



Safety, Health & Environmental Policy

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Document Control

This policy is a controlled document. Only the current document shall be used. Check with the document controller to ensure that you have the latest issue.

Issue Date and Issue Number is information to help us to ensure that we are using the current document.

The Version Number is for use by our Safety, Health & Environmental Advisor only.

Updates will be issued from time to time by the Safety, Health & Environmental Advisor or by the company. Any changes having a significant effect on safety, health or environmental will be communicated to the relevant people.

Following a new issue, any printed copies shall be destroyed but one copy of the superseded document shall be archived and stored for a minimum of three years.

When customers of the Company or other third parties request copies, these will be 'uncontrolled' copies and shall be so marked. Uncontrolled copies will not be kept up to date.

Revision Record Sheet

<u>Issue Date</u>	<u>Version Number</u>	<u>Description Change</u>	<u>Approved by</u>
<u>Jan 2016</u>	<u>001</u>	<u>New Policy</u>	<u>NT / MM</u>

Health & Safety Policy Statement

It is our policy at Eligo Edge Protection to provide and maintain safe and healthy working conditions, equipment and safe systems of work for all our employees and others who may be affected by our activities as far as reasonably practicable.

We will provide such information, training and supervision that may be needed for this purpose.

We fully accept our responsibility as outline in the Health and Safety at Work etc. Act 1974 and Regulations made under the Act, and this document outline the organisation and arrangements for meeting these responsibilities.

We further recognise that these legal requirements represent the minimum level of achievement and Eligo will strive to ensure that standards are reached which represent industry best practice.

As Director I recognise that I have overall responsibility for health and safety on site and in our offices. On a day-to day basis the Operations Manager and Contracts Manager will be responsible for the site health and safety and are responsible for ensuring that this policy and the findings of the risk assessments and method statements are implemented.

Training will be provided as required to maintain the requisite level of competency.

Where required expert advice will be sought.

Health and safety objectives are equally as important as other business objectives and targets will be set to ensure progressive improvements in health and safety performance. Our main objective is zero harm to employees, contractors and others. We will also strive to ensure full compliance with health and safety legislation as far as reasonably practicable.

Sufficient resources will be made available to achieve our health and safety objectives.

All Employees will be informed and consulted regarding our legal duties, their personal duties to themselves and others and managerial and supervisory duties. Employees will be encouraged to participate in the making of policy as well as the implementation of procedures.

Employees will be required as a condition of employment to observe safe working practices and co-operate with management in carrying out this policy.

This policy will be reviewed at least annually by the Directors and updated as necessary and any revisions will be communicated to those affected by the changes.

.....
Michael Morley (Director)

Eligo Edge Protection

Date: 1st January 2016

Review Date: 1st January 2017

Environmental Statement of Intent

Policy

Eligo Edge Protection are committed to the protection of the environment and promotion of sustainable development. We endeavour to minimise the environmental impact of our business and activities and to influence those we work with to bring about positive environmental benefit at a local and a nation level.

As an organisation we will:

- Endeavour to prevent pollution, reduce waste, encourage recycling, reduce energy consumption, reduce noise pollution and reduce the use of non-renewables throughout business process.
- Monitor and examine our environmental performance and implement continuous improvement.
- Meet the requirements of all relevant environmental legislation.

Within the organisation we will:

- Provide training and encouragement to our employees.
- Develop environmentally responsible behaviour and awareness.
- Properly maintain plant and equipment.
- Provide suitable plant and equipment for the task in hand.
- Employ appropriate and Safe Systems of Working.
- Adopt suitable arrangements for the use, handling, storage and transportation of articles, materials and substances.
- Provide adequate information, training, instruction and supervision.
- Ensure effective monitoring of Environmental Standards

All of our staff are responsible for the implementation of this policy both by the way that they carry out their day-to-day activities and by the way that they reach technical and practical solutions.

This policy will be reviewed at least annually by the Directors and updated as necessary and any revisions will be communicated to those affected by the changes.

.....
Michael Morley (Director)

Eligo Edge Protection

Date: 1st January 2016

Review Date: 1st January 2017

Organisation and Responsibility

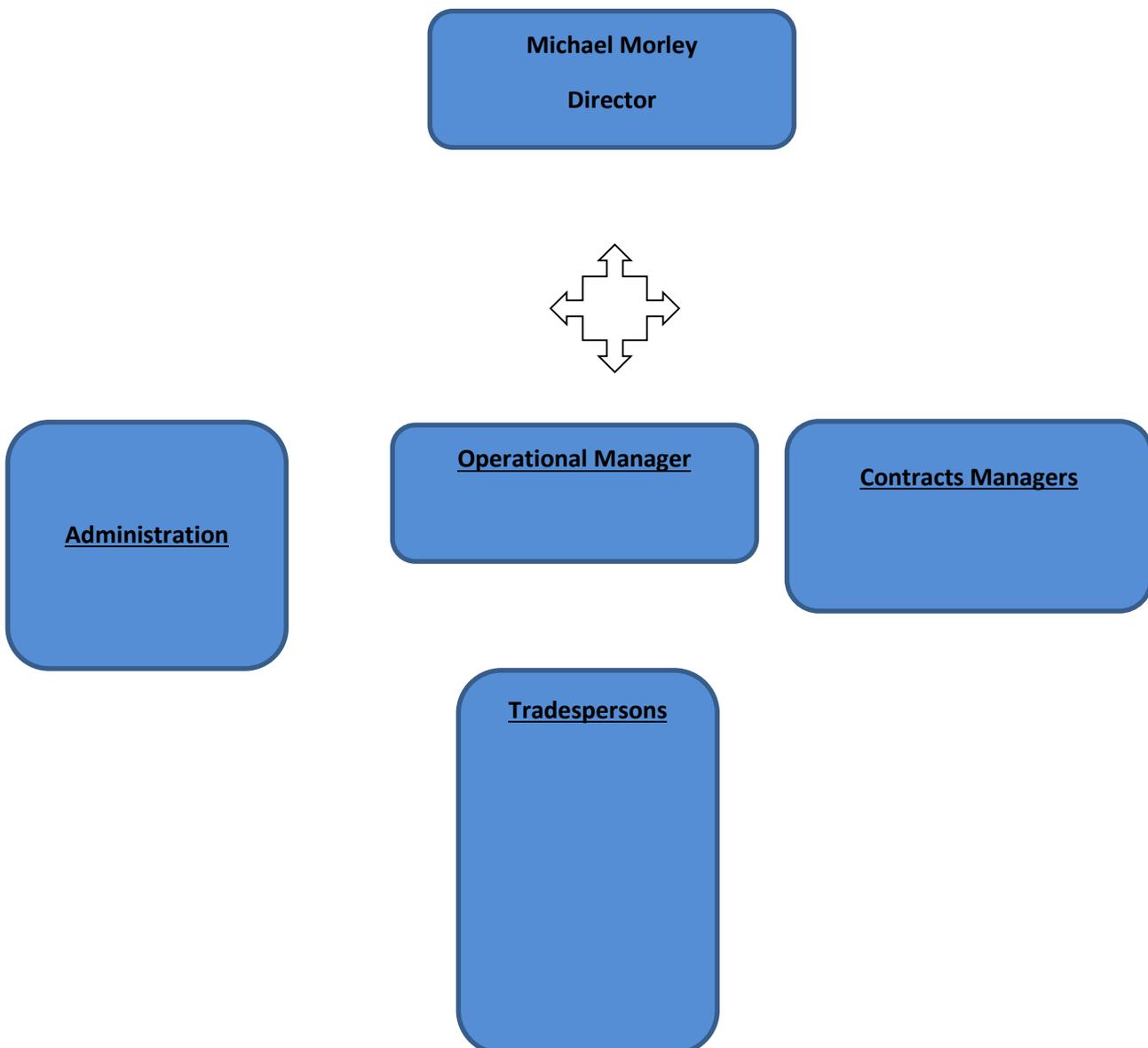
Michael Morley has overall responsibility for safety, health and environmental but expects all managers, supervisors and employees to ensure that this policy is implemented within their departments as applicable.

