

# SMR Projects Ltd

## Health and Safety Policy

Revision	Date	Details of Change
Original		Original policy with formation of company
2	Apr 2013	Major review with assistance from H&S Consultant
3	Sept 2013	Interim review completed minor changes to responsibilities
4	Sept 2014	Annual review completed no changes to be recorded
5	Sept 2015	Annual review completed, minor changes to CDM Regs & Accident reporting
6	Sept 2016	Policy Reviewed – Minor wording changes.
7	Aug 2017	Policy reviewed – Greater detail added to responsibilities section
8	June 2018	Policy Reviewed to clarify individual responsibilities, new organisation chart added, and minor wording changes made to reflect the content of the Company Employee Handbook.
9	Mar 2019	Accident investigation section reviewed and updated to support H&S team supporting investigations.
10	Nov 2019	Updated company organagram added to page 6
11	Mar 2020	Planned Policy Review

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## SMR Projects Limited Values

- **Health & Safety number one**

Through this policy and all SMR Projects Limited operations we ensure that there is no production need, competitive advantage, cost or time saving measure that is worth an injury of any kind to any person. We must have zero tolerance of any practices that could cause accidents or ill health. We have a moral obligation to our families and each other to work safely always.

- **Our business is trust**

SMR Projects Ltd and the Xypex brand are known as companies which are trustworthy and credible and which makes a profit honestly and correctly.

- **A very safe and reliable choice**

SMR Projects Ltd and the Xypex brand is a safe and reliable supplier and brand, which keeps its promises to its clients and delivers effective services.

- **Passionate about technology**

SMR Projects Ltd and the Xypex brand is at the forefront of technology through a passion for technology, focusing on what it can do to improve people's quality of life.

- **Global culture, local representation**

As the UK distributor of Xypex products SMR Projects limited is part of a global "family" with a local foundation and a respect for local cultures.

- **Environmentally and socially responsible**

The SMR Projects Ltd name and Xypex brand should, at all times be associated with a respect for human rights, acceptable working conditions, social considerations and environmental activities to obtain continuous improvements.

## Health and Safety Policy Statement

As Managing Director, I wish to emphasise my personal commitment to ensuring that we achieve and maintain high standards of welfare, health and safety. As the most senior member of the organisation, I will ensure the health, safety and welfare of my employees and others. To reach this level of excellence, it is essential that we set ourselves high standards of health, safety and welfare.

The company will provide and maintain welfare, health and safe working conditions, equipment and systems of work, along with information, instruction, training and supervision. In return it is expected that everyone will work together to prevent all accidents and work-related ill health. It is essential that we all take personal responsibility for welfare, health and safety, to promote a culture where we will not walk past unsafe practices.

Effective management of welfare, health and safety is crucial to our business. At all levels, we must ensure that welfare, health and safety arrangements are clear, constantly reviewed and implemented. Formal plans for welfare, health and safety targets and improvement are in place and monitored. The involvement of employees in our welfare, health and safety effort is fundamental and we shall ensure that effective means of consultation and communication are in place.

Through the implementation and continuous review of this Health and Safety Policy, we aim to minimise the risks from our operations. In return I expect all employees, contractors and other affected persons to help achieve this aim.

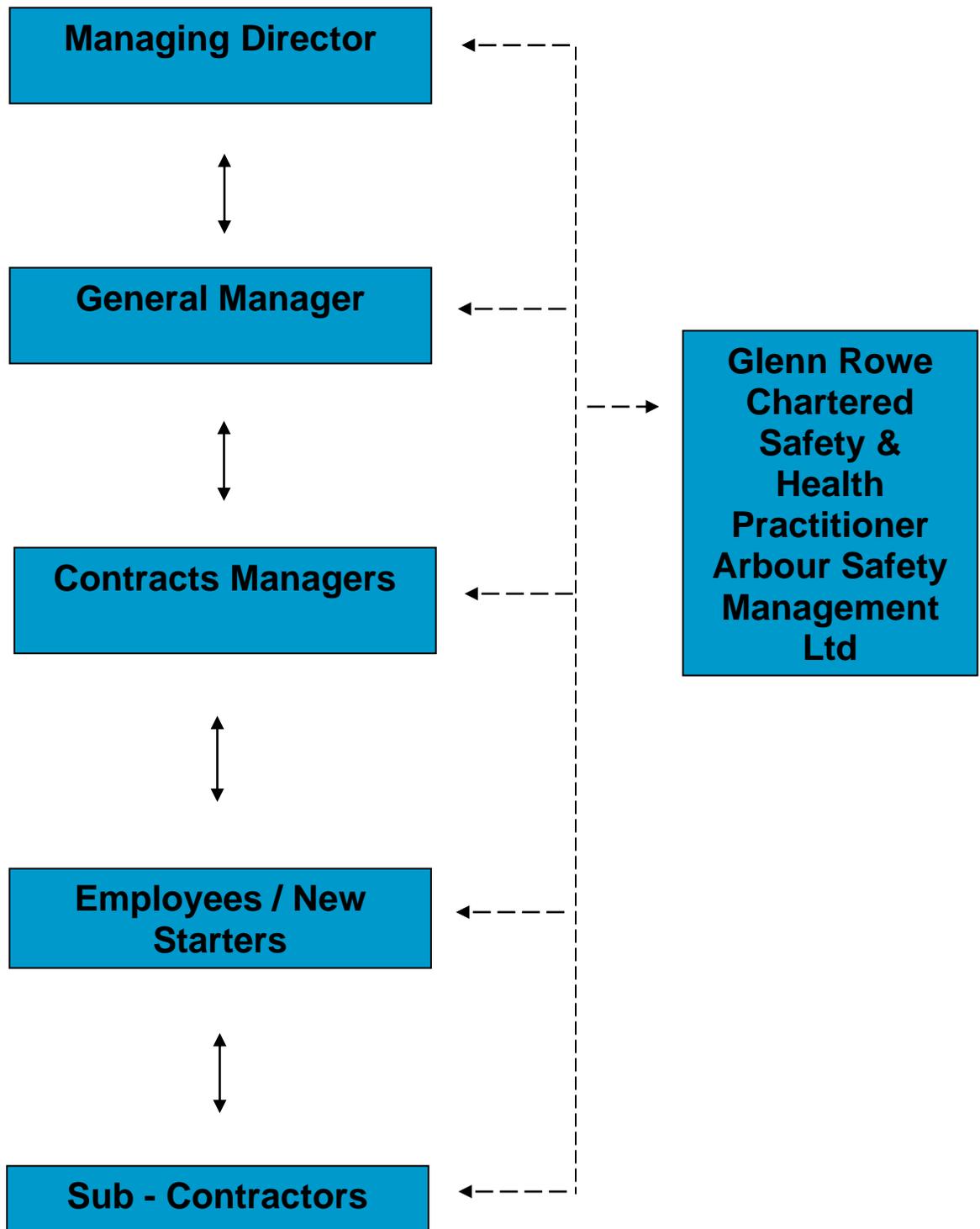
There is no production need, competitive advantage, cost or time saving measure that is worth an injury of any kind to any person. We must have zero tolerance of any practices that could cause accidents or ill health. Any refusal to work, in an attempt to maintain health & safety standards, will not result in any form of penalty against the individual. We have a moral obligation to our families and each other to work safely always.



