



DOLLMAN RALSTON

**DOLLMAN RALSTON LIMITED
HEALTH, SAFETY, WELFARE, ENVIRONMENTAL POLICY
AND PROCEDURES MANUAL**

REVISION F

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ABBREVIATIONS:

- DR: Dollman Ralston Ltd
- HSE: The Health & Safety Executive
- CDM: The Construction Design Management Regulations 2015
- PD: Principal Designer
- PC: Principal Contractor
- NNLW: Notifiable Non Licensed Work
- UKATA: United Kingdom Asbestos Training Association

GENERAL INTRODUCTION

THIS SAFETY POLICY DOCUMENT COMPRISES THREE INDEPENDENT BUT INTERLINKED SECTIONS:

- The Managing Director's Statement Of Intent committing the Dollman Ralston Ltd, to establishing a framework to ensure insofar as is reasonably practicable the development and implementation of safe working procedures and practices.
- The Organisational Structure outlines the duties and responsibilities allocated to Directors, Managers and personnel employed by or working under the control of the Company. In each instance, reference is to the current position holder. The organisational structure may also reflect the tasks of multiple duty holders.
- The Arrangements In Force outlines current procedures, planning, control, monitoring and review requirements. The arrangements are complementary to the duties and responsibilities allocated to the respective individuals.

Careful study of this document and subordinate safe working procedures will assist in discharging each individual's obligations.

DIRECTORS STATEMENT OF INTENT

In accordance with its duty under Section 2(3) of the Health and Safety at Work etc Act 1974, and in fulfilling its obligations to employees, visitors, neighbours, contractors and the general public who may be affected by its activities, the Directors of Dollman Ralston Ltd have produced the following statement of Policy in respect of Health, Safety, Welfare and Environmental concerns.

It is the aim of the Directors, so far as reasonably practicable, to ensure that:

1. The working environment of all employees is safe and without risks to health and that adequate provisions are made with regard to the facilities and arrangements for first aid and welfare at work.
2. Ensure that adequate resources both financial and physical are made available to ensure the successful implementation of this policy.
3. The provision and maintenance of plant and systems of work that are safe and without risks to health.
4. Those persons who are not in our employ, who may be affected by our activities, are not exposed to risks to their health and safety.
5. Information, instruction, training and supervision are provided, as necessary, to secure the health and safety at work for all employees.
6. Arrangements for the use, handling, storage and transportation of articles and substances for use at work that are safe and without risk to health or the environment.
7. Adequate information is available with respect to articles and substances for use at work, dealing with the conditions and precautions necessary to ensure that, when properly used, they present no risks to health, safety or the environment.
8. There is suitable provision for the safe access and egress to and from all working areas.
9. Protection of the biosphere. We will minimise and strive to eliminate the release of any pollutant that may cause environmental damage. We will safeguard habitats and will minimise contributing to the greenhouse effect, depletion of the ozone layer, acid rain and smog.
10. Sustainable resources. We will make use of renewable natural resources through efficient and careful planning. We will maximise protection to the wildlife habitat.
11. Reduction and disposal of waste. We will minimise the creation of waste, especially hazardous waste and wherever possible recycle materials. We will dispose of all wastes through safe and responsible methods.

The Director's have a responsibility for the implementation of this Health and Safety Policy and associated company Health, Safety and Environmental Procedures.

Staff are reminded of the legal requirement to comply with the Policy and Procedures.

In particular, they are required:

- *To take reasonable care for their own health and safety at work and of those who may be affected by their acts or omissions.*
- *To co-operate with their employer to ensure that they comply with any duty or requirement for health and safety and the environment, imposed upon their employer by law, and contained in this statement and the Policy and Procedures Manual.*
- *Not to intentionally or recklessly interfere with or misuse anything provided in the interests of health safety or welfare.*

'This statement will be reviewed annually unless significant changes in health and safety legislation are forthcoming'.

Signed:

Steve Dollman
Managing Director
Dollman Ralston Limited

Signed:

Leigh Duly
Director
Dollman Ralston Limited

Date: 13th June 2018

FOREWORD BY THE HEALTH & SAFETY ADVISOR

Employees are a prime resource for any successful company. Not only is it a legal requirement for the Company to have a regard for the Health, Safety and Welfare of its employees and others affected by its activities, it is a moral duty and good business practice. In addition, environmental considerations are of equal importance in all aspects of our operations and liaison with the Environment Agency shall be carried out to ensure compliance.

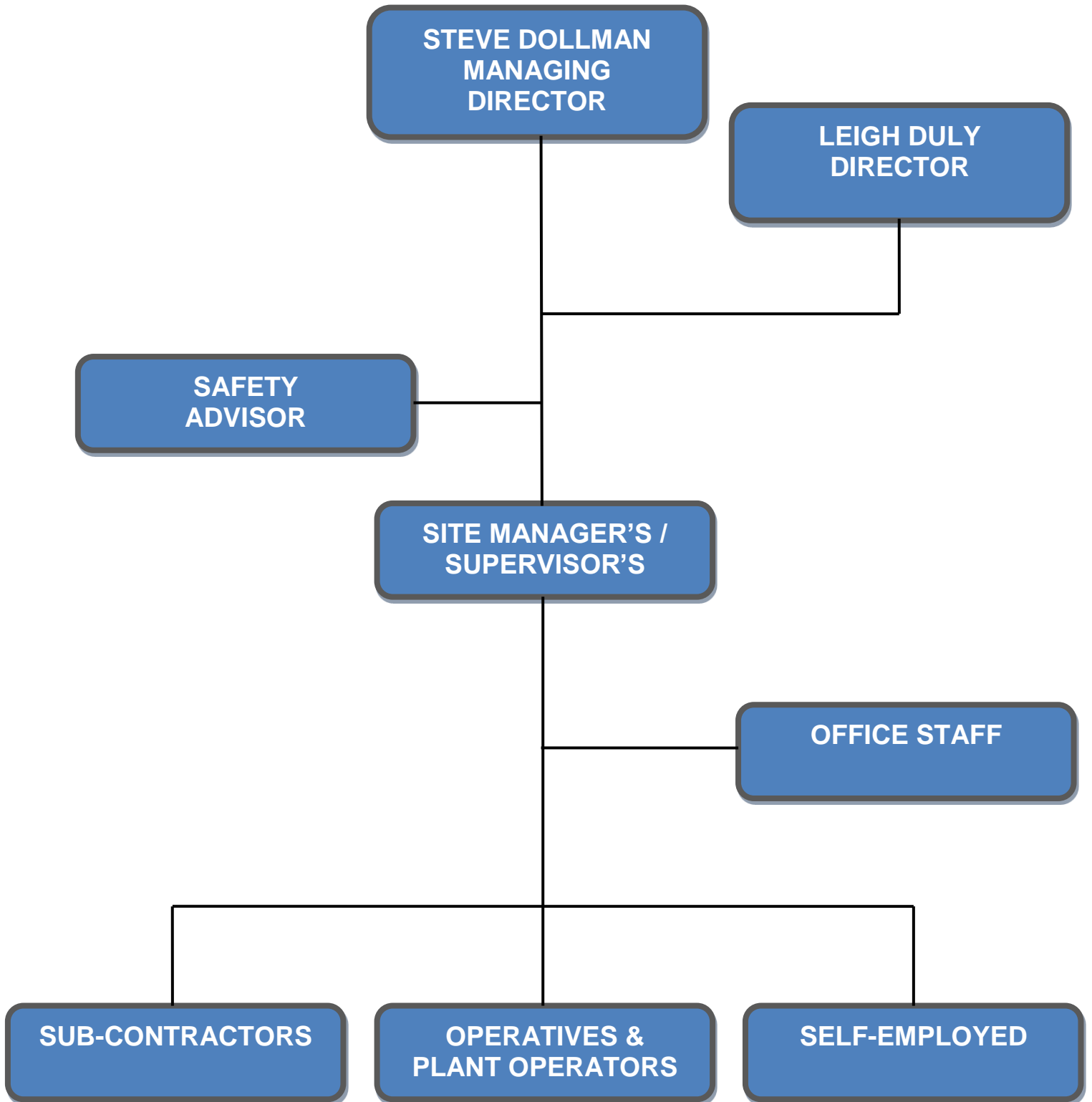
Dollman Ralston Ltd readily accepts these legal and moral duties in order to play a full active part in the communities in which it operates and is an active participant in Local Authority Considerate Contractors Schemes.

