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Ormiston Steel Services Ltd

Health and Safety Policy

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GAR TRAINING SERVICES LTD



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Introduction

It is the Policy of Ormiston Steel Services Lt to comply with the terms of the health and safety at Work act 1974 and subsequent legislation and to provide and maintain safe and healthy working conditions, equipment, and systems of work. Ormiston Steel Services Ltd will take all reasonably practicable steps to achieve this commitment, to comply with statutory obligations and to promote a positive health and safety culture within the business.

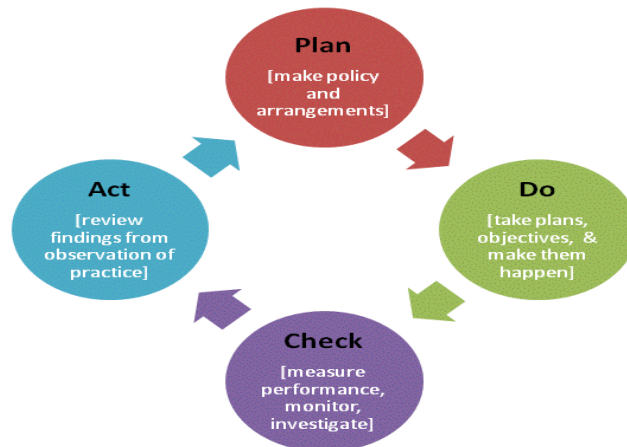
Health and safety is an integral part of our activities and whilst we take overall responsibility, any Contractor will share the responsibility for implementing this policy. Contractors are expected to cooperate and must ensure that their own work so far as is reasonably practicable, is carried out without risk to themselves or others. Ormiston Steel Services Ltd recognise and accept its duty to protect the Health and safety of anyone who may be affected by our activities including Contractors and Temporary Workers, as well as members of the public.

Ormiston Steel Services Ltd will do all that's within its power to ensure health and safety is managed and maintained, it is recognised that health and safety is the responsibility of everyone associated with a job. It is the duty of each person to take reasonable care of their own and other people's welfare. For the Company to discharge their statutory duties, Employees and Contractors are required by law to cooperate with management in all matters concerning the health, safety & welfare of themselves and any other person who may be affected by their acts or omissions whilst at work. The main health & safety management systems for the Company are located at, Buttercups, Shirrell Heath, Southampton, Hampshire, SO32 2HV, and are available for inspection by any interested party after submission of any reasonable request.

Ormiston Steel Services Ltd agrees that to ensure that the health and safety policy is sustained in an effective condition, it is essential that the information is up to date and accurate. It is the responsibility of Brett Ormiston to liaise with any nominated Health & safety Consultants and to ensure that revisions are made which reflect changes that have taken place within the Company. Our Consultants will advise on new and relevant legislation throughout the year and review documentation during an annual audit as instructed. In addition, the policy will be reviewed if accident reports or the findings of any management inspections raise concerns.

Brett Ormiston encourages Employees and Contractors to inform him of any areas of the health and safety policy that they feel are inadequate to ensure that the policy is maintained as a "live" working document. The health and safety management system is based on HSG65 which is recognised by the Health and safety Inspectorate as the standard for an effective management system.

Figure 1: HSE PDSA



Ormiston Steel Services Ltd will provide and maintain a healthy and safe working environment with the objective of minimising the risk of injury or ill-health. Particular attention will be paid to:

- Undertaking risk assessments in order to review the health and safety of our activities and implementing safe systems of work as a result.
- The use of equipment, which is properly maintained with suitable safety devices installed, where applicable.
- Minimise the use of dangerous substances and where their use cannot be eliminated, implement suitable controls.
- Ensure health and safety in connection with the use, handling, and storage of materials.

The Construction (Design & Management) Regulations 2015 (CDM) places specific obligations on Ormiston Steel Services Ltd when actively engaging on construction projects. To ensure the requirements of CDM Regulations are met, appropriate support will be provided to all parties to ensure the highest standards of health & safety are achieved. The same commitment is expected from all Contractors and Consultants involved in Ormiston Steel Services Ltd projects.

1.0 Policy Statement

Brett Ormiston acknowledges that the key to successful health & safety management requires an effective policy, organisation, and arrangements, which reflect the commitment of senior management. To sustain that commitment I will continually measure, monitor, and revise, where necessary, our policies and procedures to ensure that health and safety standards are adequate.

Brett Ormiston of the Company Ormiston Steel Services Ltd is the individual who is responsible for the health and safety policy covering work activities.

To Fulfil This Commitment the Company Will Endeavour To:

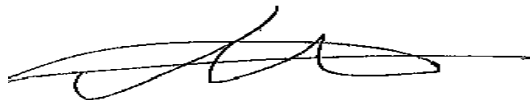
- Make financial provision for the implementation of this policy.
- Provide safe access and egress to work areas.
- Provide a safe working environment.
- Ensure that articles and substances are safe for use.
- Provide information, instruction, training and supervision to all Contractors.
- Formulate safe systems of work based on risk assessment and communicate these to Contractors.
- Carry out inspections and audits on a regular basis.

Employees/Contractors Responsibilities

All Employees and Contractors have duties under the Health & safety at Work Act 1974, and they are hereby informed of their personal responsibilities to take due care of: -

- The health and safety of themselves and to ensure that they do not endanger other persons by their acts or omissions. To cooperate with their Employer in order that the Employers can comply with the legal requirements placed upon them and in the implementation of this policy.
- To not interfere with articles provided in the interests of health and safety.

The policy has been prepared in compliance with the Health & Safety at Work at Work Act 1974 and will be amended, monitored and added to from time to time to conform with new or amended legislation or changing circumstances and operational activities. At the least the policy document will be reviewed annually



Signed:

Brett Ormiston

(Managing Director)