Michael Morley will ensure that there are arrangements in place to document the annual safety, health and environmental improvement plan, set target for achieving the core and specific objectives and publish the information to employees.

Scope

This policy applies to the whole organisation, at all sites and covers all of our activities.

Structure



Employees' Duties

Employees have a duty¹ to take reasonable care for the safety of themselves and others persons who may foreseeably be affected by their acts or omissions at work.

Employees must co-operate with the management team to enable the company to perform and comply with any statutory duties.

Employees must not intentionally or recklessly interfere with or misuse anything that has been provided for the purpose of health and safety. Failure to comply with this policy may lead to disciplinary action up to and including dismissal.

Employees must only use machinery, equipment, substances etc. as instructed or trained.

Employees must report any work situation or deficiencies in control measures, which could lead to serious and imminent danger to health, safety and the environment to a member of the management team.

Each employee is personally responsible for making their manager aware of any injury, illness or disability which could affect their own safety or well-being or the safety or well-being of others.

Consultation with employees

Company employees will be involved in the development of risk controls and consulted before any significant changes are introduced which could affect their health or safety.

Health and safety will be included in all formal team meetings/briefings as a standing agenda item.

If any employee wishes to discuss a health, safety or environmental matter they may bring it to the attention of the responsible person or their immediate manager.

Where English is not an Employee first language, arrangements will be made for translation (either verbal or written) to their native tongue. Any such translations will be externally verified as accurate.

Access to Competent Advice

Eligo has appointed Nationwide Independent Consultancy Services Ltd (further referred to as N.I.C.S.) as the source for competent advice and they will be responsible for advising on:

- All matters of health, safety and environmental
- Training and competency needs
- The carrying out of risk assessments
- Inspections and audits and advising on improvements where necessary
- Changes to legislation as applicable

N.I.C.S. subscribe to recognised sources of safety, health and environmental information (HSE, Barbour, IOSH, and Construction News) to ensure that regular updates are available on legislation, standards and guidance and these are either passed on or made available to all managers/employees.

All employees have access to the Safety, Health and Environmental Policy and will be provided with information and risk controls arising from the risk assessments.

¹ Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999 as amended.

Monitoring auditing and review

Policy

We will carry out regular monitoring, auditing and review of the safety, health and environmental management system to ensure ongoing statutory compliance and continual improvement.

Arrangements

The Responsible Person will:

1. Review the Safety, Health and Environmental Policy annually as a minimum
2. Review risk assessments regularly and at least annually
3. Monitor accident data for trends and indicators
4. Ensure that regular inspections are carried out of the workplace and activities
5. Seek feedback from employees and safety representatives

General Arrangements for Managing the Safety, Health and Environment

Accident/Incident reporting, recording and investigation

Policy

An incident is defined as 'a work related event(s) in which an injury or ill health or fatality occurred or could have occurred'.

Notes:

- *An accident is an incident which has given rise to injury or ill health or fatality*
- *An incident where no injury, ill health or fatality occurs may be referred to as a near miss or near hit.*

All incidents involving employees, contractors, visitors and member of the public must be reported, recorded and investigated.

The report must be made as soon as possible after the accident, preferably on the same day and an entry made in the Accident Book and/or Incident Report Form.

Some accidents must be reported to the Health and Safety Executive as required by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations (RIDDOR). Information regarding what is and is not reportable can be found on the HSE website www.hse.gov.uk for details.

Where applicable, the Responsible Person will complete the relevant form F2508 using the on-line reporting procedure at www.riddor.gov.uk, a telephone service is also provided for reporting fatal and specified injuries **only** - call the RIDDOR Incident Contact Centre is 0345 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

Arrangements

The Responsible Person will ensure that there are adequate numbers of competent people to respond to an incident and to complete reports and investigations.

The Responsible Person on being notified or becoming aware of an incident will:

1. Report to the scene and ensure that first aid and other emergency actions have been carried out if applicable.
2. Freeze the scene as much as possible to retain evidence.
3. Make a note of any witnesses or people in the vicinity.
4. Raise and Accident/Incident Report and capture as much information as possible of the injured person, equipment, conditions etc.
5. Carry out an accident/incident investigation.
6. Identify the cause(s) of the incident and take action to ensure that there will not be a reoccurrence as far as reasonably practicable.
7. Review the risk assessment if applicable.

Alcohol and drugs

Policy

The use of alcoholic beverages and/or drugs is absolutely prohibited on company premises or whilst working on premises/properties that are under the management of Eligo by any employee unless it has been authorised for special company events.

No employee on or off duty is permitted to drive or operate any company vehicle, equipment or machinery after consuming any alcoholic beverages, any drugs or prescribed drugs which impair driving or operating ability.

Any employee identified using alcohol or drugs on company property or premises/properties managed by the company will be dismissed immediately and without consultation.

We will provide employees with information on sensible drinking and drug awareness. The aim is to encourage those with drug or alcohol related problems to seek medical advice and counselling by an outside agency.