Safety is a concern of everyone and this policy document needs the full co-operation of all employees, who are expected to give every possible assistance towards the successful implementation of the Dollman Ralston Ltd policies and procedures and to take reasonable care for their own safety and that of others.

The purpose of this policy and the procedures manual is to assist employees and supervisors in the implementation of Best Practice for all the Companys operations be it site orientated or office based.

We require all employees to study this policy and our procedures and to follow such when at work.

ORGANISATIONAL STRUCTURE



2.1 SAFETY MANAGEMENT STRUCTURE

BOARD OF DIRECTORS

The Board of Directors of Dollman Ralston Ltd will ensure (insofar as is possible) that they will establish and maintain safe systems of work for all persons involved in the Company's operations. This objective shall be achieved by:

The allocation of responsibilities to personnel in the employ of the Company;
Having available such in-house expertise and external support as may be deemed necessary from time to time.

Requiring that such training, instruction, monitoring and feed back is arranged and presented as and when required.

Maintaining Director with Special Responsibility for the Safety Management Programme and its implementation.

The Board of Directors shall initiate, commission, encourage and support such Safety Management initiatives as may be required, based on historical reference, industry standards and statutory developments. To assist in this requirement Safety Management shall be on the agenda of all Board meetings.

DIRECTORS WITH SPECIAL RESPONSIBILITY FOR THE SAFETY MANAGEMENT PROGRAMME

The Managing Director/ Safety Director accepts ultimate responsibility on behalf of the Company for the implementation of this Health and Safety Policy and also to ensure that any financial resources required to implement this policy are available.

In order to assist the Director(s) to discharge their duties, there shall be available such specialist expertise as may be necessary. Such expertise will include the Company Safety Advisors, Technical and Engineering specialists, financial specialists, and External specialists. Each shall be required to keep the Directors appraised as to standards and developments impinging upon and influencing the Safety Management Programme. Where considered necessary the Directors may delegate operational tasks and research exercises to such personnel, who shall be required to report back within a specified time period.

CONTRACTS MANAGER

The Contracts Manager so appointed shall have the full support and commitment from the Directors, executives, managers and personnel employed by or working under the control of the company. The Contracts Manager shall report each month to the Board of Directors on matters influencing the Safety Management requirements of and standards achieved by the company.

The Contracts Manager will ensure that the Company's Health and Safety Policy is observed and that all requirements necessary for effective compliance with the policy are provided for. To ensure that through their respective Site Managers, Supervisors and Operatives, that all work carried out, and all plant and equipment in use, complies with the Company's standing instructions and is in accordance with the legal requirements.

COMPANY SAFETY ADVISORS

The appointed Company Safety Advisors will report to and be accountable to The Company Director(s) with Special Responsibility for Safety Management. They shall also be available to assist other members of the Management Team on matters influencing Safety Management including:

- Assisting in Risk Assessments.
- Assisting in developing Safety Plans.
- Assisting in Method Statements.
- The Company Safety Advisor's shall also carry out on-site:
 - Safety Management Inspections.
 - Detailed Safety Management Audits.
 - Incident Investigations.

Each such activity shall be formally reported and circulated as required by Company procedures.

It shall be responsibility of the Company Safety Advisors to:

- Maintain such records as may be required by statute or Company Procedure.
- Review and where necessary Develop Systems, Procedures, Controls and Monitoring standards to further promote the Safety Management Programme.
- Review relevant legislation and disseminate to all relevant personnel.
- Develop and arrange a Safety Management Awareness Training Programme as may be appropriate to the respective managers and disciplines within the Company.
- Circulate relevant Safety Management related information and instructions to the various managers, departments and sections within the Company.

The Company Safety Advisors or their appointee shall be authorised to suspend the Company's Activities if serious risks to persons, equipment and / or property are identified.

IN THE EVENT OF SUCH AN ACTION, A FORMAL REPORT SHALL BE SUBMITTED WITHOUT DELAY, TO THE DIRECTOR (S) WITH SPECIAL RESPONSIBILITY FOR THE SAFETY MANAGEMENT PROGRAMME.

THE DIRECTORS MAY COMMISSION A FORMAL ENQUIRY INTO THE CIRCUMSTANCES OF THE SUSPENSION

All personnel in the employ of or working under the control of the Company shall assist the Company Safety Advisor's (or authorised nominee) in discharging their duties and responsibilities.

PLANNING MANAGERS

Executives, Managers and their subordinates charged with a planning function are required to formally evaluate the Safety Management implications of their respective tasks, in respect of each Project or Phase of the Project. (Planning Managers may include Estimators, Quantity Surveyors, Design Engineers, Contracts Managers, Project Managers and Site Managers.)

Departmental and inter-departmental communication will be essential in order to discharge the planning requirements. By implication, this means the Safety Management Assessment will be integrated with and become a component of other Managerial Disciplines.

In order to assist the respective Executives, Managers and Departments the support and expertise of the Company Safety Advisor's is available. There is also a Safety Procedures Manual in force to enable key questions to be addressed and analysed.

SITE SUPERVISORY TEAMS

Site Supervisory Teams may include all or some of the following:

- Project Manager
- Site Manager
- Site Safety Management Co-Ordinator
- General Foreman
- Trades Foreman
- Charge Hands / Leading Hands
- Site Administrative Staff

To ensure that all contracts undertaken within their respective areas are carried out in accordance with the principles of this policy.

