



SAFETY MANAGEMENT SYSTEM ISSUE 14

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Contents

TERMINOLOGY AND DEFINITIONS	4
SECTION 1 PREFACE	5
SECTION 2 PRINCIPLES OF LAKESMERE'S SAFETY MANAGEMENT SYSTEM	6
SECTION 3 POLICY	7
3.1 Health and Safety Policy Statement	8
SECTION 4 ORGANISATION	9
4.1 General Responsibilities for Managing Health & Safety	10
4.1.1 Directors and Management	10
4.1.2 Duties of Personnel controlling Lakesmere operations	10
4.1.3 Technical Manager / Design Managers	10
4.1.4 General Duties of Employees	11
4.2 Independent Health & Safety Consultants	11
4.3 Training & Competence	11
4.3.1 Training Records	12
4.3.2 Induction Training	12
4.3.3 Modular Training (Toolbox Talks)	12
4.4 Communication of Information	13
4.4.1 Essential Information & Feedback	13
4.4.2 Site Safety Handbook	13
4.4.3 Notice Boards	13
4.4.4 Formal Communications	13
4.4.5 National Health & Safety Conference	14
4.4.6 Regional Health & Safety Meetings	14
4.5 Effective Management and Control	15
4.6 Consultation with Employees/Refusal to work (Work Safe)	15
4.7 Liaison with the Other Employers	16
4.8 Selection, Control & Coordination of Subcontractors.	16
4.9 Agencies	16
4.10 English Language	17
SECTION 5 PLANNING & IMPLEMENTATION	18
5.1 Performance Standards	19
5.2 Lakesmere's Project Plan	19
5.3 Method Statements	19
5.3.1 Task Specific Action Plan(TSAP) (Addendum to Method Statement)	19
5.4 Risk Assessment	20
5.4.1 Risk Assessment Library	20
5.5 Preventing Falls	20
5.6 Work Equipment	20
5.6.1 Fall arrest netting and ancillary fall prevention equipment	21
5.6.1.1 Handover Inspection (Scaffolding & Safety Nets)	21
5.6.2 Mobile Plant & Vehicles	21
5.6.2.1 Mobile Elevating Work Platforms (MEWP's)	21
5.6.2.2 Mobile Access Towers	21
5.6.2.3 Mast Climbers	22
5.6.2.4 Telehandlers / Fork Lift Trucks	22
5.6.4 Ladders	22
5.6.5 Lifting Operations & Lifting Equipment	23
5.6.6 Portable Electrical Equipment	23

5.6.7	Machinery Guarding	23
5.6.8	Abrasive Wheels & Disc Cutters	24
5.6.9	Cartridge-Operated Tools	25
5.6.9	Company Vehicles	25
5.7	Occupational Health	26
5.7.1	Manual Handling	26
5.7.2	Hazardous Substances	26
5.7.3	Asbestos	26
5.7.4	Noise	26
5.7.5	Vibration	26
5.7.6	Health Screening	27
5.8	Overhead Powerlines & Underground Services	27
5.9	Protection of the Public and others	27
5.10	Personal Protective Equipment	27
5.11	First Aid & Emergency Arrangements	27
5.12	Welfare Facilities	28
5.13	Housekeeping	28
5.14	Smoking at Work	28
	See: separate Lakesmere's Smoking Policy.	28
5.15	Substance Abuse at Work	28
5.16	Young Persons at Work	28
5.17	Dealing with the Enforcing Authorities	29
5.18	Work on or near the railway	29
5.19	Confined Spaces	29
5.20	Office Safety	29
5.20.1	Display Screen Equipment User & Operator	29
5.20.2	Eye Tests & Corrective Devices	30
5.21	Document Control	30
5.22	Records Management	30
5.22.1	Accident Books / Accident Records	30
5.23	Variation Management	31
SECTION 6	MEASURING PERFORMANCE	32
6.1	Reactive Monitoring	33
6.1.1	Accident Reporting & Investigation	33
6.1.2	Level of Accident Investigation	33
6.1.3	Near Miss & Hazard Reporting	33
6.1.4	Accident Records, Classification & Statistics	34
6.2	Proactive Monitoring	34
6.2.1	Site Management Monitoring	34
6.2.2	Inspections & Audits	34
6.3	KPI's	34
6.4	Accident Statistics	34
SECTION 7	REVIEWING PERFORMANCE	36
7.1	Review Meetings	37
7.2	Operation's Management Meeting (OMM)	37
7.3	Management Review	37
7.4	Interim Review	37
7.5	Post Contract Review	37
7.6	CDM Review	37
SECTION 8	AUDITING	38
8	Auditing	39
8.1	Internal Audits	39

