks.co.uk</a>
HSE Public Register of Convictions		<a href="http://www.hse.gov.uk/prosecutions">www.hse.gov.uk/prosecutions</a>
HSE Public Register of Enforcement Notices		<a href="http://www.hse.gov.uk/notices">www.hse.gov.uk/notices</a>

<b>Organisation</b>	<b>Website</b>	
<b>Institution of Occupational Safety and Health (IOSH)</b>		<a href="http://www.iosh.co.uk">www.iosh.co.uk</a>
<b>International Institute of Risk and Safety Management (IIRSM)</b>		<a href="http://www.iirsm.org">www.iirsm.org</a>
<b>List of Local Authorities</b>		<a href="http://www.gov.uk/find-your-local-council">www.gov.uk/find-your-local-council</a>
<b>NEBOSH Exam Board</b>		<a href="http://www.nebosh.org.uk">www.nebosh.org.uk</a>
<b>News Distribution Service for Government and Public Sector</b>		<a href="http://www.govwire.co.uk/">www.govwire.co.uk/</a>
<b>Occupational Road Safety Alliance (ORSA)</b>		<a href="http://www.orsa.org.uk">www.orsa.org.uk</a>
<b>RIDDOR Reporting</b>		<a href="http://www.hse.gov.uk/riddor">www.hse.gov.uk/riddor</a>
<b>Royal Society for the Prevention of Accidents (RoSPA)</b>		<a href="http://www.rospa.co.uk">www.rospa.co.uk</a>
<b>Safe Contractor</b>		<a href="http://www.safecontractor.com">www.safecontractor.com</a>
<b>Scottish Government</b>		<a href="http://www.scotland.gov.uk/Home">www.scotland.gov.uk/Home</a>
<b>Welsh Government</b>		<a href="http://wales.gov.uk">http://wales.gov.uk</a>
<b>MD Safety Management Limited</b>		<a href="http://www.mdsm.org.uk">www.mdsm.org.uk</a>

## APPENDIX 4 HEALTH AND SAFETY DEFINITIONS

### As far as is reasonably practicable

The term "*as far as is reasonably practicable*" (SFAIRP) is the term most often used in the *Health and Safety at Work etc. Act 1974* and also in subordinate Health and Safety Regulations. This term is often interchanged with the term "*as low as is reasonably practicable*" (ALARP).

"*Reasonably practicable*" is a narrower term than "*physically possible*" a computation must be made by the owner in which the quantum of risk is placed on one scale and the sacrifice involved in the measures necessary for averting the risk (whether in money, time or trouble) is placed in the other, and that, if it be shown that there is a gross disproportion between them - the risk being insignificant in relation to the sacrifice - the defendants discharge the onus on them".

In essence, making sure a risk has been reduced ALARP is about weighing the risk against the sacrifice needed to further reduce it. The decision is weighted in favour of Health and Safety because the presumption is that the duty-holder should implement the risk reduction measure.

To avoid having to make this sacrifice, the duty-holder must be able to show that it would be grossly disproportionate to the benefits of risk reduction that would be achieved. Thus, the process is not one of balancing the costs and benefits of measures but, rather, of adopting measures except where they are ruled out because they involve grossly disproportionate sacrifices. Extreme examples might be:

- To spend £1M to prevent five (5) staff suffering bruised knees is obviously grossly disproportionate; but
- To spend £1M to prevent a major explosion capable of killing one hundred and fifty (150) people is obviously proportionate.

Of course, in reality many decisions about risk and the controls that achieve ALARP are not so obvious. Factors come into play such as ongoing costs set against remote chances of one-off events, or daily expense and supervision time required to ensure that, for example, employees wear ear defenders set against a chance of developing hearing loss at some time in the future. It requires judgment; there is no simple formula for computing what is ALARP.

### Suitable and Sufficient

The term "*suitable and sufficient*" is not defined in the *Management of Health and Safety at Work Regulations 1999* from where it originates. However, the Approved Code of Practice (ACoP) to these Regulations suggests that, in the context of Risk Assessment, the level of detail in a Risk Assessment should be proportionate to the risk.

The level of risk arising from the work activity should determine the degree of sophistication of the risk assessment:

- For small businesses presenting few or simple hazards a suitable and sufficient Risk Assessment can be a very straightforward process based on informed judgement and reference to appropriate guidance. Where the hazards and risks are obvious, they can be addressed directly. No complicated processes or skills will be required.
- In many intermediate cases the Risk Assessment will need to be more sophisticated. There may be some areas of the Assessment for which specialist advice is required; for example, risks that require specialist knowledge such as a particularly complex process or technique, or risks that need specialist analytical techniques such as being able to measure air quality and to assess its impact.

### Competency

There are numerous definitions as to what constitutes "competent" or "competency":

- Properly or sufficiently qualified or capable or efficient.
- Suitably qualified and/or experienced.
- A specific range of skill, knowledge, or ability.
- Having the necessary skill or knowledge to do something successfully.

## APPENDIX 5 HEALTH AND SAFETY LEGISLATION

Compliance with Health and Safety Legislation is a basic minimum requirement for any responsible organisation.

The Company is committed to ensuring on-going compliance with the ever-changing requirements of Legislation. The Company is strongly aware that it is important that a register of Health and Safety Legislation applicable to the Company is identified and kept up to date.

The Company uses the Health and Safety Executive (HSE) website list of applicable Legislation as the basis of its Register:



[www.hse.gov.uk/legislation/statinstruments.htm](http://www.hse.gov.uk/legislation/statinstruments.htm)

The lists on the HSE website are linked to the Government's official legislation website:





**working with**



**Policies Assessments**  
**Training Consultancy**

[www.mdsm.org.uk](http://www.mdsm.org.uk)

[info@mdsm.org](mailto:info@mdsm.org)

**0844 335 1499**



*MD Safety Management Limited is a Health and Safety Consultancy with over 30 years' experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.*

*MD Safety Management Limited is working with **Blade Wind Services Ltd** in order to implement a Safety Management System and ensure that this is monitored and updated to comply with Health and Safety and associated Legislation.*