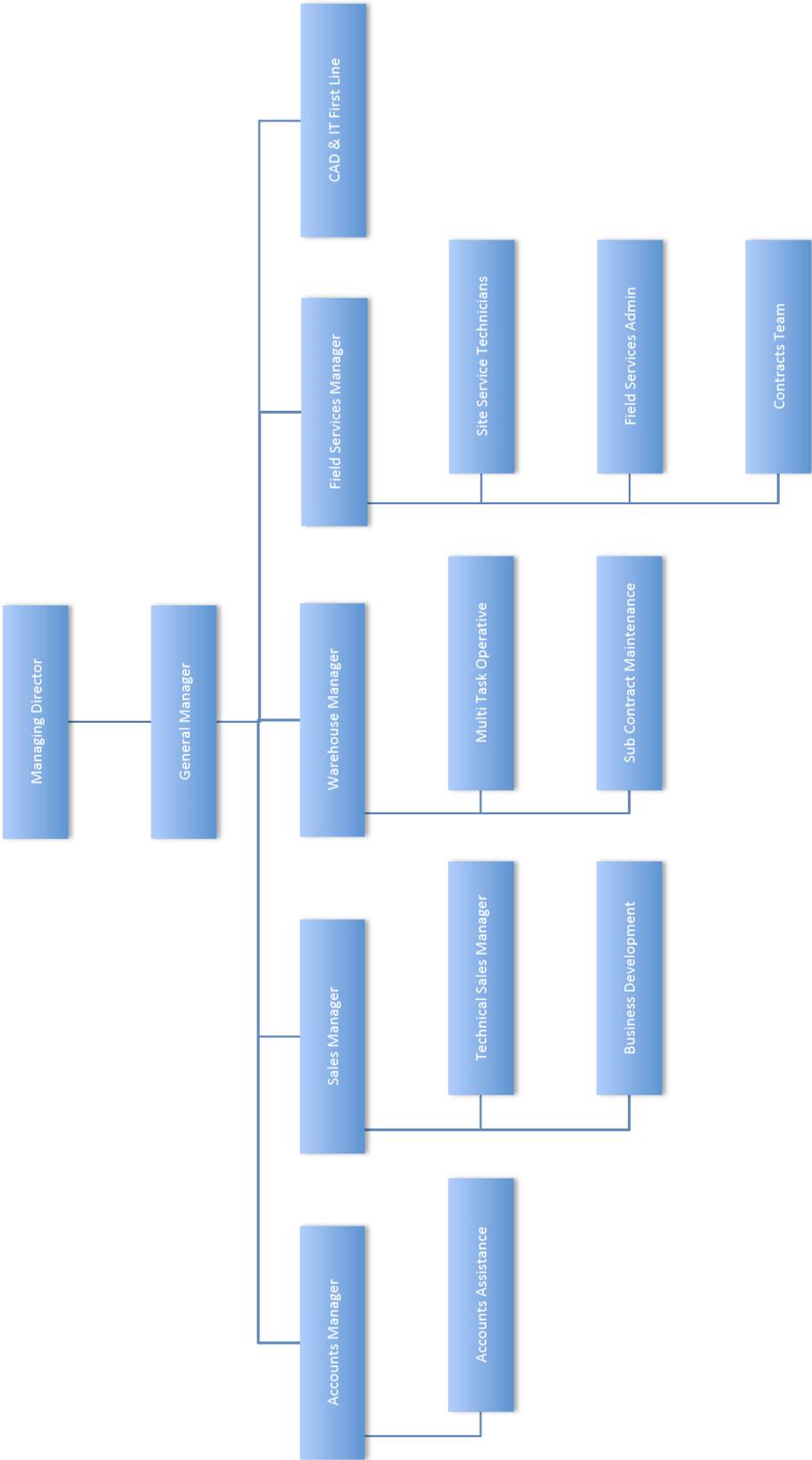
Signed

Mike Finch  
Managing Director  
March 2019

## H&S Responsibility Organisation Organogram



# SMR Projects Ltd Company Structure



## **Responsibilities for Health and Safety**

### **Managing Director**

The Managing Director has overall responsibility for health and safety across all SMR Projects Ltd operations. He is responsible for the implementation of this Policy and will ensure health, safety & welfare standards are maintained by all employees, contractors & third parties working for SMR Projects Ltd

He will ensure suitable competent people are in place, including those required by relevant legislation, so that there is effective supervision of all workplaces and that all staff are aware of the requirements relevant to their role. He shall monitor The Policy's success through formal reviews and ensure improvements are made to ensure it remains effective.

The Managing Director shall ensure sufficient resources / funds are available to enable this Policy to be implemented fully. Clear direction will also be provided in respect of health and safety matters, especially covering the development of initiatives in connection with the ongoing health and safety improvements. The Managing Director will ensure this policy is formally communicated to all employees, contractors and third parties. This will help ensure that there is good communication regarding health and safety within all areas of the organisation and client's sites.

Where any contraventions of health and safety rules are observed, the Managing Director will take immediate action to stop any poor practice. Actions to prevent a reoccurrence will be taken including a full investigation and communication to all persons of the learning points.

The Managing Director is responsible to ensure the Reporting of Incidents, Disease and dangerous Occurrences Regulations are complied with. ASM Ltd will advise and assist if an accident / injury falls under the requirement to report under RIDDOR 2013.

### **General Manager**

The General Manager has day to day responsibility for health and safety across SMR Projects Ltd operations. He is responsible for the implementation of this Policy and shall support the Managing Director in ensuring health, safety and welfare standards are maintained by all employees, contractors and third parties working for SMR Projects Ltd. He will undertake training as required to adequately discharge allocated duties with regards to Health and Safety. He shall monitor staff training plans to help ensure appropriate training including induction, on-going and specific for the works being undertaken is planned and completed.

The General Manager will give clear direction in respect of health and safety matters, especially covering the development of initiatives in connection with the ongoing health and safety improvements initiatives.

The General Manager will support this policy during all communication mediums to all employees, contractors and third parties. This will help ensure that there is good communication regarding the required health and safety standards within all areas of the organisation and client's sites.

This is seen as especially important when there are opportunities to praise and commend high standards of health and safety performance linked to the behavioural safety initiatives. This supports the continuous developing health and safety culture at SMR Projects Ltd.

Where any contraventions of health and safety rules are observed, immediate action will be taken to stop any poor practice. Actions to prevent a reoccurrence will be taken including a full investigation and communication to all persons of the learning points.