Terminology and Definitions

Accident

Undesired event giving rise to death, ill health, injury, damage or other loss involving any site worker (whether an employee of Lakesmere or not), visitors to the site and to the general public, which involved our operations.

Audit

Systematic examination to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable for achieving the Lakesmere's Health & Safety Policy and objectives

Continual Improvement

Process of enhancing the Health & Safety management system, to achieve improvements in overall occupational health and safety performances, in line with the policy.

NOTE the process will not take place in all areas of activity simultaneously.

Dangerous Occurrence

Are potentially dangerous events and are specified in schedule 2 to the RIDDOR Regulations. They include such events as the accidental ignition of explosives and the collapse of certain types of lifting equipment. Although they may not actually cause an injury, they are still reportable.

Hazard

Source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the workplace environment, or a combination of these

Hazard Identification

Process of recognizing that a hazard exists and defining its characteristics

Incident

Event that gave rise to an accident or had the potential to lead to an accident

NOTE An incident where no ill health, injury, damage, or other loss occurs is also referred to as a "near-miss". The term "incident" includes "near-misses".

Incident Investigation

Process of incident review conducted at management level to identify incident contributory factors in support of corrective actions.

Interested parties

An individual or group concerned with or affected by the performance of Lakesmere.

Non-conformance

Any deviation from work standards, practices, procedures, regulations, manage performance etc. that could either directly or indirectly lead to injury or illness damage, damage to the workplace environment, or a combination of these.

Occupational health and safety

Conditions and factors that affect the well-being of employees, temporary workers, contractor personnel, visitors, any other person in the workplace and members of the public.

Risk

Combination of the likelihood and consequence of a specified hazardous event occurring

Risk assessment

Overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable

Safety

Freedom from unacceptable risk of harm

Site Management

Contracts Managers usually are responsibly for a number of contracts, while Project Managers are usually responsible for one. These are assisted by a non-working resident Site Manager and possibly Site Supervisor or Assistant Site Manager.

Three Day Injury

An accident that results in the injured party remaining incapacitated for work for three days or more. This does not include the day of the accident.

Tolerable Risk

Risk that has been reduced to a level that can be endured by Lakesmere having regard to its legal obligations and its own Health & Safety policy

Section 1 Preface

This Health & Safety Policy and Safety Management System has been prepared to comply with the statutory requirements of Section 2(3) of the Health and Safety at Work Act 1974. Contained within this document are Lakesmere's **policy, organisation and arrangements** for occupational health, safety and welfare, for all our business activities.

Safety is paramount and achieving good health and safety performance is recognised as being consistent with overall successful business performance. We also recognise that failure to integrate health and safety into our operations will result in harm both to people and the Company. Therefore we take an integrated approach where managing health and safety forms part of the overall business strategy.

Only the electronic copy is classified as controlled – all hard copies must be viewed as “Uncontrolled”.