Any employee suspected of having consumed alcohol or drugs on duty may be subject to a test and if found positive will be dismissed immediately.

An employee should not permit any person who is, or appears to be, intoxicated or under the influence of drugs to enter or remain in the workplace or on the premise where machinery is used, if that person's presence constitutes a threat to the safety of themselves or other person in the workplace.

Asbestos at Work

Policy

We recognise that we have a duty under the Control of Asbestos Regulation to protect employees, contractors and visitors from exposure to asbestos fibres.

Where employees or any person working on our behalf has reason to work on asbestos containing materials (ACMs) or suspected ACMs, whether on our premises or at a premises/property under the management of the company, then we will ensure that they have been properly trained, on asbestos awareness as a minimum and that they have access to the asbestos management plan before any work starts so as to avoid the likelihood of exposure or inadvertent exposures.

Arrangements

The Responsible Person will:

1. Ensure that all our non-domestic premises have asbestos risk assessments and asbestos management plans in place.
2. Ensure that a copy of the asbestos assessment and asbestos management plan is kept at reception or some other easily accessible place and all contractors sign as having read and understood it before carrying out any work on the premises that may lead to the disturbance of ACMs.
3. Ensure that additional training is provided where the need is identified by risk assessments.
4. Ensure that when working a premises/property being managed by the company that an appropriate risk assessment has been undertaken of potential ACMs have been identified.

Control of Contractors

Policy

We recognise our general duty under the Management of Health and Safety at Work Regulations (MHSW) and additional duties as defined in the Construction Design Management (CDM) Regulations to ensure that contractors carrying out any work on our sites are skilled, knowledgeable, trained and experienced and that they carry out the work safely. The Responsible Person will ensure that all contractors are subject to checks on their competency to carry out the work safely and will monitor their working methods to ensure they follow a safe system of work or method statement.

When engaging contractors, we will give preference to those with CHAS accreditation or any similar accreditation recognised under the SSIP (Safe Systems in Procurement) scheme.

Arrangements

The Responsible Person will:

1. Identify all regular contractors who carry out work on site.
2. Send contractors a copy of the contractor's appraisal questionnaire for them to complete.
3. Review and assess the returned questionnaire.
4. Request risk assessments and method statements for work to be carried out.
5. Monitor the activities of contractors on site to ensure they work safely.
6. Review the approved contractors annually.

Display Screen Equipment

Policy

We recognise that the risks posed by computer workstations and similar devices must be managed and that we have duties under the Health and Safety (Display Screen Equipment) (DSE) Regulations.

We will ensure that all workstation users and their workstations as defined in the DSE Regulations are subject to risk assessments. Where required we will make suitable adjustments to those workstations to ensure users safety as far as reasonably practicable.

We will provide on request free eye tests to those employees assessed as a user.

Arrangements

The Responsible Person will:

1. Identify all employees with a workstation.
2. Assess if they are a DSE 'user'. See N.I.C.S. Guide to Display Screen Equipment for details.
3. Provide all users with a DSE self-assessment form for completion.
4. Ensure that a competent DSE Assessor carries out a workstation assessment for each user taking into account the results of the self-assessment.
5. Ensure that any actions arising out of the assessment are discussed with the user and their manager.
6. Ensure that the assessment is reviewed annually or following any significant changes, for example change of equipment or furniture and health related problems.

Driving for Work

Policy

We recognise that driving associated with work activities exposes employees to risks and that those risks should be assessed and managed along with all other work-related risks.

The Responsible Person will ensure that systems are in place for assessing work-related driving risks and that those systems follow the guidelines from the Department for Transport, see Guide to Driving for further information.

Where identified by the assessment, information, instruction and training will be provided to Company employees.

Arrangements

The Responsible Person will:

1. Identify all drivers that drive on company business or drive company vehicles.
2. Ensure that all drivers have the correct licence and where applicable medical, insurance and MOT documents.
3. Ensure that they have been issued with a driver's handbook and/or other relevant information.
4. Ensure that all drivers are aware that it is both illegal and unsafe to use a mobile phone whilst driving.
5. Ensure that drivers are aware of the procedure for dealing with emergencies such as breaking down on the motorway and dealing with a flat tyre.
6. Ensure that each vehicle has adequate emergency equipment and tools where necessary.

Electrical Safety

Policy

We recognise that poorly designed and maintained electrical equipment and systems pose a significant risk to employees and other users. We will ensure therefore that the risks from electrical equipment are included in the task risk assessments as applicable.

We will ensure that all portable and transportable electrical equipment is subject to periodic inspection and examination as required by the Electricity at Work Regulations and taking into account the finding of the risk assessment.

We will carry out regular inspections of the workplace and working practices to ensure that the risks from electricity are controlled.

We will ensure that the fixed electrical installation for all Company premises is subject to periodic inspections and test to BS7671 by a competent person.

All employees who are expected to work on electrical equipment will be suitably trained and deemed competent. Where work on mains voltage is required this will be carried out by a competent (17th Edition Trained) person.

Cont'd

Arrangements

The Responsible Person will:

1. Identify all portable and transportable electrical equipment and create an inventory of type and location.
2. Ensure that users are aware of the duty to carry out before-use checks and have the information to carry this out.
3. Ensure that formal visual inspections are carried out and recorded as part of the general workplace inspection procedure.
4. Ensure that a combined inspection and test (PAT Test) is carried out by a competent person at the frequency identified in the relevant risk assessments.
5. Ensure that records of all inspections and tests are maintained.
6. Arrange for damaged equipment to be quarantined and repaired.
7. Ensure that the fixed electrical installation for all Company properties is subject to periodic inspections and test to BS7671 by a competent person and records kept.

Fire Safety Management

Policy

We recognise the risks posed by fire and our responsibility under the Regulatory Reform (Fire Safety) Order to carry out fire risk assessments.

We will ensure that fire risk assessments are carried out on all non-domestic premises owned, occupied or controlled by us. This assessment will identify the requirements for any additional assessments required by DSEAR (Dangerous Substances and Explosive Atmospheres Regulations).

The Company will appoint adequate number of trained personnel to provide support and leadership in the event of a fire or similar emergency.

The Responsible Person will ensure that the findings of the risk assessment are acted upon and that any fire safety management systems are inspected and maintained as required and recorded in the Fire Log Book or similar.