The General Manager will support the Managing Director with his responsibility to ensure the Reporting of Incidents, Disease and Dangerous Occurrences Regulations are complied with.

## **Contract Managers**

The Contract Managers are responsible for developing and assisting with improvements for a safe and healthy working environment across all areas of SMR Projects Ltd. They are responsible for the implementation of this Policy during all day-to-day activities on site and will ensure health, safety and welfare standards are maintained by all employees, contractors and third parties working for SMR Projects Ltd. They will ensure competence through structured training programmes and monitor the condition of plant and equipment through inspection and defect reporting systems. The Contract Managers shall ensure adequate information is received regarding matters which affect health and safety and continually promote employee involvement in the health and safety effort.

The Contract Managers shall monitor and support the completion of items from the Health & Safety Improvement Plan and ensure that there is good communication regarding health and safety across all areas of the business. If they observe any contraventions of health and safety rules, they will take immediate action to stop any poor practices, which may include investigation and communication to all affected persons of the learning points.

The Contract Managers will take control of the day-to-day administration of the business in the event of absence/annual leave of the General Manager.

## **Employees**

SMR Projects Ltd values the involvement of all employees and will encourage participation through consultation.

Everyone is expected to take an active role in improving standards by, for example, reporting Near Miss's and hazards, participating in risk assessments, contributing to site meetings or undertaking inspections. It is the responsibility of everyone to comply with and enforce this policy and specific safety procedures applicable to their role. The most significant effect each employee can have on eliminating workplace accidents is by adopting a positive health and safety attitude at all times.

Every employee has both a moral and legal responsibility for their own and their colleagues' health and safety. They should set an example and not walk past unsafe working practices. They should be aware that their acts and omissions could put others at risk and should never take short cuts that compromise safety. They shall adhere to the requirements of this Policy and shall ensure that all necessary procedures and inspection schemes are implemented to guarantee the safe operation of plant / equipment.

## **New Starters**

In addition to the requirements above all new starters will be introduced and inducted with the contents of this policy. This process will run over the induction-training program. Only when both the new starter and SMR Projects Ltd are satisfied that the new starter is conversant with the requirements will he/she move on with specific training etc.

During induction new starters must remain extra vigilant when carrying out all tasks and raise any concern they have with health and safety practices within the work place. Assistance in this way will help us ensure that all new starters are aware of the correct manner in which tasks are to be performed. It will also enable poor practices to be highlighted and actions taken to improve safety.