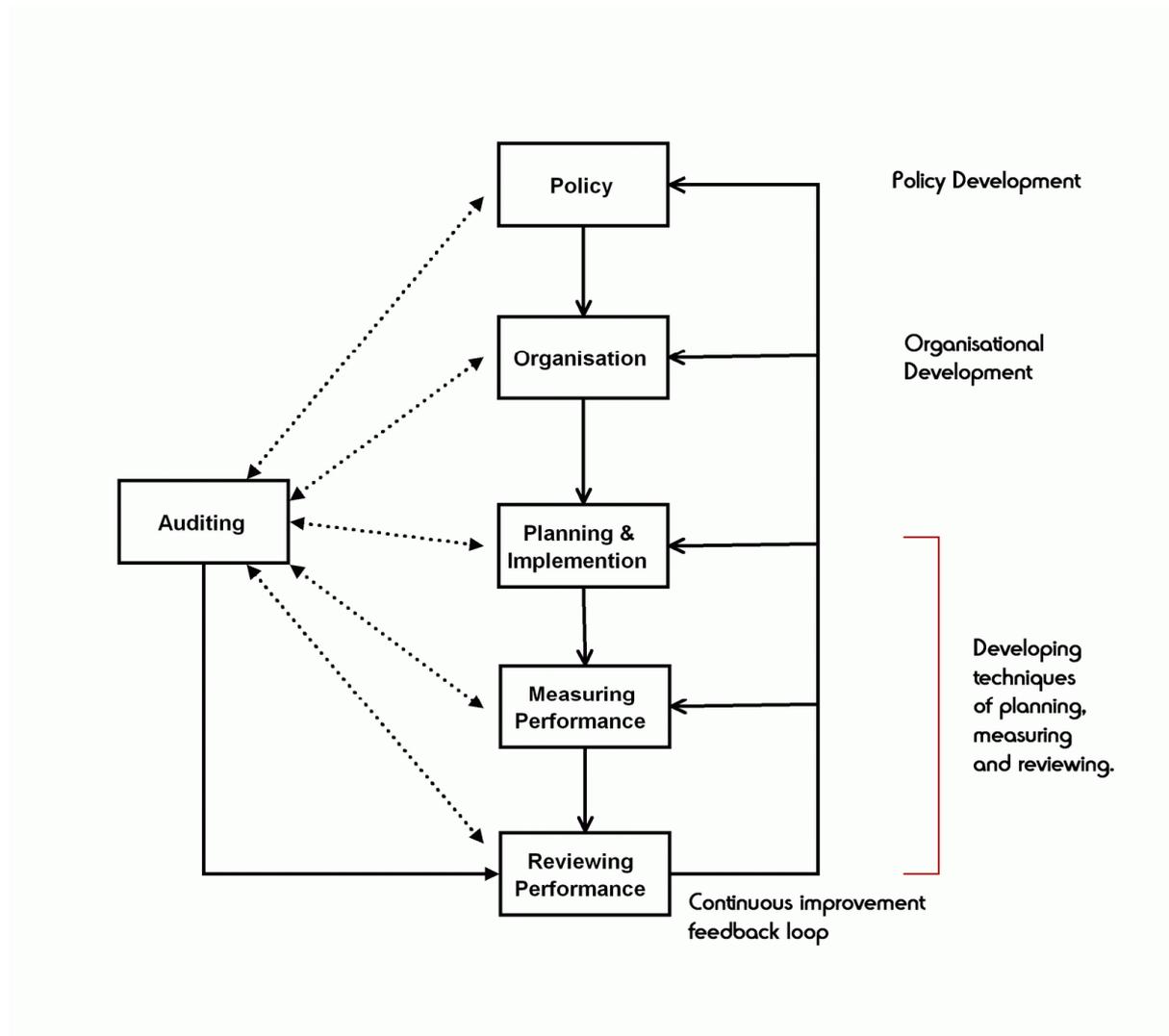
Users must check the revision number and date with the electronic version to ensure the hard copy is not obsolete.