Arrangements

The Responsible Person will:

1. Identify all building requiring a fire risk assessment of review.
2. Arrange for the assessment or review to be carried out by a competent person.
3. Ensure all actions arising from the assessment/review are completed.
4. Ensure all fire management hardware systems such as smoke detectors, emergency lighting, alarms sounders etc. are tested, inspected and maintained and recorded in the Fire Log Book.
5. Ensure there is an emergency fire evacuation in place.
6. Ensure employees and visitors are made aware of the emergency plan.
7. Ensure that weekly fire alarm tests are carried out and recorded in the Fire Log Book.
8. Ensure that an annual fire evacuation drill is carried out (as a minimum).
9. Ensure all other tests, inspections and maintenance is carried out as outlined in the Fire Log Book.

First Aid

Policy

We recognise our duty under the Health and Safety (First Aid) Regulations to provide adequate numbers of suitably trained people and equipment to provide first aid response and treatment for employees in the event of an injury at work.

Arrangements

The Responsible Person will:

1. Ensure that there are adequate numbers of suitably trained first aiders available at all times that people are at work.
2. Ensure that where the above cannot be met due to unforeseen circumstances that an Appointed Person is designated to take charge in an emergency.
3. Ensure that there are suitable first aid kits, signs and other equipment to provide first aid treatment.
4. Ensure that there is a record of treatment provided by the first aider.

Hazardous Substances (COSHH)

Policy

We recognise the risks posed by hazardous substances and our duties under the Control of Substances Hazardous to Health Regulations (COSHH). We will assess the use of hazardous substances to ensure that the risk to employees and other is eliminated or reduced as far as reasonably practicable and that our impact on the environment is minimised.

Arrangements

The Responsible Person will:

1. Ensure that all potentially hazardous substances are identified and listed.
2. Ensure that a Material Safety Data Sheet for each substance is obtained from the supplier.
3. Ensure that an assessment of the risk to the health and safety of employees and others is carried out.
4. Promote a policy of elimination, replacement or substitution of the substances as far as is reasonably practicable.
5. Ensure that the risks from using the substances are controlled and that all people affected are provided with information, instruction and supervision as required.
6. Ensure that any engineering controls are maintained in accordance with statutory standards.
7. Ensure that all other controls, including personal protective equipment are in place and being followed.

Legionnaires Disease

Policy

We recognise that Legionnaires Disease has the potential to cause ill health and fatalities to employees and others and we may have duties under statutory standards to manage the potential exposure.

Arrangements

The Responsible Person will:

1. Identify any systems that fall within the requirements of the statutory standards and where required carry out risk assessments of those systems.
2. Ensure that where applicable a written scheme is drawn up for managing the risk from legionella and they will implement and manage the scheme accordingly.
3. Ensure that records are kept and that any remedial works and examinations have been effective.
4. Ensure that any contractors appointed to manage these systems are assessed as being competent.

Lifting Equipment and Accessories

Policy

We will ensure that all lifting equipment and accessories are subject to inspection and maintenance in accordance with the Lifting Operations and Lifting Equipment Regulations (LOLER).

We recognise that equipment such as cranes, mobile elevated working platforms, fork lift trucks, harnesses, lanyards, shackles, eye bolts, chains, ropes, stops and anything used to lift a load is considered as lifting equipment.

We will ensure that we only use equipment that has been subject to inspection by a competent person and has a current test certificate.

Any employees required to use lifting equipment will have suitable instruction and training.

With regards to lifting operations there will be a nominated competent person in charge of the lift who will take charge of planning and supervising the lift. Any major lifts or lifting operations will be subject to detailed method statements specific to the lift and under the control of a competent person.

Arrangements

The Responsible Person will:

1. The use of lifting equipment/operations is considered in the risk assessment.
2. Employees are competent to use the lifting equipment.
3. All lifting equipment and accessories have a current certificate of inspection.

Lone Working

Policy

We recognise that the safety of employees may be affected by lone working.

Arrangements

Lone working will be considered in the general task-based risk assessments and where required suitable controls put in place to ensure that employees are not exposed to an unacceptable risk.

Manual Handling

Policy

We recognise that moving and handling of loads by physical force can lead to injuries and long-term illness. We will ensure that all activities that require any manual handling as defined in the Manual Handling Operations Regulations (MHOR) are assessed in accordance with these regulations and that suitable controls are put in place to eliminate or reduce the risk as far as reasonably practicable.

Arrangements

The Responsible Person will:

1. Ensure that all tasks involving manual handling are assessed by a competent person.
2. Ensure that safe systems for manual handling are followed.
3. Ensure training is provided where identified by the risk assessment.

The Responsible Person for accident investigation will ensure that all manual handling accidents are investigated.

New and Expectant Mothers

Policy

We recognise that new and expectant mothers may be put at additional risk by some workplace activities. We further recognise that we have a specific duty under the Management of Health and Safety at Work Regulations (MHSW) to carry out an assessment of those risks and to ensure that the risks are controlled as far as reasonably practicable.

Employees are required to inform the Senior Management if they become pregnant so that a risk assessment can be carried out. New employees are required to inform Senior Management if they are a new or expectant mother and this should be done immediately after employment begins.

Arrangements

The Responsible Person will:

1. Ensure that a risk assessment is carried out for all employees that fall within the definition of a new and expectant mother as defined in the MHSW Regulations and the associated guide.
2. Ensure that all employees are aware of the requirement of the new and expectant mother to inform Senior Management of their condition so that the assessment can be carried out.

Personal Protective Equipment

Policy

We recognise our duties under the Personal Protective Equipment Regulations and we will provide free of charge any personal protective equipment required to work.

Arrangement

The Responsible Person will:

1. Ensure that employees are provided with suitable PPE as identified in risk assessments and that there is a record of issue.
2. Ensure that the employees receive training on the correct use of the equipment.
3. Ensure that as required the PPE is inspected and maintained as per the manufacturer's instructions.
4. Arrange for regular checks to ensure that PPE is worn as detailed in the safe systems of working.

Risk Assessments of general workplace hazards

Policy

We recognise our duties under the Management of Health and Safety at Work Regulations to carry out workplace/task risk assessments.

Risk assessments will be carried out for both routine and non-routine activities in the workplace and the existing controls compared with statutory standards. Where the controls fall below this standard changes will be made to working practices or the design of the work area, process, substances or equipment to ensure that risks are eliminated or reduced to an acceptable standard.

For each assessment all individuals and groups at risk from the hazard will be considered in the health and safety of employees and others.

Hazards originating outside of the workplace will be considered where they may adversely affect the factors.

The assessment process will also consider hazards from the infrastructure design, hazardous materials, handling loads, equipment and fire.

Assessments will be carried out or reviewed whenever there are changes or proposed changes in the infrastructure, materials, equipment or the health and safety management system to assess the impact on employees and others.