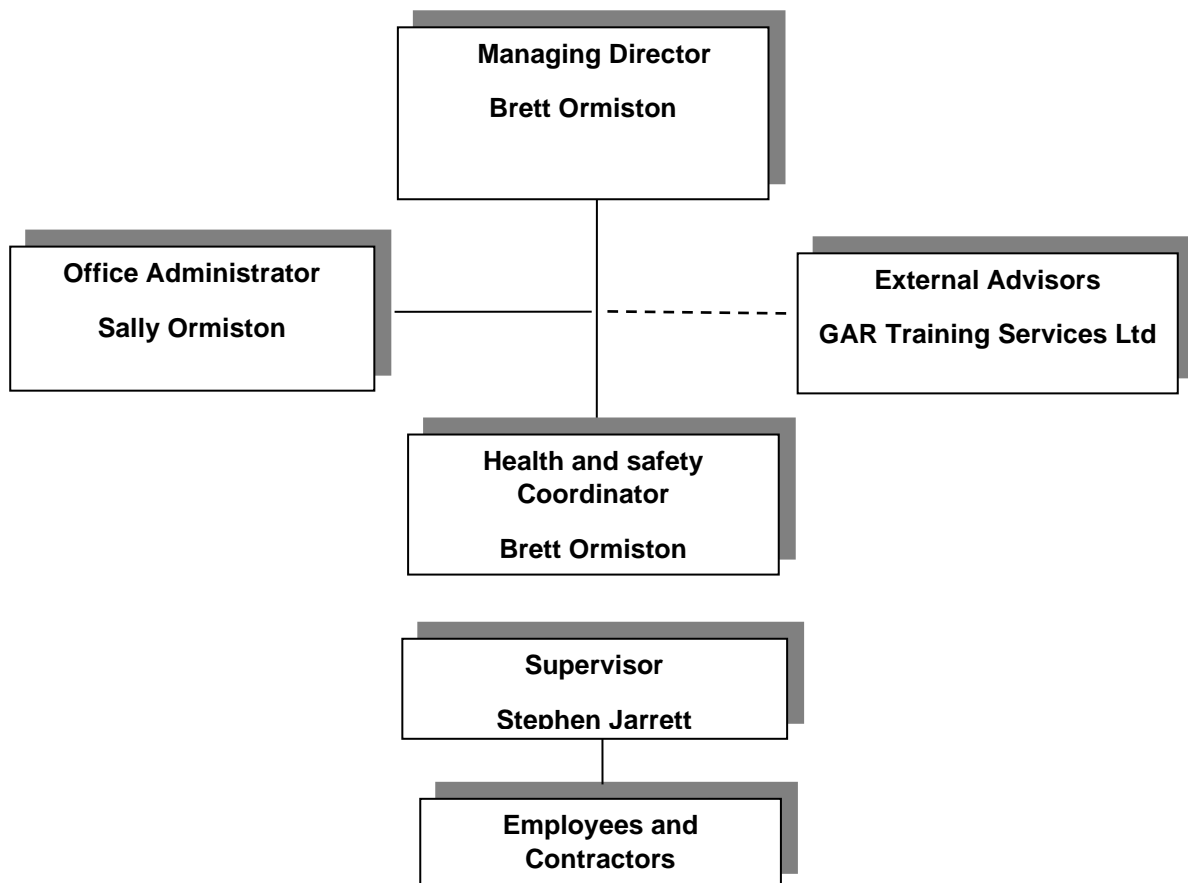
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2.0 Organisation

Ormiston Steel Services Ltd accepts executive accountability for the Company's Health, Safety and Welfare. It is expected that Employees and Contractors will cooperate with the Company and will carry out tasks according to risk assessments and safe systems of work provided. Ormiston Steel Services Ltd have instructed GAR Training Services Ltd, the Company's Health & safety Advisors to undertake unplanned and planned health & safety audits on their construction operations. The format and report for this audit is at the discretion of the Health & safety Advisor. Any significant issues will be brought to the attention of Brett Ormiston immediately at the time of the audit.

2.1. Specific Responsibilities

Ormiston Steel Services Ltd intend to comply with the Health and Safety at Work Act 1974 and associated regulations and have, therefore, developed the organisation structure shown below, which is designed to produce speedy recognition, avoidance of and resolution to any health and safety problems. Whilst each Employee and Contractor has a responsibility for health and safety, the prime responsibility rests with Brett Ormiston (Managing Director). Additionally, the Company recognise the contribution to safety that can be made by the involvement of all Employees and Contractors.



This organisation chart shows the reporting structure and organisation for health & safety ONLY and holds no reference to the corporate responsibilities, ownership, or legal structure.

2.1.1. Directors Responsibilities

The Managing Director accepts executive accountability for the Company's health, safety & welfare, however the responsibilities for the day to day management of health, safety and welfare have been delegated to other members of staff, including:

- Health and safety Coordinator
- Office Administrator

It is expected that employees will cooperate with the Managing Director and will carry out tasks according to risk assessments and safe systems of work.

Managing Director's responsibilities will include but not be limited to:

- Maintaining a detailed knowledge of, and compliance with, the health and safety policy.
- The appropriate delegation of responsibilities to subordinate staff.
- Ensuring that all levels of the organisation fully understand the arrangements for the implementation of the policy.
- Implementing the health & safety management system and ensuring the application of the health and safety policy and its subsequent monitoring.
- Ensuring that necessary resources, both in terms of manpower and finance, are available for implementing the policy.
- Ensuring that appropriate health & safety courses are included in staff training programs – specific to the role that employees fill.
- When appropriate, initiating disciplinary action against Employees/Contractors who have failed to comply with their duties under the policy or statutory requirements.
- Consulting or procuring the services of competent persons or specialist health & safety professionals on matters relating to health & safety, environmental or occupational health issues.
- Undertaking Employee/Contractor consultation and negotiations as necessary on all Health & safety matters.
- Reviewing the health and safety policy annually, or as necessary, and specifying overall health & safety objectives.
- Setting a personal example regarding health and safety and acknowledging any suggestions for improvement in safety organisation where and when appropriate.

2.1.2. Health & Safety Administration

Various health and safety administration responsibilities are assigned to the health and safety coordinator.

Health and Safety Administration includes, but is not limited to:

- Maintaining a detailed knowledge of, and compliance with, the health and safety policy.
- Maintaining the Health & safety Management Systems, documentation and records including:
 - Equipment and machinery inspection and maintenance records, ensuring that planned and emergency maintenance is completed, and records updated.
 - Ensuring that all new Employees/Contractors receive a safety induction upon employment.
 - Ensuring that all Employees/Contractors receive appropriate instruction and training in the use of any equipment or machinery that they use as part of their work.
 - Maintaining all Employee/Contractor training records, managing the training plan ensuring that training is completed as and when required and that training records are updated.
 - Ensuring that all risk assessments are carried out and that reviews are completed as stated, also ensuring that new assessments are completed when a task or operation significantly changes or when new equipment is installed.
 - Ensuring that PPE assessments are completed and that any PPE issued is suitable for the task and that the issue registers are completed.
 - Ensuring that suitable hearing protection is issued to all employees as required and that it is regularly inspected for damage and replaced as necessary.
 - Ensuring that accidents, injuries and near misses are suitably recorded and that investigations are completed where necessary.
 - Ensuring that fire safety drills are completed on a frequent basis and that these are recorded.

All safety records are to be forwarded to the Health and Safety Coordinator, who will collate the information into a centralised safety management record keeping system.

2.1.3. Employers' Responsibilities

The Employer has a duty to all Employees, Contractors, Casual Workers, Part Time Workers, Trainees, Visitors and Sub-Contractors who may be in our workplace or using the equipment provided by the Company. Consideration must also be given to neighbours, the general public and any others who may be affected by our works.

Therefore, the Managing Director will ensure that he:

- Ensure all significant risks to health & safety are assessed and brings the findings to the attention of the Employees/Contractors.
- Provides safe machinery, equipment and tools that are suitably maintained.
- Provides a safe place of work with adequate facilities and safe access and egress.
- Ensures that adequate training and information is given to all Employees/Contractors regardless of their position within the Company.
- Provides health and safety surveillance to Employees/Contractors where it is deemed necessary through any risk assessment.
- Appoints competent persons to help comply with the health & safety law.

