

T.W Betts Flooring Limited

**Unit 2 Heathway Industrial Estate
Manchester Way
Dagenham
Essex
RM10 8PN**

Tel: 020 8550 6601

Health & Safety Policy



Produced with the assistance of M.E.L. (Health & Safety) Consultants Limited
Tel: 01708 555544 Web: www.melsafety.co.uk

HEALTH AND SAFETY POLICY CONTENTS

HEALTH AND SAFETY ORGANISATION

HEALTH AND SAFETY POLICY CONTENTS	2
HEALTH & SAFETY GENERAL POLICY STATEMENT	4
ORGANISATION FOR THE ACHIEVEMENT OF SAFE WORKING PLACES	5
SAFETY ORGANISATION CHART	6

EMPLOYEE RESPONSIBILITY

THE RESPONSIBILITIES OF MR STEVE BARBER MANAGING DIRECTOR	7
THE RESPONSIBILITIES OF THE OTHER DIRECTORS	9
THE RESPONSIBILITIES OF THE HEALTH AND SAFETY CONSULTANTS	10
THE RESPONSIBILITIES OF THE OFFICE PERSONNEL	11
THE RESPONSIBILITIES OF THE PROJECT MANAGERS	12
THE RESPONSIBILITIES OF THE SUPERVISOR	14
THE RESPONSIBILITIES OF THE EMPLOYEES AND LABOUR ONLY CONTRACTORS	16
THE RESPONSIBILITIES OF SUBCONTRACTORS AND THEIR EMPLOYEES	17

GENERAL ARRANGEMENTS SECTION

GENERAL ARRANGEMENTS	18
HEALTH AND SAFETY OVERVIEW	18
ENFORCEMENT	18
ACCIDENT / INCIDENT INVESTIGATION	19
ACCIDENT PROCEDURE AND RIDDOR	20
ALCOHOL, DRUGS & SMOKING POLICY	21
ASBESTOS – DEALING WITH UNIDENTIFIED MATERIALS	21
ASBESTOS – DUTY TO MANAGE	23
CDM CONTRACTORS DUTIES	24
COMMUNICATION	25
COMPLAINTS PROCEDURE	26
CONSULTATION WITH EMPLOYEES AND CONTRACTORS	26
CONTROL OF HAZARDOUS SUBSTANCES	27
CONTRACTORS	26
CO-OPERATION AND CO-ORDINATION	28
CORPORATE MANSLAUGHTER AND CORPORATE HOMICIDE ACT 2007	28
DATA PROTECTION AND RECORD KEEPING	28
DISCIPLINARY PROCEDURE	30
DISPLAY OF STATUTORY INFORMATION	31
DISPLAY SCREEN EQUIPMENT	31
DOCUMENTATION	31
ELECTRICAL WORK EQUIPMENT	32
EMERGENCY PROCEDURES	32
FIRE SAFETY	33
FIRST AID	34
HOUSEKEEPING AND SITE TIDINESS	35
INSURANCE	35

GENERAL ARRANGEMENTS SECTION CONTINUED

KNIVES	35
MANUAL HANDLING OPERATIONS	36
MIGRANT WORKERS	37
MOBILE TELEPHONES	38
MONITORING OF PERFORMANCE	38
MUSCULOSKELETAL INJURIES.....	39
NOISE SAFETY	41
PERSONAL PROTECTIVE EQUIPMENT	43
PERMITS TO WORK	43
PLANNING	43
PLANT AND EQUIPMENT MAINTENANCE	44
PRINCIPLES OF PREVENTION	45
PROCEDURE FOR NEW EMPLOYEES ENGAGED BY THE COMPANY	46
PROTECTION OF PERSONS IN WORK AREAS	46
PUBLIC/THIRD PARTY SAFETY	47
PURCHASING POLICY	47
REFUSAL TO WORK ON SAFETY REASONS	47
RISK ASSESSMENTS / METHOD STATEMENTS	48
SAFETY INSPECTIONS.....	49
SAFETY RULES	49
SUPPLIERS.....	49
TRAINING	49
VIOLENCE TO EMPLOYEES.....	50
WELFARE FACILITIES AND SITE ACCOMMODATION	51
WORK EQUIPMENT.....	51
WORKING IN OCCUPIED PREMISES	52
YOUNG PERSONS	52
CHILDREN.....	53

MONITORING OF POLICY

DOCUMENTATION REVIEW.....	54
---------------------------	----

HEALTH & SAFETY GENERAL POLICY STATEMENT

T.W Betts Flooring Limited fully accepts its obligations to operate in accordance with the requirements of all current legislation and codes of practice relating to health and safety.

Compliance with legislation is regarded as the minimum requirement.

The Company's Health and Safety Policy confirms its commitment to the prevention of injury and ill health and continual improvement in Health and Safety management and performance; achieving the highest practicable standards of health and safety on all projects with which it is associated; to providing working conditions that are safe and healthy for all employees and those under the company's control; providing and maintaining safe plant and equipment; ensuring safe handling and use of substances and relevant information, instruction and supervision for employees.

The effectiveness of the T.W Betts Flooring Limited Health and Safety Policy relies heavily on the competency and co-operation of company employees. The policy is communicated to all persons working under the control of T.W Betts Flooring Limited with the intent that they are made aware of their individual occupational health and safety obligations. Every employee has the personal responsibility for implementing the Health and Safety Policy and applying safe systems of work.

The requirements of the Health and Safety Policy are communicated to all employees and their involvement in the management of health and safety is actively promoted through effective and regular consultation.

The Company has an excellent record for Health and Safety at its places of work. It recognises that this is achieved through the active participation, of both management and those employed by the Company, in identifying hazards and risks and then taking positive action to control them.

Ultimate responsibility for health and safety lies with Mr Steve Barber who, supported by the company's external Health and Safety Consultants, ensures that adequate resources, advice and training are provided to deliver the objectives of the Health and Safety Policy and review performance on a regular basis along with proposals for continuous improvement.

The Company's Health and Safety Policy is documented, implemented and maintained and provides the framework for setting and reviewing the occupational Health and Safety objectives, the policy will be reviewed annually to ensure that it remains relevant and appropriate or sooner should measures need to be taken to ensure its effectiveness.

This policy is available to all interested parties upon request.

Signed.....

Mr Steve Barber
T.W Betts Flooring Limited

Dated: **December 2016**

This Policy will be reviewed on an annual basis or:

If there is reason to suspect that it is no longer valid; or

If there has been a significant change in the matters to which it relates.

ORGANISATION FOR THE ACHIEVEMENT OF SAFE WORKING PLACES

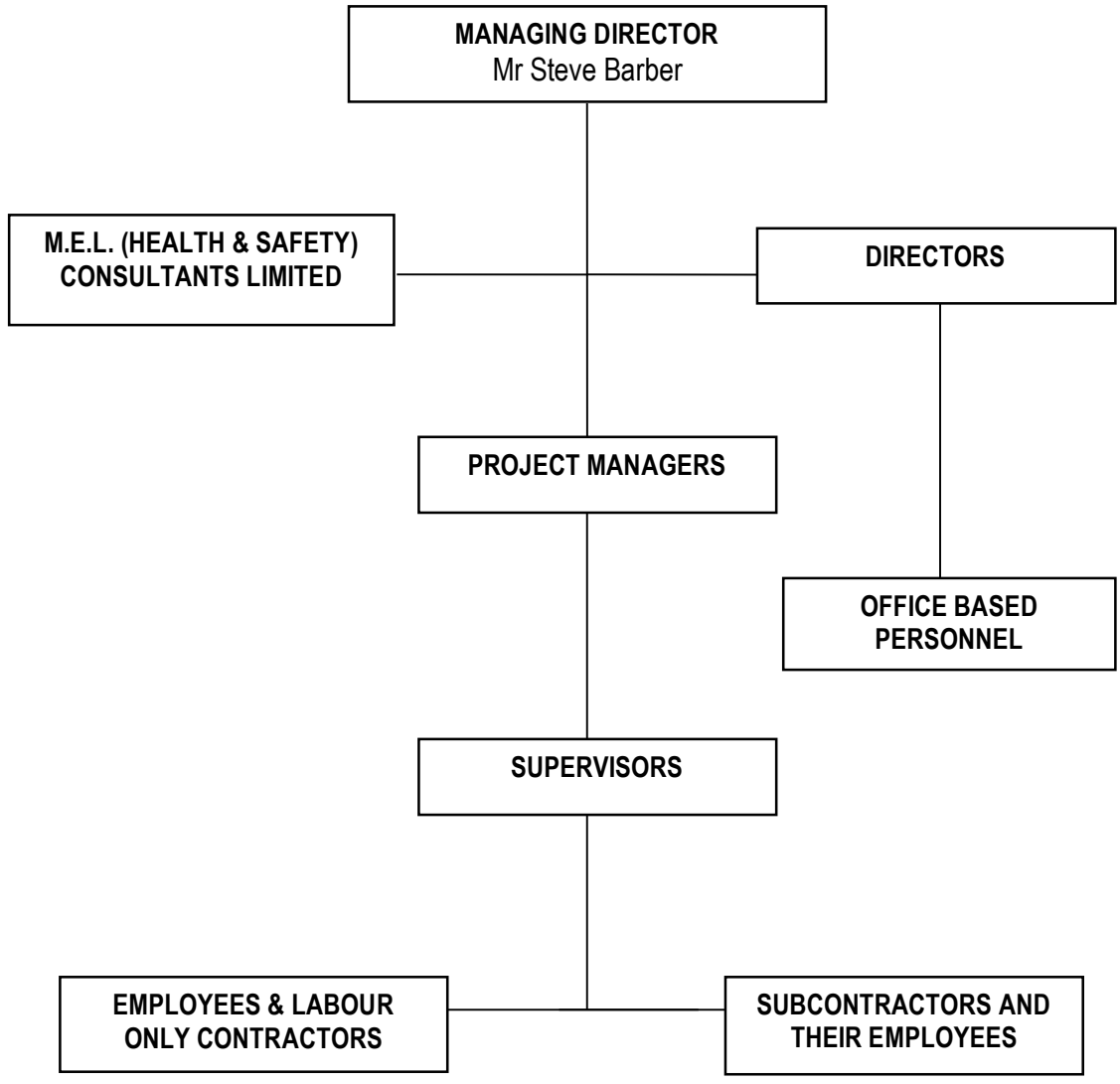
The effectiveness of the Safety Policy is dependent on the people who are responsible for ensuring that all aspects of work, whether in the Company office or on site, are carried out with due consideration for safety and with minimum risk to health. T.W Betts Flooring Limited will ensure that this Policy is applied and is adopted by all operatives and visitors to sites. In order that this can be achieved, T.W Betts Flooring Limited has a management structure as outlined in the schematic diagram with individual responsibilities detailed on the following pages.

Each individual person has a duty of care to themselves and to other persons who may be affected by their acts or omissions.

Any recognised breach of any Health and Safety Regulation or any potential hazard observed while at work is to be reported.

Employees are to regard any duty or requirement imposed on the Company or other person by or under any of the relevant statutory provisions, and to cooperate with the employer so far as is practicable to enable that duty or requirement to be complied with. They are also to act with all reasonable haste on advice and instructions given on matters of Health, Safety and Welfare.

SAFETY ORGANISATION CHART



_____ Denotes Lines of Communication

THE RESPONSIBILITIES OF MR STEVE BARBER MANAGING DIRECTOR

The overall responsibility for Health and Safety rests with the Managing Director Steve Barber but specific duties are delegated to others according to their experience and training. Each individual person has a duty of care to himself as well as to all those they come into contact with during any part of the working day.

Steve Barber, as the Managing Director will ensure that this Policy is applied throughout the whole company as well as being adopted by all Employees, Contractors and visitors to premises where contracts are undertaken and accepts the following responsibilities:

- To know, understand and implement the Company's Health and Safety Policy with the objective of ensuring safe places of work;
- To initiate the Company's Policy for Health and Safety to prevent injury, ill health, damage and waste;
- To set targets for the reduction of accidents; adhering to the Company's Health and Safety Policy for safe places of work and ensuring that this is explained to all Employees in the company's induction programme;
- To promote the Company's safety culture as a serious one and that Health and Safety is paramount at all times; by planning, creating and maintaining a strong positive Health and Safety culture throughout the Company and ensuring that all company safety rules are complied with whether in the office or on site;
- To implement, co-ordinate and control the administration of Health, Safety and Fire prevention strategies within the Company;
- To set a good personal example for others to follow;
- To ensure that the Company's Employees are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this Policy throughout the entire company;
- To ensure that all Employees are kept fully up to date on all matters relating to Health and Safety. This includes new legislation, good working practices, risk assessments and COSHH assessments including personal protective equipment and other control measures highlighted;
- To communicate with M.E.L. (Health & Safety) Consultants Limited ensuring new safety legislation is conveyed through all levels of employees;
- To pay particular attention to ensuring that Health and Safety matters are effectively communicated;
- To sanction the necessary resources for adequate welfare facilities and equipment.
- To allocate adequate time for training in all matters of Health and Safety including those deemed DSE users to meet the requirements of legislation and to ensure that the Company Health and Safety Policy is fully implemented;
- To ensure effective accident prevention and safety training programs are developed and procedures introduced to bring about a Safe and Healthy working environment; ensuring that management are trained in these policies and play their part in promoting Health and Safety and that all new employees at induction will be trained in the company Health and Safety requirements;
- To ensure that Health and Safety training needs amongst T.W Betts Flooring Limited Employees are identified and fulfilled;
- Training received by all Employees / Contractors will be entered in their personal training record file and will be reviewed;

- To ensure that fire and evacuation drills are carried out at six monthly intervals and evacuation times monitored;
- To ensure that at the outset of every project, the correct Health and Safety procedures are established;
- To undertake positive vetting of the Health and Safety policies and practices of Contractors whom the Company may employ to ensure their competence;
- To ensure that risk assessments are issued or otherwise related to Employees throughout the Company and ensure the assessments describe control measures to protect third parties on whom works being undertaken may impinge;
- To ensure control measures highlighted in risk assessments are in place before commencement of work;
- To ensure that manual handling assessments are carried out and issued or otherwise related to employees throughout the company;
- To ensure that all plant and equipment is maintained to at least statutory standards and this includes electrical appliances and the keeping of records that can be viewed on demand by enforcing authorities;
- To ensure that all accidents, dangerous occurrences and near misses are investigated thoroughly and that suitable remedial measures are introduced to prevent a similar situation in the future and this is recorded for both office and sites with the records being kept at head office;
- To ensure an accident that requires reporting under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 13) is notified to the Health and Safety Executive without delay and the causes thoroughly investigated;
- To take steps in preventing horseplay and reprimand those who fail to consider their own well-being and that of others around them;
- To discipline any Employee who fails to comply with his / her individual responsibilities towards achieving safe places of work.

