



Health and Safety Policy

Incorporating

Policy Statement

Organisation Structure and Responsibilities Company
Arrangements

Latest Revision: 30th June 2025

DOCUMENT REVISION STATEMENT AND TABLE

The Health and Safety at Work Act 1974, The Management of Health and Safety at Work Regulations 1999 (as amended) requires employers to monitor and review their systems for managing health and safety. Coniston will review this policy document at least annually or at other intervals deemed appropriate by statutory changes and senior management. Any alterations to this policy will be recorded below.

Revision No	Date	Details	Reviewed By
REV 1	29.08.2023	Change in Health and Safety Manager J-Osbourn in, A-Zobel out.	J-Osbourn
REV 2	02.03.2024	New appointment of Managing Director D-Georgiou 01.01.2024	J-Osbourn
REV 3	31.03.2025	Policy general update.	J-Osbourn
REV 4	23.06.2025	New appointment of Operations Director Megan Forster 23.06.2025 and GDPR arrangements.	J-Osbourn

CONTENTS

Section 1 Policy Statement.

Section 2: Company Structure, Organisation, & Responsibilities.

- 2.2 Responsibilities Placed on All Directors in Relation to Health and Safety.
- 2.3 Responsibilities Placed on the Human Resource Manager in Relation to Health & Safety.
- 2.4 Responsibilities Placed on Office Workers.
- 2.5 Estimators Responsibilities.
- 2.6 Responsibilities Placed on Quantity Surveyors.
- 2.7 Responsibilities Placed on Contract Managers.
- 2.8 Responsibilities Placed on Project Managers and Site Managers.
- 2.9 Responsibilities Placed on Working Forepersons.
- 2.10 Responsibilities Placed on Direct Trade and Agency Staff.
- 2.11 Responsibilities Placed on Subcontractors and Contractors.
- 2.12 Responsibilities Placed on Health & Safety Manager/ Advisor
- 2.13 Responsibilities Placed on Company Vehicle Driver(s) and Private Vehicle for Business Use.

Section 3: Arrangements.

- 3.1 Safety Policy: Monitoring, Evaluation and Review.
- 3.2 Induction Arrangement for New Employees Engaged by Coniston or Transferred to Site.
- 3.3 Disciplinary Arrangements.
- 3.4 Yellow and Red Card Arrangements.
- 3.5 Objection on Safety Grounds.
- 3.6 Training Arrangements.
- 3.7 Employee Consultation and Communication.
- 3.8 Arrangements for Visitors.
- 3.9 Accident, Incident, and Ill Health Reporting.
- 3.10 Welfare Arrangements.
- 3.11 Safe Place of Work.
- 3.12 Company Smoking and Vaping Arrangement.
- 3.13 Use of Display Screen Equipment (D.S.E).
- 3.14 Alcohol, Illicit Substance and Drug Arrangements.
- 3.15 Prescription Medication and Work Duties.
- 3.16 Out of Hours Working and Working Hours Arrangements.
- 3.17 Working Noise Arrangements.
- 3.18 Personal Protective Equipment (PPE) Arrangements.
- 3.19 First Aid Arrangements.
- 3.20 Risk Assessment Arrangements.
- 3.21 Manual Handling Arrangements.

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- 3.22 Vibration at Work Arrangements.
 - 3.23 Working at Height Arrangements.
 - 3.24 Confined Space Arrangements.
 - 3.25 Flammable Liquids and Gases Arrangements.
 - 3.26 Hazardous Substances Arrangements.
 - 3.27 Infectious Diseases(s) and Bloodborne Viruses.
 - 3.28 Asbestos Arrangements.
 - 3.29 Lead Based Material Arrangements.
 - 3.30 Safe Systems of Work Arrangements.
 - 3.31 Health Surveillance Arrangements.
 - 3.32 Protection of The Public, Trespasser Arrangements.
 - 3.33 Emergency Procedures at Work Arrangements.
 - 3.34 Stress and Wellbeing at Work Arrangements.
 - 3.35 Violence and Aggression at Work Arrangements.
 - 3.36 Young Persons at Work Arrangements.
 - 3.37 New and Expectant Mothers at Work Arrangements.
 - 3.38 Security at Work Arrangements.
 - 3.39 Respiratory Illness and Cold and Winter Flu Viruses Arrangements.
 - 3.40 Waste Management at Work Arrangements.
 - 3.41 Electrical Safety at Work Arrangements.
 - 3.42 Work Equipment Arrangements.
 - 3.43 Training and Competency (CSCS) Card Arrangements.
 - 3.44 Construction (Design and Management) & Temporary Works Arrangements.
 - 3.45 Contract Procedure Arrangements.
 - 3.46 Construction Phase Plan Arrangements.
 - 3.47 Building Safety Act Arrangements.
 - 3.48 General Data Protection Regulation (GDPR) Arrangements.
 - 3.49 Dealing with Enforcement Bodies.
 - 3.50 Site Rules and Arrangements.
 - 3.51 Useful Contact Information.

Coniston Limited are a specialist main contractor which undertakes a variety of Construction, Heritage, Listed Building Restoration, and Refurbishment projects within the Construction Sector. Whilst undertaking such projects Coniston aims to ensure that it meets its duty of care in relation to the statutory requirements outlined within relevant legislation such as The Health and Safety at Work Act 1974 to provide a safe working environment for its employees, external or contracted resource or those that may be effected by its work activities.

Coniston is committed to enhancing workplace safety and promote wellbeing by implementing and maintaining the necessary measures to continually improve safe working practices, to identify, assess, control, record and review reasonably foreseeable risk of injury or ill health prior and during its work operations. The appropriate levels of resource will be allocated and supported by competent supervision, necessary mandatory training, first aid requirements, the control of hazardous substances, plant maintenance and any necessary fire arrangements to reduce and manage risk in accordance with The Management of Health and Safety at Work Regulations 1999.

The requirements and intent of this policy where there are significant changes, reviews or changes reflected within the organisation will be communicated in various ways such as;

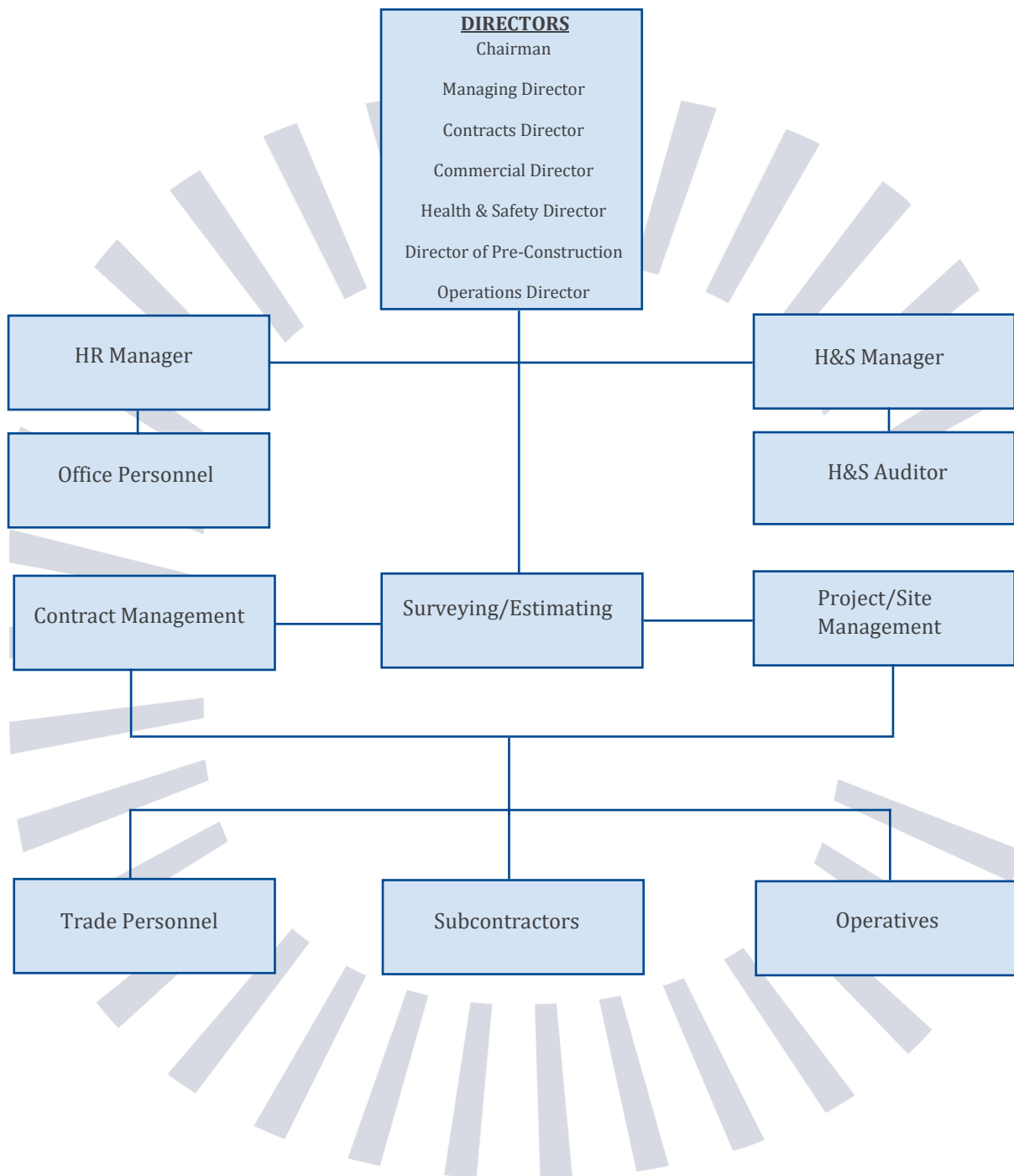
- Memos / email of reminders and updates, as and when necessary.
- A verbal instruction and signed confirmation of instruction during all staff members' initial induction.
- Reminders and updates via on-site recorded toolbox talks.

Coniston will aim communicate Health and Safety information effectively to all stake holders, promoting awareness, understanding, and compliance with relevant policies and procedures in reflection of the context of relevant changes, observations, conditions, and legislation governance.

Changes that effect or impact the Health and Safety in relation to new ways of working will be subject to consultation. Coniston aims to enhance a no blame open and honest safety culture by fostering a culture of accountability, where individuals take responsibility for their own acts or omissions and that of the health and safety of those around them. The policy will be reviewed and updated periodically to reflect the changes in legislation, technology, and best practice.



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Mr D Georgiou
Managing Director
Dated: 30.06.2025



2.1 Responsibilities Placed on Everyone in Relation to Health & Safety.

The responsibilities and duties of everyone within Coniston whilst at work is to take reasonable care for the health and safety of oneself and of other persons who may be affected by their acts or omissions whilst at work.

- Co-operate with the policy under any of the relevant statutory provisions so far as is necessary to enable that duty of requirement to be performed or complied with.
- No person shall intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare in pursuance of any of the relevant statutory provisions.
- Unsafe conditions in relation to site conditions, plant, work equipment and working practices are to be reported to the overseeing duty holder.
- Smoking and or vaping including associated sundries outside of designated areas on or within a construction site is prohibited. Vape devices are prohibited from being taken onto temporary structures such as but not limited to tube and fitting scaffold systems.
- If hazards or risks associated with a construction site including but not limited to manual handling cannot be eliminated a hierarchy of controls with associated documentation is to be adhered to.
- Unreasonable behaviour or behaviour that leads to or gives rise to unsafe conditions can result in disciplinary proceedings.
- Medical conditions or prescribed medications in relation to long term, newly diagnosed, or recent changes to any of the prior mentioned that may affect an individual's ability to carry out normal duties is to be raised to the duty holder to consider or make the necessary reasonable adjustments.
- Any personnel deemed to be under the influence of alcohol or drugs will not be permitted to work on or access a construction site under the duty holder's control.
- Communications are not to infringe upon an individual's rights or protected features as defined by any relevant legislation that may give rise to that of which may be defined as but not limited to bullying, harassment, or other forms of discrimination.
- Work equipment or tooling is to only be used for its specified design purpose and is not to be modified.
- Training arrangements that are defined are to be adhered to ensure that competence can be achieved, maintained and or upskilled.

2.2 Responsibilities Placed on All Directors in Relation to Health and Safety.

Where reasonably practicable incorporating time, trouble, expense, adequate resourcing is to be made available to enable Coniston to meet its statutory duties relevant to Health, Safety legislation and insurance requirements by:

- Supporting Health, safety, and its arrangements without a conflict of interest.
- Lead(ing) by example in relation to matters of Health and Safety.
- Utilising effective downward communication with active commitment.
- Ensuring where duties are delegated or discharged that those undertaking such duties are competent to do so.
- Ensuring due diligence is carried out in respect of adequate insurance levels are in place for day-to-day operations or where new business that may present strategic or potential adverse risk to Coniston and its operations.
- Making the necessary resource available so that appropriate training can be facilitated and given to all staff as necessary against job requirements or the business needs.
- Evaluating resources and ensuring that an adequate amount of resourcing is available to not jeopardise Health and Safety.
- Initiating potential disciplinary procedures for staff failing to satisfy their duties in relation to Health and Safety that may lead to personnel or company property being harmed or put at unreasonable foreseeable risk by contravening company policies.
- Supporting personnel when addressing persistent noncompliance of Health and Safety legislation by direct or subcontracted labour that puts Coniston at risk of potential prosecution.

2.3 Responsibilities Placed on the Human Resource Manager in Relation to Health and Safety.

In addition to core job role responsibilities that you may have to yourself and to others, responsibilities will include but may not be limited to:

- Providing guidance of disciplinary or grievance procedures that may be enacted where company policies may have been contravened.
- Ensuring compliance with relevant legislation in relation to labour requirements and employment legislation.
- Maintaining records in accordance with training undertaken for office staff and site personnel.
- Ensuring all offices and office facilities will be provided and maintained in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992, including first aid and welfare facilities.

- Ensure that all employees and visitors are aware of the requirements of the emergency plan and know where their assembly point is in the event of an evacuation.
- Making sure that staff required to use office machinery are trained in its use and are not permitted to carry out any repairs or adaptations unless competent. All office machinery is to be maintained and serviced at specified intervals dictated by the manufacturer.
- Ensure that matters of concern in relation to Health and Safety are raised with the Health and Safety Manager.
- Where reasonably practicable that offices are laid out and maintained to ensure the relevant safety of staff and visitors.
- Organise and delegating the facilities management for office requirements such as fire arrangements, maintenance and first aid with the assistance of the Health and Safety Manager where necessary.

2.4 Responsibilities Placed on Office Workers.

In addition to Health and Safety responsibilities that you have to yourself and to others, it will also be your responsibility to:

- Not use, repair, or maintain any office equipment or machinery, or carry out any work activity for which you have not received full instructions or training.
- Report any defects in office equipment or machinery immediately to the HR Manager.
- Ensure that corridors, office floors, doorways, etc. are kept clear and free from obstruction, trailing wires, drawing pins, open desk or filing cabinet drawers or doors.
- Not attempt to reach items on without using proprietary access equipment.
- Report any problems or changes experienced when working with Display Screen Equipment to your Manager.

2.5 Estimators Responsibilities.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility to:

- Read and understand the safety implications of tenders received.
- Draw the Director's attention to any unusual or high-risk activities.
- Prudently cost to allow resource to comply with legislation to prevent omissions for economic gain.
- Allow adequate resources and time in tenders to execute the work safely.

- Select from the supply chain adequately experienced, suitably qualified subcontractors taking into consideration safety prosecutions and past performance in relation to prior projects in accordance with the Construction (Design and Management) Regulations 2015 (CDM).
- Ensure any known risks or hazards are highlighted, recorded and communicated to subcontractors when asked to quote for works.
- If a tender is secured, communicate any known risks or hazards to the nominated project management team during handover for review as a proactive process.