2.1.4. Employees' Responsibilities

All Employees have a legal duty under the Health & safety at Work Act 1974 to:

- Take all reasonable care to ensure that their own health & safety, and that of others, is not adversely affected by anything that they do, or fail to do, at work.
- Take a mature and intelligent attitude towards health & safety.
- Do all in their power to minimise the possibility of any accident occurring.
- Not intentionally or recklessly misuse anything provided in the interests of health, safety and welfare.
- Cooperate with the Managing Director and others to enable them to comply with statutory duties and requirements.

Employees and Contractors should report to the Managing Director anything that they consider to be a serious danger or any shortcomings in the protection arrangements for health & safety. All accidents and incidents that result in injury or damage must be immediately reported to the Managing Director. Subsequent investigations may prevent future accidents or incidents occurring. All "accidents and near misses" (see 3.5) (i.e. events that do not actually result in injury or damage – but *could* have) must be reported to the Managing Director with the minimum of delay.

Employees and Contractors must comply with safety rules, instructions and any special measures that are introduced in the interests of safety. These may include the correct use of protective equipment and clothing where required.

They are also required to:

- Comply with all safety rules and risk assessments relevant to their area of activity.
- Attend a health & safety induction
- Always put into practice the company's safe working procedures
- Refrain from horseplay or dangerous behaviour
- Refrain from taking any unacceptable risks

2.1.5. Health & safety Advisors

The Company's Health and Safety Advisor, GAR Training Services Ltd will report directly to the Managing Director and liaise with employees and Contractors as instructed. GAR Training Services Ltd will be responsible, when instructed, for:

- Advising on all matters relating to health & safety and statutory compliance.
- Assisting in the formulation of a suitable health & safety management system.
- Advising on training and the implementation of systems that may be necessary to ensure that all places of work are made and kept safe.
- Ensuring that management are aware of their responsibilities in achieving the above objectives.
- Carrying out site inspections or audits of the Company's premises or sites making sure that all persons are complying with statutory requirements and the Company's health and safety policy.
- Assisting the Managing Director to investigate any accident or near miss, in order to reduce the risk of re-occurrence to as low as possible.
- Advising on the update of the Company's health and safety policy annually or sooner when necessary.

2.2 Risk Assessment Strategy

The Company is required to carry out a suitable and sufficient risk assessment for all work activities that create significant risk (on-site or off-site). The assessments will involve finding out what hazards are associated with the activity and thereby evaluating the extent of the risks involved. Whenever a work activity alters, then a new risk assessment will be made. Whenever an accident or “near miss” occurs the relevant risk assessment must be reviewed to establish whether it should be updated.

A risk assessment must:

- Identify the task being undertaken
- Identify the significant hazards.
- Evaluate the risks arising from such hazards.
- Record the significant findings.
- Identify any specific group of Employees and Contractors, or Individuals who are especially at risk, e.g. temporary workers, young persons (under 18yrs).
- Identify others who may be at risk, e.g. site visitors or members of the public.
- Evaluate current control procedures, including the provision of information, instruction and training.
- Assess the probability of an accident or incident occurring because of uncontrolled risk.
- Record any circumstances arising from the assessment where there is potential for serious or imminent danger.
- Specify information requirements for Employees and Contractors including precautionary measures and emergency arrangements.
- Provide an action plan giving information on the implementation of additional controls, in order of priority, and with an appropriate time scale for such implementation.

Persons carrying out risk assessments must be “competent”. This involves a combination of qualifications, knowledge and experience. Most assessments will be undertaken by our external consultant, and those carried out “in house” by a competent person.

2.3. Health Surveillance

The Company will also ensure that where a risk has been identified that could affect the health of an Employee or Contractor medical health surveillance will be provided. The Company may appoint an Occupational Health Specialist to conduct tests at regular frequencies and collate employee records of the tests. Employees and Contractors are expected to cooperate with the requirements for surveillance and, in addition, they are to identify any changes in their own health and report any concerns. Noise surveys and dust monitoring work will be carried out based on the results of risk assessment.

2.4. Cooperation and Coordination

The Company will cooperate with others that occupy any building or part of a site where the Company is carrying out work, this will include the passing of relevant information regarding the health, safety & welfare of persons entering the site or premises. Health & safety meetings will be set up as often as is deemed necessary for information to be passed between occupants.

2.5. Employer's Liability Insurance

The Company will insure against their liability for personal injury to their Employees and Contractors by virtue of the Employers Liability (Compulsory Insurance) The Company will maintain insurance with one or more approved policies with an authorised insurer against liability for bodily injury or disease sustained by an employee and arising out of and in the course of their employment. Under the above requirement, the Company will display the certificate of insurance for employee information. The Company will provide the minimum level of employers' liability cover which is set at £10,000,000. Under the 1998 Regulations the Companies should also keep all certificates for 40 years.

2.6. Public Liability insurance

The Company has in place 'Public Liability Insurance' to provide cover against claims made by members of the public who may have suffered injury or damage to property in connection with the business. All Contractors will be expected to provide details of their public liability insurance prior to their appointment.

2.7. Lifting Operations

The Company recognise the importance of the Lifting Operations and Lifting Equipment Regulation 1998

The Company will ensure that all equipment which falls within the scope of the regulations, such as the following, are fit for purpose:

- Mobile Crane
- Tower Crane
- Various Accessories

In addition to being suitable for the purpose for which they are to be used the equipment must satisfy the following criteria:

- Be of adequate strength and stability for each load.
- Equipment will be marked with its safe working load (SWL).
- Inspection, thorough examination and testing schedules are set up and maintained.
- Records for such inspections will be implemented, thorough test & examination certificates obtained and kept for future reference.
- Defects of equipment must be reported to the Director who will immediately withdraw the equipment from service until repairs have been carried out by an appropriately qualified person. When withdrawn from service the equipment will be immobilised or otherwise rendered incapable of accidental use.
- All lifting equipment must be suitably stored.

The Company will ensure that suitable training is provided to those Employees and Contractors and tasked to use the equipment, and that only suitably qualified Employees and Contractors will use the equipment.

2.8. Thorough Examination and Inspection

All lifting equipment requires a Certificate of Thorough Examination produced by a competent person, ensuring that it is safe to use.

- For lifting equipment this will be carried out at least every 12 months.
- Accessories for lifting (lifting gear) must be thoroughly examined at least every 6 months.
- Inspections are also to be carried out for lifting equipment each month as a minimum. The Operator of the equipment should be competent to carry out the regular pre-use inspections. Colour cable tie tagging will be undertaken to identify equipment that has been inspected.

3.0 Communication

3.1. Health & Safety Information

The Company acknowledges that communication between themselves their Employees and Contractors they appoint is an essential part of effective health & safety management and will endeavour to communicate the Company's commitment to health & safety and to ensure that Employees and Contractors and appointed Contractors are familiar with the contents of this health and safety policy. The Company will communicate with their Employees and Contractors and appointed Contractors through oral and written directions and by example.