Section 2 Principles of Lakesmere’s Safety Management System

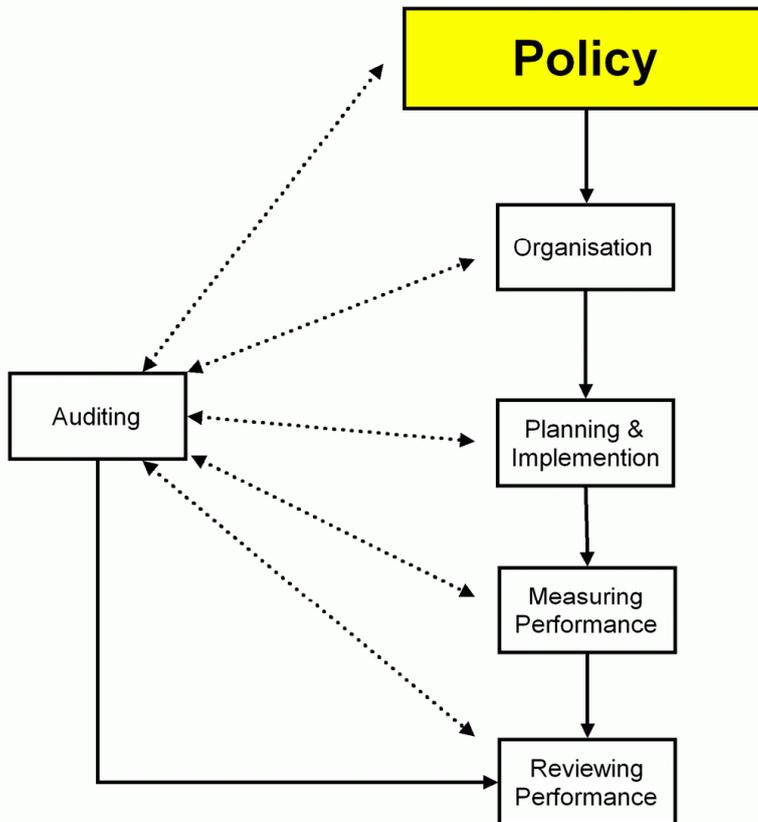
The company operates a Safety Management System (SMS) modelled upon a process of ‘Continuous Improvement’, and based upon the Management of Health and Safety at Work Regulations 1999, and its Approved Code of Practice and an interpretation of the Health and Safety Executive’s publication HSG65 - ‘Successful Health and Safety Management’.

The key elements of the SMS are outlined in the following illustration and notes:

Key Elements of Lakesmere’s Safety Management System



Section 3 Policy



Written policies and the policy decision making process of the organisation are covered in this element of the Safety Management System. These include the selection of personnel; the design and operation of safe working systems; and the selection, design and installation of the building envelope products.

This document is the written policy of Lakesmere creating a foundation for the SMS and to fulfil Lakesmere’s responsibility to its employees and others both by the spirit and letter of the law. Lakesmere recognise that to be successful in achieving the high standards of health and safety performances that we aspire to, we need an effective health and safety policy, which contributes to the overall business performance

3.1 Health and Safety Policy Statement

The objective of the Company Policy is to provide and maintain safe and healthy working conditions, equipment and systems of work for all employees and to provide such information, training and supervision necessary to reduce risk to manageable levels. The company will adopt reasonable and practical measures to protect the health and safety of others which may be exposed to business activities.

There is a commitment to provide the necessary resources both physically and financially to enable employees and supply chain partners to discharge their duties in respect of health and safety which may arise at their place of work or as a result of their work activities.

This is achieved through the adoption of a Health & Safety Management System, the primary objectives of which are:

1. To achieve and maintain a level of Health & Safety which enhances the Company's reputation within the construction industry
2. To ensure compliance with relevant statutory health & safety requirements in services provided by Lakesmere
3. To be proactive in preventive measures.
4. To plan and manage continual improvement of the Health & Safety issues, through the use of objectives, audits, analysis of data and supplier and client feedback.

Top Management will hold regular meetings to review the Health & Safety Management System, the objectives and the Key Performance Indicators used within Lakesmere.

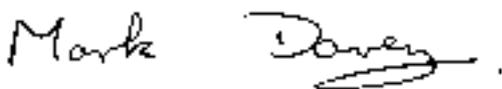
The Company employs a dedicated Health, Safety, Environment & Quality(SHEQ) Manager who holds the authority of the Managing Director on H&S matters and coordinates the internal support team for the business needs.

All employees are required to take an active part in the implementation of this policy during the execution of their duties. Any employee who wilfully contravenes a Company rule or legal requirement concerning health and safety or who fails to take reasonable measures to protect the health and safety of themselves and others may be liable to disciplinary action.

This policy is explained to each new employee by the Departmental Manager or the SHEQ Manager.

All sub-contractors and self-employed persons contracted by the Company are bound by all current legislation and the Company Safety Policy.