The assessment process will consider all statutory obligations relating to the assessment of risk and the implementation of controls.

When determining controls or considering changes to existing controls we will adopt the following hierarchy

- a) Elimination of the risk
- b) Substitution with a lower risk
- c) Engineering controls
- d) Signage, warnings and other administrative controls
- e) Personal protective equipment

Cont'd

Arrangements

The Responsible Person will:

1. Ensure that each work related activity or process throughout the organisation is identified, recorded and assessed.
2. Ensure that any potentially hazardous materials are identified, recorded and assessed.
3. Ensure that any potentially hazardous equipment is identified, recorded and assessed.
4. Ensure that any building or infrastructure related equipment or processes are identified, recorded and assessed.
5. Create a Risk Register and use this register to prioritise the impact of an uncontrolled hazard.
6. Ensure that the risk assessments are carried out and recorded by a competent person.
7. Ensure that employees are fully informed on the finding of the assessments and in particular the control measures they are required to follow.
8. Ensure that the assessments are reviewed regularly after any significant incident or whenever there is any doubt about the effectiveness of the assessment and the control measures.
9. Company employees will be involved in the risk assessment process as much as possible.

Safeguarding Visitors

Policy

We recognise that visitors to our premises or site may not be aware of the hazards to which they may be exposed or what to do in the event of an emergency.

Arrangements

We will inform all visitors on the local arrangements, likely hazards and what to do in the event of an emergency.

Where appropriate visitors will be asked to sign in and acknowledge the information provided.

Stress at Work

Policy

We understand that pressure is part and parcel of all work and helps motivate, but that excessive pressure may lead to stress-related ill health in some people.

We recognise that under the Management of Health and Safety at Work Regulations we have a duty to assess the risk of stress related ill health arising from work activities and under the Health and Safety at Work etc. Act 1974 to take measures to control that risk.

We will adopt the HSE Stress Management Standards in ensuring that we minimise the impact of work-related stress.

Arrangements

The Responsible Person will ensure that the HSE management standards for stress are followed and implemented throughout the Company.

Training on health and safety

Policy

We recognise that the Health and Safety at Work etc. Act 1974 (HASAW) and other Regulations explicitly require health and safety training for employees. To ensure we meet these duties we will carry out training needs analysis to identify specific requirements. We further recognise that instructions must be provided for employees, visitors and contractors to site, indicating site rules and procedures. Supervision will be provided at a level relevant to the risks and the level of knowledge of the employee, visitor or contractor.

The findings of risk assessments and the associated controls will be passed on to those who may be exposed to the risk so that they understand how to avoid it. The method of communication will be determined by the level of risk and the complexity of the control measures, so may range from verbal instruction to written procedures.

In all cases a record will be kept of the information, instruction or training carried out and details of the information provided.

Arrangements

The Responsible Person will ensure that:

1. A training needs analysis is carried out to identify the training requirements for all employees.
2. Records of training are maintained including refresher training.

Violence and bullying at work

Policy

We recognise that we have a legal duty to protect our employees from foreseeable violence at work and we will ensure that systems are in place to ensure this. We have a zero tolerance for any bullying or violence at work whether from other employees, members of the public or visitors.

We will continually monitor for any signs of a problem and if there is a problem we will take action immediately. Any employee found to be bullying any employees will face disciplinary action.

Work Equipment

Policy

We recognise the risks posed by work equipment and the specific duties under the Provision and Use of Work Equipment Regulations (PUWER).

We further recognise that some specialist work equipment is subject to specific Guidance and Approved Codes of Practice and we will seek advice from our health and safety advisor in identifying any additional and specific duties for ensuring compliance.

Cont'd

Arrangements

The Responsible Person will:

1. Identify all work equipment owned, hired or otherwise used by the Company.
2. Identify the specific Regulation, Guidance or Code of Practice relevant to the equipment.
3. Ensure that assessments and audits are completed to identify that the statutory standards are being complied with. This should include as a minimum;
 - a. The equipment is safe for the intended purpose.
 - b. The equipment is inspected, tested and maintained in accordance with statutory standards and/or the manufacturers recommendations and where applicable by a competent person.
 - c. People are provided with training on safe use of the equipment.
 - d. The risks associated with using the equipment are included in the task/equipment risk assessment.
4. Identify specific risks from using work equipment and ensure that the relevant statutory standards are being met. These will include;
 - a. Noise and vibration.
 - b. Radiation.
 - c. Using lifting equipment fork trucks and similar plant.
 - d. Any other requirement under 3.d. above.

Working Environment

Policy

We recognise that we have a duty to provide a safe and suitable working environment and welfare facilities as required by the Workplace (Health, Safety and Welfare) Regulations (WHSW) and that those facilities shall be maintained.

Arrangements

The Responsible Person will:

1. Ensure that an audit of the workplace is carried out in accordance with the Approved Code of Practice to the WHSW Regulation and that the required standards are being met.
2. Ensure that regular inspections of the workplace are carried out.

Working at Height

Policy

'At Height' means a place that unless the Regulatory guidance is followed; a person could be injured falling from it, even if it is at or below ground level.

'Work' includes moving around at a place of work (except by a staircase in a permanent workplace) but not travel to or from a place of work.

It is our policy to comply with the Work at Height Regulations and any guidance made under the Regulations. We will achieve this by carrying out risk assessments of all activities that fall within the definition of working at height as detailed in the Regulations.

We will do all that is reasonably practicable to prevent anyone falling by applying the following hierarchy:

1. We will avoid work at height whenever we can;
2. Where we cannot avoid working at height we will use work equipment or other measures to prevent falls; and
3. Where we cannot eliminate the risk of fall we will use work equipment or other measures to minimise the distance and the consequences of a fall should one occur.

We will provide suitable training and supervision as is necessary to control the risks from working at height.

Arrangements

The Responsible Person will:

1. Where work at height is required a risk assessment is carried out in order to identify the risk control measures required to minimise the risks, so far as reasonably practicable and that the risk assessment process takes into consideration the hierarchy of controls as set out within the Working at Heights Regulations.
2. Where applicable risk control measures include arrangements for rescue.
3. The assessment includes any training requirements and equipment inspection requirements.
4. Work at height is included in the workplace inspection programme.

Young Workers

Policy

We recognise that we have a specific duty under the Management of Health and Safety at Work Regulations to manage the risks to young people.

Before employing a young person, we will carry out a specific risk assessment. The method may vary depending on whether the guardian of the young person provides us with a form for completion, or where this is not provided we will use our own form to complete this assessment.