2.6 Responsibilities Placed on Quantity Surveyors.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility to:

- Where applicable ensure compliance with the Construction (Design and Management) Regulations 2015 (CDM) by making sure that enough resource is allocated to fulfil the project requirements. Cost to allow resource to comply with legislation to prevent omissions for economic gain.
- Validate, check and approve that the subcontractor(s) and supply chain undertaking works for Coniston are adequately insured with the full insurance policy records retained in writing stating the supply chain is insured to its contracted undertaking without limitations that would lead to a potential uninsured loss.
- Ensure that all equipment or materials purchased by Coniston do not compromise building quality or specification that may lead to design specifications that contravene legislation.
- Ensure that all subcontractors sign the Health and Safety charter.
- Ensure that risk and value management, cost control, during the project is prudent so it does not compromise Health and Safety.

2.7 Responsibilities Placed on Contract Managers.

In addition to any buying responsibilities, and the personal responsibilities that you have to yourself and to others some of which may be delegated, it will also be your responsibility to:

- Ensure that the requirements of Construction (Design and Management) Regulations 2015 (CDM) are complied with as they apply to the work activities undertaken by Coniston. Liaise with the appointed “Principal Designer” in the development of Coniston response to requirements of the Pre-Construction Pack and Construction Phase Plan without omitting reasonably foreseeable significant risks.
- Ensure that the necessary Construction Phase Plan is developed before work is commenced and maintained throughout the construction process. Also, that the plan’s requirements are brought to the attention of all parties involved and work is

undertaken in accordance with the control measures specified in it or identified during the progress of work.

- Ensure that the contract effectively meets the requirements of the Health and Safety Plan, particularly the provision of welfare facilities, safe access arrangements, working methods and equipment to avoid potential injury, damage, wastage, or exposure to substances hazardous to health.
- Ensure that notifications to local or statutory authorities are submitted where necessary.
- Ensure that sub-contract organisations are assessed in terms of their health, safety and competence. Obtain risk assessments from contractors associated with substances, processes, or any work activity hazardous to health and safety which they intend to carry out, and check that the planned control measures will provide protection to others on the site.
- Obtain or prepare in conjunction with Site Managers and Project Managers, risk assessments and method statements as necessary for all Coniston labour or agency work tasks.
- Assess the risks and provide written instructions in unusual situations not covered by company policy to establish working methods and sequences.
- Ensure, so far as is reasonably practicable, that work once started is carried out as planned and that due diligence is given to changing or unforeseen conditions that may have the ability to effect or jeopardise the Health and Safety of personnel.
- Liaise with the Health and Safety Manager in relation to notifying all new sites, giving as much notice as possible. Brief of any special circumstance that will require site inspections that are outside of the normal schedule.
- Ensure resources are adequate to cover sound methods of work, safe access and suitable welfare facilities and other control measures identified in the Pre-Construction Information Pack developed to meet the requirements of CDM.
- Lead by example by wearing appropriate protective equipment and take the lead in promoting safe working practices when visiting sites.

2.8 Responsibilities Placed on Project Managers and Site Managers.

In addition to the personal responsibilities that you have to yourself and to others that may also be delegated when reasonable to do so, it will also be your responsibility to:

- Set a personal example by wearing appropriate protective equipment and take the lead in promoting safe working practices when visiting sites.
- Make readily available, clearly communicate and record any information that may be critical or has the potential to affect the health, safety, and welfare of those undertaking works on a Coniston controlled project.
- Ensure that work methodology in relation to Safe Systems of Work, Method statements, Risk Assessments and Control of Substances Hazardous to Health

(COSSH) assessments, fire arrangements are adhered to, adequately assessed and readily available.

- Evaluate and provide feedback on work methodology for all associated defined legal documents.
- Plan, Do, Check and Act when implementing emergency procedures, inductions, personal protective equipment, first aid, and toolbox talks.
- Ensure that site arrangements and welfare setups are comprehensive to meet all obligations under the statutory arrangements in relation to all relevant legislation.
- Keep all records, registers, and reports updated for the duration of any given project to comply with relevant legislative standards, company policies to enable Coniston to meet its legal obligations.
- Keep site conditions well maintained so far as reasonably practicable so conditions do not pose a hazard to personnel or site visitors.
- Report accidents, incidents and near misses at the earliest convenience to the Health and Safety Manager.
- Liaise, co-operate, and co-ordinate trades, contractors, and subcontractors in relation to site arrangements, Health, Safety, and work tasks.
- Make sure that all plant, machinery, lifting equipment hand tools and power tools comply with legislative standards with records recorded on pre-use inspections.
- Ensure that personal protective equipment is readily available when needed or necessary.
- Follow company policies and procedures to enable the duty holder to meet its legal obligations in relation to Health and Safety.
- Enforce where necessary the site rules and procedures to visitors, trades, and subcontractors.
- Ensure that competence is defined by obtaining any copies of relative training records and random sample checking competence cards.

2.9 Responsibilities Placed on Working Forepersons.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility when delegated or agreed to:

- Set a personal example by wearing appropriate protective equipment and take the lead in promoting safe working practices when visiting sites.
- Make readily available, clearly communicate, and record any information that may be critical or has the potential to affect the health, safety, and welfare of those undertaking works on a Coniston controlled project when directed too.
- Ensure that work methodology in relation to Safe Systems of Work, Method statements, Risk Assessments and Control of Substances Hazardous to Health (COSSH) assessments, fire arrangements are adhered to, adequately assessed and readily available.
- Evaluate and provide feedback on work methodology for all associated defined legal documents when necessary.

- Carry out emergency procedures, inductions, personal protective equipment, first aid, and toolbox talks.
- Keep all records, registers, and reports updated for the duration of any given project to comply with relevant legislative standards, company policies to enable Coniston to meet its legal obligations when delegated.
- Keep site conditions well maintained so far as reasonably practicable so conditions do not pose a hazard to personnel or site visitors.
- Report accidents, incidents and near misses at the earliest convenience to the Health and Safety Manager.
- Liaise, co-operate, and co-ordinate trades, contractors, and subcontractors in relation to site arrangements, Health, Safety, and work tasks when instructed.
- Make sure that all plant, machinery, lifting equipment hand tools and power tools comply with legislative standards with records recorded on pre-use inspections.
- Ensure that personal protective equipment is readily available when needed or necessary.
- Follow company policies and procedures to enable the duty holder to meet its legal obligations in relation to Health and Safety.
- Enforce where necessary the site rules and procedures to visitors, trades, and subcontractors.
- Ensure that competence is defined by obtaining any copies of the relative training records and random sample checking competence cards when completing inductions.

2.10 Responsibilities Placed on Direct Trade and Agency Staff.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility to:

- Comply with relevant Personal Protective Equipment levels, Methodology statement, Risk assessments, (Control of Substances Hazardous to Health) COSHH assessments and Safe Systems of Work outlined within company policies and by Coniston Management.
- Do not use tools, plant, or equipment outside of its instructed manufactured design specification or if you are not competent or experienced to use it.
- Report unsafe conditions as far as is reasonably practicable.
- Conduct work in accordance with training and instruction received.
- Bring to the attention of Coniston Management any shortcomings in company arrangements which your training would reasonably allow you to know.
- Check tools, plant and or work equipment prior to use to ensure it is safe to use.
- Ensure that any defects with personal protective equipment, work equipment, tools, and plant is reported immediately to the Coniston Management so it can be taken out of use or replaced.
- Ensure that work equipment is not maliciously or deliberately miss used rendering it unusable.
- Report accidents, incidents and near misses to Coniston Management.

2.11 Responsibilities Placed on Subcontractors and Contractors.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility to:

- Comply with Coniston Health and Safety policy and the Health and Safety Charter.
- Ensure the requirements of any Health and Safety Plan developed for the site and co-operate with arrangements made to ensure health and safety on site.
- Carry out work in accordance with the relevant statutory provisions and consider the safety of third parties on-site and those within the public interface.
- Assess the risk with any associated works, substance, and process on site which will be hazardous to health and safety, that of which must be provided before work commences.
- Contractor(s) employees are not permitted to alter any plant or work equipment provided for their use or interfere with any plant or work equipment on the site without being deemed competent.
- Plant, work equipment and tools are to be in good working order at the point of use with any safety devices or guarding checked with records kept in accordance with the Provision and Use of Work Equipment Regulations 1998 and Lifting Operations and Lifting Equipment Regulations 1998. Any serviceable certifications are to be handed over prior to works commencing.
- No power tools or electrical equipment greater than the voltage of 110 volts may be brought onto site unless agreed prior with the necessary arrangements put into place. All transformers, generators, extension leads, plugs and sockets must adhere to the latest British Standards for industrial use, be in good condition and comply with the Requirements of the Electricity at Work Regulations 1989.
- Any injury sustained, or damage caused by sub-contractor's employee(s) must be reported immediately to Coniston Management.
- Sub-contractors are to co-operate with the duty holder to ensure that the duty holder can meet its legal obligations with highlighted concerns rectified within the given timeframes.
- All work activities are to be adequately evaluated prior to works starting to identify any potential noncompliance with any associated legislation.
- Contractors will notify Coniston Management when they are on site and ensure that all Trade Staff / visitors receive a site induction prior to commencement of any works and sign in and out of site.
- Ensure that Contractors who engage non or basic English speaking trade workers and other personnel must set out their arrangements for ensuring that comprehensible critical safety information can be understood to ensure that they will not endanger oneself or others by misunderstanding instruction.

2.11 Responsibilities Placed on Health & Safety Manager/Advisor.

In addition to the personal responsibilities that you have to yourself and to others, it will also be your responsibility to;

- Advise and recommend on matters of Health and Safety with respect, integrity, service and competence.
- Advise management as requested in relation to risk assessments and legal requirements affecting health, safety and welfare, prevention of injury and damage, the provision, selection and use of protective clothing and equipment, new working methods, and plant or materials.
- Update and advise upon proposed changes in legislation.
- Consult upon potential strategic risks in design where necessary.
- Uphold the integrity of an open and honest safety culture.
- Ensure that inspections and investigations are prudent and diligent to enhance an open safety culture.
- Ensure that the wider business has appropriately followed a hierarchy of control in relation to mitigating reasonably foreseeable hazards and risks.
- Ensure that the minimum statutory requirements and arrangements are in place.
- Assist management in dealing with the Health and Safety Executive or enforcement action.
- Record accidents, incidents and near misses when notified.
- Ensure that the business maintains all Health and Safety arrangements.
- Advise upon training requirements and arrange training courses when required.
- Lead by example and always take the lead in promoting safe working practices.
- Maintain systems in relation to health and safety with (PDCA) plan, do, check and act.

2.13 Responsibilities Placed on Company Vehicle Driver(s) and Private Vehicle for Business Use.

Use of Own Vehicle for Company Business and/or Claiming Mileage Allowance Policy.

Specific requirements and arrangements for the policy can be requested from the Human Resource Manager.

- All vehicles used for business use must be road worthy in accordance with any legislation and company policy.
- Associated documentation is to be made readily available for inspection at request subject to a reasonable time period.
- Any changes in relation to a valid driver's license is to be reported to the Human Resource Manager.

- If a driver is involved in an accident, it is to be reported to head office.
- A driving license(s) can be subject to reasonable requests for relevant checks for endorsements or driving offences.
- Driving in inclement weather conditions should be assessed and within the driver's capabilities before departing.

Section 3: Arrangements.

This section of the policy details the Health & Safety arrangements necessary to ensure that a healthy and safe environment is provided and maintained and ensure the health and safety of employees, contractors, and anyone else that may be affected by any work carried out on behalf of Coniston.

3.1 Safety Policy: Monitoring, Evaluation and Review.

To comply with Section 2(3) of the Health and Safety at Work etc Act 1974 and Regulations 4 and 5 of the Management of Health and Safety at Work Regulation 1999 this policy must be monitored, evaluated, and reviewed as appropriate to ensure it effectively meets the Statutory Requirements related to Coniston activities. Reviews incorporating performance in relation to safety should take place at agreed intervals to ensure that the management systems are adequately maintained and within the context of how Coniston operate.

Safety Inspections

Informal safety inspections are used to enhance collaborative working relationships encouraging an open and honest no blame safety culture designed to enable duty holders to improve safety performance. Formal audits are undertaken to highlight noncompliance benchmarked against approved codes of practice with the close out of audit points time bound. The formal Health and Safety audits are specific, measured, achievable, relative, and time bound with performance recorded and evaluated for continuous improvement.

Site Checks

Site teams record site checks within the daily diary and action any reasonably foreseeable hazards, risks, and unsafe site conditions.

Near Misses/ Incidents

The reporting of unplanned events that have the potential to cause harm or damage to assets or property are encouraged to be reported as "Near Misses". The reporting of a near miss highlights potential learning opportunities or trends that may escalate to cause harm so processes and procedures can be updated. This will help to proactively avoid potential

accidents or incidents in the future with the same patterns or trends with prior reported near misses.

3.2 Induction Arrangement for New Employees Engaged by Coniston or Transferred to Site.

Induction procedures are essential to introduce the new employee to the safety standards expected of them when working on behalf of Coniston. The arrangement is to be carried out by Coniston Health and Safety Manager, Office Manager, Human Resource Manager or Site Management where the new employee will be required to work. Visitors to site will also be required to receive a site-specific induction, which is undertaken by Coniston Management. Persons inducted must also sign to confirm that they have received and understood the information presented.

New Employees

Induction arrangements for new employees will include but may not be limited to, the following, job role responsibilities, name of Line Manager to whom they report to, personal responsibilities under Health & Safety Law, emergency procedures, first aid facilities and the requirement to report all accidents. New employees are also provided with a copy of the company handbook. Employee(s) based in the office are required to undergo a Collingwood House Health and Safety induction.

Site Specific Induction

All operatives are subject to a site induction before works are allowed to commence on site and cover Emergency Arrangements/procedures, Site Rules, First Aid Arrangements and Site Contact Details. All operatives will have their CSCS card checked during the induction and will be prompted to ensure that they have read and signed their task specific Risk assessments, Method statements.

3.3 Disciplinary Arrangements.

To ensure the safety of all employees and others who may be affected by any work carried out by Coniston, it is essential that company procedures and Site-Specific rules are always adhered to. Failure to comply with company instructions that amount to misconduct could potentially result in disciplinary action being taken. The purpose of Coniston disciplinary procedure is to deal with 'misconduct' within employment. Coniston wishes to ensure that when misconduct occurs that it is dealt with fairly, and consistently. The procedure will come into operation where misconduct, as opposed to genuine lack of capability, knowledge, or physical ability, takes place.

All disciplinary procedures are supported by the Human Resource Manager with processes in place to ensure fair independent due process.

Bullying and Harassment.

Bullying is defined as unwanted and unwarranted behaviour that causes humiliation, offence, and distress, stalking and harassment is defined as when someone repeatedly behaves in a way that makes a person feel scared, distressed, or threatened. Complaints of bullying and or harassment should be reported immediately to Coniston Management, the Human Resource Manager, the Health and Safety Manager and or a Director. All complaints are promptly investigated and any action to be taken recorded.

All members of management should be aware of the signs of bullying and or harassment, i.e. Trade Staff or office staff becoming withdrawn, changes in behaviour, taking more sick leave or a lowering of work quality. Any concerns should be reported to the above to enable further investigation to take place.

3.4 Yellow and Red Card Arrangements.

Coniston aims to positively influence the behaviour of personnel and encourage responsibility and accountability towards an open and honest safety culture. Reasonable behaviour is expected of personnel and requirements are clearly outlined within the site-specific induction and displayed site rules. Direct personnel may be liable for disciplinary proceedings if any of the criteria are met within the arrangements.

The arrangements for a yellow card can be initiated with fair warning in relation to:

- A significant unsafe act that could result in injury or damage to property and or assets.
- Unreasonable behaviour or behaviour classed as threatening and or abusive which can be upgraded to a red card after investigation.
- When there has been multiple proven reasonable documented recorded findings and informal warnings that site personnel have breached Coniston site rules or legal legislation that would meet the threshold for a material breach in law.
- Failure to follow Risk Assessments, Method Statements, Safe Systems of Work or comply with safety instruction and signage.
- Working without permits.
- Poorly erected access equipment failing to comply with the manufacturer's instructions.
- Removal of safety guarding from tooling or machinery.