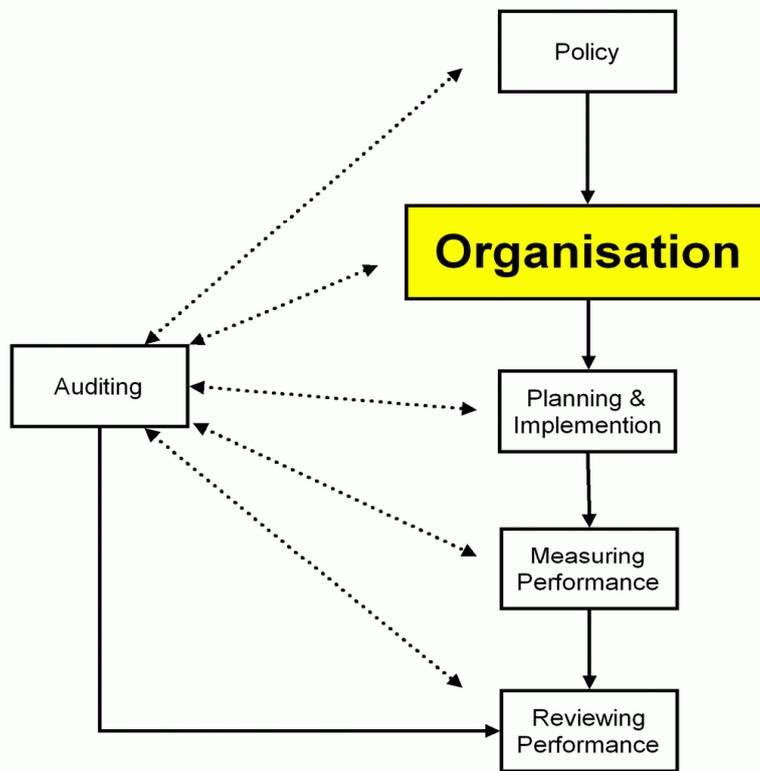
Dated: 13th January 2014



Mark Davey
Managing Director

[Note: signed copies on Lakesmere headed paper available on request]

Section 4 Organisation



Organising for safety means:

Control:

Managers taking full control of health and safety as a line management responsibility. Health and safety integrated into all day to day activities. Ensuring that acceptable performance standards are achieved through effective supervision.

Co-operation/Consultation:

Involvement and participation by individuals so that health and safety becomes a collaborative effort. Soliciting the opinion of the workforce in health, safety & welfare issues.

Communication:

The written, verbal and visible communication of health and safety standards. The visible and active leadership of Managers is necessary to develop and maintain a culture supportive of health and safety management. The aim is not simply to avoid accidents, but to motivate and empower people to work safely. So that the visions, values and beliefs of the board of directors become shared 'Common Knowledge' of every employee.

Competence:

Line-managers shall be competent to manage safety. Lakesmere shall ensure that acceptable competency levels are identified and fulfilled so that everyone can make the maximum contribution to health and safety.

4.1 General Responsibilities for Managing Health & Safety

This section covers the basic general responsibilities for managing occupational health and safety at Lakesmere. Other documents that also contain specific responsibilities for health and safety include: -

- Safety Procedures
- Work Instructions
- Job Descriptions
- Method Statements and Risk Assessments.

4.1.1 Directors and Management

The Board of Directors have ultimate responsibility for health, safety and welfare within the Lakesmere Group of companies.

The Director with prime responsibility is Mark Davey, the Group Managing Director. He is responsible to ensure the policy is brought to the attention of all management, employees and sub-contractors/suppliers and ensuring compliance through monitoring arrangements.

This Policy is a live document, which needs to be reviewed on an on-going basis to ensure that it remains current with the Company's activities and changing legislation. It is the responsibility of the Board of Directors, with the assistance of the Group SHEQ Manager, to assess the implications of new legislation and best practice, investigation reports and site inspections for the Company and to amend the Policy as necessary. As a minimum the policy will be re-issued on a bi-annual basis.