Further information regarding health & safety is available as follows:

- Through management lines of communication
- This (the Company's health & safety policy) document
- Office notice board
- Workshop notice board
- Online at various health and safety websites

3.2 Consultation

Consultation will be facilitated by "toolbox talks", planned training sessions and by pre-arranged formal meetings.

3.3 Cooperation and Care

If the Company is to build and maintain a healthy and safe working environment, cooperation between workers at all levels is essential. All Employees/Contractors are expected to cooperate with the Company and the representatives who are responsible for health & safety and to accept their own duties under this policy. Disciplinary action may be taken against any Employee/Contractor who violates safety rules or who fails to perform their duties under this policy.

3.4. Accident Investigation and Reporting

All accidents, however small, are to be recorded in the accident and incident report book. Accident report books will be sited in the Company vehicles due to the mobile nature of our work activities. Brett Ormiston will be notified immediately of any accident. The Company sees accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in serious injury a report will be drawn up by our external consultants GAR Training Services Ltd

- The circumstances of the accident - including photographs and diagrams wherever possible.
- The nature and severity of the injury sustained.
- The identity of any eyewitnesses.
- The time, date, and location of the incident.
- The date of the report.

All eyewitness accounts will be collected as near to the time of the accident as is reasonably practicable. Any person required to give an official statement has the right to have a representative present. The completed report will then be submitted to, and analysed by, the Director and our External Advisors (where appropriate), who will attempt to discover why the accident occurred and what action should be taken to avoid recurrence of the problem. A follow up report will be completed after a reasonable period examining the effectiveness of any new measures adopted.

Work related accident and incidents that are reportable under the 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995' (RIDDOR) will be reported to the authorities by a competent person as appropriate, using the appropriate form (available from the authorities)

Injuries that are reportable under RIDDOR are:

- The death of any person (Regulation 6)
- Specified injuries to workers (Regulation 4)
- Injuries to Employees/Contractors which result in their incapacitation for more than 7 days (Regulation 4).
- Injuries to non-workers which result in them being taken directly to hospital (Regulation 5).

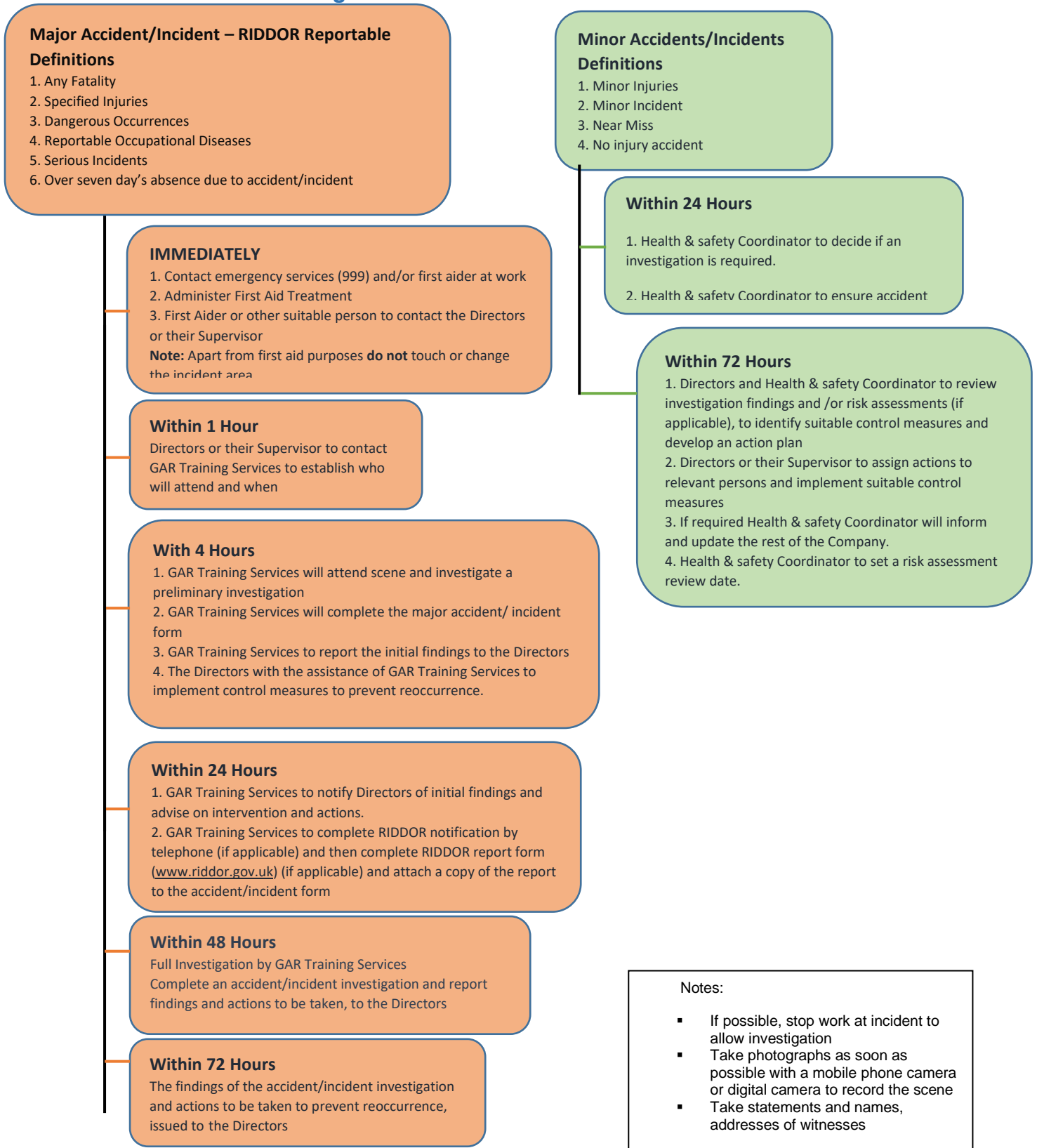
In such instances an entry should still be made in the accident and incident report book. The information held on reports will be held securely in accordance with the requirements of the General Data Protection Regulations

3.5 Near Misses

A near miss is an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. It is the Company's policy that all near misses are reported to the Director so that investigations into the cause can assist in the implementation of additional procedures to reduce the risk of a reoccurrence.

3.6 Incident Procedures

Figure 2: Incident Procedures Flowchart



4.0 Training

Safety Training is regarded as an indispensable element of an effective health & safety program. It is essential that every Employees and Contractor in the Company is trained to perform their job effectively and safely. All Employees and Contractors will be trained in safe working practices and procedures prior to being allocated any new role. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned, the safe use, inspection and maintenance of any equipment used and the emergency contingency plans. Contractors are required to provide evidence of certified qualifications prior to their appointment.

Training sessions will be held as often as is deemed necessary and will provide another opportunity for Employees and Contractors to make suggestions about, and to express any fears or concerns they might have about, health and safety. Training will be undertaken by accredited training providers as recommended by the Company's Safety Consultant.