## **Sub- contractors**

In the event of SMR Projects Ltd employing the services of sub-contractors, it will be expected that they adhere to this policy and formally confirm receipt and understanding of the requirements when working for SMR Projects Ltd. They will be expected to set an example and not walk past any unsafe work practices. They will be expected to participate in all planning, site meeting, and development of risk assessments etc, ensuring high standards are maintained.

## **Arbour Safety Management Ltd (ASM)**

ASM Ltd has been retained by SMR Ltd as their Health & Safety Consultancy. The Consultant is available to support all levels within SMR Projects Ltd in the development of the health and safety culture and helping structure the forward plans. The aim is to influence a continuing reduction in work related accidents and ill health and monitor compliance with this policy, health and safety performance and standards.

ASM will provide a high-quality Health and Safety management resource. One of the main duties is to support the operations when preparing and completing actions arising as part of ongoing health and safety improvements.

## **Arrangements for Health and Safety**

### **Accident / Incident Reporting & Investigation**

All accidents / incidents, including road traffic accidents on the public highway involving injury or property damage on company controlled operations, or injury to employees working away from base locations, must be reported via the standard accident reporting procedure. Near misses shall be reported via the Near Miss/Hazard Alert system.

All accidents and near miss incidents will be thoroughly investigated to establish not only the immediate causes but also the underlying reasons behind each event, thus determining what further precautions are required. All persons who carry out accident / incident investigations will be formally trained in accident reporting, investigation and emergency procedures. ASM Ltd will complete all accident investigations until suitable trained staff are in place. Members of the Monthly Health & Safety Team and their staff will support the investigation process where required. Where the need for further control measures is identified, positive action will be taken as quickly as possible to ensure a recurrence is avoided. In all cases when accidents, incidents or near misses / hazards are reported, dialog and feedback must be given to the person who made the report. ASM Ltd will advise and assist when due to the nature of the accident, incident and / or injury; it needs to be reported to the HSE.

In the event of an accident or incident which falls under the requirement to report under RIDDOR, a responsible person (Managing Director) shall notify, by the quickest practicable means (online at [www.hse.gov](http://www.hse.gov)) the enforcing authorities, with the exception of fatal & specified injuries, which shall be reported by telephone on 0845 300 9923 between the hours of Mon – Friday 08.30 – 17.00. An out of hours reporting system is available for more serious instances by telephoning the HSE Duty Officer.

Records of any accidents, incidents or dangerous occurrence which requires reporting under RIDDOR & any other occupational accident causing injuries that result in a worker being absent from work or incapacitated for more than 7 consecutive days will be documented & maintained. Further details can be found in the HSE leaflet INDG453. Similarly, Near Miss incidents will be documented.

Records of all accidents / incidents and near misses will be produced and where possible statistical information developed to help identify trends and enable additional control measures to be introduced that minimise the risk of further incidents. This information will be reviewed at the Monthly Health & Safety team meetings and posted to suit.

### **Code of Conduct**

It is expected that all staff and contractors project a professional image to clients, potential employees and visitors.

All staff and contractors engaged by SMR Projects Ltd will be trained and acknowledge receipt of the code of conduct. This code will be followed at all times. It details the minimum requirements when working for SMR Projects Ltd.

### **Company Meetings and Reports**

Health and Safety is the first agenda item at all company meetings. This will provide an opportunity to discuss health and safety alongside other business matters, ensuring that policy decisions are made that best suit the business.

All meeting reports shall contain relevant health and safety information to ensure that matters are recorded and communicated throughout the organisation.

### **Compliance with the Construction (Design & Management) Regulations**

SMR Projects Ltd are confident that site H&S procedures and controls are suitable for the activities completed and will meet all general site H&S management requirements. These systems are currently under review to identify any further controls to raise standards further where required.

Prior to any involvement with a contract / site which is being operated within the requirements of a Notifiable CDM project, SMR Projects Ltd will consult with the client and where necessary take advice from ASM to ensure all requirements under the Regulations are complied with.

Where required, specific structured H&S documentation will be produced, which will include clear and concise instructions and guidance to ensure all foreseeable site-specific hazards have effective control measures.

During all stages of the life of any project and associated health and safety documentation, there will be effective consultation and communication with all relevant parties.

Suitable training will be provided for all those staff and contractors who supervise and / or manage contracts for SMR Projects Ltd ensuring they are conversant with the requirements of the CDM Regulations and can effectively discharge their duties to manage such contracts.

## **Consultation with Employees**

It is important that the health and safety interests of all employees are represented. SMR Projects Ltd do not hold formal committee style meeting structure, however does operate an 'Open Door' Policy and all staff have a number of opportunities each month to raise health and safety concerns.

At the start of onsite activities, all relevant employees are expected to participate in site inductions, daily pre-start meetings and pre-job risk assessments. These platforms present an opportunity for positive consultation and assists to clarify health and safety controls have been fully communicated and understood.

SMR Projects Ltd also hold regular toolbox talks with staff where feedback is encouraged.

## **Control of Contractors**

If workloads require extra resource, contractors may be used. To ensure all contractors operate to both legal and SMR Projects Ltd standards an approved List of contractors would be maintained. Contractors are only included on the approved list when they have provided sufficient information demonstrating their competence, their works meet expected standards and staff act in a safe manner.