Throughout the organisation, the visible and active leadership of Senior Managers, through to Site Supervisors is necessary to develop and maintain a culture supportive of health and safety management. This is delivered through the principals of 'Behavioural Safety' (Incident & Injury Free – IIF (LIFFe)) and supports the majority of client objectives.

Line Managers have direct control and responsibility for health and safety management within their sphere of operation, for securing compliance with this Policy and Safety Management System.

4.1.2 Duties of Personnel controlling Lakesmere operations

All supervisors shall ensure that before allocating any work to be undertaken that due consideration (risk assessment) has been given to, the risk of injury or loss involved, the control measures required, communication of instructions, the work equipment provided and the necessary competence of the employees involved, as required by this SMS. They must co-operate and assist Senior Management in securing compliance with this Policy and Safety Management System.

4.1.3 Technical Manager / Design Managers

Have overall control and responsibility for the Design Teams with the requirement to manage Designers in according with our obligations under the Construction (Design and Management) Regulations 2007(CDM).

Ensuring that all designers are trained in the necessary requirements of CDM.

Liaising with the Clients' representative over design matters, with particular attention to CDM requirements and additional hazards/risks identified. Advising the client of their responsibilities under Construction Design and Management regulations.

4.1.4 General Duties of Employees

All persons at work carry individual responsibilities and these are outlined in the Health and Safety at Work etc. Act 1974, as follows: -

- To take reasonable care of themselves and others who may be affected by their acts or omissions.
- To co-operate with the employer so far as is necessary to enable the employer to comply with his statutory duties.
- Not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.

The Company requires the full support of all employees and subcontractors to have effective accident prevention.

4.1.5 Group SHEQ Manager

The GSHEQM reports to the board of directors and holds the authority of the Managing Director on H&S issues across the business.

It is the duty of the GSHEQM to maintain the business system for safety (SMS) in line with the business objectives and recognised standards i.e. BS OHSAS 18001/GS65

In addition the GSHEQM shall ensure that:

- a. All incidents, accidents and near misses/hits are reviewed at the appropriate level inline with investigation processes.
- b. The board of directors are informed of any changes to legislation or industry standards effecting the business operations.
- c. The business SMS is reviewed, up-dated and communicated in line with business objectives and any other events that effect the operations of the business
- d. That both skills and H&S training are maintained within the business and provide the necessary support to the HR/Learning and Development teams to achieve this.
- e. The necessary business monitoring, auditing and pre-emptive operations are undertaken and provide the board of directors with regular reporting on both national & regional basis.
- f. Liaise with all necessary enforcing and supporting bodies in respect to business activities.

4.2 Independent Health & Safety Consultants

Lakesmere retains the services of an independent consultant who may be called upon to support the needs of the business as required. These consultants shall be qualified under the national register scheme.

4.3 Training & Competence

Lakesmere recognise its general duty to employees under section 2(2)c of the Health and Safety at Work Act 1974, to provide all necessary information, instruction, training and supervision. To this ends the company Learning and Development team continuously assesses the competency level of all employees and where applicable sub-contractors.

Periodically, we carry out an organisational training needs analysis of all activities to establish acceptable competency levels and identify any training requirements. Following this analysis training programmes are developed to fulfil those competency levels. Training needs analysis is a form of risk assessment, although the normal task risk assessment process shall identify specific training requirements.

Training for competence at Lakesmere is divided into five main categories: -

1. **Induction training** for all new starters
2. Induction Training at the start of **each new project**
3. **Skill training** for management and trade competence
4. **Health and safety training**
5. **Modular training** in the form of toolbox talks and task specific briefings

4.3.1 Training Records

Each Learning and Development/Regional Administration teams shall maintain training records in the personnel files with copies of certification.

The IMS (Information Management System) holds the training and skills matrix and shall be maintained as a quick reference guide when allocating duties to individuals and as a means of monitoring validation periods, to ensure refreshers are undertaken.

4.3.2 Induction Training

Every new employee shall receive induction training, before commencing work, which includes health and safety, to ensure that they are not exposed to unfamiliar hazards. An induction training package is maintained by the HR team to ensure that all essential information is covered. A record of induction shall be kept, signed by the inductee as an acknowledgement that they have understood the content.