4.1 Induction Training

All Employees and Contractors will receive induction training, either when they are first introduced to the Company, or when they are first undertaking a new role. In some instances, especially where the working environment is particularly hazardous, it may be necessary to undertake "refresher" induction training on at least an annual basis.

Topics covered under the induction training will include:

- The Company's health & safety policy and the individual responsibilities of all concerned
- Details of hazards specific to the task, e.g. manual handling, COSHH, etc. by reference to Risk Assessment documents
- Procedures to follow in the event of a fire; means of escape, assembly areas and the use of fire extinguishers
- Current first aid arrangements
- Procedures for reporting hazards and near misses
- Correct use of personal protective equipment where provided
- Sources of health and safety information
- The role and function of the Company's Health & safety advisors

4.2 Specialist Training

Specific training will be given to employees where the need is identified by a risk assessment.

The results of a "training needs analysis" ensures certain training is planned and carried out, and covers the following as a minimum: -

- Asbestos Removal "non-licenced" work

4.3 Training Records

The health and safety Coordinator will maintain records for all persons attending training (including any induction training).

5.0 Arrangements

5.1. Construction (Design & Management) Regulations 2015

The Company acknowledge its responsibilities and duties under the Construction (Design & Management) Regulations 2015 (CDM). The Company will manage and monitor the work under its control in such a way that ensures the health & safety of anyone it might affect (including members of the public). This will be achieved by completing a Pre-Construction Phase Plan. If Ormiston Steel Services Ltd assume the role of Principle Contractor (when there is more than one Contractor on a project) the Company will fulfil its duty to plan, manage, monitor and coordinate health & safety during this phase, when all construction or demolition work takes place and provide the required documentation for the Health & safety File.

5.2. Contractors

Contractors shall always observe and apply the requirements of the health and safety at Work Act 1974 and shall comply with the health & safety practices and procedures of the Company and in particular, all requirements laid down in this policy. Failure to comply with these requirements could lead to the termination of the relevant Contractor contract and their removal from the site. The Company, or their representatives have the authority to stop any activity, or the actions of any of the Contractors if it is considered that there is a breach of the Health and safety at Work Act and its Regulations, Codes of Practice or if health and safety guidance notes are not being adhered to, or where any hazard exists that presents a risk to others. Under the Health and safety at Work Act 1974 we understand that we can be held responsible for the actions of our Contractors and to this end will ensure adequate training and information is provided.

5.3 Emergency Procedures

Emergency procedures will be implemented according to the risk and activities being carried out. Precautions will be taken to ensure that the likelihood of emergencies arising is as low as possible, and we will ensure that:

- Everyone on site is made aware of the emergency procedures.
- Emergency escape routes are maintained and kept clear.
- Arrangements will be set up for calling the emergency services.
- Adequate access is maintained at the site for emergency vehicles.
- Provision of adequate first aid equipment and trained persons are available on site to treat those injured.

5.4 Risk Assessments

The Company will carry out a suitable and sufficient risk assessment for all work activities that create significant risk. The assessments will involve finding out what hazards are associated with the activity and thereby evaluating the extent of the risks involved. Whenever a work activity alters, then a new risk assessment will be made. Whenever an accident or “near miss” occurs the relevant risk assessment must be reviewed in order to establish whether it should be updated.

A risk assessment must:

- Identify the task being undertaken
- Identify the significant hazards.
- Evaluate the risks arising from such hazards.
- Record the significant findings.
- Identify any specific group of Employees and Contractors, or Individuals who are especially at risk.

- Identify others who may be at risk, e.g. Site Visitors or members of the Public.
- Evaluate current control procedures, including the provision of information, instruction, and training.
- Assess the probability of an accident or incident occurring as a result of uncontrolled risk.
- Record any circumstances arising from the assessment where there is potential for serious or imminent danger.
- Specify information requirements for Employees and Contractors including precautionary measures and emergency arrangements.
- Provide an action plan giving information on the implementation of additional controls, in order of priority, and with an appropriate time scale for such implementation.
- Persons carrying out risk assessments must be “competent”. This involves a combination of qualifications, knowledge and experience.

5.5. Safe Systems of Work & Method Statements

Where a risk assessment has been completed but has not reduced risks to a low level, an additional method statement or safe system of work will be produced to enable detailed controls to be explained and a safe logical sequence of operation implemented.

5.6. Use of Plant and Machinery

Prior to using any plants, tools, or equipment a risk assessment will be undertaken to ensure the correct controls are in place. The risk assessments will consider all the relevant hazards. Brett Ormiston will ensure that competent Operators and Banksmen are provided or that, where necessary, full training and instruction is arranged.

5.6.1. Operators (responsibilities)

- Read and understand the Company’s health and safety policy and risk assessments and carry out your work in accordance with its requirements
- Only Operators who are trained and competent can use plant and machinery
- Visual inspections of all equipment will be undertaken by the operator prior to use at the start of each shift to ensure that the machine is defect free. Any defect with the machine is to be reported immediately to the Managing Director. Do not continue to operate the machine if the defect affects its safe use.
- Carry out and record weekly inspections of plant and machinery for defects.
- Ask for, (if applicable) and use, ear protection to ensure that you do not suffer from gradual loss of hearing due to prolonged exposure of noise.
- Never try to use the machine for work for which it was not designed. If in doubt, ask
- Suitable safety footwear and protective clothing must be worn
- All Banksmen, required to enter areas where machinery is operating will make themselves known to the operator
- Suggest ways to eliminate hazards or improve working methods.
- Ensure when operating your machine that other persons are well clear, especially if reversing.
- Ensure, if necessary, that you work with a Banksmen and, if so, you are both sure before starting work of the meaning of signals which may be used.
- Report all accidents or damage, however minor, to the Managing Director
- Plant Operators must not drink alcohol or take drugs, during the working day or shift.

5.7. Work Equipment

The Company will endeavour to ensure that all equipment used is safe and suitable for the purpose for which it is intended. This will ensure that:

- All work equipment will be used in such a way as to reduce risks to the user and others around the equipment (the ergonomic risks must be considered when selecting the equipment).
- All Employees and Contractors will be provided with adequate information and training to enable them to use the work equipment safely.
- All work equipment will be maintained in good working order and repair, maintenance programs will be implemented, and suitable records kept. Employees and Contractors must carry out daily visual "Pre-use checks" on equipment.
- Appropriate training will be provided to those expected to work with or maintain the equipment. Records of training will be kept on file.
- Safety inspections will be carried out by a competent person who has the necessary knowledge and experience to identify key components, fault find and complete reports and records.
- All controls for work equipment will be clearly visible and identifiable. Equipment will be provided with one or more stop controls and, where appropriate, emergency stop controls. Stop controls must be tested before any maintenance or repair work is undertaken, after the maintenance or repair work has been completed and when the equipment is routinely serviced.
- All work equipment will be clearly marked with health & safety warning signs where appropriate.

Whenever machines require guarding, The Company will refer to the provision and use of work equipment regulations 1998

The Company will ensure measures are taken to:

- Prevent access to any dangerous part of machinery by way of fixed guards
- Stop the movement of any dangerous part of machinery before any part of a person enters a danger zone.