The information requested includes proof of any relevant insurance, staff competence, previous risk assessments etc. Information used to justify inclusion on the list is retained and formally reviewed at least annually. The Managing Director is responsible for assessing competence of sub contractors and the final acceptance on to the approved list is made by Mike Finch with assistance from ASM as required.

If a contractor were to fail to demonstrate safe working practices, they shall be withdrawn from the approved list and their services no longer employed until they can formally guarantee safe working practices.

Before starting work, contractors will receive an appropriate period of induction to ensure that all relevant health and safety requirements are addressed.

## **Control of Substances Hazardous to Health**

SMR Projects Ltd acknowledges its obligations to control exposure to hazardous substances and prevent ill health by complying with the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

The Company maintains a register and Material Data Sheets of all hazardous substances used during any work process.

The Managing Director is responsible for identifying all substances which require a COSHH assessment. All harmful substances used in the operations undertaken by SMR Projects Ltd are subject to a COSHH assessment, prior to their use, and the assessment is reviewed by those who handle/use the substances, under the guidance of The Managing Director, and following full instruction and training.

The assessment process shall take into consideration storage, handling, usage, exposure, PPE requirements, employees health and emergency procedures. Wherever possible, harmful substances are replaced by alternative less harmful, inert products. All employees shall receive information, instruction, training and supervision and the precautions required when handling potentially harmful substances. If it is necessary for employees to wear PPE, full instruction in its use shall be given (See separate section covering PPE within this Policy)

The register, along with Data sheets are held at Head Office.

## **Display Screen Equipment (DSE)**

SMR Projects Ltd acknowledges its obligations under the Health and Safety (Display Screen Equipment) Regulations 1992 (amended 2002) to assess employees workstations and reduce risks associated with DSE use. It is the Company's intention to provide a safe and healthy working environment for employees, including particular measures to protect their health and safety when they are working with DSE. The Company will fulfil its obligations by undertaking the assessment of work stations, the provision of suitable work equipment, the provision of information, instruction and training for users of such equipment, the provision of eye and eyesight testing for users, and the provision of spectacles (where these are required solely and specifically for DSE work) & making arrangements for regular breaks for employees working with DSE

## **Drugs, Alcohol & Smoking**

All employees will be made aware of the content of the Alcohol & Drug Abuse Policy. The Policy is designed to promote a culture in which drug and alcohol abuse is eliminated, thus ensuring the safe and efficient running of the business and reducing the risk to the health and safety of employees or third parties. Similarly, all employees shall be made aware of the Smoke-free Policy. SMR Projects Ltd does not permit smoking on company premises, in company vehicles or on client premises.

## **Emergency Procedures & First Aid**

Risk assessments consider the potential emergency situations and are used to determine the range and extent of emergency plans required. SMR Projects Ltd Emergency Procedure is in place and covers the arrangements for emergencies at head office, on vehicles and during site work. The Emergency procedure is designed to assist people in responding quickly and efficiently should any serious incident occur. The risk assessments and plans shall be used to determine the requirements for emergency drills and specific training.

Appropriate first aid provision shall be in place at all times. First Aid boxes are located at Head Office, on company vehicles and on site, during contracts. The contents of the first aid boxes are checked and replenished, if necessary, each month, or following use.

First aid provisions on site are considered during the tendering process and are dependant on the hazards connected to the contract, its duration and its location to emergency services. First Aid provision is communicated through the general notice board, site inductions and meetings.

All company vehicles carry first aid boxes. Drivers are responsible to check and replenish stock of the contents of the first aid boxes and this is recorded on the daily vehicle inspections document linked to the scheme of inspection.

## **Fire Prevention**

The Managing Director is responsible to ensure evacuation arrangements are in place and tested at Head Office, and that all employees are instructed in the evacuation procedure.

A Fire Risk Assessment has been undertaken and details the actions to be taken in the event of a fire. The Fire Action Notice is posted & made known to all employees. All employees shall receive information and instruction, on induction, in the procedure.

The scheme of inspection includes the inspection and test arrangements connected to the fire risk assessment. This gives more detailed responsibility for each inspection element.

Through the risk assessment process a generic fire risk assessment has been completed which details general fire prevention for any hot work activities. All relevant employees have been trained / involved in the risk assessment and during periods of hot work employees and contractors shall comply with the preventative measures contained on the hot work check list at all times.

## **Health Care and Monitoring**

The company may operate a health care programme in the future if it is required. Currently a health questionnaire is completed by all new employees prior to them commencing work. The questionnaires are reviewed to ensure the new employees general state of health does not put their safety at risk, or put others in danger.

All employees shall be made aware of the Drugs & Alcohol Policy (see above).

In line with the scheme of inspection process, equipment which could create a potential of harm to health shall be inspected and reviewed in line with the manufactures recommendations and statutory requirements. This shall include health concerns related to noise, dust, fumes and vibration. If required, engineering methods shall be implemented to reduce levels below statutory limits where possible. Where levels still pose a risk to health, warning signs will be posted, job rotation implemented if practicable and personal protective equipment will be issued and its use enforced to protect any person using the machinery and/or persons in the vicinity from harm.

During the replacement of any machinery and tools both the noise energy and vibration levels will be considered during the purchasing process. This will help reduce levels for future purchases and limit exposure to employees, contractors and third parties.

## **Health and Safety Information**

Health & Safety information is circulated to all employees, as required. ASM will ensure suitable items are brought to the company's attention, with any relevant advice included. This service will also include relevant information covering new health and safety legislation. The Managing Director, Office Manager & Supervisors shall ensure that all relevant health and safety information is cascaded to employees and where required formal confirmation of understanding will be obtained.