A yellow card will last for three months until it can be reset. The Health and Safety Manager is to be notified of carded breaches when issued. When a yellow card is issued the person in question can be asked to leave site for a period of no less than that of twenty-four hours but not exceeding forty-eight hours and is to be re-inducted upon return. A yellow card can be communicated via email to the operative's employer and the Health and Safety Manager.

The arrangements for a red card can be initiated in relation to:

- Working practices that have the high potential to result in a fatal or serious injury.
- Tampering with or the removal of critical protection such as, edge protection, guardrails, toe boards, and all associated fire protection.
- Unreasonable behaviour deemed a criminal act.
- Placing third parties or members of the public at direct risk.
- Smoking and vaping in out of bounds or prohibited areas.
- Being on-site under the influence of Drugs and or alcohol.
- Failure to comply with a random or with cause drug and alcohol test.
- Receiving two yellow cards in a three-month period.

A red card will suspend the operative indefinitely from working on a Coniston site which can be confirmed in writing to the operative's employer.

Coniston direct staff can be referred for disciplinary arrangements if any acts or omissions meet the threshold for a yellow or red card.

3.5 Objection on Safety Grounds.

Section 7 of the Health and Safety at Work etc Act 1974 and Regulations 14 of the Management of Health and Safety at Work Regulations 1999 (as amended) require employees to take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions at work. In addition, employees must not undertake activities for which they are not adequately trained and experienced. Where such situations arise, the employee has a duty to notify any shortcomings in Health and Safety arrangements, even when no immediate danger exists, to his employer and this could give rise to an objection on safety grounds to undertaking the work.

Objection on safety grounds to undertaking work instructions should, where possible, be resolved between the parties concerned so that they can comply with their respective statutory duties.

If there is failure to resolve the problem between the parties concerned then the matter should be discussed with the immediate manager and, if appropriate, Coniston Health and Safety Manager. If there is failure to agree at the working level, then the matter should be referred to a Director whose responsibility is to achieve a solution to the objection and comply with statutory requirements.

3.6 Training Arrangements.

The Health & Safety at Work Act 1974 The Management of Health & Safety at Work Regulations 1999 (as amended 2003) (as amended)

We are committed to ensuring that all our staff have received adequate training to be able to carry out their duties safely and without risk to themselves or others and to the highest standards. The need for training will be determined by the requirements of the individual employee's job role. All training is carried out in line with the requirements of the Health and Safety at Work Act 1974.

To meet this arrangement Coniston will do the following:

- Provide all new employees with relevant induction training. This will cover key areas such as health and safety. All employees are required to sign an induction form to confirm that they have received the induction training.
- Provide relevant training when deemed necessary to any other persons who may be working on our premises such as temporary workers.
- Carry out assessments to determine whether training will be necessary to carry out a particular role (except in the case of statutory training requirements)
- Provide on the job training where an employee's job involves the operation of tools or machinery.
- If certain training is required and cannot be provided in-house, then in consultation with the employee and the member of staff responsible for Health and Safety, a suitable training course will be identified.
- Training shall be recorded, and upcoming training needs identified through the company training register.
- Evaluate all training on completion of the training course.

3.7 Employee Consultation and Communication.

The Health & Safety (Consultation with Employees) Regulations 1996

Coniston shall encourage the full co-operation, support & active participation of all employees in promoting good health & safety at all company sites. Coniston will endeavour to consult with those employees in good time on health and safety matters, and in particular:

- When introducing measures which may affect health and safety.
- The appointment of competent person(s)
- The provision of statutory health and safety information.
- Any statutory health and safety training detail.
- The health and safety measures of new plant & equipment.

Communication

Effective communication is essential if the Health & Safety Policy is to be understood and consistently implemented it is also essential that all employees receive adequate safety information to enable them to carry out their responsibilities. To achieve this:

- All employees receive a copy of Coniston Health & Safety Policy statement at induction with any updates to the policy statement communicated by means of Internal Memos, Company newsletter, Toolbox Talks and Posters.
- Coniston encourages an 'Open Door' policy for all employees and contractors. Coniston Health and Safety Manager will use site visits to discuss safe working practices and safety concerns with trade staff to achieve the effectiveness of controls, ensuring a system of regular communication and liaison.
- Regular Safety Committee Meetings take place quarterly in order to discuss the aspects of Health and Safety.

Communication with non-English speaking personnel

Coniston will ensure that all operatives under its directive will have a minimum of basic understanding of the English language in relation to Health and Safety so as basic critical safety instruction can be communicated and adhered to, so individuals do not endanger themselves and or others working around them.

3.8 Arrangements for Visitors.

Coniston recognises its responsibility, so far as is reasonably practicable, to ensure the health and safety of persons not under its directive while on Company premises. This may include Health & Safety Inspectors, Police, Local Authority personnel, Client's representatives, contractors engaged to carry out work on the premises / sites, sales representatives, delivery drivers and the public.

To ensure the safety of all visitors, they are to sign in the Visitors Book and be given any safety information, including emergency procedures, and supplied with any necessary safety equipment, including a hard hat and hi-visibility vest where appropriate. Unless formally inducted, visitors are to be always escorted. Visitors are to ensure that they sign out when leaving company premises.

3.9 Accident, Incident, and Ill Health Reporting.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

Legislation

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) clearly state the reporting procedures covering fatalities, specified injuries, injuries resulting in incapacity for more than seven days and dangerous occurrences.

Methods of Reporting

Online

Go to www.hse.gov.uk/riddor and complete the appropriate online report form. The form will then be submitted directly to the RIDDOR database. You will receive a copy for your records.

Telephone

All incidents can be reported online but a telephone service remains for reporting fatal and specified injuries only. Call the Incident Contact Centre on 0845 300 9923 (opening hours Monday to Friday 8.30 am to 5 pm).

Reporting Deaths and Specified Injuries

- In the event of a fatal or specified injury to any person or dangerous occurrence as defined by RIDDOR Coniston's Health and Safety Manager must be advised immediately.
- All reportable incidents will be reported by Coniston Health and Safety Manager
- In addition, all fatal accidents must be reported to H.M. Coroner via the local Police Station.

Other Reportable Injuries and Dangerous Occurrences

- In the event of an accident at work where, because of injury, a person is incapacitated for work of their usual kind for more than seven consecutive days (not including the day of the accident, but includes non-working days e.g. weekends), a report of the injury will be made to the Incident Contact Centre via the Internet.

- With regards a dangerous occurrence as categorised under RIDDOR, the incident will again be notified online to the Incident Contact Centre.

Reportable Disease

If a medical certificate or other written diagnosis from a registered medical practitioner has been received in respect of an employee who is absent from work and the disease diagnosed is one of those listed under RIDDOR, then Coniston Health and Safety Manager or Advisor must be contacted for advice. If the disease is reportable Coniston's Health and Safety Manager will complete the online form and submit to the Incident Contact Centre.

Incident Records

- All fatalities, specified injuries, reportable diseases, dangerous occurrences, and other notifiable injuries will be recorded. The records will be kept by Coniston Health and Safety department who is responsible for ensuring that all details are entered and that records are kept for at least three years from the date of the last entry.
- All accidents and incidents will be recorded on the system.

Analysis and Presentation of Records

Yearly statistics of all reported accidents will be recorded, and Coniston Incidence Rate calculated. Records will be used to analyse and ascertain accident trends and act where appropriate.

Accident Investigation

All injuries or damage resulting from accidents or incidents on site or in other workplaces, however minor, will be reported to the Health and Safety Manager, Site Manager, Project Manager, and relevant Contract Manager. The site team will be responsible for recording the details of the accident or incident on the system. A copy of an accident or incident report can be made available at the request of the injured party to obtain the record details of his/her accident if necessary. A copy of the report must then be sent to Coniston Health and Safety Manager. Depending on the nature and severity of the accident, Coniston Health and Safety Manager will then carry out an investigation and report the findings to the Directors. During any investigation, it will be the responsibility of all company personnel to assist when requested to do so in the process.

Where identified, corrective action will be taken to prevent further accidents, including any necessary reviews of procedures and amendments to Risk assessments where possible the investigator or manager should obtain signed statements from any witnesses and copies of site records obtained including induction procedures and photographs taken of the area. If plant or equipment appears to be a contributing factor to the accident, ensure that photographs indicate the use and state of condition of any such plant. The Contract Managers should also be consulted to provide relevant background to any incident.

Coniston's Health and Safety Manager or Advisor will prepare a full report of any incident investigated, together with any photographs, statements, or other relevant material for use by Company insurers or legal advisers. This investigation report is privileged information and must not be issued to any other person without the permission of Coniston insurers or legal advisers.

3.10 Welfare Arrangements.

The Workplace (Health, Safety and Welfare) Regulations 1992 The Construction (Design and Management) Regulations 2015

Planning Procedures

To promote the physical welfare of employees, it is the responsibility of the Site managers and/or contract managers (with advice as necessary from Coniston's Health and Safety Manager) to establish and maintain the welfare facilities and first aid facilities on site.

The Office Manager is given the responsibility to establish and maintain the welfare facilities and first aid facilities for the offices, considering the number of personnel employed therein by following the guidance given in the Approved Code of Practice for Regulations 20-25 of the Workplace (Health, Safety and Welfare) Regulations 1992.

Welfare Facilities

Detailed guidance on the welfare facilities required at a workplace is given in the Workplace (Health, Safety and Welfare) Regulations 1992, and Approved Code of Practice, The Construction (Design and Management) Regulations 2015 and accompanying schedules. Coniston will endeavour to comply as far as is reasonably practicable with these regulations. Where possible, in relation to construction work, the Client will be consulted at tender stage to ascertain the positioning of such facilities and the use of services including electricity and water. All welfare facilities must be clean and maintained free from waste and defects that could cause hygiene problems.

Minimum Welfare Facilities for A Construction Site

Under schedule 2 of the Construction (Design and Management) Regulations 2015 the minimum welfare facilities on a construction site is to have the following:

(1) Sanitary conveniences

(1) Suitable and sufficient sanitary conveniences must be provided or made available at readily accessible places.

(2) So far as is reasonably practicable, rooms containing sanitary conveniences must be adequately ventilated and lit.

(3) So far as is reasonably practicable, sanitary conveniences and the rooms containing them must be kept in a clean and orderly condition.

(4) Separate rooms containing sanitary conveniences must be provided for men and women, except where and so far as each convenience is in a separate room, the door of which is capable of being secured from the inside.

(2) Washing facilities

(1) Suitable and sufficient washing facilities, including showers if required by the nature of the work or for health reasons, must, so far as is reasonably practicable, be provided or made available at readily accessible places.

(2) Washing facilities must be provided—

(a) in the immediate vicinity of every sanitary convenience, whether or not also provided elsewhere; and

(b) in the vicinity of any changing rooms required by paragraph 4, whether or not provided elsewhere.

(3) Washing facilities must include—

(a) a supply of clean hot and cold, or warm, water (which must be running water so far as is reasonably practicable);

(b) soap or other suitable means of cleaning; and

(c) towels or other suitable means of drying.

(4) Rooms containing washing facilities must be sufficiently ventilated and lit.

(5) Washing facilities and the rooms containing them must be kept in a clean and orderly condition.

(6) Subject to sub-paragraph (7), separate washing facilities must be provided for men and women, except where they are provided in a room the door of which is capable of being secured from inside and the facilities in each room are intended to be used by only one person at a time.

(7) Sub-paragraph (6) does not apply to facilities which are provided for washing hands, forearms, and the face only.

(3) Drinking water

(1) An adequate supply of wholesome drinking water must be provided or made available at readily accessible and suitable places.

(2) Where necessary for reasons of health or safety, every supply of drinking water must be conspicuously marked by an appropriate sign.

(3) Where a supply of drinking water is provided, a sufficient number of suitable cups or other drinking vessels must also be provided, unless the supply of drinking water is in a jet from which persons can drink easily.

(4) Changing rooms and lockers

(1) Suitable and sufficient changing rooms must be provided or made available at readily accessible places if a worker—

(a) has to wear special clothing for the purposes of construction work; and

(b) cannot, for reasons of health or propriety, be expected to change elsewhere.

(2) Where necessary for reasons of propriety, there must be separate changing rooms for, or separate use of rooms by, men and women.

(3) Changing rooms must—

- (a) be provided with seating; and
- (b) include, where necessary, facilities to enable a person to dry any special clothing and any personal clothing or effects.

(4) Suitable and sufficient facilities must, where necessary, be provided or made available at readily accessible places to enable persons to lock away—

- (a) any special clothing which is not taken home;
- (b) their own clothing which is not worn during working hours; and
- (c) their personal effects.

(5) Facilities for rest

(1) Suitable and sufficient rest rooms or rest areas must be provided or made available at readily accessible places.

(2) Rest rooms and rest areas must—

- (a) be equipped with an adequate number of tables and adequate seating with backs for the number of persons at work likely to use them at any one time;
- (b) where necessary, include suitable facilities for any woman at work who is pregnant or who is a nursing mother to rest lying down;
- (c) include suitable arrangements to ensure that meals can be prepared and eaten;
- (d) include the means for boiling water; and
- (e) be maintained at an appropriate temperature.

3.11 Safe Place of Work.

Coniston shall endeavour to provide all employees with a safe working environment. A safe means of access and egress shall be provided and maintained for all work areas, including the offices and all areas of construction sites. Welfare facilities shall be provided which as a minimum meet the requirements of the statutory regulations and shall be maintained and kept in a good state of repair.

Consideration shall be given to the environmental conditions in the offices and site to ensure that the temperature, air quality, ventilation and workspace requirements are in line with the applicable regulations or guidelines.

Housekeeping

All personnel in all departments shall maintain a good standard of housekeeping. Coniston shall provide suitable and sufficient waste receptacles and arrange suitable waste disposal facilities to ensure that a satisfactory housekeeping standard can be achieved.

Workplace layout

All workplaces shall be suitably demarcated to adequately identify the areas where pedestrians and vehicles are allowed to move. The condition of the demarcation shall be maintained to ensure that the areas are always obvious. Consideration shall be given to the construction site layout to ensure that similar demarcation requirements are addressed. Areas where plant, equipment and materials are not to be placed shall be demarcated and inspections of the work area shall be carried out at regular intervals to ensure that such areas are kept clear.

3.12 Company Smoking and Vaping Arrangement.

Coniston recognises that smoking and vaping is harmful to health and should not be encouraged. Designated separate smoking and vaping areas where practicable and space permitting may be provided.

Smoking and vaping are only permitted in designated places with the necessary fire arrangements in place. Anyone found smoking or vaping in prohibited areas may be subject to disciplinary proceedings in accordance with Coniston disciplinary and or red card arrangements.

Electronic cigarettes or vaping devices are not permitted to be taken onto temporary external or internal structures such as tube and fitting scaffold systems and are not to be disposed of within the construction waste streams and should be disposed of in accordance with the manufacturer's instructions.

3.13 Use of Display Screen Equipment (D.S.E).

The Health & Safety (Display Screen Equipment) Regulations 1992 (as amended 2002)

DSE are devices or equipment that have an alphanumeric or graphic display screen and includes display screens, laptops, touch screens and other similar devices.

Employee Responsibilities

Coniston will determine whether the employee is classified as a 'user'. A 'user' is identified as someone who normally uses display screen equipment for a 'continuous spell of an hour or more at a time' on a 'daily' basis.

All users will be provided with a DSE self-assessment questionnaire which covers the following items: lighting, reflection, seating, posture adjustment, ancillary items – footrests, wrist pads, etc. Assessment will also cover, where necessary, the use of laptop computers. Where identified, Coniston will provide any equipment found to be necessary to comply

with the legislation and shall ensure that the required working practices and methods are in place to meet the statutory requirements.

The date of any assessment must be recorded. Assessments must be reviewed on a regular basis and in the light of changes to the workforce or to the worker's individual capability or where significant changes to the workstation has occurred such as relocation, modification of lighting or workstation furniture, software or hardware including screens and keyboards. Further assessments will be needed if there is a substantial increase in the amount of time that must be spent using DSE or a change in the task involved.

Eye Tests

Users will be provided, when requested, with an eye test. It is the employee's responsibility to arrange for the test and for the test to take place in their own time. Coniston does not offer paid leave for eye tests. Following the initial eye test, solely the optician will decide the frequency of any follow up tests.