To ensure that site conditions are adequate for Operatives plus plant and equipment to operate effectively and safely in their environments and that all work carried out and all plant and equipment in use is in accordance with existing Company legal requirements.

Each individual manager so designated shall be required to liaise and co-operate with the Company Safety Advisor's (or nominee) on matters relating to the Safety Management Programme or Safety Management Procedures. Particular emphasis is placed on the development and implementation of the Construction Phase Health and Safety Plan. All managers shall ensure that they are familiar with the structure and requirements of the Plan.

Site Supervisory Teams will have available the service of the Company Safety Advisor's (or nominee), to assist in the implementation of any Safety Plan.

Safety Management Standards and related matters will be an item on the agenda of Site Management Meetings and decisions made, or matters discussed shall be recorded, action delegated and timescales allocated.

The Site Supervisory Team are required to identify and propose specific Safety Awareness Training needs, variations or upgrading of Plans or Procedures and maintain such records as may be required by Company policy and / or procedures, Project / Client instructions and Statutory Requirements.

SITE SAFETY MANAGEMENT CO-ORDINATOR

If required an individual will be nominated to carry out the task of Site Safety Management Co-Ordinator and shall be known to all members of the Site Supervisory Team and will have their co-operation and assistance in discharging their responsibilities. This role is normally undertaken by the site manager. The Safety Management Co-Ordinator shall liaise directly with the Company Safety Advisor's on all matters pertaining to the Construction Phase Health & Safety Plan and Company Safety Procedures.

The Construction Phase Plan will detail the schedule of duties allocated to the Co-ordinator and will be specific to the project or phase of the project.

The Co-ordinator shall be given specific instruction and training in order to enable them to address day-to-day safety issues on site.

TRADE AND GENERAL OPERATIVES

Dollman Ralston Ltd requires that trade and general operatives employed by or working under the control of the Company shall be afforded a safe place to work. Personnel shall be directed and instructed as to the general and project / task specific Company rules and procedures in force. Personnel are also required to familiarise themselves with such requirements and co-operate with Company Managers and Supervisors in implementing and achieving safe working conditions.

Personnel may not become involved in or carry out any task or operation that requires specialist expertise or training; or carry out any action that could cause injury to themselves or others; or damage to plant, equipment or property. Equally, unsafe situations identified by personnel must be notified to a member of the Site Supervisory Team. Personnel must also report any physical injury inflicted whilst at work, or any medical condition that may reduce their efficiency in respect of their own or third party safety.

CONTRACTORS AND SUB-CONTRACTORS

Contractors and Sub-Contractors be employed by or on behalf of the Company shall be required to demonstrate that they have in force Safety Management Procedures and Controls at least equal to those of the Dollman Ralston Ltd. Such procedures and controls shall be submitted to the Company Managers for study and comment. Where submissions are found to be wanting in content or detail, this shall be remedied so as to comply with requirements in force. Pending the completion of the remedial action, standards not less than implemented by the Company, shall be the minimum standards acceptable.

OFFICE STAFF

Should read and understand the company policy for safety, health & environmental and carry out their work to it's requirements.

Ensure that you are fully aware of the procedures in the event of an emergency, including:

- Positions of fire exits and the assembly point location
- Position of the first aid equipment and the identity of the trained first aid personnel
- Any accident or damage procedures
- Bomb threat

Report any defects in the office equipment immediately to your line manager.

Observe good housekeeping at all times and keep corridors, doorways and floor spaces clear and free from obstruction.

Do not attempt to lift or move articles as heavy as likley to cause injury.

Do not overreach for items on high level shelves, use the equipment provided.

Do not misuse or interfere with equipment provided for the safety of you and others.

Do not try to use, repair or maintain any equipment for which you have received no training or instruction.

Complete and return Display Screen Assessments as and when requested.

Follow office recycling procedures.

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3.1 ARRANGEMENTS IN FORCE

3.1.1 IMPLEMENTATION OF CDM

This Company Policy Statement on the implementation of the Construction (Design and Management) Regulations 2015 (CDM Regulations) is issued with two objectives in mind:

- To ensure that all personnel in the employ of the company are aware of the basic generic policy in force.
- To advise that all projects are undertaken in accordance with the current CDM Regulations.

The introduction of the new CDM Regulations 2015 does not alter fundamentally the duties and responsibilities of the Company in its capacity as the Principal Contractor on site. The requirements of established industry- specific Codes of Regulations have been an essential component in the development of our Company Safety Management procedures. For some years we have been modifying those procedures and controls to meet the requirements of existing universally applicable legislation, in particular the Management of Health & Safety at Work Regulations 1999.

The Company, for its part, through its Management Team and professional advisors, will assist, liaise, and co-operate with the Project Principal Designer (PD) throughout the project.

On-site Safety Management controls comprise:

- Random safety inspections carried out by the Site Manager but completion of the weekly inspection sheet as a feedback to head office.
- Random safety inspections carried out by the visiting Senior Managers or Directors.
- Safety Sampling carried out by our Company Safety Advisor's or retained independent Safety Management Consultants.
- Safety Management inspections carried out by our Company Safety Advisor's or retained Independent Safety Management Consultants.
- Planned Safety Management audits carried out by our Company Safety Advisor's or retained independent Safety Management Consultants.
- The appointment of the health & safety file co-ordinator.(Generally this will be the Site Manager).

Each project allocated to an individual who has special responsibility for co-ordinating the project Safety Management programmes, has the authority to stop any activity which is assessed as constituting an imminent risk, and the circumstances relating to the decision must be recorded by the safety co-ordinator, the Company Directors for Health & Safety must be notified without delay.

The Manager appointed to co-ordinate the development, maintenance and submission of the Project Health & Safety File shall be given any technical support as is necessary, by all parties associated with the project.

This policy statement shall be subject to ongoing review and where considered necessary and beneficial, revision may be introduced. A copy of this document shall be displayed on each project notice board and brought to the attention of all individuals during Safety Awareness Induction.

When Dollman Ralston Ltd are acting as a Contractor on a project the normal duties of a contractor in accordance with CDM 2015 will be undertaken and the PC's Construction Phase Plan will be adopted and complied with. On small non-notifiable projects the CDM Regulations will still apply but as for non notifiable projects. (For amplification see section 7)

3.1.2 CONSTRUCTION PHASE PLAN

When Dollman Ralston Ltd are acting as the PC on a fully notifiable project then each project under the control of the Company shall be assigned a formal Construction Phase Plan. The Plan will comprise part of the project documentation and requirements will be made known in an appropriate and practical manner to all personnel involved in or on the project. The plan will be functional in content and structure and shall at all times address the requirements of the supervisory team and personnel seconded to the project. The plan shall be developed from the Pre-Construction Health and Safety information provided by the Principal Designer at tender stage.