Ultimately to stay abreast of developments in Health and Safety legislation and good working practices and to ensure that any new developments are communicated both quickly and effectively to all Company Employees.

THE RESPONSIBILITIES OF THE OTHER DIRECTORS

The Directors of T.W Betts Flooring Limited accept that strong and active Health and Safety leadership is important and accept the following responsibilities:

- To know, understand and implement the Company's Health and Safety Policy with the objective of ensuring safe places of work;
- To protect the Health and Safety of employees or members of the public who may be affected by the business activities;
- To identify Health and Safety as a key business risk;
- To comply with Health and Safety legislation duties;
- To promote strong and active leadership from the top demonstrating; a visible, active commitment from the board;
- To initiate effective 'downward' communication systems and management structures;
- To ensure that good Health and Safety management is integrated with business decisions;
- To ensure effective worker involvement by engaging the workforce in the promotion and achievement of safe and healthy conditions and effective 'upward' communication;
- To provide employees with high quality training;
- To identify and manage Health and Safety risks, accessing and following competent advice, and monitoring, reporting and reviewing Health and Safety performance;
- To set a good personal example for others to follow;
- Ensure that the Company's Employees are aware of their responsibilities and that each administers and promotes with enthusiasm the requirements of this Policy throughout the entire company.

Ultimately to stay abreast of developments in Health and Safety legislation and good working practices and to ensure that any new developments are communicated both quickly and effectively to all Company Employees.

THE RESPONSIBILITIES OF THE HEALTH AND SAFETY CONSULTANTS

The responsibility of the Health and Safety Consultants is to monitor and revise all modifications, amendments and requirements that are deemed necessary to comply with existing and / or new legislation.

In addition, the Health and Safety Consultants will undertake to perform those duties laid out below when requested, or should the necessity arise:

- To advise Management at all levels on the implementation of Health and Safety (i.e. relevant legislation, Codes of Practices and guidance material, fire precautions, the suitability of safety equipment and accident reporting procedures);
- To monitor by inspection the workplaces, workshops and accommodation, and also the Health and Safety performance of employees, reporting back to the Director after such inspections;
- To advise on and prepare Health and Safety documentation;
- To prepare statistical analysis of accidents and causation classification, with recommendations on preventative measures to be implemented;
- To investigate and report major injuries, notifiable dangerous occurrences and any other accidents and incidents, attending and reporting on legal proceedings in which T.W Betts Flooring Limited may be involved;
- To promote good working relations with the Health and Safety Executive and other Enforcing Authorities, striving at all times to achieve, with the co-operation of the management, compliance with current legislation;
- To advise on fire precautions, signage and best practices with regards to fire prevention;
- To assist in the choice and suitability of safety equipment and methods of training in its use and storage, etc.;
- To give guidance on the correct reporting procedure with regards to accidents at work in accordance with RIDDOR 13;
- To give guidance on the training required to ensure continued competency and assist in the production and undertaking of a training program;
- To undertake noise surveys to ensure compliance with the Control of Noise at Work Regulations 2005;
- To undertake Portable Appliance Testing to ensure the integrity of electrical equipment when authorised to do so;
- To provide details of any changes to legislation or updated guidance that M.E.L. (Health and Safety) Consultants Limited feel is appropriate and applicable to individual clients;
- To provide information via safety bulletins on changes to legislation and matters of health and safety applicable to the operations of T.W Betts Flooring Limited.

The Health and Safety Consultant or his nominee is also empowered during an inspection to stop machinery or processes that he considers present hazards to the operators or to other personnel.

THE RESPONSIBILITIES OF THE OFFICE PERSONNEL

All Employees based within our office are to comply with their individual duties under Section 7 and Section 8 of the Health and Safety at Work Act 1974 and Regulation 14 of the Management of Health and Safety at Work (Amendment) Regulations 2006. That is to ensure their own safety and the safety of others and to generally co-operate with their Employer so as to enable the Employer to carry out their Health and Safety duties towards them. Failure to comply with Health and Safety duties and regulations on the part of the Employee, may lead to dismissal from employment.

Office personnel have a duty:

- To understand the Company's Health and Safety Policy. Ensure that systems of work are planned in accordance with its requirements and that it is regularly examined to establish if improvements or additions should be made;
- To monitor, control and correct the Health and Safety actions of other persons with regards to Health and Safety;
- To ensure that all who report to you are kept fully up to date on any matters relating to Health and Safety and that the Health and Safety Policy is fully implemented;
- To pay particular attention to ensuring that Health and Safety matters are effectively communicated to those at the work place;
- To help maintain a comprehensive head office accident log for the Company and to ensure that in the event of an accident occurring the circumstances are fully and accurately documented without delay;
- To maintain a pro-active role in the assessment of risk and to familiarise themselves with the broad requirements of Health and Safety legislation;
- To ensure there is perseverance towards the continual improvement in the company's Health and Safety performance and those that the company employs;
- To assist Steve Barber to ensure that accidents and incidents are fully investigated and causation discovered to ensure that, in the event of an accident that requires the Health and Safety Executive to be notified, such notification is given without delay;
- To ensure that the office is kept clean and tidy and that escape routes are kept clear at all times. Frequently inspect immediate working environments to ensure that if a hazard presents itself it is reported directly;
- To become aware of emergency procedures;
- To ask for and expect to promptly receive assistance and guidance on any matter that relates to Health and Safety at work;
- To always consider how your acts or omissions may impinge on the Health and Safety of others;
- To report any incidents that may, if not corrected be able to cause harm to others;
- To provide Steve Barber with details of any areas where the Company Health and Safety Policy and actual Health and Safety practice differ and to highlight those areas where up to date refresher training may be required.

THE RESPONSIBILITIES OF THE PROJECT MANAGERS

The Project Manager is normally in charge of all on site operations, working with Contractors and Sub-contractors and ensuring the building contract runs to schedule. They control all aspects of the site including planning work, arranging delivery of materials and managing a range of Sub-contractors, and is ultimately responsible for ensuring a contract is delivered on time.

The Project Manager must:

- Develop a strong concern for the safety of those that the Company engages on its sites and for those who may be affected by the activities of the Company. Understand that the Company safety culture is a serious one and that Health and Safety is paramount at all times. Know, understand and implement the T.W Betts Flooring Limited Health and Safety Policy with the objective of ensuring a safe workplace;
- Ensure that all Employees and Contractors engaged on sites under your control have a good understanding of the risks associated with their activities and the materials they handle. Ensure that risk assessments and COSHH data information is issued or otherwise related. Check that those who need to be aware of it understand it. If not, implement and re-check. Never assume or leave Health and Safety matters to chance. Be pro-active and prevent accidents from happening;
- Ensure that, all persons are inducted and provide a briefing on Health and Safety issues to those engaged to undertake the works. Ensure that any operatives who join the project at a later date are similarly briefed. Frequently update Employees and Contractors on Health and Safety matters;
- Ensure that adequate personal protective equipment is available on site, provided, worn when appropriate, replaced when damaged and is stored in an orderly fashion;
- Stop any unsafe or potentially unsafe working practices immediately and notify the Contract Manager if personnel of a particular subcontract Company persistently breach health and safety rules;
- Ensure that sites, workplaces and storage areas are maintained in a safe and orderly manner. Ensure heat, light and ventilation are adequate and materials not needed are removed or stored in an orderly fashion;
- Prevent obstruction of access and egress routes by the safe delivery, stacking and storage of materials;
- Ensure that each project under your control has adequate emergency procedures, firefighting equipment and first aid kit, and a trained First Aider where required by law. If work is undertaken without your presence on site ensure that those requirements which are normally shared i.e. provision of a First Aider and first aid kit are available to those on site;
- Ensure work equipment is maintained in a fit state. Equipment requiring repairs must remain safely out of use until such time as repairs that may be required are completed;
- Ensure that, if for any reason, you are away from work or unable to fully attend to Health and Safety responsibilities at your site, immediately refer the matter to the Contract Manager or to a Director. Wherever possible take responsibility for fully briefing whoever takes over your position on any safety matters or issues particular to the sites concerned. Take responsibility for sites, inducting your replacement if necessary;
- Never, under any circumstances, allow works to proceed in an unsafe manner and report all accidents in accordance with the Accident Procedure and RIDDOR Procedure as laid out elsewhere in this Policy, whether or not anyone is injured;
- Set a good example while attending sites, ensuring that all site rules are adhered to and correct Personal Protective Equipment is worn at all times where necessary;
- Ensure that when at any time standing in for another Employee or assuming the duties of another Employee, carry out those duties in accordance with the appropriate section of this Policy.

Above all else understand and accept that those whom you manage are likely to have or be involved in accidents if you personally do not take positive steps to prevent them. In this respect your responsibility to others is considerable. Be safe rather than sorry. Failure to establish, maintain, monitor and control Health and Safety matters within your remit is regarded as extremely serious by the Company.

The Project Manager must also determine at the contract stage:

- That all hazardous materials are properly marked, used and stored, as outlined in the COSHH assessment;
- That flammables are stored in a suitable environment with adequate firefighting equipment to hand;
- That a tidy site is maintained and areas of works barriered and adequate signage erected;
- The continued safety of third parties that may be present within the building (occupied buildings);
- The delivery and safe stacking of materials to prevent obstruction of access and egress routes;
- That arrangements are made between Employees, Contractors and others at the premises to avoid confusion about areas of responsibility for Health, Safety and Welfare;
- That there are adequate supplies of personal protective equipment available;
- That the safety of third parties is considered at all time before the commencement of any activity on site and to ensure that the site is left in a safe and secure manner at the end of each working day;
- That there are suitable and sufficient risk assessments for any hazardous situation and that control measures are adequately implemented.

THE RESPONSIBILITIES OF THE SUPERVISOR

The Supervisor oversees the day-to-day activities on the project site.

Supervisors must:

- Develop a strong concern for the safety of those that the Company engages on its sites and for those who may be affected by the activities of the Company. Understand that the Company safety culture is a serious one and that Health and Safety is paramount at all times. Know, understand and implement the Company Health and Safety Policy with the objective of ensuring a safe workplace;
- Ensure that all Employees and Contractors engaged on sites under your control have a good understanding of the risks associated with their activities and the materials they handle;
- Ensure that risk assessments and COSHH data information is issued or otherwise related. Check that those who need to be aware of it understand it. If not, implement and re-check. Never assume or leave Health and Safety matters to chance. Be pro-active and prevent accidents from happening;
- Ensure that at the start of every project ensure that all persons are inducted and provide a briefing on Health and Safety issues to those engaged to undertake the works. Ensure that any operatives who join the project at a later date are similarly briefed. Frequently update Employees and Contractors on Health and Safety matters;
- Ensure that adequate Personal Protective Equipment is available on site, provided, worn when appropriate, replaced when damaged and is stored in an orderly fashion;
- Stop any unsafe or potentially unsafe working practices immediately and notify the Project Manager if Employees of a particular contract Company persistently breach health and safety rules;
- Ensure that a tidy site, workplace and storage area is maintained. That heat, light and ventilation are adequate and materials not needed are removed or stored in an orderly fashion;
- Always prevent obstruction of access and egress routes by the safe delivery, stacking and storage of materials;
- Ensure that each project you oversee has adequate emergency procedures, firefighting equipment and a first aid kit. A trained first aider must also be present where required by law. If work is undertaken without your presence on site ensure that those requirements which are normally shared i.e. provision of a first aider and first aid kit are available to those on site;
- Ensure that work equipment is maintained in a fit state and inspected prior to the commencement of a shift.
- Ensure that these inspections are undertaken by all employees. Equipment requiring repairs must remain safely out of use until such time as repairs that may be required are completed;
- Immediately speak to the Project Manager, if for any reason, you are away from work or unable to fully attend to Health and Safety responsibilities at your site;
- Wherever possible take responsibility for fully briefing whoever takes over your position on any safety matters or issues particular to the sites concerned. Take responsibility for sites, inducting your replacement if necessary;
- Never, under any circumstances, allow works to proceed in an unsafe manner and report all accidents in accordance with the Accident Procedure and RIDDOR Procedure as laid out elsewhere in this Policy, whether or not anyone is injured;

- Set a good example while attending sites and ensure that all site rules are considered and correct Personal Protective Equipment is worn at all times where necessary.

Above all else understand and accept that those whom you manage are likely to have or be involved in accidents if you personally do not take positive steps to prevent them. In this respect your responsibility to others is considerable. Be safe rather than sorry. Failure to establish, maintain, monitor and control Health and Safety matters within your remit is regarded as extremely serious by the Company.

The Supervisor must also determine:

- That all hazardous materials are properly marked, used and stored, as outlined in the COSHH assessment;
- That flammables are stored in a suitable environment with adequate firefighting equipment to hand;
- That competent / trained persons are available to undertake work and use work equipment;
- That a tidy site is maintained and areas of works barriered (where required) and adequate signage erected. Ensure the safe delivery and stacking of materials to prevent obstruction of access and egress routes;
- That arrangements that are made between Employees, Contractors and others at the premises to avoid confusion about areas of responsibility for Health, Safety and Welfare;
- That there is an adequate supply of Personal Protective Equipment made available;
- That the safety of third parties is considered at all times before the commencement of any activity on site and to ensure that the site is left in a safe and secure manner at the end of each working day;
- That there are suitable and sufficient risk assessments for any hazardous situation and that controls measures are adequately implemented.

THE RESPONSIBILITIES OF THE EMPLOYEES AND LABOUR ONLY CONTRACTORS

All employees of the Company are to comply with their individual duties under Section 7 and Section 8 of the Health and Safety at Work etc. Act 1974, and Regulation 14 of the Management of Health and Safety at Work (Amendment) Regulations 2006. That is to ensure their own safety and the safety of others and to generally cooperate with their Employer so as to enable the Employer to carry out his Health and Safety duties towards them. Failure to comply with Health and Safety duties and regulations on the part of the Employee, may lead to dismissal from employment.