Where the optician has confirmed in writing that corrective appliance is exclusively required for DSE work, Coniston will contribute towards the cost of a basic corrective appliance.

Laptops/ Portable Computers

The smaller size and design of laptop computers mean that, if used wrongly, users can experience discomfort. This is because the smaller screen and keyboard encourages users to bend over, causing shoulder and neck problems. As a result, it is company policy that laptops will be used according to the following guidelines:

- Where possible, users should be encouraged to use a docking station or firm surface and full-sized keyboard and mouse.
- The use of laptops in stationary cars is actively discouraged. This is to prevent the additional stress on the spine and the increased likelihood of injury that could arise from unsuitable seating and limited space.
- Laptops do have a potential manual handling risk if users have to carry heavy equipment and papers.
- The angle of the computer screen should be adjusted to minimise reflections.
- Users should ensure that there is enough space in front of the laptop to rest wrists and forearms whilst working.
- The height and position of the portable's screen should be angled so that the user is sitting comfortably, and reflection is minimised (raiser blocks are commonly used to help with screen height). Regular breaks from using the laptop at least ten minutes in every hour should be encouraged.

If any discomfort is experienced whilst using a laptop, it must be reported immediately to Coniston Health and Safety Manager or the Human Resource Manager.

3.14 Alcohol, Illicit Substance and Drug Arrangements.

Alcohol or drug misuse by all employees and or contractors can adversely affect the safety and health of themselves and others. Coniston will recognise that any person known to be, or strongly suspected of being under the influence of alcohol or illicit drugs must be referred to the appropriate manager who is to arrange for the person to be removed from the workplace.

If it is suspected that an employee is using or attempting to distribute drugs, illicit substances or alcohol whilst at work disciplinary processes may be initiated. Coniston recognise that alcohol and illicit drug use can be a societal concern. Where possible the individual can be guided towards the necessary levels of support for addiction and substance abuse.

The prohibition on illegal use of drugs extends to all company activities whilst at work including, but not limited to, driving on company business, on-call, or standby duties and whilst attending overnight conferences, training courses and business parties.

Understanding the signs of substance, drug, and alcohol misuse (or addiction) will help manage the health and safety risk in the workplace.

What The Issues are and What to Look Out For.

Misuse is not the same thing as dependence or addiction. Drug and alcohol misuse is the use of illegal drugs, substances and misuse of alcohol, medicines prescription, nonprescription, and substances such as solvents.

Consider these warning signs, which could indicate drug or alcohol misuse:

- Unexplained or frequent absences.
- A change in behaviour and poor decision making.
- Unexplained dips in productivity.
- More accidents, incidents, or near-misses.
- Performance or conduct issues.
- General unreasonable behaviour contributing to putting oneself or others at risk.

Random and with cause drug and alcohol testing.

Drug and alcohol testing may be initiated for reasons including but not limited to an unusual frequency of accidents, incidents, near misses, unreasonable behaviour, and at random annually.

Refusing a drug and alcohol test.

Screening and testing are conducted by an instructed competent contractor using industry approved testing methods. A refusal will result in being excluded from company premises

with the for non-direct workers with their employers being notified of the decision with direct personnel being stood down pending disciplinary arrangements.

Support for employees.

Employees with a drug or alcohol addiction may ask for help at work, Coniston will reasonably ensure that their support will be dealt with discreetly and confidentially if they are not at immediate personal risk of harm or a risk to others. Coniston reserves its own legal position if it is given evidence or information that suggests an employee's misuse has involved breaking the law at work or cause for a safeguarding concern.

Drug and alcohol dependence are recognised medical problems. Someone who is misusing drugs or alcohol has the same rights to confidentiality and support as they would if they had any other medical or psychological condition.

Coniston will encourage them to get help from their GP or a specialist drug or alcohol agency and may refer them to occupational health if necessary.

Coniston will consider whether drug and alcohol misuse in the workplace is treated as a disciplinary matter or a health concern. If their normal work is safety-critical Coniston may need to temporarily move them to another job.

Drug Waste.

Drug paraphernalia including sharps and needles which would be deemed as clinically hazardous waste are not to be removed by trade operatives unless adequately trained or instructed with the necessary levels of Personal Protective Equipment (PPE).

3.15 Prescription Medication and Work Duties.

Under section 2 of the Health & Safety at Work Act employees are to notify Coniston of any medication that they may be taking, particularly if it may affect their ability to carry out normal work duties or if and operative maybe prone to known allergy that would require emergency treated.

Employees who are valid driving licence holders are obliged to inform the Driver and Vehicle Licensing Agency of any chronic health problem that may interfere with their ability to drive safely. To ensure the safety of the employee it may be necessary for Coniston to make reasonable adjustments to working methods.

3.16 Out of Hours Working and Working Hours Arrangements.

Where a demand is needed or required for employees to work outside of normal working hours arrangements shall be made and implemented to reasonably ensure the employees' Health and Safety. Patterns of work will be considered and adequately assessed taking into

consideration the undertaking of an adequate risk assessment with the associated works due to take place.

Working Time Regulations 1998 (as amended 2009)

In line with the requirements of the Working Time Regulations 1998 (as amended 2009), Coniston's shall ensure that hours worked by all employees are monitored and that where employees are required to work longer hours than the stated maximum, it is with their agreement. In addition, the required rest periods and breaks shall be arranged as well as the appropriate holiday entitlement.

3.17 Working Noise Arrangements.

Noise can be controlled with exclusion zones and mandatory Personal Protective Equipment (PPE) zones, the level at which Coniston will provide hearing protection and hearing protection zones is 85 dB(A) (daily or weekly average exposure) and the level at which Coniston will assess the risk to workers' health and provide them with information and training is 80 dB(A). There is also an exposure limit value of 87 dB(A), taking account of any reduction in exposure provided by hearing protection, above which workers must not be exposed.

3.18 Personal Protective Equipment (PPE) Arrangements.

PPE is defined in the PPER 1992 as 'all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects the person against one or more risks to that person's health or safety, and any addition or accessory designed to meet that objective'.

Where Coniston finds PPE to be necessary after a risk assessment, using the hierarchy of controls explained below, they have a duty to provide it free of charge.

Four point PPE is mandatory for use on Coniston sites including safety boots with ankle support and a penetrative mid sole and steel toe cap, high visibility clothing (vests) of the relevant class rating, safety hats with appropriate chin straps when working at height, and safety gloves that afford the appropriate level of protection for each particular work task, four point PPE is to be donned at all times when it work areas including all visitors.

Hierarchy of controls

PPE should be regarded as the last resort to protect against risks to health and safety. Engineering controls and safe systems of work should be considered first.

Consider controls in the following order, with elimination being the most effective and PPE being the least effective:

- Elimination – physically remove the hazard.
- Substitution – replace the hazard.
- Engineering controls – isolate people from the hazard.
- Administrative controls – change the way people work.
- PPE – protect the worker with personal protective equipment.
- Employers with both employees and limb (b) workers

The PPE provided will be compatible, maintained and correctly stored. All workers must use the PPE properly following training and instruction in its use. If the PPE provided is lost or becomes defective, the worker should report it to the relevant supervisor.

Employers with only limb (b) workers

Coniston will ensure personnel under its directive are provided with PPE free of charge, where required. This means assessing the residual risk once all other measures (such as engineering controls) have been taken.

Coniston will ensure suitable PPE is:

- Provided.
- Compatible.
- Maintained.
- Correctly stored.
- Used as per the specified manufacturers instruction.

Training and instruction for the use of PPE will be provided as necessary for personnel.

Coniston shall ensure that adequate supplies of all necessary protective clothing or equipment are available in all workplaces for issue as required to employees. PPE arrangements for site visitors will be allocated for those who are required to be escorted when visiting site. Subcontractors working on the site will be required to provide their own PPE for use during their work processes.

Respiratory Protective Equipment (RPE)

Due to the nature of some works it is unlikely that dust can be prevented from becoming airborne even with engineering controls. Coniston supports and encourages the utilisation of rated disposable or reusable respiratory protective equipment. Coniston only permits the

use of respiratory protective equipment with the highest rated protection such as (FFP3) disposable masks, (P3) reusable masks or powered respirators with a (APF40) rating.

Personnel will be given training and instruction for using and maintaining reusable masks with an accompanying face fit test where necessary. Personnel are made aware of the conditions to accommodate the requirements for face fit testing such as being clean shaven.

3.19 First Aid Arrangements.

The Health & Safety (First Aid) Regulations 1981 (amended)

It is the responsibility of the Site Managers and Contract Managers to establish and maintain the first aid facilities on site. The Office Manager is given the responsibility to establish and maintain the first aid facilities for the offices. The first aid arrangements are made to reflect the likely circumstances in which an employee, visitor or contractor could be injured or become ill at work. They will be one trained first aider per twenty-five workers.

Arrangements will include: -

- The nomination of “suitable person(s)” trained and certificated to “first aid certificate level by an approved accredited provider. Suitable and sufficient person(s) must be available whilst work is being undertaken at the workplace. Certification of the Suitable persons must be maintained by the provision of refresher training.
- Means of communicating the location of the facilities and the arrangements made, including the name of the qualified first aider, to all employees, visitors, and contractors with reference to the emergency plan (fire and evacuation) where appropriate during site induction.
- A means of recording on a suitable form the first aid treatment given. This should include patient’s name/address, patient’s occupation, date of entry, date/time of accident, place/circumstances of the accident, injury details and treatment given, signature of person making the entry.
- The provision and maintenance of first aid facilities appropriate to the work and numbers of personnel.

3.20 Risk Assessment Arrangements.

Management of Health & Safety at Work Regulations 1999 (as amended 2003)

It will be the responsibility of Coniston Site Management with the assistance of the Health and Safety department to assess the risks to the health and safety of employees and any

others who could be affected by work activities, including contractors, temporary staff, visitors, and the public. The relevant procedures will be specified to eliminate or minimise those risks identified.

Definitions Hazard – a machine, substance or practice that has the potential to cause harm, Risk – how likely that harm as the result of the hazard could be in relation to the severity.

General Procedure:

1. **Identify the hazards.**
2. **Assess the risks.**
3. **Control the risks.**
4. **Record the findings.**
5. **Review the controls to ensure that the measure(s) remain relevant.**

Identify hazards

Look around your workplace and think about what may cause harm (these are called hazards). Think about:

- How people work and how plant and equipment are used.
- What chemicals and substances are used.
- What safe or unsafe work practices exist.
- The general state of your premises.

Accident and ill health records should be reviewed as these can help identify less obvious hazards. Take account of non-routine operations, such as maintenance, cleaning, or changes in work patterns.

Hazards to health include manual handling, use of chemicals and causes of work-related stress.

For each hazard, it should be considered how employees, contractors, visitors, or members of the public might be harmed.

Vulnerable workers

Some workers have particular requirements, for example young workers, migrant workers, new or expectant mothers and people with disabilities.

Talk to workers

Workers that may be affected by work operations not part of the work task deemed as a normal or standard task will be consulted to understand unforeseen potential risks.

Assess the risks

Once you have identified the hazards, decide how likely it is that someone could be harmed and how serious it could be. This is assessing the level of risk.

Decide:

- Who might be harmed and how.
- What you're already doing to control the risks.
- What further action you need to take to control the risks.
- Who needs to carry out the action.
- When the action is needed by.

Control the risks

Look at what you're already doing, and the controls you already have in place. Ask yourself:

- Can I eliminate the hazard altogether?
- If not, how can I control the risks so that harm is unlikely?

If you need further controls, consider:

- Redesigning the job.
- Replacing the materials, machinery, or process.
- Organising your work to reduce exposure to the materials, machinery, or process.
- Identifying and implementing practical measures needed to work safely.
- Providing personal protective equipment and making sure workers wear it.

What reasonably practicable means

Put the controls you have identified in place. You're not expected to eliminate all risks, but you need to do everything 'reasonably practicable' to protect people from harm. This means balancing the level of risk against the measures needed to control the real risk in terms of expense, time, or trouble.

Record your findings

You must record your significant findings, including.

- The hazards (things that may cause harm).
- Who might be harmed and how.
- What you are doing to control the risks.

Review the controls

You must review the controls you have put in place to make sure they are working. You should also review them if:

- They may no longer be effective.
- There are changes in the workplace that could lead to new risks such as changes to:
 - Staff.
 - A process.
 - The substances or equipment used.

Also consider a review if your workers have spotted any problems or there have been any accidents or near misses. Update your risk assessment record with any changes you make.

3.21 Manual Handling Arrangements.

The Manual Handling Operations Regulations 1992 (as amended 2002)

Coniston recognises the inherent risk of manual handling injuries in many work activities taking into consideration the task, individual, environment and load. To ensure that risks to personnel are kept as low as reasonably practicable, an assessment of risks of injury from lifting and carrying operations will be carried out by the Coniston Site Management in accordance with the Manual Handling Operations Regulations 1992 (as amended 2002). Where there is a risk, Coniston will review all possible options to change the system of work with a manual handling assessment or a full manual handling assessment for work tasks outside of that of which deemed normal for a job role.

All employees will be requested to follow all safe systems of work using any handling systems or aids provided, not take on any handling activities where excessive stooping, twisting, stretching is involved and report any work activity that may give rise to manual handling problems.

3.22 Vibration at Work Arrangements.

Control of Vibration at Work Regulations 2005

Hand-arm vibration is vibration transmitted from work processes into workers hands and arms. Regular and frequent exposure can lead to hand arm vibration syndrome (HAVS), as well as specific diseases such as carpal tunnel syndrome or Raynaud's Syndrome and Vibration White Finger. In accordance with the control of Vibration at Work Regulations Coniston's will have procedures in place to identify work equipment and activities, which

generate vibration magnitudes at the Exposure Action Value (EAV) or the Exposure Limit Value (ELV).

A hand arm vibration assessment will be carried out to adequately assess the risks to the workforce. Where needed, health surveillance and other monitoring strategies will be implemented to gauge the suitability and efficacy of our controls.

3.23 Working at Height Arrangements.

The Work at Height Regulations 2005 The Construction (Design and Management) Regulations 2015 The Management of Health and Safety at Work Regulations 1999 (as amended 2003) The Lifting Operations and Lifting Equipment Regulations 1998

Coniston recognises that falls from height remain the single biggest cause of workplace deaths and major injuries.

General Standards

The hierarchy of the Work at Height Regulations should be followed wherever work at height is to be carried out. All work at height, regardless of height and work duration, should be properly planned by identifying the work at height risks associated with the work and implementing the control measures that should reduce the risk to as low as reasonably practicable. Safe systems of work (Method Statement) should be produced for all work at height that is undertaken in the workplace and persons carrying out the work should be instructed and trained in the appropriate methods to be used.

The use of a working platform incorporating handrails or edge protection should be the first consideration when working at height is deemed necessary; this includes the use of podium steps and proprietary systems to replace the use of ladders and stepladders. Where it is not reasonably practicable to work from a working platform a suitable risk assessment should be prepared. Working platforms should also be kept as clear and clean as possible to avoid slips, trips, and the accidental loss of material to lower levels.

Where fall arrest equipment is selected as a control measure it should be installed by competent persons and work should not commence until the Site Management have checked that the equipment has been installed correctly.

Where personal fall protection systems are used all persons should hold the correct level of competency and the equipment should be accompanied by the appropriate inspection certificate.

An emergency rescue plan should be prepared where fall arrest and fall protection systems are the control measures introduced in the workplace. Please inform the Health and Safety Manager in this event who will create and produce the rescue plan.

Definitions

Work at Height – any workplace, including at or below ground level, (including access and egress from such a place of work) where a person could fall a distance liable to cause personal injury.

Work at height includes, but is not limited to, work involving:

- Access by / work off stepladders
- Access by / work off ladders
- Roof works - repairs, maintenance, and new build
- Fragile roofs, including roof lights
- Scaffold erection/ working platforms
- Steel / mast erection
- Access/work by deep excavations
- Work over / above openings including water, excavations etc.