A copy of the plan must be displayed on site and explained to personnel involved in implementing its requirements. A copy will be posted on the site safety noticeboard and another will be held in the site safety filing system.

The Plan will refer to core points but with the flexibility to identify the unique requirements of each project. The development of the Plan will require positive input from relevant managers, departments, specialists and the Company Safety Advisor's (or nominee). Where it is found to be necessary to modify or vary a Safety Management Plan all relevant individuals shall be consulted, the variation agreed, the modification recorded, clearly identified and appended to the original Plan. The plan will be regularly reviewed during senior management and client progress meetings on site. (For amplification see section 13)

3.1.3 RISK ASSESSMENTS

Project, Process, Task or Plant Risk Assessments will be carried out where an evaluation of the overall Safety Plan specifies or, where an on-site situation or event is evaluated as requiring one. The result of the Risk Assessment must be made known to all managers, personnel and third parties involved or affected by the report. Copies of the Assessment must be issued to supervisory personnel and displayed at the work area. Risk assessments will be requested, reviewed and approved by the site management team for all operations undertaken on site by contractors whether appointed by Dollman Ralston or the Client. Work must not be permitted to continue until this has been done and an acceptable document is received.

(For amplification see section 17).

3.1.4 SAFETY AWARENESS TRAINING

Safety Awareness Training will be an ongoing requirement. A series of modules shall be developed, be available for and relevant to the needs of delegates. Criteria for initiating Safety Awareness Training will include:

Legislative developments and standards.

Requests from Company personnel.

Identified areas / disciplines / tasks requiring refreshers and / or updating.

Records of all planned and completed Safety Awareness Training modules, nominated and actual delegates attending, the Company Safety Advisor's shall retain agendas and test questionnaires.

A company training matrix will be in place to detail all current training, refresher dates and planned dates for future training for every individual in the company.

Temporary staff appointed on projects will hold a minimum level of safety training as detailed on the minimum training requirements. Site supervisory staff will also be assessed on a project by project basis to outline any specific training requirements when being selected for a new project.

Induction and company update briefing shall be arranged for all supervisory personnel each quarter. (For amplification see section 33)

3.1.5 SAFETY MANAGEMENT PROCEDURES

A Safety Management Procedures Manual will be available to all staff and will be accessible on the company IT network system. The manual will form an extension of the company safety policy. The Manual will contain copies of current generic Safe Working Instructions, Procedures and Information. The

content will, where necessary expand and elaborate upon the requirements of the Company Safety Policy Document. In addition to this, all site staff will receive a copy of the Construction Skills GE700 Construction Site Safety. This will be kept up to date with any revisions received directly from Construction Skills.

3.1.6 SAFETY MANAGEMENT REFERENCE LIBRARY

The Company Safety Management Reference Library is an online version held at the head office. The library comprises Acts of Parliament, Statutory Instruments, Approved Codes of Practice, Guidance Notes, other Health & Safety Executive publications, relevant British, European and International Standards, relevant industry and trade generated Safe Working Procedures and Practices and a number of authoritative textbooks. Further such information shall be kept at the safety advisors company office.

The head office library and the safety advisor's library is available to personnel in the employ of the Company for reference, research and study and is controlled and updated by the Company Safety Advisor's.

This policy and procedures manual will run in conjunction with the latest Construction Skills GE 700 publication. A copy of the Construction Skills GE700 (Construction Site Safety) will be available to all site managers/ supervisors. (For amplification see section 42)

3.1.7 OCCUPATIONAL HEALTH

Work being undertaken by Dollman Ralston Ltd personnel should not normally require occupational health assessments to be undertaken as the work on site is normally undertaken by sub-contractors. However it may be necessary where identified that specific *Occupational Health Assessments* may be required during the Company's activities for employees. Priority areas are:

- Process, tasks and operations regulated by C.O.S.H.H.
- Noise generating processes, tasks and plant.
- Vibration generating tools and plant.
- Tasks and processes involving Manual Handling.
- Personnel employed at workstations.
- Work with hazardous materials. (2015 onwards health assessments will be provided to all those working on the removal of asbestos cement based materials NNLW)

All workers carrying out NNLW will need to have had a medical examination. Examinations will then need to be repeated **at least every 3 years**, as long as the worker continues to do NNLW. All workers carrying out NNLW for the first time will have to have an examination before they can start such work:

- medical examinations must include an examination of the chest and a lung function test
- they need to be carried out by a licensed medical practitioner, e.g. a GP
- those workers already under surveillance via a licensed contractor and in possession of a valid certificate do not need to have the NNLW medical
- medical examinations should be carried out in work time at the employers' expense
- the fee should be agreed with the doctor before the examination is carried out- HSE can accept no responsibility for remuneration matters
- the doctor must issue a certificate to confirm the examination has taken place and on what date - the employer needs to keep this certificate for 4 years

The results of such assessments will be made known to personnel involved and assessment records shall be displayed as determined by the Safety Management Plan, Method Statement or Risk Assessment. All Occupational Health Assessments will be retained by and be available from the Company Safety Advisor's.

The Company may arrange and finance health monitoring or screening for employees where stipulated by statute. In other instances the Managing Director may request that an employee should have a medical examination when recommended in a formal Occupational Health Assessment. Such an examination would have to be carried out by a mutually agreeable Occupational Health Practitioner and the results classified as privileged information by the Director. Employees of the Company are entitled to request that a formal Occupational Health Examination should be conducted. Where such an examination is approved and agreed, payment will be made by the Company and the results shall be treated as confidential between the Director and the individual.

The purpose of occupational medical examination is to identify cases of illness potentially induced by work related processes or where the work process may exacerbate existing medical conditions.

Personnel in the employ of, or working under the control of the Company are required to advise their supervisor of any existing chronic health condition, that may influence or affect their work, thereby endangering themselves or others. All contractors are requested to provide such information in strictest confidence at the site specific induction. This will allow for a specific risk assessment to be completed prior to them being permitted to work on site. (For amplification see section 6)

3.1.8 ALCOHOL AND DRUGS

The consumption of, or being under the influence of, alcohol during working hours by personnel employed by or working under the control of the Company is prohibited. The use of illegal drugs or the misuse of prescribed drugs is prohibited on Company premises and work locations. Individuals found to be in violation of those requirements will be considered to be in contravention of their Contract of Services or Contract for Services and their contract terminated.

3.1.9 FIRST AID AND WELFARE

The Construction Phase Plan will determine and nominate the standard of first-aid cover required and the accommodation units seconded to the projects. Static locations will have at least one resident, certificated First-Aider / appointed person. The site safety noticeboard will detail the person named as the site first aider and also the location of the first aid kit and eye wash station.

All first-aid treatment must be reported to a nominated manager and recorded as required by Company and Statute procedures. The site accident book will be held on the site safety noticeboard and once completed following an accident the sheet will be removed and placed in the site safety file for confidentiality.