To ensure that the locations where work is undertaken remain safe places of work, all operatives and contractors must:

- Read and understand the Company Health and Safety Policy, and comply with its requirements and develop a personal concern for the safety of yourself and others who may be affected by your activities.
- Obtain a good understanding of the risks associated with your activities. Risk assessments will have been produced for any activity involving a significant risk. Ensure that they are seen, read and fully understood. Especially understand the COSHH assessments and control measures to be used. In the event of any uncertainty stop work and ask for guidance.
- Never, under any circumstances, work in an unsafe manner. If you feel you have been asked to do so – don't! Contact the Director Steve Barber or someone in charge immediately.
- Wear personal protective equipment when necessary but regard its usage as a means of last resort. Work to eliminate or control the risk first.
- Do not use plant and equipment for work for which it was not intended, or if you are not trained or experienced to use it and report any damaged plant or equipment. Keep all tools and plant in good condition inspect them frequently and do not use them if they are damaged or inadequate for the job.
- Be aware that site emergency procedures would have been established. They are for your benefit. Find out what they are and establish the location and how to use fire-fighting equipment. Find out where First Aid equipment is kept and who the site First Aider is.
- Keep the work place tidy at all times to make it a safer and healthier place to work. Be aware of trip hazards and when possible remove any hazards observed i.e. nails protruding from timber or cables unsafely located.
- Do not play dangerous practical jokes or partake in "horseplay". Always consider how your acts or omissions may impinge on the Health and Safety of others.
- Report any injury to yourself, which results from an accident at work, even if the injury does not stop you working.
- Work in a safe manner at all times. Do not take unnecessary risks, which could endanger yourself or others. Suggest safer methods of working and to ensure that you and the general public are not put at any risk. Warn any other persons sharing the workplace of particular known hazards.
- Regard Health and Safety information and training as your right. Ask the Supervisor for it and do not start work until you are satisfied as to its adequacy. Ask for and expect to receive a toolbox talk on any work and Health and Safety matters you feel unsure about.
- To assist Steve Barber to ensure that accidents and incidents are fully investigated and causation discovered and to ensure that in the event of an accident that requires the Health and Safety Executive or the local Environmental Health office to be notified that such notification is given without delay.
- When at any time standing in for another employee or assuming the duties of another employee to carry out those duties in accordance with the appropriate section of this Policy.

THE RESPONSIBILITIES OF SUBCONTRACTORS AND THEIR EMPLOYEES

All Contractors will be expected to comply with this Health and Safety Policy of T.W Betts Flooring Limited and must submit their own Health and Safety Policy to T.W Betts Flooring Limited for verification.

All Contractors have a responsibility to:

- Receive a copy of this Health and Safety Policy on request and will be expected to be fully aware of what is required of them whilst working on sites;
- Ensure that work is carried out in accordance with the relevant statutory provisions and take into account the safety of others who may be present in the work area and comply with any safety instruction given to them by the Project Manager;
- Ensure that plant and equipment brought into a work area is in a safe and good working condition; fitted with any necessary guards and safety devices, with any certificates available for checking. All Employees must be adequately trained in the use of such equipment and, where appropriate, have available any certificates of competence;
- Ensure electrical equipment is regularly tested and suitable for the conditions in which it is to be used or provided;
- Ensure that any injury sustained or damage caused by Contractors Employees is reported immediately to the T.W Betts Flooring Limited Project Manager;
- Ensure that when informed of any hazards or defects, they take immediate action;
- Ensure that welfare facilities are provided at sites as well as fire extinguishers and first aid personnel by the Principal Contractor. In circumstances where this is not possible, T.W Betts Flooring Limited will make alternate arrangements with Contractors. In many situations there will be co-operation and co-ordination of activities with the Principal Contractor who will make suitable provisions;
- Ensure that workplaces are kept tidy and all debris, waste materials, etc. cleared as work proceeds;
- Wear the protective clothing or equipment appropriate to the works being undertaken or as highlighted in the PPE assessment. Contractors are to provide appropriate protective clothing and safety equipment for their employees;
- Ensure that copies of all risk assessments, COSHH assessments and safe working documentation are available for inspection by the Supervisor. Such assessments should be provided before work is due to commence and in sufficient time to allow submission to the Client.

GENERAL ARRANGEMENTS

HEALTH AND SAFETY OVERVIEW

Under the Environmental Protection Act 1990 and the Health and Safety at Work etc. Act 1974, the Secretary of State is empowered to make regulations for a number of purposes, which are listed in the Schedules to the Acts. The Environmental Agency and the Health and Safety Commission may approve and issue Approved Codes of Practice. Although failure to observe such a code would not in itself be illegal, it may be referred to in criminal proceedings to show that the failure to comply with the code or any provision of it constitutes a contravention of any particular requirement or prohibition of the Act. All Acts, Orders, Regulations and ACoPs remain in force until they are modified or repealed.

ENFORCEMENT

This is the responsibility of the Environmental Agency and the Health and Safety Executive, with the proviso that responsibility may be transferred in certain cases to local authorities. Enforcement officers / inspectors may visit site and premises, if an inspector is of the opinion that a person is contravening a statutory provision or is likely to repeat a contravention, he may serve on that person an Improvement Notice requiring specified remedial action to be taken within a specified time. If the inspector considers that the contravention involves a risk of serious injury, they may serve a Prohibition Notice having immediate effect if considered necessary, directing that the specified activities must not be carried out until the specific matters have been remedied.

If an Improvement Notice or Prohibition Notice is not complied with, persons responsible are liable to imprisonment for up to 6 months (3 months under the Environmental Protection Act 1990) and an unlimited fine. Either of these notices may (but need not) include directions as to the measures to be taken, except where a Notice has immediate effect. The notice may be withdrawn by the inspector before the specified date, however, if the controls are not adequate, the notice may be extended. An inspector may seize any plant, article or substance he finds on any premises, if they consider it to be a cause of imminent danger.

An inspector may give to persons employed (or their representatives) factual information obtained relating to the premises and anything undertaken there, informing them of any action that they may pursue in relation to their findings.

The HSE has introduced a cost recovery scheme; fee for intervention (FFI); in accordance with The Health and Safety (Fees) Regulations 2012.

These Regulations place a duty on the HSE to recover its costs for carrying out its regulatory functions from those found to be in material breach of health and safety law.

A material breach is, when in the opinion of the HSE inspector, there has been a contravention of health and safety law that is serious enough to require them to notify the person in writing.

The HSE and the government believe it is right that businesses and organisations that break health and safety laws should pay for the HSE's time in putting matters right, investigating and taking enforcement action, particularly as businesses may have gained the upper hand with their competitors by saving money on matters of health and safety. Costs were previously paid for from the public purse.

The Fee for Intervention hourly rate is currently £129.

A person found guilty of an offence under the Acts is liable for, on indictment for certain offences, up to two years imprisonment, and / or an unlimited fine. Continuation of an offence for which a person has been convicted constitutes a further offence and that person is liable to a fine for each day on which the contravention continues.

The Legal Aid, Sentencing and Punishment of Offenders Act 2012 increases the penalties and provides courts with greater sentencing powers for those who flout health and safety legislation. The Act raises the maximum penalties that can be imposed for breaching health and safety regulations in the lower courts from £20,000 to unlimited, and the range of offences for which an individual can be imprisoned has also been broadened.

In accordance with section 120 of the Coroners and Justice Act 2009, the Sentencing Council issued new sentencing guidelines for the sentencing of Health and Safety offences committed by Organisations (employers) and by Individuals (employees). It applies to all organisations and offenders aged 18 and older, who are sentenced on or after 1st February 2016, regardless of the date of the offence.

Courts will determine the offence category based on the culpability and harm factors of each individual case. Health and safety offences are concerned with failures to manage risks to Health and Safety and do not require proof that the offence caused any actual harm. The offence is in creating a risk of harm. Further factors to be considered will be whether the offence exposed a number of workers or members of the public or whether the offence was a significant cause of actual harm.

Courts will follow the general principles in setting a fine in accordance with section 164 of the Criminal Justice Act 2003, which requires that the fine must reflect the seriousness of the offence and that the court must take into account the financial circumstances of the offender.

The fine will be sufficiently substantial to have a real economic impact on the organisation or individual, which will bring home to both management and shareholders the need to comply with Health and Safety legislation.

T.W Betts Flooring Limited accepts that the level of fines for some health and safety offences has previously been too low and takes health and safety management responsibilities very seriously in order to prevent accidents and incidents of ill health at all levels within the organisation. Employees are encouraged to act in accordance with the statutory provisions placed upon them and are warned of the consequences that could result if they fail to adhere to our safe systems of work.

The Act fulfils a longstanding Government and HSE commitment to provide the courts with greater sentencing powers for health and safety crimes. The effect of the Act is to:

- Raise the maximum fine which may be imposed in the lower courts to unlimited for most health and safety offences;
- Make imprisonment an option for more health and safety offences in both the lower and higher courts;
- Make certain offences, which are currently tri-able only in the lower courts, tri-able in either the lower or higher courts.

ACCIDENT / INCIDENT INVESTIGATION

T.W Betts Flooring Limited together with our Independent Health and Safety Consultants M.E.L (Health & Safety) Consultants Limited will undertake a thorough investigation of accidents/incidents in juxtaposition with contractors and Principal Contractors.

First aid injuries will be recorded and the record sheets forwarded to Steve Barber for his consideration as to what action to take. RIDDOR accidents will be investigated to ensure that suitable controls are implemented and safe systems of work are adopted, with the aim of preventing recurrence, removing the hazard and reducing the risk. Details of company accidents will be reviewed, as will investigations when undertaken, with details analysed to consider if there are any trends present; whereby working practices need to be changed and further controls included in risk assessments, to reduce risk or eliminate a hazard.

The reasons for investigating accidents are:

- To discover the circumstances of an accident in order to implement controls to prevent recurrence;
- To ensure that the preventative measures taken are adequate and pose no further risk;
- To determine whether any specific breaches of legislation have occurred;
- To increase the knowledge and awareness of employees;

- To maintain credibility of the accident reporting mechanism to the general workforce;
- To provide confidence to our clients that systems will be reviewed and controls applied if required.

All accidents will be reported to the Supervisor for their consideration, as soon as is practical after the incident has occurred. Steve Barber will determine if an accident investigation is required and dependent on the circumstances and a subjective assessment an investigation will be undertaken, examples of these circumstances are:

- Accidents or incidents which have been repeated;
- Fatalities irrespective of cause;
- Accidents whereby the cause is uncertain and the controls in place to prevent recurrence require expert attention;
- Specified injuries to persons at work, as defined in RIDDOR 2013;
- All reported cases of disease that meet the criteria for reporting under RIDDOR 2013;
- Dangerous occurrences where it appears from the report that the outcome, potential outcome, or apparent breach of law is serious;
- Work related accidents involving the public, as defined in RIDDOR 2013.

ACCIDENT PROCEDURE AND RIDDOR

An accident book will be retained at work sites and in the event that there is an accident full details will be completed in the book and the page detached and sent to the head office for the attention of Steve Barber.

In the event that an accident is reportable Amy Barber together with M.E.L (Health & Safety) Consultants Limited will give consideration to completing a formal investigation.

In recognition of its duties under RIDDOR 2013, the Company has instigated a system for reporting accidents, diseases and dangerous occurrences to the Health and Safety Executive. In the first instance T.W Betts Flooring Limited will, so far as is reasonably practicable, provide and maintain a safe place of work, a safe system of work, safe appliances for work and a clean, safe and healthy working environment.

The company will provide such information, instruction, training and supervision as may be necessary to ensure the Health and Safety at work of its employees and to promote awareness and understanding of the Environment and Health and Safety throughout the workforce. In accordance with RIDDOR 2013, Amy Barber will ensure that the reporting of all accidents, diseases and dangerous occurrences outlined in the regulations will be reported within 10 days unless where detailed:

- All deaths to workers and non-workers that arise from a work related accident (report to HSE without delay);
- Specified injuries to workers as outlined in Regulation 4 of RIDDOR 2013 (within 10 days);
- Over 7 day injuries (whereby an employee or self-employed person is away from work or unable to perform their normal work duties for more than seven consecutive days, not counting the day of the accident) (within 15 days);
- Work related accidents involving members of the public who are taken from the scene to hospital for treatment to that injury (examinations and diagnostic tests do not constitute 'treatment' in such circumstances);
- Reportable occupational diseases caused or made worse by work, as listed in RIDDOR 2013;
- 27 categories of Dangerous Occurrences as listed in the regulations.

T.W Betts Flooring Limited will retain all records of incidents to ensure that sufficient information is collected to properly manage health and safety risks. This information will be used as a valuable management tool as an aid to risk assessment helping to develop solutions to potential risks in this way records will help T.W Betts Flooring Limited prevent injuries and ill health and control costs from accidental loss.

ALCOHOL, DRUGS & SMOKING POLICY

Anyone found under the influence of or in possession of alcohol or narcotics will be dismissed from the areas of work and may be subjected to appropriate disciplinary measures, which could result in dismissal for serious or repeated offences.

Employees, labour only contractors and contractors are reminded that some prescription drugs may induce tiredness and lethargy etc. therefore it is the Policy of T.W Betts Flooring Limited that any person who is taking medication, prescribed or not, is to inform their Supervisor if those drugs could affect their performance whilst at work. Employees etc. are also requested to notify their Supervisor of any illness that may affect their ability to undertake work activities in a safe manner.

Employees are required to submit this information pursuant to Section 7 of the Health and Safety at Work etc., Act 1974.

Anyone found smoking in an area other than designated "Smoking areas" will be instructed to extinguish the cigarette immediately with repeat offences being subject to disciplinary measures. Together with being a health risk smoking also greatly increases fire risk. The Smoke-free (Premises and Enforcement) Regulations 2006 now prohibit smoking within premises and within company vehicles therefore this is a statutory requirement.

ASBESTOS – DEALING WITH UNIDENTIFIED MATERIALS

The presence of asbestos is not always obvious. The HSE have advised that it is sensible to assume that any building constructed or refurbished before the year 2000 will contain asbestos materials, e.g. insulation boards, corrugated roof sheets, cement guttering, pipe work and lagging. No work should be carried out which is likely to expose employees to asbestos unless an adequate risk assessment with regard to exposure has been made.

If materials containing asbestos are cut or damaged, minute fibres of asbestos can be released into the air which may be inhaled if adequate precautions are not taken. Some people exposed to this risk, and in particular those who also smoke cigarettes, have developed asbestosis and/or certain types of cancer. It is well known that exposure to asbestos fibres can result in asbestosis; a disease caused by fibrous scarring of the lungs. Lung Cancer, Mesothelioma and Laryngeal Cancer are other diseases that can be suffered after contact with asbestos fibres.

If you suspect a material to be asbestos which was not identified during an initial assessment of the site, STOP WORK! Inform your Supervisor immediately and ask others to leave the immediate work area.

Employees of T.W Betts Flooring Limited are not permitted to handle asbestos products.

If asbestos is discovered T.W Betts Flooring Limited will ensure that the work area is protected to prevent disturbance of the material and subsequently to prevent damage to any asbestos which may result in the release of fibres. T.W Betts Flooring Limited will then arrange for (or pass onto the client or Principal Contractor to arrange) a competent person / specialist analyst to assess the material to confirm if it is asbestos; ascertain the condition of the asbestos containing material and whether it requires removal or can be left undisturbed. If the materials are left in place and undisturbed it will be necessary for the owner of the site to introduce a system of management of the remaining identified asbestos. A log for the building must be kept and the type of and location of the asbestos must be recorded.

If asbestos is confirmed and its condition is poor, then a specialist Licensed Contractor will be employed to protect, repair or encapsulate the asbestos or remove the asbestos to a specified tip that is licensed by the local waste disposal authority. Once the asbestos has been made safe or removed other Contractors will be advised and clearance certificates will be made available. Work will then continue with caution, in case any further un-identified asbestos is found.