Work at Height Risks:

- Personnel falling from the place at height
- Material falling onto persons below
- Personnel / material falling through fragile roofs
- Contact with overhead services when erecting scaffold or using MEWPs
- Persons falling to a lower level e.g. into excavations, water, manholes
- Personnel falling from ladder / stepladders
- Suspension trauma
- Scaffold collapse
- Extreme weather conditions
- Personnel falling through unprotected voids
- Slips and trips on working platforms

Hierarchy – A series of measures ranging from the safest method to the least safe method.

- Avoid work at height.
- Use work equipment or other measures to prevent falls where work at height cannot be avoided. (Collective Prevention i.e. guard rails)
- Where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

Work Duration – the amount of time required to carry out the task e.g. controls should be reasonably practicable according to duration. Controls for short term duration may be lower down the hierarchy than those for long term duration, e.g. surveys, inspections, ad hoc access for less than ten minutes.

Working Platform – Any guarded platform used as a place of work,

- Edge Protection
- Scaffolding
- Mobile elevated working platform (MEWP)

- Tower scaffold

Fall Arrest Equipment – Equipment that does not prevent falls but mitigates the consequence of the fall e.g.

- Air mats
- Air bags
- Safety nets
- Crash decks

Personal Fall Protection System - Equipment worn by an individual that does not prevent a person falling but prevents a person falling to the ground thus mitigating the consequences.

- Restraint system
- Harness and lanyard
- Rope access and positioning techniques

Mobile Elevated Working Platform – An enclosed working platform which can be adjusted to work at different heights and in different locations.

Planning, Design & Tender – Construction Projects

Where reasonably practicable, the need for work at height during the construction stage should be eliminated. Where it cannot be eliminated, the requirement for the erection of working platforms should be considered during the design stage. Where the use of a working platform is not reasonably practicable the requirement for the use of other means of access should be identified to the construction team as a residual risk. All working platforms must be adequate for the task and loads that are required of it.

When selecting scaffold contractors, preference should be towards National Association of Scaffold Contractors (NASC) listed contractors.

Planning of Workplace Activities

The factors that should be taken into account when planning the work at height include the distance and consequences of a potential fall, the environment and condition of the workplace, the tasks to be performed, the movement of tools and materials to the place at height, the people involved, others at risk and the work equipment to be used.

The Site Management should identify the activities requiring work at height and should select the appropriate height protection systems, to reduce the risks of falling to as low as reasonably practicable.

A survey of the work area should be carried out and hazards for delivering scaffold or erecting scaffold, or the use of mobile elevated working platforms should be identified and recorded.

All roof coverings should be classed as fragile until written confirmation is received that it is not fragile.

Where fragile roofs / roof lights are identified suitable and sufficient access / working platforms, covering, barriers etc. should be planned and included in the control measures.

The methods for transporting material and tools to a place of work at height should be planned to reduce the manual handling e.g. the installation of scaffold staircases, the installation of a goods hoist, or the use of lifting equipment. The carrying of loads up a ladder should be prohibited.

The equipment required for work at height should comply with the relevant industry standard and the requirements clearly communicated to procurement departments, so the information can be included on purchase / hire orders.

Contractors and Suppliers

Contractors should be approved by the Company and be provided with known hazards identified during the physical survey by the site management. Contractors should provide risk assessment / method statements and evidence of competency of personnel before starting work. The Site Management team should review the information provided by any contractor to check suitable controls measures are identified specific to the hazards identified.

Work Practices

The Site Management should implement control measures identified in the risk assessment and monitor work at height to ensure that significant work at height risks are reduced to as low as reasonably practicable.

Where it is not reasonably practicable to use a guarded work platform, a suitable risk assessment and method statement should be provided for the works; in addition to a "permit to work at height" permit should be completed by the Site Management team and the works closely monitored.

Temporary openings must have a securely fixed cover and adequate signage to identify the hole below.

Such openings should be inspected weekly, and inspections recorded.

The site supervisors should continually monitor (No less than once a week) the workplace to ensure the control measures are implemented and are suitable for the risk.

Scaffold

Scaffold systems should be TG:20 compliant and or designed, by competent persons, appropriate to the ground bearing conditions, the load bearing capacity required and the design of the building.

Scaffold should only be erected, dismantled, or adjusted by trained scaffolders working in accordance with current legislation and the guidance document.

Where system scaffold is used, the competency of the persons erecting it should include formal training provided by the system scaffold supplier as a minimum.

The scaffold should be designed and erected in accordance with the design prepared by a competent person and should not be used until a handover certificate has been completed by the scaffolder and the Site Management have inspected the scaffold Handover Certificate for use.

Remember to ensure that a copy of the scaffold design / drawing and calculations must be retained on site. Pull tests should be undertaken on no less than 10% of the scaffold and the Handover Certificate must also remain on site.

The following hierarchy should be considered for scaffold / platform access:

- Stairways
- Internal ladders
- External ladders – which should have access gates

Scaffold loading bays should be fitted with proprietary safety gates and clearly signed with their safe working load. Safety gates should be inspected weekly and recorded on the Scaffold Inspection Record.

The scaffold and access ladders should be visually inspected by a competent person at the start of each working day, and weekly inspections carried out and recorded. The scaffold should also be inspected following any alteration or incident that may have affected its stability e.g. high winds, struck by plant etc.

Tower Scaffold/ Podium Steps

Towers should be constructed in accordance with manufacturer's guidance by persons with the relevant training and competency in their erection and should be inspected by the contractor's supervisor before they are used for the first time. The Site Management should continually monitor the use of tower scaffold and brief contractors on the safe use of them and where tower scaffolds are deemed applicable for use.

Site Managers should have PASMA certification or equivalent and be trained in the work at height systems that are to be used on their sites.

Mobile Elevated Working Platforms (MEWP's)

MEWP's should only be used by persons who have the appropriate level of training (IPAF) and experience to use them, competency of persons and the test and certification of equipment should be checked by the Site Management before the work commences. The operative should provide evidence of or receive familiarisation training prior to authorisation to operate the MEWP and the manufacturer instruction is to be kept on site.

MEWP's should be included in the LOLER register, a person should be nominated for carrying out the inspection and records kept on the LOLER register.

Unless designed for the purpose, MEWP's should not be used as a means of transfer to another place of work. Where access to another place of work at height is required, specialist equipment should be hired in that is suitable for using for access purposes.

The requirement for restraint systems should be clearly identified; where cherry pickers or MEWPs with a Boom function are used a harness and restraint lanyard should be used. Where a harness is required, the MEWP should have a suitable anchor point for clipping on to. Where other types of MEWPs are selected for use (Scissor Lifts), the requirement for restraints should be risk assessed dependant on the work situation and type of equipment.

Man Baskets / Cages

Man, baskets suspended from cranes, purpose-built cages on forklifts etc., may be used where it is not reasonably practicable to position a MEWP. Where lifting equipment is used for lifting man basket / cage the Thorough Examination Certification should be checked and have been examined less than 6 months before the lift and at 6 monthly intervals whilst it is being used for lifting persons.

Edge Protection

Edge protection should be provided where there is a risk of persons falling from height or below ground level. The edge protection should be suitable and sufficient to prevent materials and persons falling and be designed specifically for its intended use. Only trained and competent persons should erect, alter or dismantle any edge protection in accordance with a safe system of work to prevent persons installing / removing the protection from falling.

Where work is of short-term duration, e.g. survey, and edge protection is not reasonably practicable to install, a specific assessment should be provided to identify other control measures and a permit to work at height issued.

Where sloping roof edge protection is required the recommendations in BS 13700 EN 13374 should be followed.

Personal Fall Arrest Equipment (harness, lanyards, ropes etc.)

Persons using harnesses and lanyards should be trained, familiar and competent in the wearing and inspection of the equipment that they are required to wear. They should also be instructed on the risks associated with the wearing of such equipment and advised of the emergency actions to take in the event of a fall.

Where fall arrest equipment is used, the Site Management should check the competency of persons, ensure they are familiar with the type of equipment and check that all the equipment being used has the relevant inspection certificates and evidence of regular inspections in accordance with LOLER and PUWER.

Ropes, harnesses, and lanyards should be visually inspected by the user before each use and weekly inspections recorded on the harness inspection log. The Site Management should

check the emergency rescue plan is relevant to the workplace and the rescue equipment and personnel are available and familiar with the emergency rescue plan.
A permit to work at height is required to be issued by the Site Management before the work commences.

Fall Arrest Equipment

Where fall arrest equipment (net, bags etc.) has been identified as the appropriate control measure it should be checked for damage by the site supervisor before it is installed and be positioned by persons who have received the correct level of training and experience in its correct use.

Safety nets should only be installed by persons with FASET training, where nets are left in place, they should be visually inspected by a competent person daily before they are used, and weekly inspections recorded on the LOLER register.

The installation should be checked by the Site Management before the work commences and a permit issued for the work at height.

Trestles

Trestle based proprietary access systems must have edge protection, toe boards, safety access gates, brick guards where necessary and tethered ladders. The supplier will often give recorded familiarisation training to training users in the use of such systems.

Ladders & Stepladders

Ladders / stepladders, other than for access, should only be used for short duration works where it is not reasonably practicable to use other equipment. A specific risk assessment should be provided and reviewed by the Site Management. The Site Management is to provide a Step Ladder / Ladder permit to work where they are being used to work from.

Persons should be competent and experienced in the work they are to undertake and should be briefed on the safe system of work. The briefing should be recorded in writing. Ladders and stepladders should be to the appropriate industrial standards and be of sufficient length / height for the tasks they are to be used for.

All ladders and stepladders in the workplace should be inspected before use and weekly inspections carried out and recorded on a PUWER register. Where ladders are used ad hoc intervals for inspection should be determined in the workplace's risk assessment. Step Ladders in particular should become the exception for working at height.

Rescue Plans

Where persons using personal fall protection equipment may fall but remain at height e.g. safety nets, harness and lanyards etc., a rescue plan should be produced as appropriate to the task and the type of equipment in use. Suitable rescue equipment should be provided on site and staff should be trained in its use and instructed in the specific emergency plans for the workplace. These briefings should be recorded in writing. Coniston's Health and Safety Manager should be informed in order that the rescue plan can be developed, and that suitable training has been provided.

Maintenance Activities at Height

Work at height activities to carry out internal or external maintenance to any place of work should be planned by the appointed Site Manager and only trained and competent persons should be employed to carry out the tasks. The Site Manager should ensure that risk assessments and method statements are provided for the tasks to reduce risks to as low as reasonably practicable for both those undertaking the work and others who may be affected by the works.

The Site Manager should issue a permit to work at height to any contractor carrying out maintenance activities and any employee carrying out maintenance work at height without the provision of a suitable working platform.

Other work at height in non-construction site workplaces should be identified and appropriate control measures included in the workplace assessment, this includes works at Head Office in Dartford.

3.24 Confined Space Arrangements.

The Confined Spaces Regulations 1997

Suitable arrangements shall be put in place to ensure that all work to be carried out in confined spaces, e.g. sewers, ducting, silos, roof voids, lift pits etc, is done so according to the requirements of the Confined Spaces Regulations 1997. No person shall be allowed to enter a confined space unless an adequate assessment of the conditions has been made and suitable control measures introduced (including the use of a permit to access system). Air sampling and monitoring shall be carried out as appropriate and suitable rescue and escape arrangements put in place which reflect the nature of the work and the work environment. The Site Manager will ensure that all safe systems of work are in place.

3.25 Flammable Liquids and Gases Arrangements.

The Dangerous Substances and Explosive Atmospheres Regulations 2002

Any highly flammable liquids or gases stored or used at the workplace shall be handled according to the instructions of the manufacturers using the designated facilities and appropriate warnings. No flammable materials shall be allowed to be stored at the workplace unless they have a current handling instruction sheet from the supplier and the appropriate precautions in place. Managers shall ensure that such instructions are available, and that each member of staff is familiar with the requirements. These instructions shall be maintained by the nominated Manager. Only such amounts of highly

flammable liquids as are required for the job will be allowed out of the store and then not to exceed 50 litres.

Dangerous Chemicals

These will be handled strictly according to the manufacturer's instructions. Safety equipment will be issued to all employees handling such materials and must be worn always. Where appropriate, the Health and Safety Manager will consult with the Managing Director and the chemical suppliers to draw up an emergency procedure for dealing with spillages and safe storage. Attention, of all personnel is drawn to the guidance notes and Approved Code of Practice in the COSHH Regulations 2002 (as amended).

3.26 Hazardous Substances Arrangements.

The Control of Substances Hazardous to Health Regulations 2002 (as amended 2004)

Many materials or substances used or created at work could harm your health. These substances could be dusts, gases, or fumes that you breathe in, or liquids, gels or powders that come into contact with your eyes or skin. There could also be harmful micro-organisms present that can cause infection, an allergic reaction or are toxic.

Harmful substances can be present in anything from paints and cleaners to flour dust, solder/welding fumes, blood, or waste. Ill health caused by these substances used at work is preventable.

The Hazards

Some substances can cause chemical burns, asthma or other diseases, including cancer. Many can damage the skin, and some can cause serious long-term damage to the lungs.

The effect can be immediate, such as dizziness or stinging eyes, or can take many years to develop, such as lung disease. Many of the long-term or chronic effects cannot be cured once they develop.

Prevent or reduce workers exposure to hazardous substances by:

- Finding out what the health hazards are.
- Deciding how to prevent harm to health (risk assessment).
- Providing control measures to reduce harm to health.
- Making sure they are used.
- Keeping all control measures in good working order.
- Providing information, instruction and training for workers and others.
- Providing monitoring and health surveillance in appropriate cases.
- Planning for emergencies.

COSHH Risk Assessment

A COSHH assessment concentrates on the hazards and risks from hazardous substances within the workplace.

The health hazards are not limited to substances labelled as 'hazardous'. Some harmful substances can be produced by the process you use, for example:

- Wood dust from sanding and cutting.
- Silica dust from tile, brick, block, concrete grinding and cutting.
- Fumes from welding or soldering.
- Anthrax from contaminated land and buildings (animal hair within plaster coatings)

Identify The Hazards

Identify which substances are harmful by reading the product labels and safety data sheets (SDS). If in doubt, contact the supplier of the product.

Harmful substances produced by work processes, such as cutting or grinding, or to which workers may be otherwise exposed. Examples include:

- Processes that emit dust, fume, vapour, mist, or gas.
- Skin contact with liquids, pastes and dusts.

Substances with workplace exposure limits (**WELs**) are hazardous to health.

Assess The Risks

Determine who might be harmed and how.

Assess:

- How workers might be exposed (whether the substance can be breathed in, get onto or through the skin or can even be swallowed) and the effects of exposure by each of these routes.
- How often people work with the substance and for how long.
- Anyone else who could be exposed - do not forget maintenance workers, contractors and other visitors or members of the public who could be exposed.
- What you're already doing to control the risks.
- What further action you need to take to control the risks.
- Who needs to carry out the action.
- When the action is needed by.

Control The Risks

Once you have carried out a risk assessment and identified which harmful substances are present, and how workers can be harmed, you need to think about preventing exposure.

Elimination

Do you really need to use a particular substance, or is a safer alternative available? Can you change the process to eliminate its use or avoid producing it? If this is not possible, you must put in place adequate control measures to reduce exposure.

Changing The Process to Reduce Risks

Consider whether you can change the process you use to reduce the risk of exposure. For example, you could reduce the temperature of a process to reduce the amount of vapour getting into the air or use pellets instead of powders as they are less dusty.

Containment

Enclose the process or activity as much as possible to minimise the escape or release of the harmful substance.

Use closed transfer and handling systems and minimise handling of materials.

Use a properly designed local exhaust ventilation (LEV) system which extracts dust, fume, mist, gases or vapour through a hood or booth and reduces the exposure of the worker.

All ventilation equipment must be examined and tested every 14 months by a competent person (someone who has the necessary skills, knowledge, and experience to carry out the work safely).

Systems of Work

Restrict access to those people who need to be there.

Plan the storage of materials and use appropriate containers. Check that storage containers are correctly labelled and that incompatible materials, for example acids and caustics are separated.

Plan the storage and disposal of waste.