The Site Manager or Site Supervisor will be responsible for ensuring the first aid kit is kept in good order and checked regularly as part of the weekly site managers monitoring.

The Company shall ensure that all projects; sites and office locations have the required welfare provisions to allow Dollman Ralston employees, visitors and subcontractors to carry out their work duties in comfort and practice good personal hygiene standards. (For amplification see section 13)

3.1.10 ACCIDENT/ INCIDENT REPORTING AND INVESTIGATION

Incidents requiring formal in-house investigation by the Company Safety Advisors (or Nominee) will be determined by the following criteria:

- As stipulated by the Statute in force.
- As identified by Company Procedures.

- As required by the terms and conditions of contract.
- When requested by a Company Manager.

Incidents may comprise major injury, lost-time injury or non lost-time injuries; acute illnesses; damage incidents involving plant, property or equipment; near miss incidents, where the potential consequences might have resulted in a major injury or damage. Site based personnel will usually be best placed to identify such incidents. It is incumbent upon them to report incidents to the Company Safety Advisors by the quickest practicable means, including telephone, fax or notification form

Company Incident Notification Forms are issued to all locations where work is being carried out. Company Managers are trained in preliminary incident investigation and risk identification techniques.

Where required, formal notification to Statutory Enforcement Agencies is carried out by the Company Safety Advisors (or Appointee).

The compilation of statistical information measuring project and overall frequency and incidence rates will be carried out by the Company Safety Advisors and the results issued to the Director(s) with Special Responsibility for Safety Management. Monthly accident and number of personnel on site will be completed by the site manager and forwarded to head office for compilation. (For amplification see section 32)

3.1.11 FIRE PREVENTION MANAGEMENT

All static and temporary accommodation units will be subject to regular in house fire prevention inspections ensuring that the Office or Project Fire safety plan is being implemented and revised as may be necessary. Static offices will be subject to a fire risk assessment which will be regularly reviewed and held in the fire safety log book. Essential requirements incorporated into the Fire safety plan shall include:

- Compartmentation of the structures.
- Location of fire fighting equipment.
- Control of fire loading.
- The selection, provision, servicing of and training of personnel in the use of fire fighting equipment.
- The provision of approved flammable material containers.
- Arrangements for the disposal of flammable waste.
- Arrangements for the establishment, maintenance and review of emergency evacuation routes.
- Where required, the co-ordination of emergency procedures with the controller of the premises.
(For amplification see section 30)

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|--------------------------------------------------------------------------------------------------------------|
| IN THE EVENT OF ANY OUTBREAK OF FIRE, REGARDLESS OF HOW APPARENTLY SMALL, THE FIRE SERVICE MUST BE SUMMONED. |
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3.1.12 PLANT / EQUIPMENT SELECTION AND USE

Personnel charged with the responsibility of authorising, selecting, purchasing, hiring or specifying plant / equipment for the use on Company premises or tasks under the control of the Company must ensure:

- That manual or power operated plant / equipment is only issued to and used by authorised and trained personnel.
- That the plant / equipment is approved, tested, calibrated or certified as required by Company Procedures and or Statute.
- That the current issue of the manufacturers safe operating / use instructions is available on site, explained to personnel and implemented.
- That the plant / equipment is used in for the purpose(s) designed and as intended by the manufacturer / supplier.

- That the plant or equipment is used / operated by personnel not using prescribed medication or suffering ill health. This is particularly important where power operated or rotary plant is involved.
- That the use and condition of the item(s) is monitored regularly or as stated in the Site Safety Plan, Risk Assessment and Method Statement.
- That defective or unsuitable plant / equipment is withdrawn from use, clearly marked and isolated so as to prevent further usage. (For amplification see section 31)

3.1.13 ACCESS / EGRESS STANDARDS

All Employees of the Company shall be responsible for establishing, maintaining and upgrading standards of access / egress to and from their workplace. This control will extend to:

- Sequencing and scheduling materials.
- Stacking and positioning materials.
- Waste management controls.
- Eliminating, reducing and highlighting of obstructions.
- Ensuring the provision of a sufficient standard of illumination either natural or artificial.
- Clearly establish and sign demarcation areas.
- Review procedures and controls from the Health and Safety Plan in force.

3.1.14 ADMINISTRATION

Projects will be supplied with site safety noticeboards which hold all scheduled Statutory Registers and Notices. These boards will be re-used and updated as projects are completed. Authorised personnel, who will be responsible for their availability, accuracy and currency, may only enter statutory Registers.

Notices identifying Mandatory, Prohibition, Warning and Safe Condition status will be allocated to each project and selected / specified in the Construction Phase Health & Safety Plan or Risk Assessment. Safety awareness notices may be selected on the same basis.

Each site will erect the company safety noticeboard in the office which will display all the relevant statutory notices. On larger projects where a separate canteen unit is provided then a secondary safety noticeboard will be mounted so that all contractors are reminded of the site rules, first aiders, local A&E hospitals and emergency contact details. When projects become watertight then a single site safety noticeboard will be mounted on entry to the building. (For amplification see section 12).

3.1.15 PERSONAL PROTECTIVE EQUIPMENT

Specific Company requirements in respect of the selection, supply, training and use of Personal Protective Equipment will be referred to in the Safety Procedures Manual, Method Statement or Risk Assessment. The Company shall supply employees with appropriate PPE without charge, for general site work. In all cases this will comply with current legislative requirements.

Personnel supplied with items of PPE shall be required to wear the items supplied and required to sign for on receipt.

Personal Protective Equipment is considered a last line of defence and may not be incorporated as a substitute for a formal Safe System of Work.

(For amplification see section 16).

3.1.16 THIRD PARTY SAFETY

On premises and at locations where the work process overlaps with others, contractors and sub contractors the Company Safety Advisors and Site Safety Management will be required to liaise with the overall controller of the premises. In such circumstances an additional Safety Plan may have to be initiated, communicated, agreed, monitored and reviewed as detailed within that Plan.

Where a task, process or operation is carried out by the Company and should it become foreseeable that a third party may suffer physical injury or damage may be caused to property, once it is safe to do so the work may be suspended. Conversely, where a third party may foreseeably cause injury to an employee or individual working under the control of the Company or damage may be caused to plant, equipment or property owned by or seconded to the company, the personnel and / or plant may be withdrawn from that location. Should such an incident occur the matter must be reported as required by Company Procedures.

Where work is carried out in the presence or proximity of authorised visitors, due care and consideration shall be exercised so as not to expose them to risks to their Health & Safety. In such situations it should be assumed that the visitor is not familiar with the work in progress. Therefore a very high standard of care must be exercised.

Work on or in proximity to areas dedicated to public shall be subject to a separate Method Statement or Risk Assessment which is to be prepared with input from the company safety advisors.

3.1.17 COMMUNICATION/ CONSULTATION

Regular Senior Managers Safety Reviews are held and attended by all senior staff, company safety advisors, office manager and Directors.