ASBESTOS – DUTY TO MANAGE

The owners of buildings have a duty to investigate and make safe any areas where the presence of Asbestos is known or suspected in accordance with the Control of Asbestos Regulations 2012. A plan is required to be kept by companies stating the exact location of known Asbestos together with its type, state, and last inspection date where the assessments shows that Asbestos is (or is liable) to be present. A management plan will also be required to be produced to reduce the risk to any person who may be exposed to the substance while working in the premise, encompassing maintenance work and including contractors.

The duty to manage Asbestos is contained in Regulation 4 of the 2012. T.W Betts Flooring Limited (as the “duty-holder”) will:

- Take reasonable steps to find out if there are materials containing Asbestos in the premises, by conducting a suitable and sufficient assessment;
- Presume materials contain Asbestos unless there is strong evidence that they do not;
- Taking into account any plans and considerations of the age of the building and if discovered and confirmed, record the amount, location and condition of those materials;
- Assess the risk of anyone being exposed to fibres from the materials identified;
- Prepare a plan that sets out in detail how the risks from these materials will be managed;
- Take the necessary steps to put the plan into action;
- Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date;
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

There is also a requirement on anyone to co-operate as far as is necessary to allow the duty holder to comply with the above requirements.

BULLYING / HARASSMENT

T.W Betts Flooring Limited is committed to providing a work environment free of any kinds of bullying or harassment. This applies to all persons involved in the operations of T.W Betts Flooring Limited and prohibits bullying or harassment by any employee of the company, including supervisors, managers and visitors.

Bullying

Bullying is defined as repeated verbal, psychological or physical aggression by an individual or group against others that could be regarded as offensive, humiliating or intimidating. Any such activity is viewed as an act of misconduct. Examples may include:-

- Manipulating the victims reputation by rumour, gossip and ridicule;
- Social exclusion or isolation;
- Preventing the victim from speaking by voicing loud criticisms or obscenities;
- Manipulating the nature of the work or the ability of the victim to perform their work e.g. by overloading, withholding information or setting meaningless tasks.

Harassment

Harassment occurs if any person feels intimidated, humiliated, patronised or embarrassed by the derogatory, offensive or discriminatory remarks or actions of others. Harassment may interfere with job performance, undermine job security or create a threatening or unpleasant work atmosphere.

Sexual Harassment

Sex harassment is unwanted behaviour of a sexual nature by one employee towards another person that is sexual in nature. Examples of sexual harassment include:-

- Sexual gestures;
- Displaying sexually suggestive material, such as pictures or sending suggestive or sexually explicit correspondence;
- Unwelcome sexual comments or jokes;
- Unwelcome physical conduct, such as unnecessary touching, pinching etc.

Racial Harassment

Racial harassment is unwanted behaviour of a racial nature by one employee towards another. Examples may include:-

- Abusive language, mockery or racist jokes;
- Display or circulation of racially offensive material;
- Racial name calling;
- Intrusive or persistent questioning about a person racial or ethnic origin, culture or religion;
- Exclusion from normal workplace conversation or social events i.e. frozen out.

T.W Betts Flooring Limited deplores all forms of harassment and seeks to ensure that the working environment is comfortable and secure for all its employees.

The company will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

Once the investigation is completed and determination is made regarding the alleged bullying / harassment, the result is communicated to the employee as soon as possible.

Any employee who brings a complaint of harassment will not suffer for having brought the complaint: however, disciplinary action will be taken against employees whose allegations of harassment are found to have been malicious.

CDM CONTRACTORS DUTIES

When acting as a Contractor, T.W Betts Flooring Limited will:

- Ensure that when appointing a Designer or Contractor that they have the skills, knowledge and experience and, where relevant, organisational capability to carry out the work for which they are being appointed, or that they are in the process of obtaining them;
- Co-operate with other duty holders;

- Plan, manage and monitor the construction work under our control so it is carried out in a way that controls the risks to Health and Safety and that it is proportionate to the size and complexity of the project and the nature of risks involved;
- Ensure that effective, preventative and protective measures are put in place to control the risks and the right plant, equipment and tools are provided to carry out the work involved;
- Co-ordinate the planning, management and monitoring of our own work with that of the Principal Contractor and other Contractors, and where appropriate the Principal Designer. Attending regular progress meetings with other duty holders to ensure that our arrangements for planning, managing and monitoring our own work can feed into, and remain consistent with, the project-wide arrangements;
- Monitor our work to ensure that the Health and Safety precautions are appropriate, remain in place and are followed in practice;
- Assess the existing Health and Safety skills, knowledge, training and experience of our operatives, compare these existing attributes with the range of skills, knowledge, training and experience they will need for the job; and identify any shortfall in order to provide the 'necessary training'; and not rely on CSCS cards or similar as evidence that a worker has the right qualities;
- Provide appropriate supervision to all Employees, Contractors and newly trained individuals giving them the opportunity to gain positive experience of working in a range of conditions. The level of supervision provided will depend on the risks to Health and Safety involved, and the skills, knowledge, training and experience of the operatives concerned;
- Provide Supervisors who have the skills, knowledge, training, experience and leadership qualities, good communication and people management skills to be effective. All Supervisors will be provided with nationally recognised site supervisor training which includes leadership and communication skills;
- Domestic clients are now also in scope of CDM 2015; we understand that their duties may be transferred to T.W Betts Flooring Limited (on a single contractor project) or the Principal Contractor (where more than one contractor is involved). Where a Principal Contractor or Principal Designer has not been appointed by the client, this role may fall to T.W Betts Flooring Limited where the company will be in control of the construction phase of the project;
- Where a Principal Contractor has been appointed we will follow the Construction Phase Plan that is relevant to our work and facilitate co-operation and co-ordination between contractors. We will produce a Construction Phase Plan before construction begins where T.W Betts Flooring Limited are the only Contractor on the project;

We will also ensure that Employees or Contractors under our control:

- Are consulted about matters which affect their health, safety and welfare;
- Take care of their own Health and Safety and others who may be affected by their actions;
- Report anything they see which is likely to endanger either their own or other's Health and Safety;
- Co-operate with the management of T.W Betts Flooring Limited, fellow operatives, Contractors and other duty holders.

COMMUNICATION

T.W Betts Flooring Limited sees communication within the company as an essential part of effective Health and Safety management. The company will endeavour to communicate to employees their commitment to Safety. In doing so, we will ensure that employees are familiar with the contents of the Company's Health and Safety Policy.

Communication with employees will be in the form of directions and statements, in writing, by way of the Policy Statement and by example.

T.W Betts Flooring Limited aim to work with their Client's Health and Safety representatives and other employers to ensure that all information and documentation is shared regarding Environmental, Health and Safety matters and is communicated to relevant employees in order to ensure safe working of all parties at all times. In the event that an employee has concerns with regards to health and safety they are encouraged to contact their Supervisor or Steve Barber so that the issue can be solved. Members of the public who may have concerns with regards to any matter will be given the telephone number of the head office so that it can be dealt with.

T.W Betts Flooring Limited will ensure that there is adequate consultation with all personnel should there be any alteration to working practices; when new plant is introduced or for any reason that may impinge on the Health, Safety and Welfare of employees, in accordance with the Health and Safety (Consultation with Employees) Regulations 1996 and the Safety Committee and Safety Representatives Regulations 1977. Employees are encouraged to have a representative when a formal convener has not been appointed.

COMPLAINTS PROCEDURE

Work undertaken on construction sites has, by its very nature, an impact on the surrounding environment. T.W Betts Flooring Limited will work pro-actively with the allocated Principal Contractor, Principal Designer, the Client and Local Authority to ensure that generic site nuisances are restricted as far as is reasonably practicable.

Consideration will be given to all reasonable recommendations to obviate the impact on the surrounding environment. Should a third party offer a complaint on site, this is to be recorded on the complaints procedure form and forwarded directly to T.W Betts Flooring Limited at the Head Office.

Should an employee consider that they have a valid complaint on any issue while at work they are to speak directly to their Supervisor. In circumstances where this action may not be appropriate or they consider that the situation has not been rectified adequately, they are to outline their complaint in a letter and forward it directly to Steve Barber for his consideration; whereby a meeting will be arranged to offer appropriate action and controls.

CONSULTATION WITH EMPLOYEES AND CONTRACTORS

The Company will ensure that there is regular consultation with all Employees and Contractors to achieve and maintain an effective Health and Safety culture within the Company's operations. The Company will consult with the Employees or their representatives and contractors, before the introduction of new procedures or technology that may affect their working practices.

Consultation will also occur before the introduction of new statutory information, new or modified work equipment or systems of work and when new technology or new substances are to be used. The consultations will be undertaken on a formal and informal basis according to the matters being relayed. Where necessary the Company will keep records of the consultations. Employees are encouraged to contact their Supervisor if they have any concerns or queries with regards to health and safety matters or systems of work.

CONTRACTORS

T.W Betts Flooring Limited recognise our duty to appoint Contractors who are competent and we will make reasonable enquiries for evidence of competency prior to engaging companies in contractual works. We will ensure that the contractor has the skills, knowledge and experience and, where relevant, organisation capability to carry out the work for which they are being appointed as detailed in Regulation 8 of the Construction (Design & Management) Regulations 2015. This competence check will take into account the nature of the work being undertaken and the risks that this work entails.

All Contractors will be asked to satisfactorily complete a copy of T.W Betts Flooring Limited pre-qualification safety questionnaire and they will be placed on the Approved Contractor list before they are asked to tender for any work. If successful when tendering, a pre-commencement meeting may be required to discuss any unusual Health and Safety implications relating to a particular project.

All Contractors will be asked to submit a copy of their Health and Safety Policy, current certificate of Employers Liability Insurance, training certificates and Method Statements / Risk Assessments in advance for verification before commencing work for T.W Betts Flooring Limited.

Contractors will be expected to comply with the Health and Safety Policy of T.W Betts Flooring Limited when working on site and will be supplied with a list of Safety Rules and Requirements. The following paragraph may be inserted into Contractors contracts:

“Please note this copy of our Company Policy for Health, Safety and Welfare and a list of Safety Rules and Requirements for Contractors on this Company’s sites and clients premises. Your acceptance of the requirements of this Policy will be deemed to include acceptance of the requirements of our Company Policy”. Please contact Steve Barber for information on any matter in connection with Health, Safety or Welfare.

CONTROL OF HAZARDOUS SUBSTANCES

Due to the type of operations undertaken by T.W Betts Flooring Limited, some hazardous substances are used. However, we will endeavour (through our purchasing policy) to purchase only those substances that are not hazardous to health.

T.W Betts Flooring Limited recognise our duties in accordance with the Control of Substances Hazardous to Health (Amendment) Regulations 2004 (COSHH) and will endeavour to purchase substances that are not hazardous to health if they compare favourably in all characteristics i.e. cost, effectiveness and quality. Should hazardous materials not have a suitable replacement the use of such materials will be assessed in accordance with the Regulations and controls implemented to reduce the risk of injury to the lowest level reasonably practicable. The use of those substances subject to COSHH, will be restricted and strictly controlled as outlined above together with adequate information, instruction, training and supervision afforded those using the materials.

Dust

The elimination or the reduction in the production of dust will be considered prior to the commencement of any operation in order to eliminate the hazard of dust inhalation in accordance with COSHH. T.W Betts Flooring Limited will endeavour to purchase materials that are pre-fabricated to the correct size, whereby the dust created by cutting and grinding etc. is eliminated.

Examples of dust control techniques include:

- Using water to suppress dust during cutting, drilling, and grinding etc.;
- Using dust extraction on power tools;
- Ensuring that any dust filtering device on tools is in place and in working order;
- Controlling waste with the use of closed bags, or containers, to prevent the spread of dust;
- Vacuum cleaning avoiding the use of brushes or compressed air;
- Segregation - either separate the dusty activity from other parts of the site physically, or do the dusty work at a time when others are not around;
- The provision of Local Exhaust Ventilation System.

CO-OPERATION AND CO-ORDINATION

If we are to build and maintain a Clean, Healthy and Safe working environment, it is essential that there is co-operation between all Employees and Contractors. All Employees and Contractors are expected to co-operate and accept their duties contained in this policy. Employees have a duty to take all reasonable steps to preserve and protect the Environment and the Health and Safety of themselves and all other people affected by the Company's undertakings.

T.W Betts Flooring Limited will ensure that through co-operation and co-ordination, all employees within shared places of work, operate in a safe environment.

CORPORATE MANSLAUGHTER AND CORPORATE HOMICIDE ACT 2007

An offence will be committed where failings by an organisation's senior management are a substantial element in any gross breach of the duty of care owed to the organisation's employees or members of the public, which results in death. The maximum penalty is an unlimited fine and the court can additionally make a publicity order requiring the organisation to publish details of its conviction and fine.

In considering the liability of an organisation under the Act, a jury must consider any breaches of health and safety legislation and may have regard to any health and safety guidance. In addition to other health and safety guidance, this guidance could be a relevant consideration for a jury depending on the circumstances of the particular case.

The Law

There are no new obligations under this Act. However, the Act does provide a new offence under existing common, civil and criminal law. Companies and organisations who comply with existing health and safety legislation are not likely to be in breach of the new provisions, particularly if they can show due diligence to continual improvement in their Company's Health and Safety culture.

This Act:

- Makes it easier to prosecute companies and other large organisations when gross failures in the management of health and safety lead to death;
- Removes a key obstacle to successful prosecutions because, until now, a company could only be convicted of manslaughter if a "directing mind" (such as a **director**) at the top of the company was also personally liable;
- Means that both small and large companies can be held liable for manslaughter where gross failures in the management of health and safety cause death; not just health and safety violations;
- Does not apply to individual directors, senior managers or other individuals: it is concerned with the corporate liability of the organisation itself (but where there is sufficient evidence, individuals can already be prosecuted for gross negligence manslaughter and for health and safety offences and the Act does not change this position).

The Sentencing Council issued new sentencing guidelines for judges imposing fines in relation to the size of the convicted organisation. Under the Corporate Manslaughter and Homicide Act 2007, there is no upper limit on penalties.

The following factors will be assessed when deciding upon penalties:

- How foreseeable was serious injury;
- How far short of the appropriate standard did the organisation fall;
- How common is this kind of breach within the organisation;
- Was there more than one death, or a high risk of further deaths, or serious personal injury in addition to death.

The fine imposed will reflect the seriousness of the offence and will take into account the financial circumstances of the organisation. The fine will be sufficiently substantial to have a real economic impact which will bring home to management and shareholders the need to achieve a safe environment for workers and members of the public affected by their activities.

DATA PROTECTION AND RECORD KEEPING

Collection of data

In order to maintain accurate and efficient records, information regarding the planning and management of Health and Safety is stored as follows:

- By means of paper based records, manually retrievable;
- By means of retrievable electronic systems.