Arrangements

The Responsible Person will:

1. Ensure that a risk assessment is carried out for all employees that fall within the definition of a young person as defined in the MHSW Regulations and the associated HSE Guidance.
2. Ensure that all employees are aware of the requirement to carry out assessments for young people.

Specific Arrangements for Managing Health and Safety in Construction Work

Responsibilities and Arrangements

Operational Manager & Contracts Manager – Have the responsibility for:

The Operational Manager will be responsible on a day to day basis for health and safety on site, that there are safe working practices on site and that the health and safety policy and site rules are being followed.

They will ensure that where applicable:

- All employees and contractors receive site induction, information on hazards and risks, the method or work, site rules, emergency arrangements and PPE requirements and that they sign as having fully understood.
- Carry out a weekly health and safety inspection and make a report of the findings – copy to senior management.
- Ensure that any breaches of safety rules are dealt with immediately.
- Ensure that all accidents are recorded in the Accident Book and if required in the clients Accident Book.
- Investigate all accidents and near misses to determine the causes and prevent a reoccurrence.
- Ensure site arrangements for delivery of equipment and materials are safe.
- Ensure that site perimeters are defined, fenced and that access to unauthorised people is restricted and that warning signs are in place.
- Check and approve any risk assessments and method statements provided by specialist contractors and where there is any doubt about safety seek advice from the appropriate person.
- Check that all employees and sub-contractors have the correct PPE and that it is worn correctly.
- Carry out regular walk round inspections of the site to check that all persons under their control are working in accordance with the general risk assessment and method statement or if applicable the contractors own risk assessment and method statement.
- The requirements of the Construction (Design and Management) Regulations are being complied with including any additional duties for notifiable projects.
- Each project is subject to a unique risk assessment and method statement.
- All employees and contractors are made aware of the requirements of the risk assessment and method statement and any local site rules.
- That all relevant training certificates and proof of competency are maintained and up to date.
- That all accidents and incidents are reported, recorded and thoroughly investigated.
- That targets are set for continual improvements in health and safety performance.
- That regular inspections and audits are carried out at sites.
- That regular meetings take place between senior management and the company H&S Advisor.
- That there is an open communication route for employees and subcontractors to voice their concerns on matters relating to health and safety.

Carry out regular walk round inspections of the site to check that scaffolding, site access and egress, fire safety arrangements, welfare arrangements and the general housekeeping on the site is safe and without risk. Any non-conformances must be reported immediately to Senior Management.

Communication, consultation and workforce involvement

We recognise that involving the site workforce in health and safety matters is one of the most effective ways of reducing accidents and ill health. We include the workforce in the development of the risk assessment and method statement; they are encouraged to join the Safety Supervisor and the H&S Advisor on-site inspections/audits; the results of the inspection/audits are discussed with them; their views are actively sort during the induction training. We actively encourage employees and sub-contractors to express their views on matters of health and safety. Wherever possible we include non-managerial members of the workforce in meetings with the Clients and sub-contractors and also in progress meetings with our H&S Advisor.

We will ensure that regular toolbox talks are carried out by the appropriate person deemed competent.

Site induction training will be provided to all employees and contractors and will include:

- The risks to their health and safety identified by risk assessments.
- The preventative and protective measures applicable to them.
- PPE requirements.
- The procedures for the evacuation of the site in the event of serious or imminent danger.
- Accident reporting procedures.
- First Aid procedures.
- Site rules.

Monitoring, auditing and review of site activities

Health and safety performance will be monitored on a job by job basis and any unsafe acts investigated with the aim of preventing reoccurrences. Where a project runs for more than 5 working days then the Site Supervisor will carry out a weekly site inspection and record the findings. The H&S Advisor will carry out site visits, as instructed to audit the arrangements for health and safety and record the findings. The results from these inspections and audits will be reviewed by the Site Safety Manager to track trends and implement improvements.

Accident and incident reporting and investigation will be another method whereby performance will be monitored and this will be analysed and discussed annually.

A full list of toolbox talks will be kept available along with a sign off sheet. Due to the nature of our work we do not have a set programme for how many or how often these will be carried out but we will deliver talks as often as is required. The talks will be used to compliment ongoing training and also to raise awareness of a particular hazard of the project.

All recipients will be required to sign to say that they have received and understood the talk.

CONSTRUCTION (DESIGN and MANAGEMENT) REGULATIONS

(6th April 2015)

Eligo Edge Protection recognise that all works undertaken must comply with the CDM Regulations, but also acknowledge that the majority of their works will be classed as non-notifiable projects.

General Issues

The CDM Regulations are the principal construction regulations that govern our operations on site.

- We are required to ensure that we have sufficiently skilled, knowledgeable, trained and experienced employees or subcontractors to carry out the works safely and in line with our contractual agreements with our Clients.
- We require co-operating with the design team and ensuring adequate co-operation and co-ordination of all persons whom duties are placed.
- We will require ensuring that suitable and sufficient risk controls are in place and a Construction Phase Plan is produced for projects.
- Welfare provisions will require being in place throughout the Construction Phase complying with Schedule 2 of the CDM Regulations.

Non-Notifiable Projects

52. – the requirements of CDM 2015 apply whether or not the project is notifiable.

Notifiable Projects

A Project is notifiable to the HSE if the construction work on a construction site is scheduled to:

- Last longer than 30 days and have more than 20 workers working simultaneously at any point in the project; or
- Exceed 500 person days.
- Where this is the case the Client (unless the client is classed as domestic) will require notifying the HSE of the project using an F10 before the construction phase begins. Where the client is classed as a domestic client this will be the responsibility of the Principle Designer or Principle Contractor if not the same.

Eligo Edge Protection in conjunction with their Health and Safety Advisor will develop a project specific Construction Phase Plan which will detail the Project particulars, management arrangements, details of how we will control the significant risks and confirmation of the information required for inclusion in the Health and Safety File (if required as per Appendix 4).

Any Notifiable jobs, Eligo Edge Protection will not commence operations until a copy of the completed F10 is received and is displayed on the relevant construction site with a copy of the Construction Phase Plan, received approval and established the welfare facilities on site.

The Health and Safety File is only required for projects involving more than one contractor and will be issued at project completion in line with the Client's requirements.

Co-operation and Co-ordination Construction projects are built by teams and it is therefore essential that clear lines of communication are established in the early stages of the project to ensure that all duty holders clearly understand their responsibilities on the project and design information and risk management issues are clearly coordinated to reduce risks to as low a level as possible. The construction Phase Plan will clearly detail how this issue will be managed.