All guards and protection devices provided shall be suitable for the purpose for which they are provided. Employees and Contractors are forbidden to tamper with guards to machinery with the intent of bypassing them for any reason. Guards to machinery will be inspected on a regular basis.

5.8. Personal Protective Equipment (PPE)

All Employees and Contractors who may be exposed to a risk to their health & safety whilst at work will be provided with suitable, properly fitting, and effective personal protective equipment (PPE).

- All PPE provided will be properly assessed prior to its provision.
- Complex PPE such as respirators must be “face fitted” and examined.
- All PPE provided will be maintained in good order.
- All Employees and Contractors provided with PPE will receive training and information on the use, pre-use checking, maintenance, and purpose of the equipment.
- All PPE provided is must be used correctly by its Employees and Contractors.
- The Company will carry out an assessment before the use of any PPE to ensure that it is suitable, that it is used as a ‘last resort’ and that the risk cannot be eliminated or reduced by other means which are practical. Wherever the task or place of work changes, a reassessment shall take place. Records will be kept of the assessments and use of PPE.
- Suitable storage facilities will be provided and comprise of portable lockers or kit bags.
- Employees and Contractors that are issued with equipment and it is their responsibility to store it in the facilities provided.

Employees and Contractors must use PPE as intended and must forward the old kit when in need of replacement. Failure to use the PPE as intended could result in disciplinary action being taken

5.9. Manual Handling

All loading and unloading involves lifting and handling to some extent. Although mechanical equipment will be used whenever practicable, some of the work will inevitably be carried out manually. The risk of injury can be greatly reduced by a knowledge and application of correct lifting and handling techniques.

The Company will comply with the relevant duty of care by carrying out the following:

- Manual handling will be avoided as far as is reasonably practicable
- Where it is not possible to avoid manual handling, an assessment of the operation will be made considering the task, the load, the working environment, and the capability of the individual concerned.
- All possible steps will be taken to reduce the risk of injury to the lowest level possible.
- An assessment will be reviewed if there is any reason to suspect that it is no longer valid.
- Manual handling instruction will be given to Employees and Contractors and will be relevant to the tasks being undertaken.
- Where the nature of the load or environment dictates, PPE will be issued and will be expected to be used by Employees and Contractors.

5.10. Control of Substances Hazardous to Health

A risk assessment will be conducted of all work involving exposure to hazardous substances. The assessment will be based on manufacturer's and supplier's health & safety guidance and the Company's knowledge of the work process. All Employees and Contractors who encounter hazardous substances will receive information on the health & safety issues relating to that type of work where applicable. Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

In addition to the above the Company will apply the following:

- Keep an inventory of all hazardous substances used, including those used in maintenance and cleaning.
- Identify a point of use for each substance.
- Whenever possible minimise the use of substances
- Obtain, and make available to all relevant Employees and Contractors, hazard data sheets from the manufacturers or suppliers of each substance.
- Any PPE required during the use of the substance shall be provided and maintained by the Company. Employees and Contractors are required to notify Brett Ormiston if the PPE is no longer serviceable.
- Keep records and documentation on each assessed substance.
- Keep all hazardous substances in safe places (i.e. that are locked and marked with safety signs where necessary).
- Any substance identified as requiring special needs other than described above will be stored as per relevant Regulations or manufacturers recommendations.
- Fuel, particularly petrol, must be stored securely and only be used to power engines. It is forbidden to use fuel to wash skin, components, or light fires.

5.11. Electricity

The Company acknowledge that there is a statutory requirement to maintain electrical equipment in a safe condition so that users are protected from such hazards as electric shock, burns or fire; the requirements also extend to those carrying out maintenance work on electrical equipment or systems. All electrical work carried out in the Company's construction sites will be in accordance with the latest Regulations published by the Institute of Electrical Engineers for Electrical Installations, and will only use an NICEIC (The National Inspection Council for Electrical Installation Contracting) approved Contractor. The Company only permits persons classed as 'competent' under the Electricity at Work Regulations 1989 to work on electrical equipment.

All electrical equipment owned by the Company will be subject to safety inspections by a competent person. Each piece of equipment will be identified with its unique number, labels will be fixed to the equipment following the test, and these will show the test date, the person carrying out the test, expiry date and the identification number of the equipment. Records of these tests will be retained by Brett Ormiston. Any equipment found to be faulty will be removed from service immediately and labelled accordingly. All records will be kept for the life of the equipment.

The Company expect all Employees and Contractors to carry out a visual inspection of electrical equipment prior to use and to report any defects for repair before the equipment is used. No Employee or Contractor is to knowingly use defective equipment

5.11.1. Site Electrical Equipment

The Company will only permit the use of 110 volt portable and handheld electrical tools on site. This will include Company equipment and equipment that may be used by Contractors and the Self-Employed. Only in extreme circumstances where specialist equipment is needed, which is not available in 110volt form, will 240volt equipment be permitted- and then only under the written authorisation of the Managing Director.

5.12. Abrasive Wheels

Employees and Contractors using grinders/cutters will receive abrasive wheels training, this will include, recognising potential hazards, safe working practices and inspection procedures. Safe storage and handling, and PPE requirements. Records of all training will be kept on file and reviewed as necessary. A regular maintenance/service schedule will ensure all equipment provided by the Company is suitable for its intended use, as well as identifying defective equipment, which will be tagged and removed from service to await repair/replacement.

5.13. Noise

The Company recognise that there is a statutory duty to control noise and to protect Employees and Contractors and other persons from its effect. Excessive noise can cause permanent damage to the hearing of those exposed to it. Noise is also a source of annoyance and disruption and may directly or indirectly increase the risks of accidents. Every practical step will be taken by the Company to control noise. It is now law that, in any activity where the noise level exceeds 85dBA, the Operator must wear ear protection when the noise cannot be removed or contained. In any activity where the noise level is less than 80dBA, the Operator is not legally obliged to wear ear protection, but it must be available for their use.

Although all practical methods should be used to reduce noise levels where they remain high ear protectors should be worn as appropriate. Ear protectors should be suited to the user and suitable for the type of noise. They are only effective if they fit properly, providing a tight seal. They should be inspected regularly for damage and stored in a clean place when not in use. The Company have identified no activities that require hearing protection at this time. Noise assessments will be carried out as appropriate to monitor the noise levels and the suitability of any hearing protection provided. These noise assessments and records will also demonstrate the Company commitment to identifying noise hazards and removing any unacceptable risks.

5.14. First Aid

The Company shall provide such equipment and facilities as are adequate and appropriate in the circumstances for enabling First Aid to be rendered to persons if they are injured or become ill at work, this will be determined by carrying out a risk assessment of each workplace.

- The Company shall ensure suitably qualified first aid personnel to ensure adequate arrangements for First Aid.
- Fully stocked first aid kits will be available in Company vehicles. The size of the kit will be dependent on the number of Employees and Contractors and the risks identified.