The Managing Director, in conjunction with ASM, will ensure the information contained within the information files held within each company vehicle is kept up to date, with reissues circulated as and when required. All employees will be formally issued with the file and training shall be given to ensure full understanding is achieved to help them understand and discharge their responsibilities under relevant legislation.

## **Home Working**

A home worker is anyone who is employed to work at home for SMR Projects Ltd. All home working activities will be considered and assessed, by the employee completing the 'Homeworking Self-Assessment Checklist'. This will then be used by a Senior Manager to ensure that working conditions at home comply with best practice. If there is little or no risk to the employee (or others within the home) no action will be required. However, if the assessment highlights the need for further action, SMR Projects Ltd will improve controls to reduce any risks as far as reasonably practicable.

## **Inspections, Monitoring, Audits and Defect Reporting**

A framework of maintenance and inspection schemes, to monitor health and safety standards and promote preventative maintenance, has been implemented. The extent of the schemes depends upon the hazards / level of risk and statutory requirements e.g. Provision and Use of Work Equipment Regulations. The scheme includes any statutory inspections and covers a variety of areas. (Electrical Wiring, Fire Extinguishers, Portable Appliance Testing, Ladder Inspections, Vehicle Inspections, Site Inspections, Machinery and hand held tools etc.) The exact scope and frequency of inspections is determined and documented in the formal written scheme.

The scheme is reviewed periodically to ensure that all items remain comprehensive and effective. Inspections are carried out by people who are competent by virtue of their training and experience. Records are kept detailing items listed on the various registers and frequency of inspection, together with plans for any remedial work to be carried out

The company is committed to a system of inspections, monitoring and reviews. SMR Projects Ltd shall undertake formal inspections of operations. These will be planned and unannounced, to ensure safe working practices are being adhered to and to identify any poor practices and implement improvements where required. Inspections will also present an opportunity to praise and promote safe working to encourage high health and safety standards.

ASM Ltd shall undertake spot inspections, if requested. A detailed report shall be completed following each visit with actions monitored through SMR Projects Ltd management structure.

## Management of Asbestos

SMR Projects Ltd is not a licensed remover of asbestos but considers themselves competent to identify potential substances which may contain asbestos. If such material is found and is within the work area the work will be suspended until the actual make up of the material is known and any relevant precautions are implemented. Ideally the Client will have completed an asbestos survey and have a management plan identifying asbestos within the premises / work area. The plan will be consulted before works commence. If asbestos is to be removed this will only be completed by a licensed asbestos remover. The pre job assessment includes an item for the identification of material containing asbestos, acting as a back stop for the identification of suspect substances.

Training is given to all relevant employees to assist with the identification for materials containing asbestos and refresher training is completed annually.

## Manual Handling

The Manual Handling Operations Regulations 1992 require the company to:

1. **AVOID** manual handling operations so far as is reasonably practicable.
2. **ASSESS** the risks from any hazardous manual handling that cannot be avoided.
3. **REDUCE** the risk of injury from hazardous manual handling, so far as is reasonably practical, by the introduction of control measures.

The Managing Director is responsible for identifying manual handling operations and assessing all significant risks to employees. Measures are implemented to eliminate manual handling operations where practicable and any remaining risks are reduced to their lowest level, by the introduction of control measures. These include; reducing weights, reducing the frequency of handling loads, increasing the numbers of employees to handle loads, automating or mechanising the activity and by the selection of appropriate persons to carry out the activity, appropriate employees are those who have received appropriate training, are competent and possess the physical attributes in terms of age, physique and health to undertake the task.

All employees shall receive information, instruction, training and supervision in manual handling tasks. The training shall cover the requirement of employees to consider the TILE approach to assessing risks associated with manual handling activities.

- **TASK** (eg. Repetitive handling, moving loads to/from different levels etc)
- **INDIVIDUAL** (eg. age, gender, physical capability, existing medical conditions, level of training etc),
- **LOAD** (eg. Size, shape, bulky, stable etc),
- **ENVIRONMENT** (eg. Floor surface, cramped conditions, housekeeping, route etc) Training shall also include avoiding moving heavy loads manually, and also cover kinetic lifting techniques (i.e. using the body's natural movements to the advantage of manual handling operations) and the use of appropriate PPE.

Prior to moving any load, SMR Projects Ltd expects that all employees carry out a Manual Handling Assessment of the risks to themselves & others, from manual handling of loads. They are expected to:-

- a) Avoid hazardous manual handling operations so far as is reasonably practicable (this may be to automate or mechanise the activity)
- b) Assess any hazardous manual handling operations that cannot be avoided
- c) Reduce the risk of injury so far as is reasonably practicable by the introduction of control measures.

## Permit to work

Some work activities involve significant risks and therefore a greater degree of management control is required. To ensure high standards of health and safety are maintained during specific high risk activities, a Permits to Work will be completed involving all relevant employees and if required reference will be made to associated method statements and risk assessments. SMR Projects Ltd Permit to Work form will be completed prior to work commencing. Those who are involved with the issue of permits will have completed suitable training to ensure the process is fully completed.

## Personal Protective Equipment (PPE)

The Company acknowledges its obligations under the Personal Protective Equipment at Work Regulations 1992 and seeks to ensure that where the risks cannot be controlled by other means, personal protective equipment (PPE) is correctly selected and used.