Cleaning

Exposure to hazardous substances can occur during cleaning, so plan and organise the workplace so that it can be easily and effectively cleaned. Smooth work surfaces will allow easy cleaning.

Have the right equipment and procedures to clear up spillages quickly and safely.

Clean regularly using a 'dust-free' method – vacuum, do not sweep fine dust.

Personal Protective Equipment

If you cannot adequately control exposure by other means, provide personal protective clothing and equipment, in combination with other control measures.

Do not automatically opt for personal protective equipment (PPE) as a control measure. It is not as reliable or effective as other measures.

Information and Training

Workers need to understand the outcome of your risk assessment and what this means for them. Tell them what the hazards and risks are, and any workplace exposure limits, and what they need to do to protect themselves.

You must make workers aware of the results of any monitoring of exposure and the collective results of health surveillance.

Workers should be trained to use controls and PPE correctly.

Workers should know what to do if there is an accident (for example spillage) or emergency.

Contractors in your workplace also need to know what the risks are and how you are controlling them. In addition, you need to know if they are bringing hazardous substances onto your premises, and how they will prevent harm to your workers.

Record Your Findings

You must record your assessment write down what steps you have taken to identify the risks. Make a list of the actions you have taken to control the risks to workers' health.

Review Your Controls

Review the risk assessment regularly to ensure it is kept up to date and accounts for any changes in your workplace.

You must review the controls you have put in place to make sure they are working.

You should also review them if they may no longer be effective or there are changes in the workplace that could lead to new risks such as changes to:

- Staff.
- A process.
- The substances or equipment used.

Also consider a review if your workers have spotted any problems or there have been any accidents or near misses.

Update the risk assessment(s) record with any changes you make.

3.27 Infectious Diseases(s) and Bloodborne Viruses.

Infectious Diseases.

The nature of any personnel(s) illness will be confidential unless it is within the public interest to notify third parties which will be assessed with medical guidance when necessary. Personnel are to be made aware that disease can be caused by vermin and contaminated blood.

First Aid

The risk to first aiders is from contaminated blood or other bodily fluids is to be mitigated with the use of personal protective equipment and the necessary levels of training.

3.28 Asbestos Arrangements.

Asbestos can be present within buildings dating from or before the year 2000, when people work on the structure of a building, they are more likely to come across asbestos. Activities that could disturb asbestos and put them at greater risk can include:

- Drilling into a wall.
- Refurbishment or retrofitting.
- Demolition.
- Installation, for example of smart meters.

Prior to works commencing where works are deemed to be invasive IE, soft strip works, refurbishment and demolition a valid refurbishment and demolition asbestos survey must be in place prior to works starting. All known asbestos will be removed from work areas prior to works being instructed. All operatives will be made aware of known asbestos and its locations during the project via the site induction or toolbox talk whether it has been removed or not. Personnel are to be made aware that although a R&D survey has been carried out within work areas that there are always limitations to what a survey can find. There may still be a chance that asbestos can be discovered or potentially disturbed whilst carrying out

works so the necessary precautions should be taken, and works should cease immediately if anything suspicious is discovered.

Training and Awareness

Asbestos awareness is given to employees whose works could foreseeably disturb the fabric of a building and expose them to asbestos or who supervise or influence the work. Trades where it is foreseeable that ACMS (Asbestos Containing Materials) may become exposed during their work includes but is not limited to:

- Demolition workers.
- Construction workers.
- General maintenance staff.
- Electricians.
- Plumbers.
- gas fitters.
- painters and decorators.
- Joiners.
- Shop fitters.
- Plasterers.
- Roofers.
- Heating and ventilation engineers.
- Telecommunication engineers.
- Computer and data installers.
- Fire and burglar alarm installers.
- Architects, building surveyors and other such professionals.

Asbestos License and Non-Licensed Works

Higher-risk work with asbestos must only be done by a licensed contractor.

The Control of Asbestos Regulations define licensable work as follows:

- Where the exposure of workers to asbestos is not sporadic and of low intensity.
- The risk assessment cannot clearly demonstrate that the control limit will not be exceeded.
- Work on asbestos coating.
- Work on asbestos insulating board or asbestos insulation for which the risk assessment demonstrates it is not short duration work, for example: It will take no more than 2 hours in any 7-day period, and no person works for more than 1 hour in that 2-hour period.

Examples of types of licensable work are provided below. However, any decision on whether a particular work activity is licensable or not must be based on the risk.

Examples of licensable work

Licensable work includes:

- Removing sprayed coatings (limpet asbestos).
- Removal or other work which may disturb pipe lagging.
- Any work involving loose fill insulation.
- Work on asbestos millboard.
- Cleaning up significant quantities of loose/fine debris containing ACM dust (where the work is not sporadic and of low intensity, the control limit will be exceeded, or it is not short duration work).
- Work on AIB, where the risk assessment indicates that it will not be of short duration.
- **All licensable work** must be notified to the appropriate enforcing authority using the ASB5 form at least 14 days before the work starts.

Examples of notifiable non-licensed work (NNLW) with asbestos

- Large-scale removal of textured decorative coatings using steaming or gelling methods (eg beyond that required for maintenance activities such as installation/replacement of smoke alarms and fittings).

Minor, short duration work:

- To remove asbestos insulating board as part of a refurbishment project.
- Involving asbestos insulation (eg repairing minor damage to a small section of pipe insulation where the exterior coating has been broken or damaged).

Removal of:

- Asbestos cement products (eg roof sheeting) where the material has been substantially damaged or broken up (eg as a result of fire or flood damage).
- Asbestos cement products (eg roof sheeting) where the removal activity will mean that the material will be substantially broken up, creating significant quantities of dust and debris (eg 'dropping' an asbestos cement roof).
- Asbestos paper and cardboard products if not firmly bonded in a matrix.

3.29 Lead Based Material Arrangements.

Health and safety at Work etc Act 1974 & The Control of Lead at Work Regulations 2002

Coniston acknowledges the health hazards arising from exposure to lead and will protect those employees and other persons potentially exposed to lead as far as is reasonably practicable. This will be achieved by minimising exposure through using of proper control

methods and work practices supported by training of employees. Respiratory protective equipment will only be used to control exposure where other means cannot provide adequate control. Contract Managers and Site Managers will be responsible for the implementation of our procedures.

No work with lead or lead containing materials shall commence without a thorough assessment of the potential exposure of employees and others to lead. The assessment will be recorded and include details of the methods of work to be adopted and the controls to be used, and the risks posed by any potential failure of these controls.

Before starting work with lead or lead containing materials all employees and contractors will be required to undergo training to enable them to understand the health hazards of work with lead, the correct work methods, the use of control measures, the importance of good personal hygiene in reducing exposure and the procedures for reporting any defects in controls.

Whereas a result of the risk assessment, engineering control measures are provided to reduce exposure they will be adequately maintained to ensure their continued effectiveness.

Facilities will be provided for changing, clean storage of personal clothing and washing. Whereas a result of the risk assessment it is deemed necessary, these facilities will include showers, and “clean” and “dirty” areas for clothing to prevent cross-contamination.

Areas in which lead, or its compounds are used will be segregated and designated as lead contaminated areas. These areas will be kept as clean as is reasonably practicable. Smoking, eating and drinking will not be permitted in these areas.

The effectiveness of the control measures used will where appropriate and beneficial, be monitored by means of workplace air monitoring and medical surveillance by an appointed occupational specialist at appropriate intervals. Contractors and Employees will be made aware of the following:

- (a) That a record is being kept
- (b) The reasons why a record is kept
- (c) That they have the right of access to their own records and are entitled to correct it.

Where a contractor or employee raises a problem with to Coniston Site Management, related to health and safety issues in the use of lead, Coniston via the Health and Safety Manager will take all necessary steps to investigate the circumstances, take corrective action where appropriate, and advise the individual employee or contractor of the actions taken.

Where an employee or contractor identifies a problem in the use of lead at work or a defect in any of the control measures provided, the person must inform a responsible person, usually the Site Manager or Contracts Manager, immediately.

Lead is hazardous to the worker and others if the proper procedures and precautions are not observed, however it can be used safely if the following points are adhered to:

1. Ensure that you are using the correct work methods (set out in the method statement).
2. Ensure that you are using the controls appropriate to the work being carried out.

3. Ensure that the controls are working in the way in which they were designed, report any defects to the site manager or contract manager immediately.
4. Maintain a good standard of personal hygiene by washing all exposed areas of skin immediately on leaving the work area, and prior to smoking, eating or drinking; never smoke, eat or drink within the work area.
5. Use the protective clothing provided and store clothes for wearing outside the work area in a “clean” area.

3.30 Safe Systems of Work Arrangements.

Safe Systems of works form part of a collective measure of controls put into place taking into consideration the assessment of risk the method of work(s) the competence of individuals and appointed responsible persons. The method of works will outline the sequence of works, safety measures with referenced risk assessments, engineering controls, PPE, permit systems, and emergency arrangements including first aid measures. The measures are to be applied including but not limited to lone working and unplanned events potentially defined as an emergency. A proactive stop, evaluate, to seek help and support to put all the necessary measures and requirements in place to protect personnel and the buildings Coniston undertake work in is an arrangement for a standard working procedure.

3.31 Health Surveillance Arrangements.

Health surveillance is any activity which involves obtaining information about employees' health and which helps protect employees from health risks at work.

The objectives for health surveillance are:

- Protecting the health of employees by early detection of adverse changes or disease.
- Collecting data for detecting or evaluating health hazards.
- Evaluating control measures.

It should not be confused with general health screening or health promotion.

Health surveillance is necessary when:

- There is a disease associated with the substance in use (eg Asthma, Dermatitis, Cancers).
- It is possible to detect the disease or adverse change and reduce the risk of further harm.
- The conditions in the workplace make it likely that the disease will appear.

Health surveillance is a process; it may be a regular planned assessment of one or more aspects of a worker's health, for example: lung function, hearing function or skin conditions.

However, it is not enough to simply carry out suitable tests, questionnaires or examinations. Employers must then have the results interpreted and take action to eliminate or further control exposure. It may be necessary to redeploy affected workers if necessary.

Health surveillance may need to be completed by an occupational health professional (doctor or nurse). If a GP offers the service, you need to be sure that they are competent in occupational medicine.

The clinical outcomes from health surveillance are personal. The service provider must interpret the results of health surveillance for each individual. The service provider must supply general information for you to keep up-to-date health records. They may also be able to anonymise and group the information to highlight trends.

4 Stage Approach

1. Do I have a health risk problem, or a need for occupational health input, in my workplace?
2. What/who do I need to control/provide it (a doctor or nurse or a responsible person)?
3. Take that action.
4. Is it working (check on what has been done)?

3.32 Protection of The Public, Trespasser Arrangements.

Protection of the public should be reasonably practicable with necessary planning and design protections.

- Access and egress onto the site should be secure and or controlled at all times.
- Material movements should be segregated and third parties with the use of barriers.
- Access ladders must either be removed or boarded when not in use after each shift.
- The site perimeter should be secured and well maintained.
- Risks to the public should be designed out where possible.
- Deliveries should be planned at scheduled times and not coincide with peak times.
- Signage should be in place to warn visitors and potential trespassers of potentially unsafe site conditions.
- Security measures such as CCTV and scaffold alarms should be utilised to record and deter trespassers.
- Routes should be well lit where hoarding is erected.

3.33 Emergency Procedures at Work Arrangements.

Regulatory Reform (Fire Safety) Order 2005 Fire Safety (Employees Capabilities) (England) 2010

Responsibilities

The Site Managers and Contract Managers are responsible for the carrying out of an assessment of Fire risks for construction related projects and produce relevant emergency procedures, detailed in the Construction Phase Plan. The procedures must consider the nature of the work activities, all persons who may be at risk and any controls already in place. High risk fire risk assessments should be undertaken by a competent third party or a fire risk assessment that has been undertaken should be verified by a third party for legal compliance. The construction fire risk assessment should be kept under review for the duration of the project and updated when anything changes or reviewed every three months.

The Contract Managers are responsible for providing adequate information and any necessary training to enable all personnel on site to discharge their responsibilities under this plan. With regards to contractors, they are responsible for ensuring that their personnel understand the requirements of this plan, in particular their assembly points and roll-call requirements.

All personnel on site have a responsibility to understand and comply with the requirements of any Emergency Plan and undertake NO ACTION that will endanger themselves or others.

Fire Fighting Policy

All workplaces will be provided with means for fighting fire for use by people in the premises. Properly trained staff will be available at all workplaces to tackle a fire in its early stages, if they can do so without putting themselves at risk. Fires should only be attacked if accompanied by a second person and should only commence at the point where the building occupants are in the evacuation stage. Arrangements must be in place to ensure that the last person to evacuate reports that the area is clear with the exception, of the people fighting the fire. Fire Action Notices will be displayed prominently on all Company sites. A Fire Logbook shall be maintained the Coniston Office Manager for company offices. The fire log will contain recorded information on the dates of all fire drills, tests, and inspections.

Company Offices

All employees are informed of the procedures to be followed in cases of emergency during induction. Visitors are the responsibilities of their host to ensure that in the event of an emergency, they are safely escorted out of the building to the fire muster point.

Site Offices

Site specific procedures will be advised to all trade staff and visitors during induction, including procedures to be followed when working on individual properties and the position of the Assembly Point

Fire Safety Training

Induction Training – on the first day of employment, induction training will cover:

- The fire hazards in the area where they work.
- The location and use of the escape routes.
- The location, operation and meaning of the fire warning system.

Fire drills will be held twice a year for the office and every three months on construction sites. All training and fire drills will be recorded. Weekly fire alarm tests should be recorded from different fire points.

Fire Equipment

All firefighting equipment will be maintained by the supplier and records kept of all testing and inspection. Where discharged, the extinguisher must be returned to the supplier, refilled, and tested before being supplied to site. Fire extinguishers are to be serviced annually and the fire alarm system every six months. The fire alarm system should be tested weekly at recorded stipulated intervals from different call points.

The Charging of Lithium-Ion Batteries

Lithium-Ion batteries for low voltage tools are to be charged and stored in designated areas away from fire exits and green routes where a potential fire can be reasonably contained. The charging facility should be made from a non-combustible material such as alloy to enable any potential thermal runaway to be reasonably contained. The charging of lithium-ion batteries is not permitted outside of the designated charging area.

3.34 Stress and Wellbeing at Work Arrangements.

Coniston is aware that stress is an important occupational Health and Safety related problem, which can impact severely on individual and company performance. Stress is “the adverse reaction people have to excessive pressures or other demands placed on them”.

Coniston will make suitable arrangements to assess stress in relation to:

- Demands, job demands should be reasonable and achievable.
- Control, reasonable adjustments can be made to accommodate individuals.

- Support, foster a culture of inclusiveness and an environment that promotes wellbeing.
- Relationships, encourage positive and supportive relationships.
- Role, job roles should have written specified responsibilities.
- Change, the communication of change is to be considered, consulted, and timely.

Support mechanisms will be in place to allow all employees to have access to consultation and communication channels, which allow staff to raise issues at the earliest stage. Concerns will be treated with strict confidentiality except where there is a risk to safety. Mental health first aiders are trained and competent to direct individuals to support. Crisis support and referral to professional mental health services can be organised, when necessary, with the support of occupational health. All personnel are made aware of the levels of available support with an employee assistance programme in place provided by a third party. Coniston promotes mental health, psychological safety, and wellbeing which is included within the induction and supports charities that organise workshops within an ongoing awareness programme.

3.35 Violence and Aggression at Work Arrangements.

The Health and Safety at Work etc Act 1974 The Management of Health and Safety at Work Regulations 1999 (as amended 2003)

Coniston acknowledges that the nature of our activities, places company employees in direct contact with the public and other persons not associated with the business. This contact may lead to staff being exposed to aggressive or violent behaviour.

The definition of violence at work to be the same as that given by the HSE i.e.:
“Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”

Coniston will assess the risk to its workers and carry out any necessary measures defined within the risk assessment.