All sites will hold safety forum meetings on a regular basis attended by members of the project team and sub-contractors working on the project. This will ensure communication between all companies on site hazards, work methods, programming for safety and all aspects of site health, safety and welfare. All meetings will be recorded and actions identified. Minutes will be taken of all meetings with protective and preventative measures taken and the minutes displayed on site safety noticeboards. Site induction/ toolbox talks involving all those involved with the project will be held prior as detailed in the Dollman Ralston, Safety Health and Environmental Procedures Manual. Dollman Ralston will operate an open door policy to allow any individual to raise any safety, health and environmental concerns to site management, this will be communicated at induction and posters displayed in site welfare facilities. All issues raised will be treated with confidentiality and where necessary appropriate action taken. Personnel will be able to complete a safety notification form that is held on the canteen safety noticeboard. This is to be completed and either handed to the site manager, left on their desk or placed back into the plastic holder box held on the canteen safety noticeboard. (For amplification refer to section 14, 26 and 34)

3.1.18 YOUNG PERSONS

The Management of Health and Safety at Work Regulations 1999 require that employers ensure the Health and Safety of young persons (over 16 and under 18 years of age) by suitable and sufficient risk assessment taking into account their immaturity and lack of experience etc. Dollman Ralston Ltd will provide suitable and sufficient risk assessment for any young person's brought into the workplace. They also expect any sub-contractor used by them to ensure the same requirements are met. (For amplification see section 17).

3.1.19 WORKING AT HEIGHT:

We will provide a safe working environment for all employees who may be required to work at height. This will be achieved by:-

- Identifying work activities that may involve working at height;
- The hierarchy of control is to be applied: AVOID, PREVENT, MITIGATE;
- Eliminating the need to work at height whenever it is reasonably practicable to do so;
- Ensuring that, where work at height cannot be eliminated, we use the risk assessment process to evaluate & manage risk.
- Implementing a safe system of work that will prevent falls of persons and materials & equipment;
- Providing suitable plant and equipment to allow safe access for persons and materials.
- Ensuring working platforms and any supporting structures are appropriate and designed in accordance with current standards;
- Ensuring that regular inspections of all equipment required for working at height are undertaken;
- Providing adequate information and training to ensure that only competent persons are engaged in working at height.

SCAFFOLDING

Scaffold will only be erected or altered by competent persons and handover certificates issued by the erector, access to the working platforms will be provided by the erector. In the case of access to roof level or floor levels of buildings then a scaffold stair will be provided. All loading bays shall be guarded using a proprietary gate system. All access ladders shall be fitted with a self closing access gate and all birdcage access points shall be fully guarded around the opening. All scaffold will be erected in accordance with the requirements of TG20:13 Guide to Good Practice for Scaffolding with Tubes and Fittings and SG4:10 Preventing Falls in Scaffolding. Scaffold tag or similar systems will be introduced and recorded inspections will take place every 7 days or following inclement weather or significant alterations. The individual user should visually inspect scaffolds and report any defects to the site manager. . (For amplification see section 21).

LADDERS & STEPS

All working platforms will be selected, assembled and used in accordance with the Work at Height Regulations 2005. Ladders will be of sound condition and fit for the purpose intended (Class1 or EN131 only), the foot of the ladder should be supported on a firm level surface, at the correct angle and should not rest either on loose material or on other equipment to gain extra height. The top of the ladder shall be securely fixed to the structure so that it cannot slip. While lashing etc. are being secured, the ladder shall be footed, the ladder should extend 5 rungs above the step off point. Ladders (including step ladders) are provided as an access to the work area only and should not be used for transporting materials to the work area. Short duration work may be carried out from a ladder providing a three point contact with the ladder frame can be maintained. (For amplification see section 23).

TRESTLES

Bricklayer's trestles are permitted on sites but must be fitted with the proprietary handrails and toeboards with a ladder access point that has a tied ladder. Spacing's and boards used must be to the manufacturer's instructions and specification. Loading out points must be centred over the trestle support position.

'A' frame decorators type trestles may not be used on site at any time.

MOBILE ACCESS TOWERS

Mobile access towers are permitted to be used on site and podium steps come under this policy and guidance also. Personnel erecting and dismantling mobile access towers must be trained and competent to do so in accordance with current PASMA guidance.

Only BS approved type mobile towers can be used. If they stand in one location for more than 7 days then they must be inspected weekly and entered into the workplace inspection register by the competent person. Scafftags are to be used when erected.

MEWPS

All mobile elevated work platforms (MEWP's) will be selected and used in accordance with the Working at Height Regulations 2005 and the Provision and Use of Work Equipment Regulations 1998. Safety harnesses with fall restraint lanyards will be used in boom type MEWP's.

(For amplification see sections 16, 17, 18, 20, 21, 23, 24).

3.1.20 ELECTRICITY

Appointed contractors will carry out all portable appliance testing (PAT) at company locations. Nominated NICEIC or ECA approved contractors will carry out electrical connections, checks and alterations to temporary accommodation. Temporary electricity supplies to site accommodation shall be tested on installation and at three monthly intervals. Generally electricity supplies above 33,000 volts are routed overhead. Below this voltage they may be overhead or underground. If work is required to be carried out near overhead power lines, the area electricity board shall be consulted before work commences and a safe system of work devised and implemented. 110V electrical tools, temporary lighting and other equipment shall be used at all times. Where this is not practicable, residual current devices shall be provided for use with 230V mains supply in line with current legislation. Routine inspection will be carried out in accordance with the Dollman Ralston Safety Health and Environmental Procedures manual. (For amplification see section 22).

3.1.21 ROOFWORK

As a high-risk activity it is important that any roofwork occupation is pre-planned. The particular hazards of each job and the best means to overcome them must be considered so that the a safe method of work can be established and a detailed written method statement can be prepared. Before any roof is used as a means of access or as a place of work during any operation, whether for construction , repair, maintenance, it is essential to identify all risk associated with height work including fragile materials and decide on the precautions to be taken. When fall prevention measures cannot be introduced, fall arrest equipment shall be provided. When nets are provided the manufacturers advice shall be sought on the suitability of any particular net for the purpose for which it is to be used. When work from a roof may endanger personnel at ground level then the net shall be taken up and over the handrail protection, brickgaurds/ fans or other similar precautions shall be provided. (For amplification see section 23).

3.1.22 EXCAVATIONS

Excavations work shall be carried out using a Permit-to-Dig procedure. There is no minimum depth requirement for the shoring of excavations. Adequate supplies of support materials shall be available before the excavation commences and will be of sound, free from defects, of adequate strength and properly maintained. Supports shall be fixed securely to prevent displacement. Care shall be taken to ensure that excavation work does not jeopardise the stability of any adjacent structure. Safe means of

access and egress to an excavation shall be provided. Ladders shall be securely fixed and properly maintained and shall permit quick and easy escape in case of flooding or falls of materials.