All necessary protective equipment is supplied, and its use enforced. A core list of standard PPE has been developed from employee consultation to endeavour to provide the best possible and most suitable equipment for the hazards connected to SMR Projects Ltd operations. During the assessment and selection of PPE consideration is given to the engineering measures to negate the need for PPE, where this is not possible training in use, maintenance procedures, storage arrangements and the replacement procedure for damaged and/or worn equipment is clearly explained.

Records of PPE issue along with training, maintenance, storage and replacement are maintained.

## Planning for Improvement

Health and safety planning is critical in improving standards / business performance and driving down accident rates. A formal Health and Safety Improvement Plan / Action List is in place and is reviewed on a monthly basis, to ensure forward planning and continual improvement.

The Managing Director is responsible for ensuring that the items on the plan / Action list are adequately resourced and shall monitor progress on a monthly basis. ASM will monitor performance and assist in the completion of the plans actions when required.

Items listed on the health and safety improvement plan arise from risk assessments, audits, inspections, near miss reporting, etc. The plan includes clear objectives, targets and aims to minimise hazards, control risks and reduce accident rates on an ongoing basis. New statutory requirements will be considered during the planning process.

## Risk Assessments

The company understands that the most important tool in managing health and safety is risk assessment and follows the 5 stage approach to managing risk:

1. Identify the hazards.
2. Identify who could be harmed and how.
3. Evaluate the risk.
4. Record significant findings.
5. Monitor & review the risk assessment.

All levels of employee within the business, including sub-contractors, will be involved in the risk assessment process, covering all relevant activities. Assessments cover all generic and contract specific hazards with associated risks identified and subsequent control measures being suitable and sufficient. All employees will receive training in hazard identification and risk assessment. The assessment process will include the review of all relevant statutory requirements, i.e. Noise, Vibration, Asbestos, Working at Height, Manual Handling etc. Where required, ASM will assist in the process.

The company operates a CoSHH assessment process linked to the general risk assessments. As part of this process there is a list of substances held along with manufacturer data sheets. This information is converted into assessments which are reviewed by all persons who handle / use the substances.

Completed risk assessment forms, including significant findings, will be brought to the attention of all relevant people, through discussions at health and safety meetings, by posting on site notice boards and by the generation of pre-job risk assessments, which are completed for all contracts. Prior to any new contract commencing the generic assessments will be reviewed and where required specific assessments created. This process forms part of the Pre-Job Risk Assessment process. If the conditions and work practices are covered and controlled by the measures within the generic assessments, the job can commence. If other hazards are present, the job will not commence until the hazards are controlled to an acceptable level.

It should be noted that generic risk assessments are a 'blue print' of expected standards but are not prescriptive and a Pre-Job Risk Assessment will always be completed prior to every contract commencing.

Similarly, Method Statements provide the stages of the work and general safety principles to be applied when undertaking a specific task and will be supported by risk assessments that must be relevant to the site and activities being undertaken. Prior to all work activities, the method of work and the findings of associated risk assessments will be communicated to all those involved in and, where applicable, who may be affected by the works and a formal confirmation of understanding will be completed.

Risk assessments shall be reviewed if there is any reason to suspect that the original assessment is no longer valid, such as a change in process, staff, working conditions, for a new contract etc, or following an accident or reported near miss / hazard. In addition, they shall be formally reviewed at least once every 12 months. All persons involved in the risk assessment process will formally confirm their involvement on the individual assessment sheets.

## **Safe Systems of Work (SSOW) and Procedures for operation**

SSOW and Procedures covering key hazard areas will be developed if required. They will be compiled following full consultation, involving all relevant staff and identify the expected performance requirements when working for SMR Projects Ltd. Confirmation of involvement will be recorded on each document.

## **Statutory Duties & Inspections**

SMR Projects Ltd shall comply with all relevant statutory duties and inspections. The full list of requirements shall be established following consultation with ASM Ltd. A Scheme of Inspection is in place to ensure maximum time periods for inspections are not exceeded and that items identified from inspections are closed out and signed off. All staff have access to this scheme and training is given, if required, to those who have responsibility to complete inspections listed on the scheme.

## **Stress Management**

Stress management is a key concern within industry. It is SMR Projects Ltd intention not to create work patterns that have the potential to create stressful circumstances. If, however situations arise which cause an employee concern, e.g. pressures of work, contact with clients, home life issues etc, this should be discussed with Mike Finch. All instances will be treated with the utmost confidentiality and assistance will be given where required.

## **Structural Stability**

Prior to any work on smaller contracts (Non CDM) that could affect the structural stability of the building or area to be worked on, a structural review will be conducted and any remedial actions taken to ensure the integrity of the structure is maintained both during and following the completion of the task.

## **Training**

**On Induction** - All new employees shall receive a copy of the company's Employee Handbook and safety training to ensure safe methods of working are adopted at all times. Training will commence on day one and will consist of a formal written programme that considers the individual needs of the employee and the specific job role.

The duration of the induction training programme will vary dependent on the individual and the complexity of the tasks. The duration will be sufficient to ensure that the employee or others are not put at risk. In particular, specific requirements shall be put in place if young / inexperienced employees are recruited.

After a predetermined period, the induction shall be formally reviewed and assessed, to ensure full understanding of procedures and areas/items discussed.