Regulation 7 Application to domestic clients

53. CDM 2015 now includes projects where a domestic client has construction work done on their own home, or the home of a family member, which is not done in connection with a business. Local authorities, housing associations, charities, landlords and other businesses may own domestic properties, but they are not a domestic client for the purposes of CDM 2015. If the work is in connection with a business attached to domestic premises, such as a shop, the client is not a domestic client.

54. A domestic client is not required to carry out the duties placed on commercial clients in regulations 4 (client duties for managing projects), 6 (Notification) and 8 (General duties) - see also paragraph 23.

Where the project involves:

- a) Only one contractor, the client duties must instead be carried out by the principle contractor. The principle contractor must then carry out the client duties as well as the duties they already have as principle contractor for the project (see paragraphs 147–179). In practice, this should involve doing little more to manage the work to ensure health and safety.
- b) More than one contractor, the client duties must instead be carried out by the principal contractor as well as the duties they already have as principal contractor (see paragraphs 110–146). If the domestic client has not appointed a principal contractor, then the duties of the client will be carried out by the contractor in control of the construction work.

55. In many situations, domestic clients wishing to extend, refurbish or demolish parts of their own property will, in the first instance, engage an architect or other designer to produce possible designs for them. It is also recognised that construction work does not always follow immediately after design work is completed. If they so wish, a domestic client has the flexibility of agreeing (in writing) with their designer that the designer coordinates and manages the project, rather than this role automatically passing to the principal contractor. Where no such agreement is made, then the principal contractor will automatically take over the project management responsibilities (see paragraph 54).

Arrangements for managing risk areas on site

Abrasive Wheels

Policy

We recognise that a number of risks are associated with the use of abrasive wheels. All abrasive wheel operators will be suitably trained and competent. All wheels will be marked to conform to Annex 'A' of BS EN 12413. All wheels are guarded and secured in position and properly adjusted before the wheel is run.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- All users have received training in accordance with HSG17
- All abrasive wheels are included in the equipment register/inventory and subject to a monthly formal visual inspection or as per the power tools policy for electrical equipment.
- Abrasive wheels are included in the site inspection programme.

Confined Spaces

Policy

A confined space is defined as any place, including any chamber, tank, vat, silo, pit, trench, pipe, and sewer, flue, well or similar space in which, by virtue of its enclosed nature, there arises a reasonably foreseeable specified risk. We will avoid working in confined spaces as far as reasonably practicable.

All work in confined spaces will be subject to a detailed risk assessment and method statement and may also require a Permit to Work before entry. All operatives required to enter confined spaces will receive suitable instruction/training before entering. Each confined space activity will be under the supervision of a competent person.

All confined space work will be carried out in accordance with the specific risk assessments and method statements.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- All confined space work is considered in the risk assessment.
- Employees are competent to work in the confined space.
- Safety equipment is provided and used.
- Confined spaces work is included in the site inspection programme.

Emergencies

Policy

We recognise that the arrangements have been considered at site and that suitable arrangements are in place to cover for fire, first aid and other emergencies.

In practice this will generally be the responsibility of the site controller or principal contractor. However, we will discuss this in pre-project meetings and agree the arrangements in detail. The arrangements will then be included in the method statement and site induction briefing.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Emergency situations have been considered, discussed and suitable arrangements agreed.
- Employees are made aware of these arrangements.
- The arrangements are regularly reviewed.
- The arrangements are included in the site inspection programme.

Ladders and steps

Policy

Ladders and stepladders will only be used as access equipment or for short duration work (maximum 30 minutes) and then only for light work involving the use of one hand and/or carrying loads up to around 10kgs. The ladder will be secured by tying off, wedging, providing a ladder stability device or footing. All users will be trained on the safe use of ladders using the HSE guide INDG402 and associated documents. All ladders and steps will be Industrial Class 1 or BS EN 131 standard.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- All users have received training or toolbox talks using INDG402.
- All ladders and steps are included in the equipment register/inventory and subject to a 3 monthly formal visual inspection.
- Ladders and steps are included in the site inspection programme.

Manual Handling

Policy

We recognise that any site work is likely to involve manual handling and we have therefore carried out a generic manual handling assessment based on our experience on several different sites. In addition, each sites general risk assessment and method statement will take account of manual handling activities and will include controls for eliminating the risk or managing it within the limits of the Manual Handling Operations Regulations. All employees will receive and will continue to receive training and information about the risk from manual handling and instruction on safe lifting techniques. Our policy is that no person should lift more than approximately 25kg and two-person lifts should be limited to approximately 35kg. Above that mechanical handling equipment must be used.

Cont'd

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Manual handling risks are considered as part of the job risk assessment and that the Method Statement details how manual handling risks will be controlled.
- Employees receive information, instruction and if required training on the safe systems of work for manual handling.
- Mechanical aids are available where required.
- Manual handling activities are included in the site inspection programme.

Mobile Elevating Work Platforms (MEWPs)

Policy

All MEWP operators will be trained by recognised training provider such as IPAF.

We require all MEWPs to be thoroughly examined at least every 6 months by a competent person. In addition, the operator will carry out inspections before use and weekly.

The selection of suitable MEWPs will be in accordance with CIS58 and MISC614.

When not in use all keys will be removed. Chin straps must be used when wearing hard hats.

A full body harness (BS EN 361) and lanyard (BS EN 354) will be used for all MEWP types including scissor lifts, the lanyard length will be set short enough to prevent a person reaching a position where they could fall. Fall arrest (inertia reels or retractable) are not permitted when working from MEWPs unless a detailed assessment has been carried out. Operators will receive instruction in the use of the harness/lanyards and the procedure for periodic inspection.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Only competent people operate MEWPs
- Training certificates and/or licenses are checked, are suitable for the equipment to be used and are in date.
- The MEWP is subject to inspection, including;
 - a) Check LOLER 6 monthly inspection certificate on arrival at site.
 - b) Check daily inspections are carried out.
 - c) Check weekly inspections are carried out and recorded on the Statutory Inspection Register.
 - d) Ensure MEWP is checked after any event liable to have affected its stability.
- Harnesses and lanyards are subject to 6 monthly inspections.
- Access equipment is included in the site inspection programme.

Noise, Vibration & Dust

Policy

We recognise that our employees may become exposed to excessive noise, vibration and dust from their own work and the work of others if we do not have suitable controls in place.

We will ensure that our employees are made aware of the effects of noise, vibration and dust actions required for reducing exposure.

We will provide suitable hearing protection but we will also endeavour to eliminate or reduce the noise at source as far as reasonably practicable.