3.36 Young Persons at Work Arrangements.

The Management of Health and Safety at Work Regulations 1999 (as amended 2003) Working Time Regulations 1998 (as amended 2009)

In line with the requirements of Regulation 3 and 19 of The Management of Health and Safety at Work Regulations 1999 (as amended 2003), the management shall ensure that young persons employed by Coniston's are protected at work from any risks to their health and safety which are a consequence of their lack of experience, absence of awareness of existing or potential risks or the fact that the young person has not yet fully matured. To

deliver this policy, adequate assessment of the young person's activities shall be undertaken, suitable control measures put in place and close supervision maintained. In addition, Coniston shall ensure that the required weekly rest periods, rest breaks and supervision are provided for young persons.

A 'young person' is defined as —a person above compulsory school age who has not yet reached the age of 18.

3.37 New and Expectant Mothers at Work Arrangements.

Informing your employer

Coniston requests that it is informed in writing when you:

- Are pregnant.
- Have given birth in the last 6 months.
- Are breastfeeding.

Coniston will make reasonable adjustments to working conditions if it has been made aware of the points outlined above.

A certificate from a doctor or midwife may be requested to confirm if an employee is pregnant. Coniston will allow a reasonable amount of time to complete all necessary medical tests.

Coniston will take into account medical advice provided by a doctor or midwife. This might mean making adjustments to working conditions or hours, for example if:

- The employee has any pregnancy-related medical conditions.
- The doctor has said you should not work nights.

An individual risk assessment

- Coniston will have assessed any potential risks to women of a childbearing age as part of a general risk assessment process.

Coniston will then carry out a more specific individual risk assessment if pregnancy is confirmed or given birth in the last 6 months or breastfeeding.

Common risks to pregnant workers or new mothers. These include:

- Standing or sitting for long periods.
- Long working hours.
- Work-related stress.
- Temperature.
- Noise.

If Coniston identifies a significant risk to you or your child

If Coniston identifies a risk that could cause harm to the mother or child, it will firstly decide if it can control it.

- If the risk cannot be controlled or removed, Coniston may adjust working conditions or hours.

If that is not possible:

- you should be offered suitable alternative work on the same terms and conditions, including pay

If that is not possible:

- Coniston may suspend you on full pay for as long as necessary to protect you and your child.
- Reviewing any changes.

Coniston will review and update your individual risk assessment:

- As pregnancy progresses.
- If there are any changes to the work or the workplace.

Regular discussions with the employee are important because the risk of harm to a new and expectant mother and unborn child may increase at different stages of pregnancy.

As the pregnancy progresses, it may affect the employees:

- Dexterity.
- Agility.
- Coordination.
- Speed of movement.
- Reach.

Raising your own safety concerns

The employee is entitled to raise any concern about health and safety at work, and that of a child. Coniston will assess any concerns.

Before an employee returns to work after maternity leave, the employee should send Coniston a written notification that they are breastfeeding. This is so Coniston can ensure that the employee returns to a healthy, safe, and suitable environment.

Coniston will provide a suitable area where the employee can rest or breastfeed. And will:

- Include somewhere to lie down if necessary.
- Be hygienic and private so the employee can express milk if the employee chooses to – toilets are not a suitable or hygienic place for this.
- Include somewhere to store milk, for example a fridge.

3.38 Security at Work Arrangements.

Access to both office and construction site premises are controlled entry with the use of secured doors for access control. Sites may utilise CCTV, scaffold alarms and facial recognition systems. Visitors to site will be required to sign in and will be escorted if a relevant induction has not been completed. The security duties covering the IT systems will be discharged to a competent contractor act upon the behalf of Coniston.

3.39 Respiratory Illness and Cold and Winter Flu Viruses Arrangements.

COVID-19 will remain a public health issue, and guidance for workplaces has been replaced with public health advice. Coniston will advise employees to follow the guidance in place from public health in relation to respiratory illnesses. Cold and winter flu viruses become more prevalent within the winter months so regular cleaning of surfaces, hand sanitising should be encouraged. Welfare areas and office areas should be adequately ventilated to prevent person to person transmission.

3.40 Waste Management at Work Arrangements.

Environmental Protection Act 1990 The Environmental Protection (Duty of Care) Regulations 1991 The Environmental Permitting Regulations 2007 The Waste (England and Wales) Regulations 2011

Waste material produced by Coniston shall be disposed of in line with relevant legislation and Coniston's ISO 14001:2004 Environmental System and Policy (see separate document for further details).

Contract arrangements are in place to regularly remove and dispose of a variety of wastes including - general waste, confidential documentation, maintenance materials, construction site debris, etc.

Coniston shall fulfil its duties under the legislation by:

- Applying the waste hierarchy of control.
- Ensuring washout procedures are in place.
- Preventing waste being illegally disposed of by undertaking due diligence checks.
- Preventing the escape of waste into ecosystems such as water courses.
- Ensuring waste is only transferred to an authorised person or premises.
- Ensuring an accurate description of waste is provided when the waste is transferred, and a transfer note is completed such as waste electrical and electronic equipment.
- Ensuring that waste is appropriately classified with corresponding criteria's such as water acceptance criteria tests and classification tests (WM3).

Legionella

Legionella bacteria can cause Legionnaires' disease, a serious respiratory illness. Construction sites can pose a risk due to stagnant water found in:

- Stored water systems and aerosol generating activities. Legionella bacteria can be found in water storage tanks and pipe work such as dead legs or pipes that have not been used for a long period.
- Cooling towers and HVAC systems.
- Dust suppression systems.
- Showers, wash stations and welfare facilities.
- Excavations and ground water.

Arrangements should be in place to:

- Conduct legionella risk assessment or obtain from the building owner.
- Monitor the water temperature weekly and keep hot water above 50 degrees Celsius and cold water below 20 degrees Celsius.
- Flush unused hoses, showers, and water outlets weekly.
- Excavations and ground water.
- Treat the welfare facility water system where necessary.

3.41 Electrical Safety at Work Arrangements.

The Electricity at Work Regulations 1989 The Provision & Use of Work Equipment Regulations 1998 (PUWER)

Coniston Management will take all necessary actions, and regularly undertake assessments to identify any risks involving electrical equipment and reduce them as far as is reasonably practicable. Power tools or electrical equipment of voltage greater than 110 v shall not be used on company sites without special protection arrangements in place, i.e. Residual Current Devices (RCDs).

Regular inspections of all electrical installations will be carried out on a regular basis. All portable electrical equipment will be inspected and tested at specified intervals by a competent person and records kept. The user must carry out a visual inspection of all portable electrical equipment before use. No personal electrical equipment may be brought onto Company premises unless given prior approval and the equipment has been inspected by a competent person.

No fault finding, repairs or temporary repairs are to be carried out by staff unless competent to do so. Any problems with electrical equipment must be reported to Management to ensure remedial action is carried out. Any faulty equipment is to be clearly labelled 'Do Not Use' until any repairs are carried out.

Testing and Inspection

Whilst there are no absolute rules regarding how often an item of electrical equipment should be tested, Coniston have a procedure to have all construction portable equipment PAT tested at a minimum every 6-months, but preferably every 3-months on high usage sites and all office equipment tested every 3-years. Fixed installation should be tested every five years and site temporary electrical installations should be tested every three months.

3.42 Work Equipment Arrangements.

The Provision & Use of Work Equipment Regulations 1998 (PUWER) The Lifting Operations & Lifting Equipment Regulations 1998 (LOLER)

The Provision and Use of Work Equipment Regulations 1998 applies to all work equipment, including second hand, leased, or hired. Work equipment means any machinery, appliance, apparatus, tool, or installation for use at work and includes office equipment.

The Regulations require that equipment provided for use at work is suitable for the intended use, safe for use, maintained in a safe condition and subject to regular recorded inspection. It also requires that equipment is to be only used by persons who have received adequate instruction, information & training and that it conforms to rated safety industry and or testing standards. Lifting operations where the lifting equipment is deemed as simple lifting equipment like a construction hoist is to have a written lifting plan in place with accompanying risk assessments, personnel competence and LOLER certificates. Complex or contracted lifting operations are to be planned by a competent appointed person with the

relevant experience. Lifting attachments and equipment that lifts personnel including harnesses must be inspected and have LOLER certificate of thorough examination every six months. Lifting equipment must have a valid LOLER certificate of through examination every twelve months (year).

Suitability and Risk Assessment

All work equipment will be assessed to ensure its suitability for the task and not adapted for a task outside of the manufacturer's specification. Where necessary, specialist advice will be obtained in order to select the correct type of plant necessary to complete any given task safely. All work equipment will be subject to Company Risk Assessment Procedures to ascertain hazards and risks involved in its use and provide effective controls to reduce those risks to the user. Where appropriate, the end user should be consulted and involved in the assessment of any risk.

Acquisition of Work Equipment

Work equipment should only be supplied following an assessment of requirements and specification. All new and hired work equipment should be supplied with all necessary documentation to ensure that it is suitable for its intended use and, where appropriate, is clearly marked with any limitations to its use. Second-hand equipment should be rigorously inspected by a competent person prior to its first use and any necessary repairs carried out by a qualified competent person. The purchase of equipment from dubious sources, such as unregistered suppliers is to be avoided because that may not meet the minimum requirements of safety standards.

Information, Instructions, and Training

Where possible, suppliers, including Hire Companies, should be asked to supply all necessary paperwork including up to date testing certificates and detailing information and instructions and familiarisation on the correct use of the equipment. Where appropriate, suppliers will be requested to recommend suitable training requirements and courses. Certification should be provided as proof of attendance and competency. Training should be updated as necessary. The borrowing of tools should be covered with a brief ensuring that the tool will be used for what it is designed for as per the instruction manual.

Procedures and Documentation

Where work equipment could result in risks to the health and safety of the user or others, the management process, and procedures for ensuring its safe provision and use must be documented. Copies of Risk and COSHH Assessments and Safety Method Statements appropriate to the use of the equipment is to be provided to all users. Where it is thought necessary and appropriate, the Site managers, Contract Managers or Company Health and Safety Manager will provide a Toolbox Talks to ensure that all users fully understand the correct use and limitations. This does not preclude the requirement for training detailed elsewhere within the policy.

Guards & Protective Devices

The critical safety components associated with work equipment are not to be removed or adapted for the ease of use.

Examination, Inspection, Repair and Maintenance

Testing, inspections, and maintenance should be initiated as part of a proactive maintenance schedule at defined intervals or as per the manufacturers guide with records retained. Formal maintenance is to be undertaken by those deemed competent to do so. The users or work equipment are expected to undertake recorded pre-use checks in accordance with PUWER.

Reporting Defects

All defects, problems, etc. should be reported to the relevant manager, and if necessary, Coniston's Health and Safety Manager as soon as possible. Work should not commence with defective plant. Should a defect become apparent during operation, work shall immediately cease. All such plant should be clearly labelled 'Do Not Use' until repairs are complete.

Monitoring and Updates

If there are new operators, major modifications to any equipment, or changes to the use to of work equipment, etc., the instructions, information and training will have to be updated accordingly. Risk Assessments and Safety Method Statements will also require reviewing as necessary. Site Management will be required to exercise appropriate levels of supervision to monitor operator compliance.

Disposal Procedures

All work equipment deemed unserviceable and beyond repair will be broken up to prevent re-use by others. A note will be made on the inspection sheet of the date of dispersal.

3.43 Training and Competency (CSCS) Card Arrangements.

Competency Cards (CSCS)

Coniston is committed to ensuring that the workforce is aware of the risks and hazards associated on a construction site. Construction Skills Certification Scheme (CSCS) or affiliated schemes with the associated Health, Safety and Environmental training and tests help maintain the workforce's relevance to current industry safety standards and guidelines.

Competence can be demonstrated with relevant industry qualifications, experience, and certified industry schemes. Those with relevant verifiable experience without the necessary industry standard qualifications or valid competency card will be assessed on a case-by-case basis. This will be applicable to long standing members of staff and artisan trades. A recent Health, Safety and Environmental test will be a minimum required standard to work unsupervised on a construction site.

3.44 Construction (Design and Management) & Temporary Works Arrangements.

The Construction (Design and Management) Regulations 2015 are based on the principle that everyone involved in a construction project must be committed to the task of reducing accidents and ill health. The Regulations requires that certain key appointments be made and details the responsibilities of these appointees.

- Client
- Principal Designer
- Designers
- Principal Contractor
- Contractors

As a Company it is envisaged that the predominant role will be that of Principal Contractor. Should the Company be required to act in another capacity, Coniston Health and Safety Manager should be consulted in order that the relevant duties are undertaken according to statutory requirements.

Duties of Principal Contractor

- Ensure that the Client has notified HSE of your appointment and supplies a copy of that notification and that such notification to the HSE is displayed in a prominent position where they can be read by all Trade Staff on site.
- Ensure that the Principal Designer provides you with a Pre-Construction Information Pack and, where available, any Health & Safety File, that includes any relevant information relating to the premises where work is to be carried out, before work commences.
- Before appointing contractors, ensure that they are competent and intend to allocate sufficient resources.
- Ensure that the construction work does not start until you have prepared a Construction Phase Health and Safety Plan and that the Plan should be completed in sufficient time to allow it to be provided to any contractor at tender stage.
- Provide advice to contractors on compliance with the Health and Safety Plan and decide on arrangements to ensure compliance. Each contractor is to be provided with comprehensive information on the risks to the health and safety of that contractor's employees or other contractors or persons under his control, which would allow him to conduct risk assessments. Provide each contractor with information on the first aid and welfare requirements.
- Draw up site rules in writing and include them in the Health and Safety Plan. A workable system is to be devised for bringing these rules to the attention of all persons who may be affected by them (induction training). A record is to be kept of all those inducted, which should include individual acknowledgement of the rules.
- Ensure that contractors have provided persons under their control with the relevant health and safety information and training. These checks should include details of induction training - names of personnel, continuation training, special to task training - proof (e.g. certification), details of management/site managers safety proficiency.
- Take steps to ensure co-operation between all contractors.
- Set in place a system of recording hazards/breaches of safety rules so that they can be rectified and, where applicable, training needs identified.
- Ensure that periodic meetings are held at which safety is discussed and attended by representatives from all the contractors and that items discussed are recorded and the minutes distributed to all contractors.
- Take reasonable steps to ensure that unauthorised personnel do not gain access to the site area.
Details on site access should be communicated to all parties concerned.
- Ensure that all persons at work on the project can discuss or make suggestions on matters that affect their health and safety.
- On large projects of a complex nature, ensure that the views of all those working on site are co-ordinated (if necessary, by their representatives) where those views affect their health and safety. Ensure that a medium exists for passing information quickly to all concerned, whether it is of an urgent operational matter or of a safety training nature.
- Ensure the Principal Designer receives any information that he needs to complete the safety file. This includes any design information that might affect the health and

safety of any person carrying out construction, maintenance, or cleaning work during and after construction, and any affected third party.

Temporary Works

Temporary works provide an engineered solution that is used to support or protect either a structure during construction, an item of plant or equipment, the sides of an excavation during construction operations or to provide access. Temporary works need to be planned and managed.

Temporary structures are to be designed, installed, and maintained to withstand any foreseeable loads which may be imposed on it and that it be only used for the purposes for which it was designed, installed, and maintained. Temporary works such as scaffolding, excavations, cofferdams and caissons must be inspected by a competent person on a regular basis.

Temporary works to provide structural support include:

- Shoring for excavations.
- Propping for walls and floors.
- Falsework for above ground concrete pours.
- Scaffolds for access.
- Haul roads and working platforms for plant including cranes.
- Permanent works used for temporary purposes during construction.

Temporary works on a construction site also include:

- Site fencing and hoarding.
- Welfare and office units.
- Earthworks, including stockpiles, that will be removed later.

On larger sites, or where a number of subcontractors are involved, it may be appropriate for one or more Temporary Works Supervisors (TWS) to be appointed. A TWS should be responsible to the TWC and assist the TWC in the supervision of temporary works.

Temporary Works Coordinator

An appointment of a Temporary Works Coordinator (TWC) is to ensure that suitable designs are prepared, checked, and correctly erected on site.

The TWC should be formally appointed and have adequate authority to carry out the role, including stopping the work if it is not satisfactory. The TWC may also need to advise on build sequence, systems of work and equipment so that other activity does not damage or compromise the temporary works. On a simpler job advice may be needed from an engineer to provide a design check for temporary works.