In all circumstances, it is the policy of the company to maintain a record keeping system, regardless of description that provides protection for the privacy of all Employees, Clients and Contractors, where personal data is stored **N.B. *personal data is defined as data that relates to a living individual who can be identified.***

Description of data

Some Health and Safety data retained by the company will be classified as being sensitive personal data and may include:

- Records of physical injury suffered during the course of employment i.e. the accident book;
- Records of occupationally induced ill health e.g. sickness records;
- Records of health and safety awareness training;
- Records of safety management audits, safety sampling, safety encounters or safety inspections, where the employee is named in the reporting document;
- Financial information.

Other data may include:

- Safe working procedures, developed in support of this Policy document;
- Construction Phase Health and Safety Plans;
- Safety method statements;
- Assessment records of significant risks;
- Permit to work controls; which may directly refer to named employees.

Processing of data

Data processing may comprise of any or all of the following:

- Collection or gathering of information;
- Subsequent retrieval of information;
- Disclosure of data to any source.

Managing Data

Our Employees will be made aware of the Data Protection Act 1998. Where we retain personal data relating to our Employees, Clients and Contractors:

- We shall process personal data solely for the purpose of providing our services or otherwise in accordance with instructions received;
- We shall have in place technical and organisational security measures, including measures which guard against unauthorised or unlawful access to, or alteration, disclosure or destruction of personal data, and against accidental loss or destruction of, or damage to, personal data;
- We shall not sell, transfer or otherwise disclose personal data to any third party, unless such disclosure is required by law or court order.

Requests for information on data stored

Any Employee, Client or Contractor may request information regarding their own personal data and information will be promptly released and explained. Should an Employee, Client or Contractor consider that the data stored causes unwarranted substantial damage or distress, the Employee, Client or Contractor may request that the processing of the data causing concern should cease.

DISCIPLINARY PROCEDURE

When there are issues of non-compliance of Health and Safety Regulations the Company will investigate them. Steve Barber will collate any information and this will be reviewed and the appropriate corrective action taken to ensure that there are controls implemented and that the employees are made aware of the situations which are causing concern. If subsequently, the problems persists then the Company will apply further measures to ensure the Health, Safety and Welfare of all employees and others who may be affected by the actions of those who are not complying with the Health and Safety Regulations.

The employee's attention will be drawn to a situation, which is causing concern in order to give the employee the opportunity to explain and to improve a position. If subsequently, the problem persists then further, more stringent measures may be necessary.

Where the Company is dissatisfied with an employee or sub-contractors performance on Health and Safety grounds they will arrange a formal interview, where the employee can be accompanied by a fellow employee or trade representative. After considering the details an appropriate admonishment, oral warning, written warning, suspension or dismissal will be issued. Records of the disciplinary actions will be maintained by the Company and available for any appeals or legal actions arising from the issues of non-compliance of Health and Safety legislation.

The following contraventions will result in the offending individual being suspended from work pending an inquiry, which will be supervised by Steve Barber.

- Failure by supervisors to notify and explain to operatives over whom they have charge the controls in force for projects and associated risks and the procedures established for their protection and safety;
- Working in a manner where safety management controls and requirements are disregarded to such an extent that the activity or action is considered life threatening to the individual, colleagues or third parties;
- Malicious misuse of or damage to any items which have been provided to assist in maintaining Health, Safety or Welfare standards, including;
 - Personal Protective Equipment;
 - First aid provisions and facilities;
 - Welfare facilities;

- Safety notices, instructions or signs;
- Consumption of or being under the influence of, alcohol or other substances during the course of employment.

DISPLAY OF STATUTORY INFORMATION

All statutory notices provided by the company will be displayed in a proper manner in places that are appropriate and easily accessible to all employees concerned. Such items are the Health and Safety Law poster “information for employees”, Company Health and Safety Policy, F10, etc.

The new version of the Health and Safety Law poster must now be displayed. Employers have a legal duty under the Health and Safety Information for Employees (Amendment) Regulations 2009 to display the approved poster in a prominent position in each workplace or to provide each worker with a copy of the approved leaflet.

DISPLAY SCREEN EQUIPMENT

The use of display screen equipment is not generally a high-risk activity, but failure to meet the minimum requirements may lead to serious muscular or other physical problems, eyestrain, fatigue and stress.

The company will undertake assessments to check that the DSE is properly installed in an acceptable environment. DSE users are to co-operate with the company in the assessment and efficient use of their workstation and report any difficulties or defects which could potentially contribute to a health hazard. Employees who are required to use DSE for substantial work will receive advice so that they are aware of the hazards and health risks and are able to arrange and adjust their equipment and workstation for safe and efficient working.

Employees who carry out substantial work at a display screen will be entitled to eye tests, before commencing work on DSE or as soon as is practical, at regular intervals afterwards or when visual difficulties are experienced. Where tests show that eyesight correction is needed to carry out work on DSE corrective spectacles required solely for DSE will be obtained for the user.

DOCUMENTATION

The office will ensure that a complete copy of relevant extracts from the Company Health and Safety Policy are made available to clients when requested for reference.

T.W Betts Flooring Limited will display a copy of the Policy Statement where employees can easily access it. In preference it will be displayed at the general places of work as a paper copy, e.g. as a photocopy pinned to a notice board. As an alternative it may be stored electronically but operatives will be able to access it if required e.g. as a page on our intranet or as a document in a shared folder on our network.

Each major project will be supplied with the following:

- Certificates for plant and equipment e.g. PAT and tests of thorough examination etc.;
- Method statements and risk assessments;
- Records of safety talks (Tool box talks);
- Safety notices;
- Training certificates / training matrix; and
- A copy of the Employers Liability Insurance.

ELECTRICAL WORK EQUIPMENT

Electrical equipment used on site will be 110V centre tapped to earth. This equipment will be portable appliance tested at 3 monthly intervals as recommended by the HSE guidance note HS (G) 107.

240V equipment is not permitted unless a risk assessment has been produced for its usage, residual circuit devices are fitted and portable appliance testing is undertaken on a monthly basis.

Employees will be properly trained only to use equipment after they have given it a visual inspection to identify damage or defects, and to use it only for the purposes for which it is intended. Where equipment is found to be faulty, repairs and re-testing will be carried out by competent persons before the equipment is re-issued.

Company management will ensure that there is adequate supervision of the requirements of the electrical equipment and will keep records of maintenance and testing results.

EMERGENCY PROCEDURES

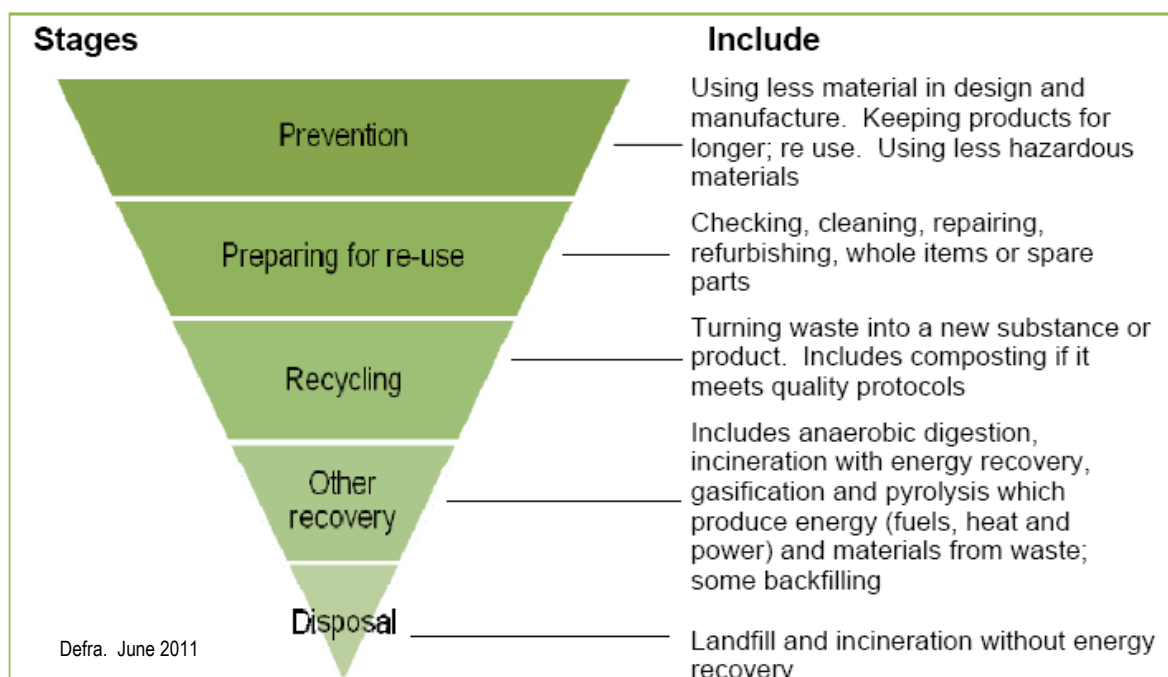
The Company will establish appropriate emergency procedures to be followed in the event of serious and imminent danger to persons working within the premises. The prime objective will be to ensure that no Employee or visitor is subjected to danger when an emergency or possible danger may be present. The plan will allocate responsibilities to persons who have first received adequate Health and Safety instruction and training.

The Company will inform Employees about the emergency procedures and will provide the names of those persons given tasks to complete should there be an emergency.

The Employees will also be instructed on how to identify unsafe conditions when it may be necessary to stop work and go to a place of safety. The Emergency Procedures will provide adequate safeguards to avoid a return to the work area until the risk of danger has been cleared. Emergency procedures / evacuation will be practiced as a minimum every six months.

ENVIRONMENTAL CONSIDERATIONS

T.W Betts Flooring Limited recognises its Duty of Care under The Environmental Protection Act 1990, The Waste (England and Wales) Regulations 2014 and other associated statutory provisions. As a considerate company T.W Betts Flooring Limited will undertake to reduce its impact on the environment at all stages of its business and will endeavour to follow the Defra and Environmental Agency guidance on the reduction of waste and care of the environment.



FACE FIT TESTING

Where a respiratory sensitiser cannot be eliminated, and environmental controls, such as ventilation cannot reduce exposure to a low enough level, exposure may need to be controlled using RPE. HSG 53 states that RPE should only be selected and used after a justification has been made in a risk assessment.

T.W Betts Flooring Limited will ensure that RPE is only used:

- When a respiratory risk remains after all other reasonable controls have been put in place;
- For short-term or infrequent exposures where other controls are not reasonably practicable;
- As an interim measure while other control measures are being put in place;
- In an emergency, to escape, to carry out emergency work, or for trained personnel for rescue purposes.

For RPE to be an effective control, it's essential that it's selected, fitted, maintained and stored correctly, and that people exposed to respiratory hazards are in a programme of health monitoring and surveillance.

According to The Control of Substance Hazardous to Health (Amendment) Regulations 2004, the performance of respiratory protective equipment (RPE) with a tight-fitting face piece depends on a good contact between the wearer's skin and the face seal of the mask.

Fit testing is needed where RPE is used as a control measure. Where it is worn by choice for comfort, fit testing isn't required. Loose fitting RPE, such as hoods and ventilated visors, do not need fit testing, although they should fit appropriately.

Selection of RPE will take account of:

- Individual factors such as facial hair, health conditions and the need to wear glasses;
- Task factors such as duration, temperature, humidity, other personal protective equipment required, and the need to see fine detail, to move around or communicate;
- Hazard factors such as the substances and their volatility.

The selection stage will include face fit testing with individual users who will need to wear RPE. Ideally, different models of RPE should be provided to individual users for them to try on.

When selecting RPE, we will make sure that it:

- Provides effective protection for the wearer against the hazard(s) identified;
- Is suitable for use in the environment in which it's to be used;
- Can be worn correctly while carrying out tasks;
- Can be worn correctly with other personal protective equipment that's needed;
- Is CE marked;
- Reduces exposures sufficiently, to comply with the law.

Fit testing will be repeated if the wearer:

- Loses or gains enough weight to change the shape of their face;
- Undergoes substantial dental work;

- Develops any facial scars or moles, etc. which could affect the fit of the RPE.

Once a user has passed a fit test for a particular face piece, they can wear other face pieces of the same make, model, type and size. However, if they need to use a different make, model, type of size then that face piece will also need to be fit tested.

It is the policy of T.W Betts Flooring Limited that a two-year cycle for re-testing is undertaken to check that the face piece remains suitable and that the wearer is taking care to wear and remove the mask correctly.

FIRE SAFETY

Firefighting equipment will be located at strategic points throughout the work areas. All equipment will be supplied by the client and as required by T.W Betts Flooring Limited. Arrangements may be made with contractors in situations whereby T.W Betts Flooring Limited may not have a permanent Supervisor on site to ensure that suitable extinguishers and procedures are in place. In situations whereby work is undertaken at the Clients premises those extinguishers will be checked and adopted with authorisation from the Client.

In accordance with the Regulatory Reform (Fire Safety) Order 2005 T.W Betts Flooring Limited has appointed a 'Responsible Person' to undertake the following specific duties:

- Ensure that general precautions are in place to protect Employees from the risk of fire;
- Ensure that a fire risk assessment is prepared and regularly reviewed;
- Ensure the effective planning, organisation, control, monitoring and review of the preventive and protective measures;
- Ensure that specific arrangements are made for the safe handling, storage and transport of dangerous substances and waste containing dangerous substances;
- Ensure that appropriate steps are taken to reduce the risks of ignition or have taken steps to limit the spread, growth and impact of a fire;
- Ensure that adequate and suitable means are provided, giving warning in the event of a fire, for the escape from a fire and for firefighting;
- Any equipment, fixed or portable, used for fighting fires must always be kept in an operational condition;
- Ensure that identified risks and safety precaution information is passed onto Employees and others that may be affected;
- Ensure that Employees are adequately trained in relation to fire safety.

Employees of T.W Betts Flooring Limited will be instructed in the procedure for evacuating the premises and the location of the Assembly Point at induction to the Company. Employees are expected to tackle a fire themselves only if they have been trained in the use of firefighting equipment and if it would pose no threat to their personal safety to do so.

Fire exits must be kept clear and must never be blocked or used as storage space.

All Employees have a duty to ensure their safety and the safety of others who may be affected.

FIRST AID

T.W Betts Flooring Limited will undertake risk assessments and ensure that there are sufficient competent trained First Aiders to meet the risk level requirements and they will ensure that all first aid facilities are well maintained in accordance with The Health and Safety (First Aid) Regulations 1981.

Risk assessments, in accordance with The Health and Safety (First Aid) Regulations 1981, will examine:

- The number of Employees;
- The nature of the work in which they are involved;
- The size of the operation;
- How widely employees are distributed across a site;
- The location of the site and its proximity to medical treatment.

The first aid kit and its location shall be known by all Employees and its contents replaced as they are used or when an expiry date is exceeded. A regular check is to be made of the contents to ensure this. One person holding a current "First Aid at Work" certificate or an "Emergency First Aid at Work" certificate will be responsible for the proper use and maintenance of the first aid box.