**Ongoing Training** - Training needs for all personnel is formally identified on an individual training matrix and reviewed on an annual basis. Training and development programmes will help ensure that all employees are competent for their job role. Up to date training records shall be kept which shall also include details of National Vocational Qualifications, CSCS, and other competency based assessments as required.

**Specific Training** - Where required specific training will be given along with a period of assessment to ensure competence, i.e. first aid, etc. Only when employees have successfully completed the program will they be deemed competent and certificated accordingly.

## Transport, Driving & Mobile Phones

SMR Projects Ltd provides both Company vehicles and Pool vehicles. All persons who are entitled to use either of these vehicles will be made aware of the Company Vehicle Policy and are expected to comply fully with the policy requirements.

All employees who drive vehicles on behalf of the company must hold a current full driving licence, which must be produced for periodic check by the finance / administration department.

To ensure Pool vehicles are in a road worthy condition and all essential equipment is being carried, vehicle inspections will be completed.

Mobile phones must not be used whilst driving any SMR Projects Ltd vehicle whether answering / making calls, text messaging etc. Employees can only receive calls when using an approved hand free system and then conversations must be kept to a minimum. People making calls to mobile phones are responsible for encouraging compliance with these standards by checking in the first instance that it is safe for the driver to receive the call. This prohibited use of mobile phones also extends while operating any hazardous equipment or machinery.

## Welfare

In accordance with the requirements of the Workplace (Health, Safety and Welfare) Regulations, the company will endeavour to provide workplaces with adequate provision for ventilation, temperature, lighting, sanitary conveniences and washing facilities. Welfare facilities are provided at Head Office.

Arrangements shall be made, prior to on-site activities, to secure adequate welfare facilities. These are generally provided by prior arrangement with the Client. It is expected that these facilities will be maintained in a clean and tidy condition, although it is everybody's responsibility to aid the cleaning process by not leaving areas in a condition, they would not expect themselves. All company vehicles contain anti-bacterial hand wipes, cleaners & creams.

Part of the pre-job risk assessment covers the provision of welfare cover and it is SMR Projects Ltd intention to arrange suitable cover from the outset of every contract.

## Working at Height

The Company recognises its obligations under the Work at Height Regulations 2005, to ensure that all work at height is performed safely.

If work cannot be carried out safely from ground level then suitable access equipment will be utilised. All work to be carried out at height will be in full compliance with the relevant method statements / risk assessments and in line with best practice, limiting injury from falls. Training shall be completed for all employees using access equipment prior to the respective employee using the equipment, i.e. IPAF. The following seven steps will be followed during surveys and pre-job assessments where working at height cannot be avoided.

### Safe Work at Height - seven steps

1. Assess the risk and decide how to work safely.
2. Follow the hierarchy for safe work at height
  - (i) **Avoid** (e.g. design out the need to work at height; clean high windows from the ground using extending poles)
  - (ii) **Prevent** by using an existing place of work at height (e.g. a permanent structure such as a flat roof or gantry with fixed guard rails and safe means of access/egress; a tanker roof with fixed edge protection)
  - (iii) **Mitigate** by minimising the distance and consequences of a fall.
  - (iv) **Give priority to collective protective measures** which protect more than one person (e.g. tower scaffolds, Mobile Elevating Work Platforms)
  - (v) **Prevent the risk of falls using personal work equipment** (e.g. work restraint Systems which make it impossible to get to a fall position shall be given priority over fall arrest systems which do not prevent a fall but minimise the consequences)

3. Plan and organise work properly, taking account of weather conditions and the possibility of emergencies.
4. Ensure the competence of those working at height, including those planning and managing activities involving work at height.
5. Select and make use of appropriate work equipment.
6. Manage all risks associated with work at height including risks from working on or around fragile surfaces and from falling objects.
7. Inspection and maintenance of the work equipment to be used and inspection of the place where the work will be carried out (including access and egress routes).

## Work Equipment

All work equipment used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations 1998, the Electricity at Work Regulations 1989, The Lifting Operations and Lifting Equipment Regulations 1998 and other relevant legislation.

Before new equipment is introduced into the working environment, an assessment will be made by the Managing Director along with the staff using the equipment in order to ascertain that the equipment is suitable for its intended use.

The Managing Director will ensure that proper maintenance and inspection of all work equipment is conducted and recorded in line with the scheme of Inspection. Furthermore, The Managing Director will ensure that no employee will use work equipment until they have received specific training. Training shall include the instruction that any guarded equipment shall not be used without the guards being in place, that pre-use checks shall be performed on all portable electrical equipment and no employee will knowingly misuse any work equipment.

All work equipment shall be maintained and inspected at suitable intervals, internally by a competent person as detailed with the scheme of inspection. All inspections will be formally recorded in line with the schemes requirements.

The Managing Director shall ensure that all Portable electrical equipment is suitable for the task to be performed, is inspected and tested by a competent person and documentation is maintained. Details are recorded in line with the scheme of Inspection.

If any faults or damage is found on any equipment, the equipment shall be immediately withdrawn from service, labelled as faulty and the fault reported to a Supervisor.

## Closing Statement

**Everyone within SMR Projects Ltd and its Sub-Contractors are responsible for helping to achieve the aims and standards within this Policy and together must ensure zero tolerance of any practice that could result in accidents and ill health. Please remember that we are not expected to put ourselves at risk and that the requirement to work safely is a condition of employment.**

**There is no reason for working in an unsafe manner and we must remember our moral obligation to our families and each other.**