The Appointment of a Structural Engineer

On a complex design or project an appointment of an independent structural engineer with the relevant experience and training with stipulated visit intervals may need to be instructed during the design phase

Temporary Works Equipment

Equipment manufacturers' instructions must be followed in the selection and use of temporary support. In all but the simplest situations a design, including calculations, will be needed for the temporary works. In more complex works the design will also need to be checked by an independent party.

Temporary Works Procedures Arrangements

Effective arrangements for controlling risks arising from the use of temporary works. These are captured in a temporary works procedure including but not limited to the following elements:

- Appointment of a Temporary Works Co-ordinator (TWC).
- Preparation of an adequate design brief.
- Completion and maintenance of a temporary works register.
- Production of a temporary works design (including a design risk assessment and a designer's method statement where appropriate).
- Independent checking of the temporary works design.
- Issue of a design/design check certificate, if appropriate.
- Pre-erection inspection of the temporary works materials and components.
- Control and supervision of the erection, safe use, maintenance and dismantling of the temporary works – ie, procedures to:
 - Check that the temporary works have been erected in accordance with the design and issue a formal "permit to load" where necessary.
 - Confirm when the permanent works have attained adequate strength to allow dismantling of the temporary works and issue a formal "permit to dismantle" where necessary.
- The procedure should include measures to ensure that the design function, the role of TWC, and Temporary Works Supervisor(s) where appropriate, are carried out by competent individuals.

Temporary Works Register

It is useful for a temporary works register to be prepared for any project it should contain a list of all identified temporary works items associated with the project. These can be set out as a table using appropriate headings, which could include:

- Design brief number (for each item) and date issued.
- Short description of temporary works.
- Date required.
- Category of temporary works.

- Designer.
- Design Checker.
- Date design complete.
- Date design checked/approved.
- Erection complete and checked or "Permit to Load" "Permit to Dismantle".

Design Brief

A design brief should be prepared for each item of temporary works to serve as the focus for subsequent decisions, design work calculations and drawings. It should include all data relevant to the design of the temporary works and should be prepared in good time to allow for all subsequent activities. The brief may be relatively simple for the smaller schemes, but for major work, more information will need to be collected and collated before design work can commence. The TWC should ensure that an adequate design brief is provided to the designer and design checker of the temporary works.

Temporary Works Design

The design of the temporary works should be based on the agreed design brief. Any proposed alteration or modification of the design brief by the designer should be referred back to the TWC. The temporary works should be designed in accordance with recognised engineering principles. The preparation of design calculations, drawings and specification should be undertaken with similar rigour to the procedures applied to the design of the permanent works.

Temporary works designers include the manufacturers and suppliers of proprietary temporary works equipment and those working in a contractor's temporary works department or office. Temporary works designs are sometimes categorised to indicate the complexity/simplicity of the specific temporary works structure and the potential risk. See below for an example:

- Simple and/or potentially low risk temporary works.
- Standard scaffold.
- Formwork less than 1.2m high.
- Hoarding and fencing up to 1.2m high.
- Simple propping schemes – 1 or 2 props.
- Internal hoarding systems and temporary partitions not subject to wind loading.
- Shallow excavations less than 1.2m deep/high.

More complex and/or potentially medium risk temporary works:

- Falsework up to 3m high.
- Formwork for columns and walls up to 3m high.
- More complex propping schemes – multiple props at single level.
- Needling of structures up to 2 storeys high.
- Excavations up to 3m deep/high.
- net systems not fixed to robust primary members.
- Hoarding and fencing up to 3m high.

- Simple designed scaffold.
- Temporary roofs.

Complex and/or potentially high-risk temporary works:

- Falsework and formwork over 3m high.
- Trenchless construction, including headings, thrust bores, mini tunnels.
- Working platforms for cranes and piling rigs.
- Tower crane bases.
- Façade retention schemes.
- Flying and raking shores.
- Complex propping schemes – multiple props and multiple levels.
- Needling of structures greater than 2 storeys high.
- Ground support schemes greater than 3m deep.
- Complex designed scaffold.
- Cofferdams.
- Bridge erection schemes.
- Jacking schemes.
- Complex structural steelwork and precast concrete erection schemes.
- Hoarding and fencing over 3m high.

Simple temporary works require careful consideration in their design, construction, commissioning, inspection, and loading. The choice of the appropriate temporary works solution, including the use of "standard solutions," is discussed in Clause 9.4 of BS5975: 2008. A "standard solution" is an arrangement for which the basic design work has already been carried out and is presented in a tabular or similar form, and for which no further calculations are required.

Design Checks

Before erection commences, the temporary works design should be checked for:

- Design concept.
- Strength and structural adequacy (including foundations and lateral stability).
- Compliance with the design brief.

The design check should be carried out by an independent competent person(s). The ability and independence of the checker should be greater where the temporary works are more complex or where new ideas are incorporated. Recommendations for various categories of design check are given in Table 1 of BS5975:2008, reproduced below:

Categories of Design Check (taken from BS 5975)

Category	Scope	Comment	Independence of checker
0	Restricted to standard solutions only, to ensure the site conditions do not conflict with the scope or limitations of the chosen standard solution.	This applies to the use of standard solutions and not the original design which will require both structural calculation and checking to category 1, 2 or 3 as appropriate.	Because this is a site issue, the check may be carried out by another member of site or design team.
1	For simple designs. These may include formwork, false work (where top restraint is not assumed): needling and propping to brickwork openings in single storey construction.	Such designs would be undertaken using simple methods of analysis and be in accordance with the relevant standards, supplier's technical literature or other reference publications.	The check may be carried out by another member of the design team.
2	On more complex or involved designs. Designs for excavations, for foundations, for structural steelwork connections, for reinforced concrete.	Category 2 checks would include designs where a considerable degree of interpretation of loading or soils' information is required before the design of the foundations or excavation support or slope	The check should be carried out by an individual not involved in the design and not consulted by the designer.
3	For complex or innovative designs, which result in complex sequences of moving and/or construction of either the temporary works or permanent works.	These designs include unusual designs or where significant departures from standards, novel methods of analysis or considerable exercise of engineering judgement are involved.	The check should be carried out by another organization

The Role of CDM Co-ordinators

CDM co-ordinators should take reasonable steps to ensure co-operation between permanent and temporary works designers, in particular to ensure that arrangements are in place to ensure that designs are compatible and that the permanent works can support any loadings from temporary works. CDM co-ordinators also have a duty to advise clients on the suitability of the initial construction phase plan. Amongst the topics that need to be considered when drawing up the construction phase plan, as listed in the ACOP, are the arrangements for controlling significant site risks including, the "stability of structures whilst carrying out construction work, including temporary structures and existing unstable structures" and "work on excavations and work where there are poor ground conditions".

3.45 Contract Procedure Arrangements.

Tendering and Planning

At the tendering and planning stages, the requirements of this company policy and hazards identified in the Pre-Construction Information Pack (as appropriate) must be taken into consideration by the Estimators and Contract Managers.

Planning of work will include the identification of existing hazards and systems for controlling or eliminating them. On identifying future hazards during the planning process these hazards must be brought to the attention of the appropriate department or contractor in order that measures may be taken to deal with those hazards.

Any aspects of work not covered by this policy must be planned by the site/workplace management in conjunction with advice from Coniston's Health and Safety Manager and written procedures defined. Pre-contract meetings will be held with the Coniston Health and Safety Manager or Advisor if health and safety matters require collaboration.

Contractors

The selection of competent and well-resourced contractors will consider their safety policy, accident record and previous performance with respect to accident and ill health prevention on site.

Suppliers

All information received from suppliers will be passed to site/workplace supervision for implementation or reference on site.

Notifications

New projects should be brought to the attention of the Health and Safety Manager at the earliest opportunity via a measurable form of communication.

The Contracts Manager or client will ensure that any necessary notifications in respect of HSE, local authorities, etc. are made and notify the safety department or other appropriate personnel within Coniston.

Protection of Public

All necessary measures required for the protection of the public will be allowed for and planned. Considering the recommendations contained in Health and Safety Executive Guidance HSG 151, "Protecting the Public: Your Next Move".

Documentation

The Coniston Health and Safety policy is to be displayed on site boards for reference purposes.

All necessary statutory notices, regulations, company documentation (including Policy Statement, copy of the current employers' liability insurance certificate), registers and accident report forms, will be issued to site/ workplace by the Contract Managers.

The Site Managers in conjunction with the Contract Managers must ensure that all documentation supplied is displayed as necessary and that reports, and records required are submitted promptly to the Head Office.

The Contract Managers must ensure that all registers, site inspection reports and other documentation relating to health and safety are returned to the office for safe keeping at the completion of the contract. The Health and Safety Manager will provide systems for ensuring that relevant project documentation is maintained at the office in a safe place for a minimum of 3 years. Where appropriate, copies of relevant information will be collated by the Contract Manager for the duration of the project and forwarded to the Principal Designer for placement in the Health and Safety file.

3.46 Construction Phase Plan Arrangements.

Following the receipt of the Pre-Construction Information Pack, the Contract Managers assisted where necessary, by the Coniston Health and Safety Manager and site team, will develop the plan for the construction phase of the project. In accordance with the HSE recommendations, the size and details of the plan will reflect the nature, size, complexity and risks inherent in the project.

Generally, the Plan will include the following criteria as appropriate:

- A general description of the project including a brief description of the area and any restrictions in force.
- Details of Parties concerned including Site Management and contact details.
- Selection procedures for contractors.

- Details on communication and co-operation including co-operation between contractors and arrangements for site meetings.
- Identification of activities with risks significant or otherwise to health & safety and arrangements to eliminate or control those risks.
- Site-specific emergency procedures.
- Accident reporting procedures.
- Welfare facilities.
- Provision of information & training.
- Consultation arrangements.
- Site Rules.
- Waste management.
- Arrangements for the Compilation of Health & Safety File.
- Monitoring and Review.

The Contract Managers, Project Managers and Site Managers will keep the Plan up to date for the duration of the contract and revise the Plan as necessitated by changes to working procedures, design aspects or new materials.

3.47 Building Safety Act Arrangements.

Applies primarily to higher-risk buildings (at least 18 meters or 7 stories high with at least 2 residential units).

- Covers design, construction, and occupation phases of a building's lifecycle.
- Establishes a Building Safety Regulator (BSR) to oversee compliance.

2. Duty Holders and Responsibilities

- **Accountable Person:** Responsible for managing building safety risks once a building is occupied.
- **Principal Designer & Principal Contractor:** Must ensure safety compliance during construction.
- **Building Owners & Landlords:** Must maintain safety measures and provide transparency to residents.

3. Building Safety Regulator (BSR)

- Oversees building safety and enforces compliance.
- Maintains a register of high-risk buildings.
- Powers to prosecute breaches of safety regulations.

4. Building Control and Competency

- Strengthens building control oversight, ensuring inspectors are competent.
- Requires buildings to meet higher safety and structural standards.

5. Golden Thread of Information

- Requires a digital record of safety information throughout a building's lifecycle.
- Ensures clear accountability and easier access for regulators and emergency services.

6. Resident Engagement and Complaints

- Residents must be informed of building safety risks and measures.
- Establishes a formal complaints process for safety concerns.
- Introduces Building Safety Charges so leaseholders only pay fair costs.

7. Liability and Compensation

- Expands liability for defective work, allowing homeowners to claim for safety defects.
- Extends legal action timeframes: 15 years for recent buildings, 30 years for older ones.

8. Cladding and Fire Safety

- Building owners must remove unsafe cladding (e.g., ACM cladding linked to Grenfell Tower fire).
- Government funding available to cover cladding remediation in certain cases.

9. Enforcement and Penalties

- Non-compliance can result in fines, criminal charges, and enforcement orders.
- Greater powers for local authorities and regulators to take action.

10. Leaseholder Protections

- Protects leaseholders from excessive remediation costs for safety defects.
- Introduces cost-recovery mechanisms for developers and landlords.

3.48 General Data Protection Regulation (GDPR) Arrangements.

Coniston collects, stores, and processes personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. This arrangement applies to all personnel handling personal data of the behalf of Coniston. The arrangement ensures the privacy, security and lawful handling of personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

Coniston will comply with the following principles:

- Lawfulness, fairness and transparency – data must be processed lawfully and in a transparent manner.
- Purpose limitation – data is collected for specified, explicit, and legitimate purposes.
- Data minimisation – only necessary data is collected.
- Accuracy – personal data is kept accurate and up to date.
- Storage limitation – data is retained no longer than necessary.
- Integrity and confidentiality – data is processed securely.

Data Collection may include:

- Employee records (names, contact details, addresses, NI numbers, bank details).
- Subcontractor records (ID checks, addresses, CIS details, UTR details, NI numbers).

- Client contact information.
- CCTV footage (site security).
- Access records (e.g., site logs).

Why is the data collected:

- Contractual necessity.
- Legal obligations (eg, Duty of care and health & safety records).
- Legitimate interests (eg, Site security, project delivery).
- Consent (where explicitly required).

Rights of individuals, data subjects have the right to:

- Access their data.
- Rectify incorrect data.
- Request erasure (where applicable).
- Object to processing.
- Data portability (in applicable cases).

Data security and what measures are applied:

- Limited full user access.
- Regular data audits and spot checks.
- Staff are trained in data handling.
- Secure cloud storage.

Data sharing and transfers:

- Data may only be shared with authorised parties (eg, HMRC, Police, HSE, payroll).
- Subcontractors under strict confidentiality.

How long Coniston potentially retains data:

- Employee records – 6 years post-employment.

- Health & Safety records – 40 years.
- Project data – minimum of 12 years.

Breach notification:

All data breaches will be assessed. If high risk to individuals is identified, the ICO and affected individuals will be informed within 72 hours.

3.49 Dealing with Enforcement Bodies.

Coniston recognises the valuable and important role that enforcement bodies play in securing compliance with relevant statutory provisions in order that the health, safety, and welfare of people at work and those affected by work activities are protected.

Coniston will have arrangements in place for giving and receiving information from enforcement bodies. Site Managers and Contract Managers and employees will be told to comply with enforcement bodies so as not to impede the duties of an enforcement body inspector or investigator.

3.50 Site Rules and Arrangements.

The following will form the basis of Company Safety Rules that will be displayed on site and form part of the Site-Specific Induction Procedures. Additional rules, as required by site specific procedures or as requested by the client, will be displayed as necessary.

Site Rules

- No smoking, vaping or using e-cigarettes except in designated areas.
- No consumption of alcohol or the use of illegal or illicit substances.
- No radios or other music devices that may impair safety instruction.
- No shouting or swearing.
- No shorts, inappropriate clothing or the removal of shirts.
- No offensive language or behaviour.
- Do not indulge in horseplay or disregard direct safety instruction.
- All personnel including visitors must sign in upon arrival and sign out when leaving site.
- All personnel must undergo a site induction before commencing work.
- All personnel must read, sign and adhere to their submitted risk assessment(s) and method statement(s).
- All personnel are to comply with the fire & emergency procedures.
- Site specific PPE must be worn at all times.
- Work areas must be kept in a safe fair condition at all times.
- Permits must be completed prior to starting works.
- All accidents, incidents & near misses must be reported to Management.
- Only operate work equipment or plant for that of which you have been trained and authorised to use and report any damages.
- Welfare facilities are to be well maintained and cleaned regularly.
- Report any unsafe conditions or poor health & safety practices to Coniston management.

Failure to comply with site rules may result in persons being excluded from site.

3.51 Useful Contact Information.

Health and Safety Executive (Regional Office)

Rose Court
2 Southwark Bridge
London, SE1 9HS
Tel: 020 7556 2100
Fax: 020 7556 2102

Health and Safety Executive (online information)

Website: www.hse.gov.uk

Environment Agency

General Enquiries: 08708 506 506
Website: www.environment-agency.gov.uk

Incident Contact Centre (for RIDDOR Incidents)

Health and Safety Executive
RIDDOR Reports
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
Email: riddor@natbrit.com
Website: www.riddor.gov.uk