Arrangements may be made with the Principal Contractor at projects for the shared usage of such facilities when employees are working on site.

HOUSEKEEPING AND SITE TIDINESS

Site tidiness will be considered at all stages of the work and good co-operation is expected between T.W Betts Flooring Limited and other Sub-Contractors. Waste material, especially combustible material, will be controlled and either deposited in an agreed area, or removed from site. Spillages of oil, diesel and other substances will be dealt with immediately.

INSURANCE

In recognition of its statutory and common law duties, T.W Betts Flooring Limited has taken out insurance with an approved insurer. The certificate of insurance will be prominently displayed where our Employees can easily read it, however, we reserve the right to store it electronically, and instruct our employees how to access it. This will be made available for inspection at all reasonable times by employees and regulatory authorities e.g. the Health and Safety Executive.

KNIVES

In general, knife accidents involve cutting or stabbing the non-knife hand and forearm, more serious accidents also occur as a result of stabbing injuries to the body.

Good working practices

Select the correct tool for the job. Knives are generally manufactured to perform a particular task. Using the wrong knife can significantly increase the risk.

Ensure that all knives are kept sharp. A blunt knife will not cut as well and therefore more force will have to be used to penetrate the item being cut. This increases the risk of the knife slipping or skidding and also increases the likely level of injury should a stabbing incident occur.

Always replace the knife in its scabbard when not in use. Never walk around with a knife in your hand unless the blade is covered.

Where there is a risk of fingers slipping onto the blade during a cutting operation, ensure that the handle is constructed of a material which offers a good level of slip resistance and that it is designed so as to reduce the potential for slipping.

Ensure that all operatives are suitably trained, including:

- The correct use of knives and other hand tools;

- The dangers associated with the misuse of knives and other hand tools;
- The correct use of protective equipment and clothing.

Always pick up a knife by the handle and never try to catch a falling knife.

Never lay a knife down on a work surface, where they could be covered by other objects.

MANUAL HANDLING OPERATIONS

Standards Required

The Manual Handling Operations Regulations 1992 apply to the manual handling or lifting of materials by persons.

Planning

A manual handling assessment will be undertaken in all situations in which a risk remains after the implementation of controls in accordance with The Manual Handling Operations Regulations 1992. The assessment will follow the format of Schedule 1 (task, individual, load, environment and other factors).

All work will be tendered for or negotiated taking into account the above Regulations and the schedules of those regulations. Operatives will ensure that materials are landed as close as possible by machine or truck to the area of works. Where the use of a machine is available to handle any heavy or awkward loads, instructions must be issued to site on the handling of these loads. All Employees will be given training in the correct methods of handling and lifting loads as part of their normal safety training.

Supervision

Operatives will be instructed in the correct handling and lifting of loads when mechanical means are not practical and Supervisor will ensure that there is a supply of suitable gloves available for issue as required for the handling of materials, which may cause injury to hands through physical or biological means e.g. sharp edges or chemicals.

Safety footwear will be worn at all times on site and Supervisor will caution any employee or sub-contractor wearing unsuitable footwear. The Supervisor will not require any operative, particularly a young person to lift without assistance, a load which is likely to cause injury. T.W Betts Flooring Limited must reiterate that in the first instance mechanical means must be used to lift all materials and loads.

Safe System of Work

- The main injuries associated with manual handling and lifting are:
- Back strain, slipped disc;
- Hernias;
- Musculoskeletal disorders;
- Lacerations, crushing hands or fingers;
- Tenosynovitis;
- Bruised or broken toes or feet;
- Various sprains and strains etc.

The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physical build etc.

Where loads have to be manually handled, the need to ensure that access and egress are safe is especially important. The training provided should be based on the physical structure of the body and the effect of attempting to handle loads in various positions.

Manual handling operations will be avoided as far as is reasonably practicable i.e. by delivering work equipment, as close to the area of intended works and by the use of lifting devices, but where a risk of injury still exists it will be reduced to the lowest level possible.

Where an avoidance of a manual handling task is not possible an assessment of the operation will be made taking into account the task, the load, the working environment and the capability of the individual to perform the task in hand. An assessment will be reviewed if there is any reason to suspect that it is no longer valid. In the first instance all possible steps will be taken to reduce the risk of injury to the lowest level possible throughout the workplace.

MIGRANT WORKERS

T.W Betts Flooring Limited ensures compliance with the requirements of the UK's immigration laws and states our commitment to providing a safe working environment for employees and contractors whose first language is not English.

Line managers will be responsible for ensuring that this policy is implemented throughout the company and that a safe working environment is achieved and maintained at all times. Where there are risks to the safety of Non-English speaking persons under their control the appropriate control measures will be adopted.

In order to comply with its legal requirement the company will check and copy certain original documents **before** appointment letters are issued (the only exceptions to this rule are Work Permit holders entering the UK).

The responsible manager will check the validity of documents:

- Check that photographs are consistent;
- Cross-check dates of birth;
- Check expiry dates of limited leave to enter or remain in the UK have not passed;
- Check any UK Government endorsements (stamps, visas etc.) to see if the person is able to do the type of work you are offering;
- Satisfy the company that the documents are genuine and have not been tampered with;
- If the names are different on any of the documents, ask for an explanation and further documentary evidence i.e. marriage certificate.

Take a photocopy or scan:

- For passports or travel documents, a copy will be taken of the document's front cover and any page containing the holder's personal details. In particular, the responsible manager will copy pages that provide details of the nationality, date of birth, signature, date of expiry or biometric details and a copy of the photograph; and
- Any page containing UK Government endorsements, noting the date of expiry and any relevant UK immigration endorsement which allows the person to do the type of work you are offering.

Record keeping:

- The copies will be filed in the individual's personnel file.

Ensuring Safety

The company will ensure the Health and Safety of migrant workers under their responsibility by:

- Providing information, instruction, training and supervision and making sure all workers can understand it;
- Ensuring overseas workers have the necessary knowledge and skills to do the work for which they have been employed, competently and safely;
- Ensuring workers understand that T.W Betts Flooring Limited have responsibilities for their health and safety;
- Providing literature in their native language;
- Providing translators for groups of workers where required;
- Monitoring this procedure for its compliance by line management.

MOBILE TELEPHONES

The Company shall bring to the attention of all employees, including Directors and Senior Management, the legal requirement that no persons shall operate mobile telephones when in control of a motor vehicle.

The offence, which also includes usage while stationary in traffic or waiting at traffic lights, includes 3 penalty points each time you are caught holding a phone with a fixed fine of £100.00, which will increase if the offence goes to court. This holds a maximum fine of £1000.00. Drivers of goods vehicles can obtain a maximum fine £2,500.00.

The Company shall undertake not to encourage phone usage while Employees may be driving.

The purchase of a hands free kit does not eradicate this problem, you can still be prosecuted if you are involved in an accident while using a hands free kit.

Research has shown that people are still four times more likely to be involved in an accident using a hand free kit than normal drivers as this still causes a split in concentration.

Note: you can be prosecuted under the Road Traffic Act e.g. for dangerous driving for which there is an unlimited fine and possible prison sentence.

MONITORING OF PERFORMANCE

Within the company as a whole, implementing the policy in the working environment is just the first step. Health and Safety management changes continually and therefore T.W Betts Flooring Limited will be proactive in monitoring the effectiveness of our policy. In real terms, this means being able to identify potential problems and taking action to prevent them becoming reality. There is also a need to be reactive to any breaches or near-breaches of health and safety, by investigating why an incident has occurred.

Proactive monitoring means taking action before accidents happen e.g.:

- Regular safety inspections to check that our standards are being implemented and management controls are working and the extent to which our company complies with the relevant Health and Safety legislation;
- Detailed safety audits that tell us whether the Health and Safety standards in our business remain acceptable and whether standards have improved or deteriorated since the last audit.

As a company we recognise that proactive monitoring is the preferred method and despite reactive monitoring being the result of a failure there are benefits from learning from mistakes – whether they have resulted in injuries, illness or damage to property or just near misses. Incidents will be thoroughly investigated to ensure that actions are taken to prevent a similar occurrence. This type of monitoring involves a systematic collection of information about the incident and it is an important aspect of health and safety performance measurement.

The Company will conduct a review of Health and Safety performance during site meetings with Clients, Designers, Principal Designers, Principal Contractors and others and any corrective actions advised or suggested will be investigated and appropriate actions implemented. Steve Barber is responsible for collating Health and Safety information from the Supervisors and dealing with them on site.

Health and Safety matters to be monitored by the Company during a project are:

- First Aid - First Aider, First Aid Box (s);
- Welfare - Clean and Satisfactory;
- Fire Precautions - Adequate escape measures, equipment and Instructions;
- Housekeeping - Access and Egress, materials properly stored;
- General hazards - Created by bad practices, design, material or substances;
- Documentation - Health and Safety registers, notices and information;
- Safety Equipment - Fit for use and inspected;
- Personal Protective Equipment - Fit for use;
- Access Equipment - Scaffolding, Ladders, Steps used appropriately;
- Plant and Machinery - Suitable and safe, also well maintained;
- Training - Suitably trained staff and supervision for the task.

Steve Barber monitors any accidents and will compile the supporting documentation for the authorities and keep records should an accident occur on site. Where there are reportable accidents that require notice to the HSE, T.W Betts Flooring Limited will comply with the requirements of RIDDOR 2013. Reportable and more serious incidents will be reviewed by the external consultant at the request of Steve Barber to see what corrective or preventive action, if any, is required to prevent a similar accident occurring again.

If there are any corrective or preventive actions required on the project, these will be undertaken promptly to protect the health and safety of all those involved. Where appropriate, the Company will issue revised instructions to employees and amend written procedures to take account of any new or perceived risks to Health and Safety within the project.

Our independent Health and Safety advisor M.E.L. (Health and Safety) Consultants Limited will, when requested, undertake either full safety audits of the company or inspections of workplaces. A written report will be compiled after the audit or inspection. Audits and inspections will be referred to by those people in our management structure who have the authority to sanction the appropriate remedial action to be taken – particularly where it entails a high level of expenditure or organisational and policy changes. If there are any corrective or preventive actions required on a project, these will be undertaken promptly by the Manager to protect the Health and Safety of all those involved. With both audits and inspections, priority will be given where the risks are greatest.

Where appropriate T.W Betts Flooring Limited will issue revised instructions to personnel and amend written procedures to take account of any new or perceived hazard to Health and Safety within the company. With regards to projects, actions, when necessary, will be communicated to Supervisor on other projects to ensure controls are implemented throughout the company.

MUSCULOSKELETAL INJURIES

Musculoskeletal injuries are a range of disorders involving muscles, bones, tendons, blood vessels, nerves, and other soft tissues. The most common term used to describe these disorders is Repetitive Strain Injury (RSI). Some examples of musculoskeletal disorders are Carpal Tunnel Syndrome, Tendinitis, Tenosynovitis and Bursitis.

Who is at risk?

Every worker who:

- Maintains fixed positions;
- Performs repetitive movements of the limbs;
- Overloads particular muscle groups;
- Applies pressure on body parts;
- Uses forceful movement;
- Works with great speed along with repetitions.

What are the symptoms of musculoskeletal injury?

- Pain in the hands, arms, shoulders, neck, back, legs or feet;
- May include swelling, numbness, tingling and a feeling of heaviness and/or tiredness in the affected area;
- Some workers may experience multiple symptoms due to more than one injury.

Severity of symptoms varies from person to person:

- **Stage 1** — Dull aching pain/fatigue which disappears with rest;
- **Stage 2** — Recurrent aching/fatigue which begins after work starts and continues after work ceases. Fatigue often present due to intermittent night pain. Reduced capacity to perform repetitive daily tasks;
- **Stage 3** — Inability to perform daily tasks. Persistent aching and fatigue. Weakness while at rest as well as pain even with non-repetitive movement.

At the first signs of Stage 1 symptoms notify your supervisor.

At the first signs of stage 2 symptoms see your doctor or chiropractor. Ensure you are able to describe in detail your workplace and work practices to assist in a diagnosis.

- Do not continue any task that has caused injury unless adjustments have been made to prevent the injury from recurring. Ask that you be accommodated within your restrictions.

Each task that has the potential to cause injury should be evaluated thoroughly by both the operative and the supervisor, and following the evaluation adjustments should be made so the work is safe to continue, if the work is still not safe DO NOT START.

Note - No worker should do a task until it has been modified to prevent injury. You may exercise your Right to Refuse Unsafe Work. (See "Refusal to work on safety grounds").

In order to prevent musculoskeletal injuries T.W Betts Flooring Limited will ensure that the following has been carried out:

- An analysis of the ergonomics of the work you perform;
- Ergonomically designed work stations and tools;
- Training in lifting and carrying procedures;
- Avoidance of repetitive motion lasting longer than 10 minutes - take frequent short breaks;

- Use of safe lifting and carrying techniques, and assistance for lifting items that are beyond the capability of the individual.

NOISE SAFETY

Where noise levels are suspected of being above the statutory level, T.W Betts Flooring Limited will inform its external Health and Safety Consultants and request that they carry out full noise surveys, the Employees will then be informed of the results. When there is reason to suppose that the assessment is no longer valid, or when there has been a significant change in the work to which the assessment relates, noise levels will be reviewed and changes made as recommended by the review.

Noise from the site, to the public can be a nuisance when in close proximity.

Planning Procedures

At tender or negotiation stage the above standards will be taken into account.

The Supervisor will ensure that information on the noise level of any plant, which it is intended for hire or purchase is obtained and taken into account before hiring or purchase takes place.

T.W Betts Flooring Limited will assess noise levels for operations and where guidelines are given by manufacturers these will be adhered to.

Guideline: Can the person using the equipment talk to someone 2 metres away without having to raise their voice to be understood? If they have to raise their voice, the noise from the equipment or operation is probably loud enough to damage their hearing, so action must be taken, ear protection should be offered. If there is any doubt, employ competent people and equipment to assess the noise levels.

Action Levels:

The lower exposure action values are:

- A daily or weekly personal noise exposure of 80 dB (A), and
- A peak sound pressure of 135 dB (C).

The upper exposure action values are:

- A daily or weekly personal noise exposure of 85 dB (A), and
- A peak sound pressure of 137 dB (C).

The exposure limit values are:

- A daily or weekly personal noise exposure of 87 dB (A), and
- A peak sound pressure of 140 dB (C).

Control Measures where the Action Value is likely to be reached:

If an Exposure Action Value is exceeded, T.W Betts Flooring Limited shall:

- Use other work methods which eliminate or reduce the exposure to noise;
- Selection appropriate work equipment taking into account the work to be done;
- Assess the design and layout of workplaces, workstations and rest facilities;
- Provide suitable and sufficient information, instruction, training and supervision for employees;

- Reduce the noise by technical means;
- Implement appropriate maintenance programmes for work equipment;
- Limit the duration and intensity of exposure to noise;
- Implement appropriate work schedules with adequate rest periods.