Where an employee is frequently exposed to noise, vibration and dust above the upper exposure limit, health surveillance will be provided.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Noise, vibration and dust exposure is considered in the risk assessment.
- Employees are provided with suitable hearing protection.
- Hearing protection is worn when required.
- Appropriate dust masks or respirators are supplied by the company.
- Hearing, vibration and dust protection is included in the site inspection programme.
- The use of vibrating tools is kept to a minimum.

Personal Protection Equipment (PPE)

Policy

We will provide suitable PPE free of charge to all employees as required by this policy and the finding of risk assessments. We require employees to wear PPE as instructed and trained.

We will maintain records of PPE issue and training. We will carry out inspections and maintenance of PPE as required by the HSE guidance and manufacturers recommendations.

Where an employee loses their PPE through negligence we reserve the right to charge them for the replacement.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- PPE requirements have been identified in the risk assessment.
- Employees are made aware of these requirements.
- PPE has been issued and instructions given on its use.
- Formal visual inspection/maintenance is carried out as required.
- The use of PPE is included in the site inspection programme.

Power Tools

Policy

We recognise that hand-operated power tools can be hazardous if they are not suitable for the job, are not used correctly or are not maintained correctly. All our power tools are purchased with the working environment in mind. Users are instructed to carry out before use checks; the Operational Manager or Contracts Manager will carry out regular visual inspections and any faulty equipment will be removed and quarantined for repair or replacement. Power tools are never left unattended. All operators receive on the job training on the correct use of each piece of equipment including extension leads. The majority of mains-operated power tools are either 110v centre tapped to earth or battery operated. If we need to use 240v equipment it will only ever be used with an RCD protected supply.

We recognise that using hand-operated power tools can lead to conditions such as vibrating white finger. We will as far as reasonably practicable provide equipment with the lowest vibration levels available. We closely monitor each activity on site to ensure that exposure times are not exceeded. We have provided all employees with information on the effect of vibration and the importance of not exceeding the exposure times, how to recognise the early symptoms of vibration white finger and what to do if they believe there is a problem.

All electrically-powered tools will be subject to a formal visual inspection monthly (110v) or weekly (230v) and a combined inspection and test (PAT Test) before use on site, then 3 monthly (110v) or monthly (230v).

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- All users have received training or toolbox talks on the use of hand held power tools.
- All power tools are included in the equipment register/inventory and subject to inspection as per this policy.
- Vibration risk assessments are carried as required.
- Power tools are included in the site inspection programme.

Roof Work

Policy

We will avoid roof work wherever it is possible to. All roof work will require a site-specific risk assessment and method statements, Permits may be required by the client or site controller and they will normally issue these, however the Operational Manager & Contracts Manager may issue permits for roof work if considered necessary.

The guidance document HSG33 (Safety in Roof Work) and INDG284 as well as other industry guidance will be used to determine control measures.

All employees involved in roof work will receive instruction/training as required to ensure their safety.

Cont'd

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- All roof work is subject to risk assessment and if required a method statement.
- All employees are competent and fit to carry out the work.
- All access equipment and other safety equipment is suitable and inspected.
- Roof work is included in the site inspection programme.

Site Co-Operation and Co-Ordination

Policy

We recognise the importance of good co-operation and co-ordination with clients, other trades and the workforce in managing health and safety on projects. All employees will be fully involved in the development of risk assessments, method statements and methods of working. We will be proactive in organising regular meetings with clients to ensure that any concerns or problems are raised in good time.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Pre-project meetings take place between all parties to discuss safety arrangements.
- Employees are included in this process as far as is possible.
- The arrangement for progress meetings is agreed.
- The arrangement for the response to serious incidents is agreed.
- The arrangement for submitting assessments and methods is agreed including any time scales for approval.
- The arrangement for keeping employees and other contractors informed about significant changes is agreed.

Site Risk Assessments and Safe Systems of Work

Policy

We will carry out risk assessments for all activities and record the significant findings. We will provide methods of work where necessary based on risk and complexity.

We use a combined risk assessment/method statement format and in general the Operational Manager & Contracts Manager will generate this following a visit to site. For routines work, short duration work or lower risk work we will use a simplified version of the combined risk assessment and method statement form.

The findings of the assessment/method will be included in site induction for employees and sub-contractors.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- The risk assessment and method statement for the project/job is carried out.
- Employees are made aware of the finding and that they sign as having understood.
- The method of work is followed.
- The method of work is included in the site inspection programme.

Site Welfare provision

Policy

Welfare facilities are in the main provided by the client or by means of the customer's facilities. For construction sites the facilities are the responsibility of the Principal Contractor and our requirements is that the facilities comply with the HSE guidance for site welfare on fixed construction sites. Our first site survey will include an inspection of these to ensure they are suitable. Subsequent site inspections will include these facilities.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Suitable welfare arrangements are in place before work starts.
- Welfare facilities are maintained in a good hygienic working order.
- Any concerns are brought to the attention of the responsible person.
- The welfare facilities are included in the site inspection programme.

Tower Scaffolds

Policy

Tower scaffolds will only be assembled by competent persons PASMA trained to CIS10. The working platform will have guardrails and toe boards and the means of access will be by an internal ladder access through a flip hatch in the platform. When a tower is being moved all person and materials will be removed from the working platform. When in use the wheels will be locked to prevent movement. Towers will be inspected in accordance with CIS10.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Only competent people build and use tower scaffolds.
- The tower is subject to inspection;
 - a) After assembly
 - b) After any event liable to have affected its stability
 - c) At intervals not exceeding seven days.
- The results of inspection are recorded on the Statutory Inspection Register.
- Tower scaffolds are included in the site inspection programme.

Working at Height

Policy

We recognise the serious risks from working at height (WAH) and we include this in our risk assessment and method statement. For all WAH we will use the safest method available in the circumstances. This means that wherever possible we will avoid or eliminate the need for WAH. Where WAH cannot be avoided then we will use access equipment such as Mobile Elevating Working Platforms (MEWPs) as first choice, followed by scaffolding, tower scaffolding and finally access platforms. When defining controls, we will consider collective controls as having priority over individual controls.

Arrangements

The Operational Manager & Contracts Manager will ensure that:

- Where work at height is required a risk assessment is carried in order to identify the risk control measures required to minimise the risks, so far as reasonably practicable and that the risk assessment process takes into consideration the hierarchy of controls as set out within the Work at Height Regulations.
- Where applicable, risk control measures include arrangements for rescue.
- The assessment includes any training requirements and equipment inspection requirements.
- WAH is included in the site inspection programme.