Where a person may be exposed to a risk of fall, suitable barriers shall be erected; shallow excavations shall have suitable barriers erected when persons may fall into them. Barriers shall be erected to keep materials, plant and equipment away from the edges of an excavation. Barriers may be removed to permit access of personnel, plant and equipment etc; they shall be replaced as soon as possible. Spoil heaps can form part of the barrier. During darkness, the edges of an excavation will also be marked with lights, where there is a danger to the general public. All excavations shall be inspected before work starts and thoroughly examined weekly, or after substantial damage. A record of these examinations shall be recorded in the workplace register. This register will be held on the site safety noticeboard.

Before any excavation work is undertaken a survey of the area will be conducted. The owners of the services shall be contacted to obtain plans to show the approximate line and depth of known services. If possible, cable routes shall be avoided; a cable locating device (CAT) shall be used to trace the position of the live services as accurately as possible in conjunction with the services plans. The line of any cable or service shall be noted and marked using paint, wooden pegs, waterproof chalk etc. Power tools or machinery shall not be used within 0.6m of the indicated line of service. (This may increase dependant on the type and size of service). (For amplification see section 24).

3.1.23 LIFTING EQUIPMENT

Lifting equipment is defined as work equipment used for lifting, lowering and suspending of loads (including persons) and any attachments for anchoring, fixing or supporting the load. All lifts shall be properly planned, supervised and executed as required by BS 7121. A crane permit will be used on all sites. All equipment and accessories must be tested in accordance with current legislation and copies of certification held on site. Clarification of responsibilities shall be sought with crane hirers and the following documentation requested prior to work commencing:-

- 12 monthly thorough examination for cranes but 6 monthly for devices used to lift people
- 4 Yearly (or sooner) thorough test
- 6 monthly test certificates for slings, chains, man baskets, associated lifting gear.
- Operators CPCS, IPAF or similar equivalent card.
- Lift Plan in accordance with BS 7121
- Risk Assessment and method statement
- Name of lift supervisor, bankspersons and appointed person in connection with the lifting operations.

All cranes and other lifting appliances shall be clearly marked with their maximum safe working load (SWL). If the driver cannot see his load during the whole lifting operation they shall have one or more trained signaller (Banksperson) to enable them to handle the load safely. Where tower cranes are used a thorough test and examination must be carried out after erection and before being put into use for the first time. (For amplification see section 25).

3.1.24 MOBILE PLANT

When plant is constantly moving on or around a site or being relocated, the factors that create hazards and cause accidents may be more difficult to anticipate and eliminate. All vehicle movements will be controlled by a written traffic management procedure in accordance with the Dollman Ralston Safety, Health and Environmental Procedures Manual ensuring vehicle/pedestrian separation at all times. (For amplification see section 31)

3.1.25 CONFINED SPACES

Wherever work is to be carried out in any confined space, adequate ventilation will be provided and maintained. Suitable and adequate means of access to and egress from the confined space will be provided and maintained. It may be necessary that the air in certain confined spaces will require monitoring before work commences and at regular intervals during work procedures. When planning work in any confined space the possibility of a lack of oxygen must be considered. Before any confined space working is allowed the environment to be worked must be tested by a competent person and a Permit-to-Enter issued. (For amplification see section 15.5).

3.1.26 ASBESTOS

A licensed sub-contractor must be used to remove asbestos material with full documentation provided prior to work commencement; HSE to be notified as required 14 days before removal begins. Method statements and risk assessments will be communicated to all persons carrying out or affected by asbestos removal works. Asbestos awareness training will be provided to all management on site and toolbox talks will be provided to all contractors on site where there is or could be the presence of asbestos. (For amplification see section 6.2).

3.1.27 CONTROL OF WASTE

Waste produced on site will be deposited in skips to be removed and replaced as required. The Skip Company will be fully registered for waste disposal and must provide a duty of care waste transfer notice to be filed in the site office. A specialist-licensed sub-contractor who will supply all necessary safety documentation prior to starting on site will remove contaminated waste. Duty of care controlled waste certificates will be provided and a copy of Certificate of Registration as required under current legislation will be available following removal. (For amplification see section 29)

3.1.28 INDUCTIONS

All personnel commencing direct employment with the company will undergo a company induction process of which part of that induction will include the issue and training on this policy and the associated company procedures that apply.

All personnel working on site will undergo a site specific safety induction that is presented by the site manager or his nominated appointee prior to anyone carrying out work on that site. (For amplification see section 14).

3.1.29 VISITORS TO SITE

All visitors will be given a visitors induction and be required to sign the site personnel register as do all personnel on site. Visitors must be escorted at all times whilst on the company's premises. The emergency contact details will not be taken but this type of induction will not allow them to carry out any physical work on site. It is purely for walking round site and carrying out an inspection or viewing. (For amplification see section 14.1)

3.1.30 MANUAL HANDLING

Hazardous manual handling operations are to be avoided so far as is reasonably practicable and where such avoidance is not possible a suitable and sufficient assessment must be made. This assessment must reduce the risk of injury from those operations by mechanisation, automation and careful planning of such activities. Manual handling assessments to be carried out in accordance with the Dollman Ralston Safety, Health and Environmental Procedures Manual. (for amplification refer to section 17)

3.1.31 COSHH

The company uses a range of materials, some of which have the potential for causing ill health, but if handled properly and with due regard for the risks involved the chance of harm can be minimised. The aim is the protection of health, in which everyone has an interest in ensuring success. While planning the approach, site operative shall be consulted; assessments shall be communicated to the end user in accordance with the Dollman Ralston Safety, Health and Environmental Procedures Manual.

(For amplification see section 19)

3.1.32 SAFE SYSTEMS OF WORK

The company shall ensure that Safe Systems of Work are provided and supplied to all personnel who will require the information held therein, to undergo a given task in an adequate, appropriate and correct manner in relation to Health and Safety. Specific Hazard data sheets/risk assessments/method statements shall be provided during all hazardous operations. Method statements and risk assessments shall be prepared in line with the Dollman Ralston Safety, Health and Environmental Procedures Manual. (refer to section 18 amplification).

3.1.33 SUB-CONTRACTORS

All sub-contractors working on Dollman Ralston Sites will be checked for competency and will produce the following information prior to site start-up:

- Company safety policy
- Liabilities insurance
- Method statements/Risk assessments
- Emergency Procedures including rescue planning where required
- Pre-qualification questionnaire
- Management and Operative training records
- Plant and equipment (records of preventative maintenance)

This information will be checked and approved prior to work commencement. Sub-contractors safety performance will be closely monitored at all times and post contract reviews will be carried out at contract completion. Any sub-contractors failing to reach the desired levels of safety compliance will be prevented from working on further contracts until the necessary steps have been taken to ensure improvements in safety performance. (For amplification see section 9).