Control Measures where the Limit Value is exceeded:

If an Exposure Limit Value is exceeded, T.W Betts Flooring Limited shall forthwith:

- Reduce exposure to noise below the limit value,
- Identify reasons for that exposure limit value being exceeded, and
- Modify the organisational and technical measures that are in place or implement new control measures to prevent it being exceeded again.

The Supervisor will ensure that any static plant to be installed on site or in the workshop is planned to be in a position, which takes accounts of effects of noise on the operatives or the public. Where Employees are required to work in situations where high levels of noise are likely to be encountered, the Supervisor will ensure that full information is obtained before work commences on the levels and frequencies of noise. Any measures to reduce noise levels to below levels considered to be safe must be planned or, if this is not practicable, suitable hearing protection equipment must be selected for use by personnel.

Regular monitoring of noise levels and frequencies will be planned as required. Instruction and training will be provided to Supervisors and Employees required to work in premises or with plant which is likely to result in exposure to high noise levels. The Supervisor will ensure that all plant provided is fitted with silencers, mufflers, doors, canopies, etc. and that all equipment is used.

Supplies of ear defenders, or other hearing protection, will be made available on the site or for any operations where it is not practicable to reduce the noise level to a safe limit. These will be issued to Employees as required and must be worn at all times when the operative is exposed to noise.

Safe System of Work

The Safety Consultants can provide the following services:

- Carry out a noise survey to establish levels and frequencies of noise,
- Regularly monitor noise levels and frequencies,
- Give advice on noise control measures,
- Arrange for Audiometric testing of operatives,
- Arrange for individual monitoring of exposure,
- Provide training and instruction for personnel.

Hearing damage results from over exposure to noise T.W Betts Flooring Limited undertake to, as far as reasonably practicable:

- Reduce noise at source,
- Isolate the noise source,

- Reduce the time that operatives are exposed to the noise,
- Identify which employees are exposed,
- Keep adequate records of such assessment until a further assessment is made,
- As a long-term undertaking to reduce the noise levels to which employees are subjected,
- Provide the employee with such information as will enable him to carry out his statutory duties,
- To designate ear protection zones and post signage accordingly.

When there is reason to suspect that the assessment is no longer valid, or when there has been a significant change in the work to which the assessment relates, noise levels will be reviewed and changes made as recommended by the review.

PERMITS TO WORK

Due to the hazardous nature of activities undertaken by T.W Betts Flooring Limited, it is a prerequisite that they be undertaken in accordance with a permit to work system. Contracts Managers are to highlight during the tendering process to those preparing and considering Health and Safety requirements that a permit will be required to undertake the works.

Typically, permits to work will be required for all operations undertaken within confined spaces and those tasks requiring the working on live services (only undertaken if it is unreasonable in all the circumstances for it to be dead; and it is reasonable in all the circumstances for him to be at work on or near it while it is live).

Should a permit be required, it will be issued by a person nominated as being competent by the senior management of T.W Betts Flooring Limited. The competent person is to ensure that all requisites of the permit have been considered and controls implemented before works commence. Only then will he authorise the permit. Once works are complete the nominated person is to "sign off" the permit as confirmation that the area is safe.

PERSONAL PROTECTIVE EQUIPMENT

PPE identified as necessary after an assessment of the various activities will be supplied free of charge by the Company. Employees will be fitted with equipment, trained in its use, maintenance and any applicable storage requirements, advised of the possible results of non-use and the reporting procedures for faulty equipment. T.W Betts Flooring Limited will operate an on-going policy of monitoring equipment use.

It will be a disciplinary matter if Employees do not adhere to the use of PPE and the associated controls that are to be implemented as part of the risk assessment. It will be mandatory that employees shall wear a safety helmet and safety boots or safety shoes at all times. Other PPE may be required according to the risk assessment & in accordance with the site rules.

Personal Protective Equipment - Visitors to Site

Official visitors to sites (e.g. surveyors, engineers, inspectors etc.) will be required to wear a safety helmet and safety boots. Other PPE such as a high visibility waistcoat should be considered and used when required. Visitors will be reminded that they should set a good example by wearing the appropriate protective clothing at all times whilst on site.

PLANNING

At the planning stage the requirements of this Company Policy must be taken into account.

Any aspects of work not covered by this Policy must be identified and planned by the Supervisor and written procedures defined. If necessary pre-contract meetings will be held and specific safety matters discussed.

Representatives of those persons who may perform everyday work duties while work is undertaken will be informed of hazards and systems of work. Those representatives as well as T.W Betts Flooring Limited will communicate this information.

PLANT AND EQUIPMENT MAINTENANCE

The company will ensure that all work equipment and plant is maintained in an efficient state, in working order and in good repair. Where the equipment has a maintenance log, the log is to be kept up to date. Compliance with the PUWER 98 Regulations will be the minimum standard required.

The Company has a statutory duty to maintain and inspect its plant and equipment and avoid risks to Health and Safety. The Company will use maintenance schedules to control and manage the equipment. Various maintenance programmes may be required; these will need to take into account the operational needs as well as Health and Safety considerations and the possible impact of the environment. Also allowances must be made for the aptitude and skill of the operator.

Management may use:

- Unscheduled or breakdown maintenance;
- Scheduled or routine maintenance;
- Planned preventive maintenance;
- Predictive maintenance;
- Improvement maintenance.

The Company will provide adequate supervision, information, training and instruction to ensure that there is compliance with safety procedures. The Company will develop safe systems of work, which identify risks and hazards and then eliminate or reduce the risk to a minimum. Operatives using Company plant and equipment will be experienced and competent. They must inspect the equipment before use and then at regular intervals, lifting plant is to be inspected weekly and a register kept of the inspections.

Operatives must report all faults, damage, defects or malfunctions to their Supervisor and must not use defective equipment or plant. Defective equipment / plant will be immobilised and identified as awaiting repair.

Standards Required

The following regulations contain requirements to be complied with in the provision, maintenance operation and use of plant on site:

- The Provision and Use of Work Equipment Regulations 1998 (PUWER 98)
- The Lifting Operations & Lifting Equipment Regulations 1998 - Lifting appliances in general

Planning Procedures

All work will be tendered for or negotiated in accordance with the above standards and the requirements of the Management of Health and Safety at Work (Amendment) Regulations 2006.

The Plant Manager will take all aspects of the work into account to ensure that sufficient information is provided to Hire Companies to enable the correct type of plant to be provided.

T.W Betts Flooring Limited will ensure that competent operators and banksmen are provided or that where necessary full training and instruction is arranged.

At the project planning stage it will be determined whether any preparatory work is required for the installation or use of plant on site and to ensure that any requirements are planned e.g. plant and diesel storage areas, loading areas, etc.

Supervision

The Supervisor will ensure that plant delivered to site is in good order and fitted with any necessary safety devices and guards. Any defects noted on hired equipment will be reported to the Hire Company immediately.

No young person, under 18 years of age will be permitted to operate any item of plant or act as banksman unless being trained under the direct supervision of a competent person. All plant will be properly secured and immobilised at the end of each day.

All necessary testing and test of thorough examination certificates will be kept in the cabs of plant at all times and all items of plant requiring weekly inspections by the operator or other competent persons will have the inspection recorded in the site register or in the register kept by the operator of the Plant.

The Supervisor will ensure that any necessary preparatory work required to enable plant to be installed or used correctly is carried with specific requirements. The Supervisor will ensure that any defect notified by the Plant Operator during operations on the site is reported immediately for repair and that where defects could affect safety on site, the item of plant is not used until the repairs are carried out.

The Supervisor will not ask or permit the Plant Operator to carry out work with the machine for which it was not intended unless specific advice has been obtained from the manufacturers of the machine on the proposed use.

Safe System of Work

Hazards with the use of plant arise out of:

- Unskilled operation
- Incorrect use
- Poor maintenance
- Reversing unsupervised
- Defect in machine unchecked
- Noise (see separate section)

All banksmen, Supervisor Employees and operatives required to enter earth moving areas will be provided with high visibility waistcoats.

PRINCIPLES OF PREVENTION

T.W Betts Flooring Limited will, as a responsible employer, comply with The Management of Health and Safety at Work (Amendment) Regulations 2006 Regulation 4 as part of the overall strategy for reducing risk. T.W Betts Flooring Limited will implement any preventive and protective measures on the basis of the principles specified in Schedule 1 to the above Regulations and Appendix 1 of The Construction (Design and Management) Regulations 2015 i.e. by:

- Avoiding risks;
- Evaluating the risks which cannot be avoided;
- Combating the risks at source;

- Adapting the work to the individual; especially with regards the design of workplaces, the choice of work equipment and the choice of working and production methods. In particular, with a view, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;
- Adapting to technical progress;
- Replacing the dangerous with the non-dangerous or the less dangerous;
- Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;
- Giving collective protective measures priority over individual protective measures;
- Giving appropriate instructions to employees.

PROCEDURE FOR NEW EMPLOYEES ENGAGED BY THE COMPANY

The procedure is to be carried out by the Supervisor where the new employee will be required to work.

- Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible.
- Issue the new employee with a copy of the Company Statement of Safety Policy and details of their responsibilities for safety matters. Also show the new employee where the complete Company Policy for Health, Safety & Welfare is kept and explain its purpose.
- Ascertain if the new employee has any disability or illness which could prevent him/her carrying out certain operations safely or require additional protective measure.
- Show the new employee where copies of Regulations are kept.
- Warn new employees of any potential dangerous areas of operations on jobs or in the workplace.
- Warn the new employee of any prohibited actions, e.g. entering specific areas without a safety helmet, operating plant unless authorised, etc.
- Ascertain whether there is any training or instruction required and liaise with MEL (Health & Safety), as appropriate, to arrange, e.g. abrasive wheels, cartridge tools, scaffold inspections etc.
- Issue to the employees any protective clothing or equipment necessary, e.g. safety helmet, eye protection, ear defenders/plugs, wet weather clothing etc., and obtain their signature for the items issued.
- Where necessary, inform the new employee of vehicle servicing procedures etc.

Additional Procedure for new Employees Under 18 years of age

Inform them that they must not operate any plant, give signals to any crane driver, and use any power tools or equipment unless being trained under the direct supervision of a competent person.

PROTECTION OF PERSONS IN WORK AREAS

All necessary measures required for the protection of others will be allowed for and planned, taking into account Section 3 (1) of the Health and Safety at Work etc. Act 1974. Consideration will be given at the planning stage to ensure the protection of others and when necessary, barriers, screens etc. will be provided to ensure their protection and to obviate the effects of dust etc.

PUBLIC/THIRD PARTY SAFETY

Under Section 3 (1) of the Health & Safety at Work etc. Act 1974 T.W Betts Flooring Limited recognises its duty of care to the general public/third parties and will take all necessary measures to safeguard the public during any work activity, which may impinge upon them.

This will include control measures highlighted from risk assessments undertaken in accordance with the Management of Health and Safety at Work (Amendment) Regulations 2006.

Site/workplace security will be put in place to stop members of the public/third parties getting into a position where they are a danger to themselves or to operatives of T.W Betts Flooring Limited.

This will include working in residential properties where there may be children present. In occupied premises all persons that require information will be notified of the parameters of the works and will be notified accordingly of any changes to those work parameters.

PURCHASING POLICY

T.W Betts Flooring Limited recognises its duties in accordance with various Regulations with regard to the purchase of materials, substances, machines and equipment and will, before each purchase, consider how they may impinge on the Health, Safety and Welfare during their use, storage, handling and transportation.

T.W Betts Flooring Limited has a Purchasing Policy that not only takes into consideration the quality of an item in comparison to the cost but also considers the suitability of the item against a number of underlying criteria.

Examples:

- T.W Betts Flooring Limited will endeavour to purchase substances that are not hazardous to health if they compare favourably in all characteristics i.e. cost, effectiveness and quality with a less hazardous substance.
- Consideration will also be given to ensure that where practicable substances which are hazardous to the environment will also be replaced by less hazardous chemicals when available.
- Equipment and machines will be compared not only by price but also on features including ergonomics, noise, vibration, usability, suitability for the task, adequate guarding and ease of maintenance and inherent hazards.
- Choice of Personal Protective Equipment will not be limited to cost but assessed on quality and suitability for the protection it is to afford the wearer, it will also be compatible with other PPE and comply with standards.
- Office furniture and equipment will be purchased after consideration has been given to: Ergonomics, fire rating, sustainable resources etc.

REFUSAL TO WORK ON SAFETY REASONS

T.W Betts Flooring Limited are committed to providing safe systems of work for all our employees whilst carrying out their activities and undertakings and do not expect any member of Employees to work in an unsafe manner.

Full consideration will be given to the situation whereby a member of Employees refuses to work on safety reasons.

Our Employees possess confidence in their ability to question the safety of working arrangements without fear of victimisation, in the knowledge that points they raise will be given serious consideration. If any member of our Employees has reason to believe that the task they are required to undertake or have already commenced, will endanger either themselves or others, they are required to cease work and report the matter to their immediate Supervisor.

The Supervisor after consulting with Steve Barber and any relevant rules and instructions as necessary must decide whether grounds for refusal to work are justified. He will then consult with the working group and the system of work will either be confirmed or changes agreed after considering all circumstances.

All cases of refusal to work are logged at the relevant site office for inspection by management, and will be made available to the client if requested. Steve Barber is responsible for reviewing all cases of refusal to work and instigating any follow up action. Follow up action may involve consultation with our Health and Safety Consultants.

RISK ASSESSMENTS / METHOD STATEMENTS

The company will ensure that competent persons carry out on-going risk assessments for operations that may harm employees or third parties. Suitable controls will be implemented to eliminate risk, or reduce it to an acceptable level, in accordance with The Management of Health and Safety at Work (Amendment) Regulations 2006 and other relevant Regulations. The risks and controls to be implemented will be communicated to all staff to enable them to undertake their work safely. This procedure will be continuous and assessments will be updated as required by situations or statutory requirements.

T.W Betts Flooring Limited recognise that the workplace, tasks and personnel will vary from time to time e.g. we may purchase new equipment, the working environment may change, we may employ new staff or new procedures could lead to new hazards. T.W Betts Flooring Limited are committed therefore, to review what we are doing on an ongoing basis particularly when there are any changes. Every year, we will formally review risk assessments to ensure that controls are suitable and that we improve controls and do not overlook their implementation. Employees are encouraged to bring to the attention of Steve Barber any improvements that they feel may reduce or eliminate risk. However, Employees must never make changes to the safe system of work prior to notifying the Supervisor.