5.15. Fire Safety

It is our Policy to set up and maintain the following fire safety measures:






- To provide suitable and sufficient information to all Employees and Contractors which will cover:
 - What to do in the event of a fire.
 - How to use fire extinguishers provided.
 - The location of the fire assembly point (changeable for each site).
 - General fire precaution measures.
 - How to raise the alarm and call the fire brigade.

5.16. Safety Signs

If, following a risk assessment, a risk remains after controls are in place, safety signs will be displayed warning Employees and Contractors and visitors of the hazard.

All signs will meet with the UK Regulations regarding colour, size, shape and design and where necessary will contain a pictogram as well as words. Safety signs are coloured as is shown in Figure 1.

Figure 3: Colour Coding of Safety Signs

Mandatory		 All persons must sign in each day	
Warning		 DANGER Electric shock risk	
Prohibition		 Authorised persons only	
Fire		 Fire extinguisher	
Safe Condition & First Aid		 First aid	

5.17. Hand Arm Vibration

The Company is aware of the health risks involved with the prolonged use of hand tools of a rotary or percussive nature, and that such tools can cause the users various forms of damage, known as “hand-arm vibration syndrome” (HAVS). The most common form is the damage caused by vibration white finger (VWF).

Various tools can expose personnel to hazards from vibration, these may include:

- Grinders

The Company will commit themselves to reducing the risk of HAVS to their Employees and Contractors and as such, will develop a strategy that aims to reduce any identified risk to an acceptable level. This will include assessing the risk to Employees and Contractors and implementing methods that will help reduce the hazard, which may include the elimination of the hazard through substitution with a non-hazardous process.

The Company will also implement the following:

Training & Information

Provide Employees and Contractors with suitable training, information, and supervision. This will include the use of the equipment that they are expected to use, and toolbox talks on the risks to health from VWF.

Tools & Equipment

Select equipment and tools that have low vibration properties and obtain, from suppliers, information on the amount of vibration that might be expected from the equipment. Machines and equipment will be maintained at regular intervals and any faults rectified as soon as possible, which will help reduce vibration problems through the lack of lubrication or worn out parts.

Personal Protective Equipment

PPE will be provided by the Company; the wearing of gloves will help lessen the effects of vibration but will not remove the problem. Ear protection will be provided, and eye protection as required to reduce the risk of injury from flying particles.

Work Patterns

The Company will obtain the vibration levels for equipment and work out the maximum time that an operator can use the equipment in an 8-hour period by using a vibration level chart. The Company will monitor work patterns and will reduce, wherever possible, the time which Employees and Contractors are exposed to vibration so that it is within the maximum allowed time. This will be accomplished by rotating the work and splitting it between Employees and Contractors, thereby reducing the effects of vibration on each user. The trigger times will be noted by the Employees and Contractors as they will be the one exposed to the vibration levels.

5.18. Machinery Safety

It is always our policy to provide a safe working environment for our Employees and Contractors. To help us do this, we have introduced a policy to cover the safe use of any machinery that will be used within our activities.

The Provision and Use of Work Equipment Regulations 1998 (PUWER) require that any equipment which we provide for use at work is:

- suitable for its intended use
- can be used safely
- maintained in a safe condition
- inspected as necessary
- effectively guarded
- Only used by Operators who have received adequate information, instruction, and training.

5.19. Vehicle Safety

Due to the use of vehicles by Employees and Contractors the Company recognises the need to assess and reduce the risk of injury in every work setting. Hazards to Employees and Contractors, visitors, and the public are assessed, and controls put in place. Assessments take into consideration:

- Traffic speeds.
- Safety equipment that can be fitted to vehicles.
- Pedestrian and vehicle routes (on work sites).
- Work area layout.
- Use of loading/ unloading and parking areas.
- Route planning.
- Driver competence and health.
- Driving license checks upon employment and regularly thereafter

5.20. Safe Systems of Work

Risk assessments and method statements are prepared for all significant activities with 'permit to work' permit to dig' and 'permit to carry out hot works' systems set up where appropriate.

5.21. Working at Height

The Company recognises its responsibility to protect its Employees and Contractors from falls and will ensure that consideration is given to all working at height and wherever reasonably practicable work at height will be avoided. Risk assessments will be carried out for all activities to enable a safe system of work to be adopted. The Company will refer to the Working at Height Regulations 2005. The following Policies will be adopted when working at height:

Use of scaffold towers:

Scaffold towers will only be erected by trained individuals, who are in possession of the manufacturer's instructions. Towers should be thoroughly checked before being erected, the floor area should be clear of debris and outriggers used at all times.

Makeshift Platforms:

Under no circumstances should makeshift platforms be used.

Ladders

Ladders will only be permitted for work where there is no alternative means, and then will only be permitted for short duration works, where the operative can maintain a three-point contact with the ladder. In all cases an alternative method will be considered and wherever possible Scaffold Towers or MEWPS will be used.

MEWPS

Cherry-pickers and scissor lifts will be used by operatives who have received full training in the use of the equipment, the equipment will be inspected prior to use by the operator and every 7 days thereafter. When working in a cherry picker a safety harness will be worn at all times by the operators, when working from a scissor lift a risk assessment will determine if a safety harness is required. Under no circumstances should operatives climb the cage sides to extend their reach.

Harness and Lanyards

Use of a harness and appropriate lanyards will be based on risk assessment for the task to be carried out.

Work where work at height is part of the job will be assessed and safe systems of work developed.

5.22. Mobile Phones

Due to the high nature of their use in many working activities the Company has implemented guidelines for the safe use of mobile phones. A mobile phone or similar hand-held gadget should not be used at any time when it has been identified as unsafe to do so by risk assessment, or at any other times identified by the company. The following are certain activities that during which the use of a mobile phone should be prohibited:

It is now illegal to use a hand-held mobile phone or similar gadget including satellite navigation systems, hand-held computers etc. whilst you are driving, stationary at traffic lights, in a traffic jam or in any other hold up. Hand-held phones may only be carried in the vehicle providing they are switched off and not checked during these periods

- Whilst in control of any vehicle, including any road-going vehicle.
- Whilst using any hazardous hand-held equipment, e.g. power tools.
- When operating any industrial machinery
- When working in areas where there are vehicle movements
- In areas in which there are known security issues
- Whilst working at height
- Whilst handling any hazardous substances.

Any breach(es) of the above policy will be treated as a serious breach of company rules and may be treated as a disciplinary matter.

Note. The only occasion under which a hand-held phone can be used whilst driving is to make a 999-emergency call, but only if it is not safe or practical to stop to make the call. Hands-free sets for mobile phones are legal to use. However, we expect all drivers to exercise their judgement in deciding when it is safe to make or receive phone calls. Drivers must always retain full control of their vehicles.

Note. You can still be personally prosecuted for failing to drive without due care and attention, or for dangerous driving.