3.1.34 TEMPORARY STAFF

Where temporary workers (i.e. Agency Personnel) are employed, the company will ensure through enquiry and consultation that the individual is trained, competent and fit to carry out their duties. The Site Manager shall check that all agency personnel have received a site-specific induction and all relevant information (i.e. Risk Assessments and Method Statements) for them to carry out the role safely. (For amplification see section 33)

3.1.35 TRAINING

Formal Safety training requirements will be identified by managers in consultation where considered necessary with the Company Safety Advisers. Regional Directors are responsible for ensuring that their staff are trained in line with the Dollman Ralston training matrix. Managers will review their safety training requirements on a monthly basis during safety Review Meetings. (For amplification see section 33)

3.1.36 SAFETY HEALTH & ENVIRONMENTAL MONITORING AND INSPECTIONS

The policy and procedures manual will be regularly reviewed and as a minimum every 12 months or following legislation change/ incident or accident within the company/ construction industry. Every work location manager will ensure that regular inspections are carried out to ensure that work operations are being carried out in accordance with the location Construction Safety, Health and Environmental Plan, Method Statements/Risk Assessments and company safety, health and environmental policy. These inspections will take into consideration the work operations taking place and the location conditions prevailing at the time. Site inspections and audits will be carried out in accordance with the Dollman Ralston Safety, Health and Environmental Procedures Manual. (For amplification see section 26)

3.1.37 HOUSEKEEPING

Good housekeeping is to be observed at all times at all Dollman Ralston work locations, safe access and egress to work areas must be maintained. Regular cleaning of spent materials, debris and unused material will be undertaken, where applicable sub-contractors must be held responsible for keeping work areas and welfare facilities in a clean and tidy condition.

Lay-down areas must be incorporated into the site safety plan wherever practicable. This is to allow for the safe storage and subsequent distribution of materials.

3.1.38 DISPLAY SCREEN EQUIPMENT

An assessment of every workstation used is carried out, in order to identify the risks and precipitate action to reduce them to the lowest extent reasonable practicable. Workstation assessments will be carried out as detailed in Dollman Ralston Safety, Health and Environmental Procedures Manual. (For amplification see section 6.1)

3.1.39 ROAD RISK

Whilst driving on company business we must exercise a duty of care to other road users. All drivers must operate with the company driving policy document and recognise the need for journey planning, regular breaks during long journeys and the care and maintenance of the vehicle being used. The use of mobile phone in company vehicles is to be avoided and if essential then to be via hands free kits only and call duration should be kept to absolute minimum. Otherwise drivers must stop in a safe place and carry out any calls when stationary. Phones should be switched off when driving.

3.1.40 STRESS

Whilst Dollman Ralston has no control over external factors, as a good employer it wishes to promote the physical, psychological and social well-being of all its employees. It is committed to ensuring, so far as is reasonably practicable, that no member of staff is subjected to an excessive and sustained level of reasonably foreseeable work-related stress that is detrimental to their health. Employees suffering from excessive and sustained levels of work related stress will be treated in accordance with the Policy, Code of Practice and Guidelines on Equal Opportunities in Employment and appropriate related present and future policies. The needs of people with disabilities will be given particular consideration.

The Company aims to help understand the phenomenon of work-related stress and put in place both preventative and reactive measures including:

- promoting a culture of encouragement, participation and open communication.
- increasing awareness of the phenomenon of work-related stress and the methods available to combat this.

- assisting staff in managing stress in themselves and others
- providing appropriate and confidential support for those who are experiencing stress.

3.1.41 OUTSIDE NORMAL HOURS/ WEEKEND WORKING

When work is to be carried out on a site that entails that work being undertaken outside normal working hours then the senior management and directors will be informed and notified by method of forwarding the standard company notification form. Suitable supervision will need to be in place along with first aid cover and emergency contact details. Should any high risk work activities be carried out then the site manager or senior management must be present on site during that work. (For amplification see section 28).

3.1.42 EMERGENCY PROCEDURES

Written procedures will be compiled and adopted for head office and any sites being worked on with regard to the following situations:-

- Fire
 - Bomb Threat
 - Environmental Issues (Chemical Spillage, Pollution etc)
- (For amplification see section 27)

3.1.43 MOBILE PHONE USE

Whether personal or company owned mobiles are used all employees must adopt the following in order to ensure their own safety and the safety of others whilst at work:-

IN VEHICLES – The company advise all employees not to use mobile phones either receiving or making calls, texts or emails whilst driving. This applies also when a handsfree kit is installed. Therefore they should arrange for the phone to take messages whilst they are driving, or arrange for a passenger to use the phone. The use of text messaging whilst driving is forbidden. Employees should plan journeys so they include rest stops every two hours during which time telephone messages can be checked and calls returned.

ON SITE – The site rules and induction for the specific site clearly state that use of mobile phones is not banned as they do on occasions become necessary in an emergency situation. Therefore mobile phones are not to be used as a general rule on site unless you stand in the nominated safe mobile phone area set up on site when Dollman Ralston are acting as Principal Contractor. If a safe area has not been set up on site then you must ensure that if you use your mobile phone on site you stop what you are doing, move to an area that is safe and separated from any plant, traffic or equipment and then answer your phone. When working at height you must only answer phones when on a solid working platform that has edge protection.

3.1.44 LONE WORKING

As a general rule lone working is not permitted on any Dollman Ralston premises or sites. On the occasion that it is unavoidable then a specific risk assessment must be completed. Any high risk activities such as work at height, use of plant and equipment, work in confined spaces, manual handling etc must not be carried out by lone workers. (for amplification refer to section 39)

3.1.45 NON ENGLISH SPEAKING PERSONS

It is the policy of Dollman Ralston Ltd to employ non-English speaking employees only if there is a competent interpreter capable of briefing safety and environmental related information in their native language present at all times.

We would also expect any sub-contractors employed by us to observe this policy.

In all cases, every attempt will be made to ensure essential information is passed on to Non-English speaking workers in an easily understood format and in line with HSE guidelines.

3.1.46 RADIOS, CD PLAYERS AND MP3 PLAYERS

The use of radios, CD players and MP3 players is prohibited in the workplace due to their distraction and possible nuisance to others which could result in accidents taking place. This is detailed specifically in the site rules and site induction for sites. All employees must comply with this requirement.

3.1.47 MODERN SLAVERY ACT POLICY STATEMENT

Dollman Ralston Ltd. recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company activities are varied through multiple disciplined areas and sectors such as: Structural Alterations, Substructure & Superstructure works, Concrete & Builders work Packages, Main Contracting and works on private commercial and residential properties. And likewise we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been

briefed on the subject. We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers Safety managers and Safety Advisors;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

For transparency the company will publish the Modern Day Slavery & Trafficking Act 2015 Policy Statement on its website for the public, consumers, employees, contractors, clients or non-governmental organisations to view.

This policy applies to all those employed by Dollman Ralston Ltd.