Employees will ensure that they are familiar with Method Statements and Risk Assessments before commencing their activities and that they are competent to undertake the work. All Employees will be supervised by the Supervisor to ensure that the risk assessments are being adhered to and that assessments are a true reflection of the risks. The Supervisor will always be present in situations whereby a Method Statement is to be followed to ensure the safe system of work is not deviated from. Should the assessments not be of an adequate quality, the Supervisor is in a position to insist to Upper Management that reviews of the assessments are required. When used, generic risk assessments will be checked to ensure their complete relevance at each work site prior to the works being undertaken.

Risk management using risk assessments will be the basis of the Company's objective of achieving safe working places. T.W Betts Flooring Limited will use the 'Five Steps to Risk Assessment' in order to manage risk and develop safe systems of work:

Five Steps to Risk Assessment:

- Step 1 Identify the hazards
- Step 2 Decide who might be harmed and how
- Step 3 Evaluate the risks and decide on precautions
- Step 4 Record your findings and implement them
- Step 5 Review your assessment and update if necessary

The following definitions will be used in this process:

Hazard – Any situation (e.g. chemicals, electricity, working from ladders etc.) that has potential to cause damage or injury.

Risk – Likelihood (or chance) that somebody could be harmed.

Severity – An estimation of how serious the potential problem might be in terms of harm to people and/or damage to property.

Severity of Harm x Likelihood of Occurrence = Risk Rating

When determining controls or considering changes to existing controls, consideration shall be given to reducing the risk according to the hierarchy in BS OHSAS 18001:2007. Namely:

- Elimination
- Substitution;
- Engineering controls;
- Signage/warnings and/or administration controls;
- Personal Protective Equipment.

SAFETY INSPECTIONS

Random inspections of work sites may be undertaken with results recorded to ascertain that all activities are undertaken in a controlled safe manner and with due regard for statutory obligations and Approved Codes of Practice.

Our independent safety Consultants M.E.L. (Health and Safety) Consultants Limited may on occasion be called upon to undertake independent inspections to cross-reference with those undertaken by T.W Betts Flooring Limited. If at any time a Health and Safety Audit is deemed to be required this will be undertaken by M.E.L. (Health and Safety) Consultants Limited at the request of Steve Barber.

Sub-Contractor's safety arrangements will also be vetted to ensure that they are working competently in accordance with the company Health and Safety requirements, their method statements and to current legislation.

SAFETY RULES

In the interests of safety and in order to ensure that the safest systems of work are used at all work places rules will be outlined during induction. Safety rules on site will be specific to individual projects in order to ensure that hazards are eliminated and risks reduced.

Employees breaching health and safety rules will be disciplined in the first instance with further breaches resulting in dismissal. Safety rules will be displayed on the notice board or in a prominent position at all places of work.

SUPPLIERS

The following paragraph may be inserted on all orders to suppliers or hire companies providing any article or substance for use at work.

“In accordance with Section 6 of the Health and Safety at Work etc. Act 1974 we would be pleased to receive your confirmation that the article or substance to be supplied is safe and without risk to health when properly used. Also, in accordance with the above, please supply details of any tests of examinations carried out and full instructions for the safe use of the article or substance e.g. safety data sheets. Reference should also be made to the Provision and Use of Work Equipment Regulations 1998.”

All information received from suppliers will be passed to the Supervisor for implementation and reference by operatives.

The company will maintain assessment procedures in order to ascertain the training needs for the Employees allocated to use new work equipment introduced.

TRAINING

Safety training is regarded as an indispensable ingredient of an effective Health and Safety programme. It is essential that all persons are trained to perform their task effectively and safely. It is the opinion of Steve Barber that a task, if not undertaken safely, is not performed correctly.

All Employees will be trained in safe working practices and procedures prior to working on site. Where Employees are required to carry out key tasks they will be provided with the necessary training.

Contractors will need to demonstrate that their Employees, where required, have the necessary training and proof of competency.

All Employees are to be trained in accordance with the Management of Health and Safety at Work (Amendment) Regulations 2006.

The Company will provide adequate Health and Safety training:

- On recruitment and when exposed to new or changed risks;
- On site, in the form of Tool Box talks that will cover all aspects of Safe Site Working Procedures and specific Contract requirements;
- On going with regards to appropriate refresher training.

The Company undertakes to provide Induction Training for general education and additional training for specific jobs as they occur and any additional specialised courses or Employee training as is appropriate and necessary for the requirements of their duties. All training deemed to be beneficial to Employees will be provided and paid for by T.W Betts Flooring Limited in the interests of Employee Health and Safety. Training will be mandatory with records of training being kept within the main office.

The Company has a firm commitment to the training of its Employees in matters relating to Health, Safety and Welfare. The objective of these is to ensure that the obligations of the Company in these matters are fully complied with.

Training and improvement in the understanding and application of Health, Safety and Welfare matters is seen as a continuous process. There is no defined training agenda but rather a flexible approach whereby training is provided in whatever areas are required by individual Employees.

Training is provided in both a formal and informal manner and all Employees are encouraged to positively identify any areas where they feel they require training or retraining in Health and Safety matters.

On-site training will be provided in the form of induction courses and toolbox talks. This instruction will, where necessary, include familiarisation with the place of work e.g. welfare facilities, provision of and explanation of any information contained in risk assessments or method statements and it will also deal with the use of any personal protective equipment together with instructions on maintenance of the equipment.

The Company has a firm commitment to the training of its Employees in matters relating to absolute competency, Health, Safety and Welfare. The objective of this is to ensure that the obligations of the company in these matters are not only fully complied with but are exceeded in order that locations of works are as safe as is reasonably practicable.

VIOLENCE TO EMPLOYEES

The Company will assess the risks and evaluate the work and the work places of the Employees to identify possible "at risk" Employees and to implement effective procedures and precautions to protect them from possible violence whilst at work.

Employees will be trained in any specific procedures required and will familiarise themselves with all arrangements outlined by clients to reduce the possible risk of violence and follow them as appropriate to each situation where violence may occur.

Where there are known risks, a preventative strategy will be invoked before undertaking any work, these will differ in each case, the Supervisor and operatives will agree on how to handle the situation and use appropriate safeguards.

Where there is any suspicion that violence may occur, the operatives will contact a Supervisor and seek assistance before undertaking any work or compromising their position. All violence or abuse towards Employees i.e. verbal or physical intimidation, threat or assault by a member of the public, in circumstances arising out of or in the course of their employment, will be investigated by the Company and, if appropriate, reported to the Police and local authorities.

WELFARE FACILITIES AND SITE ACCOMMODATION

Projects undertaken differ in their duration from very short term to long duration with the Principal Contractor supplying all welfare facilities. On larger projects any site accommodation and temporary buildings required by T.W Betts Flooring Limited will be agreed with the Principal Contractor before being placed on site.

Welfare arrangements will be provided by the Principal Contractor or T.W Betts Flooring Limited as agreed in the contract document, or as required by The Construction (Design and Management) Regulations 2015. Facilities will include the provision of shelter, toilets and washing facilities and will comply with The Construction (Design and Management) Regulations 2015 as an absolute minimum. Fire extinguishers of an agreed type (i.e. AFFF, water, dry powder or carbon dioxide) will be provided and maintained in any welfare provided.

They will be positioned in an appropriate location and be kept free of obstruction and available for use at all times. At each site, there will be facilities readily available for summoning assistance from the emergency services (i.e. telephone or mobile phone) and for raising the alarm and administering First Aid.

Welfare facilities provided within the Head Office will meet the requirements of The Workplace (Health, Safety and Welfare) Regulations 1992, as a minimum, with the aim of exceeding these requirements. The Managing Director will be responsible for ensuring that the welfare is maintained in good order.

WORK EQUIPMENT

In the first instance, consideration will be given by T.W Betts Flooring Limited to purchase tools and equipment that is low risk i.e. that the hazardous nature of equipment is considered together with cost e.g. the purchase of tools that produce less noise and vibration. The company will then ensure that work equipment is maintained in an efficient state, in working order and in good repair. Where the equipment has a maintenance log, this log will be kept up to date. T.W Betts Flooring Limited will provide work equipment that complies with the statutory provisions contained within the Provision and Use of Work Equipment Regulations 1998 and the work equipment will be fit for purpose and only used for the job it is designed to do.

Prior to using work equipment within the workplace, it shall be visually inspected to ensure that guards are fitted as required and that it is safe and suitable for the purpose for which it is to be used. T.W Betts Flooring Limited will provide adequate supervision, information, training and instruction to ensure that there is compliance with any safety procedures or risk assessments.

Employees must report any faults, damage, defects or malfunctions in work equipment to their Supervisor without delay. Employees are never to use defective equipment or equipment that has guards missing. Defective equipment is to be taken out of use and identified as awaiting repair. Only use tools and equipment if you are competent and trained in its use and inspect the equipment thoroughly before you use it. Never use tools or work equipment to undertake a job that it is not intended to do and do not misuse them e.g. applying pressure or not changing blunt blades. All repairs that are required need to be undertaken by a competent person and Employees must not undertake makeshift repairs themselves.

The company has a duty to maintain its tools and work equipment to avoid risks to Health and Safety. Plant will be inspected by the user but when used regularly a weekly register will be kept of a formal inspection. This inspection may be undertaken when a piece of equipment is used if it is not used regularly and remains in the store unused between jobs.

To ensure safety in the use of tools and equipment T.W Betts Flooring Limited will provide adequate supervision, information, training and instruction and safety procedures. Safe systems of work will be developed in the form of risk assessments that will identify risk and hazards and the controls required to eliminate the risk or reduce it to an acceptable level. Personal Protective Equipment will only be used as a last resort but when it is indicated, as required due to signage on the equipment or as a result of the risk assessment, it is mandatory that it is worn. In situations where PPE is required ensure that you give consideration to third parties in your work area at all times as they too may be affected by the hazards e.g. noise, dust, ejected materials etc.

WORKING IN OCCUPIED PREMISES

Where the Company is involved with work in occupied premises care will be taken for the Health and safety of the occupier whilst the work is in progress. T.W Betts Flooring Limited will operate within the conditions of the Client's Contract and liaise with the Occupier and advise them on the work to be carried out and an approximate time scale for the contracted works.

Any additional works found during the process may affect the project; these will be discussed with the Client and Occupier. Company Operatives will wear any security / ID card required by the Client.

The Operatives will be competent to undertake all tasks required in an occupied property and will adopt all emergency procedures put in place by the Client or Occupier.

During the work the Operatives should not leave any materials or debris where it could be a trip hazard. All reasonable precautions will be taken to obviate the impact when carrying out dusty and noisy operations at all times they will be carried out with care and consideration.

The operatives will ensure that the property is left tidy and the waste materials are cleared regularly during the works, to reduce the risks of injury to the occupier and the general public. All barriers and screens will be utilised and occupants made aware of any changes to hazardous areas throughout the working day.

Particular emphasis will be placed upon:

- Fire evacuation routes;
- The position and location of firefighting equipment;
- Emergency evacuation procedures;
- Special circumstances relating to the personnel working within or visiting the premises;
- Safety plans specific to the building or any part of the building;
- Maintaining fire compartmentalisation standards;
- Any special requirements in relation to the overall project works or any part of the work;
- Permit to work conditions.

YOUNG PERSONS

When the Company employs people not having attained the age of 18, it will complete explicit risk assessments in respect of the young workers. The assessments will address the specific factors identified for the safety of the young persons and the other workers who may be affected by the work of the young persons. The company will inform the young person of the risk assessments, and the control measures to be used to provide a safe working environment as required by the Management of Health and Safety at Work (Amendment) Regulations 2006.

The Company will provide the appropriate supervision to ensure that the young person's undertake their tasks safely, are not exposed to any risk that may affect their Health, Safety or Welfare at any time.

CHILDREN

In the event than a child (not having attained school leaving age) is employed by T.W Betts Flooring Limited, the Company will inform the parents or legal guardians of the risk assessments and the control measures to be used to provide a safe working environment as required by the Management of Health and Safety at Work (Amendment) Regulations 2006.

The working hours and times of work will be in accordance with the Children and Young Persons Act 2008 and the Children (Protection at Work) Regulations 2000.

The Company will provide the appropriate supervision to ensure that the young persons and children undertake their tasks safely.

No child will be permitted to undertake any work unless they are directly supervised by a fully competent person.

MONITORING OF THE POLICY

Employees are encouraged to bring to the attention of Steve Barber areas, which in their opinion this policy appears inadequate. All such comments will be passed to our Independent Safety Advisors for their consideration and review.

This Policy and Arrangements will be reviewed on at least an annual basis, provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

HEALTH AND SAFETY POLICY DOCUMENTATION REVIEW			
To ensure that we comply with the requirements imposed by the Health and Safety at Work etc. Act 1974, This Policy and Arrangements will be reviewed on at least an annual basis, provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.			
DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	NEXT REVIEW DATE
September 2011	M.E.L (Health & Safety) Consultants Ltd	Sections Amended; Enforcement, Asbestos, CDM, COSHH, Electrical Work Equipment, Environmental Considerations, Fire Safety, Mobile Phones, Noise Safety, Plant & Equipment Maintenance, Safety Inspections and Audits, Training, Young Persons.	September 2012
December 2012	M.E.L (Health & Safety) Consultants Ltd	Sections updated in line with legislation or current good practice: Enforcement, Accident/Incident Investigation, Accident Procedure and RIDDOR, Alcohol, Drugs and Smoking Policy, Asbestos – Dealing with Unidentified Materials, CDM for Contractors, CDM for Principal Contractors, Control of Hazardous Substances, Risk Management Section Added: Asbestos – Duty to Manage	December 2013
December 2013	M.E.L (Health & Safety) Consultants Ltd	Sections Updated: Responsibilities of the Health and Safety Consultants Accident / Incident Investigation Accident Procedure and RIDDOR Asbestos – Dealing with Unidentified Materials Consultation with Employees and Contractors Fire Safety Welfare Facilities and Site Accommodation Sections Added: Safe Use of Knives	December 2014
October 2014	M.E.L (Health & Safety) Consultants Ltd	Section Amended: Communication, Documentation, Emergency Procedures, Insurance, Risk Assessments. Sections Added: Migrant Workers, Monitoring of Performance.	October 2015

DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	NEXT REVIEW DATE
December 2015	M.E.L (Health & Safety) Consultants Ltd	<p>Sections Amended: Employees Responsibility, Enforcement, CDM Contractors Duties, Complaints Procedure, Contractors, Data Protection and Record Keeping, Electrical Work Equipment, Monitoring of Performance, Principles of Prevention, Welfare Facilities and Site Accommodation, Co-operation and Care (replaced with Co-operation and Co-ordination).</p> <p>Section Removed: CDM Principle Contractor Duties.</p> <p>Section Added: Display of Statutory Information and Musculoskeletal Injuries.</p>	December 2016
December 2016	M.E.L (Health & Safety) Consultants Ltd	<p>Sections Amended: Enforcement, Corporate Manslaughter and Corporate Homicide Act 2007, Work Equipment and Children.</p> <p>Sections Added: Bullying / Harrassment and Face Fit Testing.</p>	