At the start of each new project all employees and subcontractors will receive induction training to discuss the Method Statement and the risk assessments that are unique to that particular contract. All in attendance will sign the training record LCL/150 as conformation of the training received.

The induction is recognised as an opportunity to convey the management beliefs and company values for health and safety management and to help influence the attitudes of all new starters.

4.3.3 Modular Training (Toolbox Talks)

Modular training in the form of toolbox talks is used to help increase and maintain general levels of health and safety awareness. Each Site Manager shall establish their own frequency of toolbox talks, as necessary (e.g. weekly, fortnightly). However, as a minimum every operative shall receive at least one toolbox talk per calendar month, covering a specific topic related to the project and or business safety bulletins..

The instructor will complete the Toolbox Talk Record, quoting the date and time the topic(s) of the talk and listing the attendees who will sign the record as evidence of their attendance. Records shall be sent to the Learning and Development/Regional Administration teams and a copy will remain in the site files until the completion of the project.

There is a library of toolbox talks (GE700) from which the instructor may choose the topic to include or he/she may design and deliver additional talks based upon local needs and requirements.

4.4 Communication of Information

4.4.1 Essential Information & Feedback

Business meetings, such as Handover, Team Briefings, Design Reviews, Co-ordination, Induction and Toolbox Talks etc. shall be used to help disseminate essential health and safety information throughout the organisation.

It is important to solicit information from the workforce and receive feedback on health and safety issues. A few moments should be taken during the meeting will give the opportunity to raise and discuss issues.

4.4.2 Site Safety Handbook

Every site operative and labour only subcontractor shall be issued with a copy of the Site Safety Handbook. The handbook is a means of providing each employee with written key health and safety information, including policy, procedures and guidance. The Safety Handbook shall be issued at induction stage. A tear-off slip on inside of the handbook must be completed as acknowledgement of receipt and kept as a record.

For directly employed staff a more comprehensive Staff Handbook will be provided at the start of their employment, this will include Company rules on the use of the Internet, use of e-mail, grievance procedure, holidays and other terms of employment.

The Site Safety Handbook and the Staff Handbook will be reviewed periodically and updated to ensure that it remains current. Following an up-date it must be reissued.

4.4.3 Notice Boards

A notice board(s) for posting health and safety information must be in common areas of the area office and site offices. This information shall include a copy of the statutory Health and Safety Law poster.

4.4.4 Formal Communications

To ensure the effective communication of important information Lakesmere uses the following formal systems: -

- Point of Work Risk Assessments
- Work Instructions
- One to one coaching
- Memorandums & General Notices
- Safety Bulletins
- Team Briefings
- News Letters

Safety Bulletins are a system for communicating up-to-date health and safety information. Important issues, such as accident / incident learning to be shared will be compiled and issued to all employees, as necessary.

Copies of such written information should also be posted on the notice boards. Certain formal communications may require the recipient to sign and return an acknowledgement slip accepting that they have received, read and understood the communication.

4.4.5 National Health & Safety Conference

The GSHEQM shall organise an annual National Health & Safety Conference to include all aspects of the site management.

Representatives from main contractors, the HSE and external Safety Consultants will be invited. The minutes of these conferences will be distributed together with the action plans to those in attendance and to all site management.

4.4.6 Regional Health & Safety Meetings

Regional safety meeting will be organised by the Regional Director/Area Manager at least once a year. The attendees should include site management and Labour-only subcontract team leaders.

4.5 Effective Management and Control

At Lakesmere we have established general principles for effective management to help ensure control of our core operations and compliance with the established performance standards, for all elements of the business, not just health and safety.

The general principles for effective Management are: -

1. Ensure that the requirements of every project is **thoroughly understood** by an intensive handover meeting chaired by the Estimator involved in the project to Contract Management, Designers, Buyers and Quantity Surveyors
2. The Contracts Manager or Project Manager will ensure that suitable and sufficient **risk assessments** are carried out and a project specific method statement is prepared (see section 5.4 Risk Assessment).
3. Ensure the correct **competence** levels of those allocated duties, in relation to the task(s) to be undertaken and the work equipment to be used.
4. Ensure the effective **communication** of the required performance standards and essential information e.g. Control Measures
5. Assign a non-working resident Site Manager to the project to provide the suitable levels of **imposed supervision**.