5.23. Control of Substances Hazardous to Health (COSHH)

A risk assessment will be conducted of all work involving exposure to hazardous substances. The assessment will be based on manufacturer's and supplier's health & safety guidance and the Company's knowledge of the work process. The Company will ensure that exposure of workers to hazardous substances is minimised and adequately controlled in all cases. All Employees and Contractors who will come into contact with hazardous substances will receive training and information on the health & safety issues relating to that type of work. Assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

In addition to the above the Company will apply the following:

- Keep an inventory of all hazardous substances used, including those used in maintenance and cleaning. A copy will be held centrally and available at each work site. The responsibility for maintaining Material Safety Data Sheets (MSDS) will be held by an appointed competent person centrally.
- Identify a point of use for each substance.
- Whenever possible minimise the use of substances
- Obtain, and make available to all relevant Employees/Contractors, safety data sheets (MSDS) from the manufacturers or suppliers of each substance.
- Develop and commence a training programme informing users of the risks and the controls to be taken using MSDS, manufacturers labelling, and toolbox talks where significant risk is retained
- Any PPE required during the use of the substance shall be provided and maintained by the Company. Employees/Contractors are required to notify the Managing Director if the PPE is no longer serviceable. Failure to use the PPE provided could lead to disciplinary action being taken.
- Keep records and documentation on each assessed substance.
- Keep all hazardous substances in safe places (i.e. that are locked and marked with safety signs where necessary). Ensure that all warning/use & care of labels are not defaced or removed or decanted into unmarked containers.
- Any substance identified as requiring special needs other than described above will be stored as per relevant regulations or manufacturers recommendations.
- Fuel, particularly petrol, must be stored securely and only be used to power engines. It is forbidden to use fuel to wash skin, components, or light fires.
- Highly flammable liquids such as paint thinner and brake cleaner must always be stored in fireproof metal storage cabinets – and returned to the cabinet as soon as they are no longer required.

All substances used that present any type of risk to the health, safety or welfare of the user must be identified with the following warning symbols:

Figure 4: Warning Symbols



5.24 Smoking and Vaping

The Company has developed a non-smoking/vaping policy to protect all Employees, Contractors, Customers and Visitors from exposure to secondhand smoke and vape fumes and to assist compliance with the smoke-free legislation made under the Health Act 2006. Exposure to secondhand smoke increases the risk of lung cancer, heart disease and other serious illnesses. There is little evidence against vaping, however, the Company's policy is that of our smoking policy. The Company will ensure that all our workplaces are smoke-free and that all employees have a right to work in a smoke-free environment. Smoking is therefore prohibited in all enclosed and substantially enclosed premises in the workplace. This also includes Company vehicles used by more than one person, even if they are used at different times. This policy applies to all Employees, Consultants, Contractors, Customers or Members of the Public and Visitors.

Appropriate "no-smoking" and "no-vaping" signs will be clearly displayed at the entrances to and within the premises, and in all smoke and vape free vehicles. Disciplinary procedures will be followed if a member of employees does not comply with this policy. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

5.25 Drugs

The Company recognizes that non-prescribed drugs are widely available that could have health and safety implications for the company. We are also aware that whilst not developing an addiction, some employees may choose to take them recreationally. As a result, this policy states our position on the taking of any non-prescription drugs that are unlawful under the criminal law. Due to its importance, this drugs policy also forms part of the Company's overall Health and safety policy. Many drugs have side effects that not only affect an individual's health but may also compromise their safety and that of others. Although the affects vary depending on the drug used, common side effects can include a loss of body coordination, forgetfulness, and confusion. The potential safety risks for all staff at work are obvious, but a lack of mental alertness is particularly important for those in safety critical roles. These include those who operate heavy equipment, dangerous machinery, and drive vehicles. Due to these risks, no drugs are allowed onto any company premises or to be consumed on them at any time. This includes all areas, both internal and external. The prohibition on illegal drugs extends to all activities that relate to activities whilst "at work". These include, but are not confined to the following:

- driving whilst on company business
- on-call/standby duties

A breach of these rules will result in disciplinary action being taken against the individual. It may also result in summary dismissal on grounds of gross misconduct. The Company does recognize that there may be circumstances when an Employee or Contractor experiences a drug-related problem that requires specialist help. So, it is our intention to deal with these cases constructively and sympathetically. For reasons of health and safety of the individual, or of others who may be at risk, we reserve the right to transfer any individual undergoing treatment for drug dependency out of a safety critical role. In doing so, the needs of the individual will be considered and wherever possible, a suitable alternative post sought.

6.0. The General Data Protection Regulations (GDPR)

Data Protection and Data Erasure

Personal Data is any data which may be used to identify, contact, or locate a single person. Anyone who has their personal data held by Ormiston Steel Services Ltd has the right to access, view and erase this data. A subject Access Request (Article 15) grants every EU Citizen the right to a copy of all their personal data held by Ormiston Steel Services Ltd will provide this information in an electronically transportable format usable by the Client requesting the information.

The Right to be Forgotten (Article 16 &17) entitles Clients to have this data erased. Ormiston Steel Services Ltd understands that failure to fulfil this entitlement will be a violation of GDPR and subject to penalties.

Data Breaches

In the event of a data breach posing any kind of threat to Clients personal information Ormiston Steel Services Ltd will inform the affected Clients within 72 hours.

Ormiston Steel Services Ltd is committed to ensuring that we comply with The General Data Protection Regulations (GDPR) principles, as listed below:

- Meet our legal obligations as laid down by The General Data Protection Regulations (GDPR).
- Ensure that data is collected and used fairly and lawfully.
- Process personal data only to meet our operational needs or fulfil legal requirements.
- Take steps to ensure that personal data is up to date and accurate.
- Establish appropriate retention periods for personal data.
- Provide Clients with access to their personal information upon request.
- Abide by Article 15, granting Clients the right to have their personal information erased.
- Provide adequate security measures to protect personal data.
- Ensure Computer Security Software is current.
- Ensure computers containing personnel information have their passwords changed on a regular basis.
- Ensure that a nominated Director, (Office Administrator) is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensure that all Clients are made aware of good practice in data protection.
- Provide adequate training for all responsible for personal data.
- Ensure that everyone handling personal data knows where to find further guidance.
- Ensure that queries about data protection, internal and external to the Company, are dealt with effectively and promptly.
- Regularly review data protection procedures and guidelines within the Company

Data Protection Principles

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purpose and shall not be further processed in any manner incompatible with that purpose.
- Personal data shall be adequate, relevant, and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.

- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under The General Data Regulations (GDRP)
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing or personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to another Company unless they can demonstrate an adequate level of protection for the rights of data subjects in relation to the processing of personal data.

7.0 Coronavirus (Covid-19)

Covid-19 will remain a public health issue, guidance for workplaces has been replaced with public health advice. Although the HSE will no longer expect COVID-19 control measures, employers must continue to consult Employees and Contractors on any changes they make that might affect health and safety. The HSE no longer expects businesses to consider COVID-19 in risk assessments.

8.0. Summary of Revisions

DATE	REVISION NUMBER	DETAILS OF REVISION
13/08/2021	1	Annual Review and Update
15/09/2022	2	Annual Review, Covid -19 update