A line-manager may delegate the performance of a supervisory duty to a subordinate, but they must ensure that they are deemed competent to undertake the particular task

All Contracts Managers, Project Managers and Site Managers will receive the appropriate management training i.e. the CITB 5 day *Site Management Safety Training Scheme*.

4.6 Consultation with Employees/Refusal to work (Work Safe)

The Health and Safety (Consultation with Employees) Regulations 1996 (HSCER) states that where there is no representation by safety representatives under Safety Representatives and Safety Committees Regulations 1977 the employer must consult employees in good time on matters relating to their health and safety at work. Consultation can either be carried out with each employee directly, or via one or more elected representatives of employee safety.

Lakesmere will undertake to consult with its employees via team briefings, fortnightly coordination meetings, TBTs, safety conferences and/or specially convened safety meetings to fully comply with the requirements the HSCER.

WORK SAFE

Each and every employee has the given right to refuse to work where they feel that provisions, controls, resources and environments, under the control of either Lakesmere or their client, do not meet the necessary safety levels to protect either themselves or those effected by their work from harm. (see also Network Rail specific policy for rail environment)

Should an employee feel this is the case they must report the issue(s) immediately to their line management who will investigate and correct the situation within the requirements of the applicable statute(s) pertaining to the operation.

Should a situation go unresolved or not to the satisfaction of the employee they are permitted, without redress, to take the issue up to regional director/manager level where they shall be afforded un-restricted access. In addition access to the business H&S team shall be un-restricted thus allowing senior management involvement to remedy situations/issues in line with business policy, industry practice and legislative statutes.

4.7 Liaison with the Other Employers

Lakesmere recognise its duty under the Management of Health and Safety at Work Regulations 1999, to communicate with other employers using the workplace to ensure information about hazards and control measures is shared. This will enable suitable arrangements to be made.

This information is initially communicated to the Principal Contractor via Lakesmere's Project Plan which includes the method statement, risk assessments, COSHH assessments and manual handling assessments and is submitted to the client for their approval. Additional information will be transmitted to other employers by Lakesmere's Site Manager.

In addition Lakesmere shall be represented at site based coordination/H&S meetings to ensure integration is maintained and risks are understood.

4.8 Selection, Control & Coordination of Subcontractors.

There are two types of subcontractors used by Lakesmere on the majority of our projects:

1. Labour Only Subcontractors (LOS)
2. Supply and Fix Subcontractors (SFS)

When specialist SFS are employed the control of these contractors activities must be strictly covered by the terms of their contract.

A formal approval process is carried out for the assessment of Suppliers, Consultants and Contractors to make reasonable enquiries of the competence and performance standards prior to their appointment. This approval procedure requires all contractors to complete a supplier/sub-contractor questionnaire. Their answers will form the basis of the assessment. The results will be kept on record and the exercise repeated, as necessary.

Following the assessment of the approval questionnaire, a further assessment of the contractor may be required in the form of an audit by the appropriate department within Lakesmere.

The Commercial Manager will supply a copy of LM/166 *Subcontractors H&S Checklist* with each SFS order placed.

LOS will be treated as though they are directly employed by Lakesmere and subject to all the controls required for a quality product, delivered safely and in budget. All LOS will be subject to the Company's monitoring arrangements, to ensure compliance with the relevant policies, procedures etc. ALL LOS operatives must complete the sub-contractor questionnaire form LM142 that shall be returned to the Learning and Development/Regional Administration teams for inclusion on to IMS.

At the end of each project the Site Manager shall complete a confidential report on all subcontractors, consultants and key suppliers used on the project. This report will form part of the input for the Post Contract Review. (See 7.5 Post Contract Review)

See also: Quality Management System for second party audits.

4.9 Agencies

If agencies are used to provide site labour then enquiries shall be made with the agency on how they vet their construction staff and that are registered under the UK Border Agency as necessary.

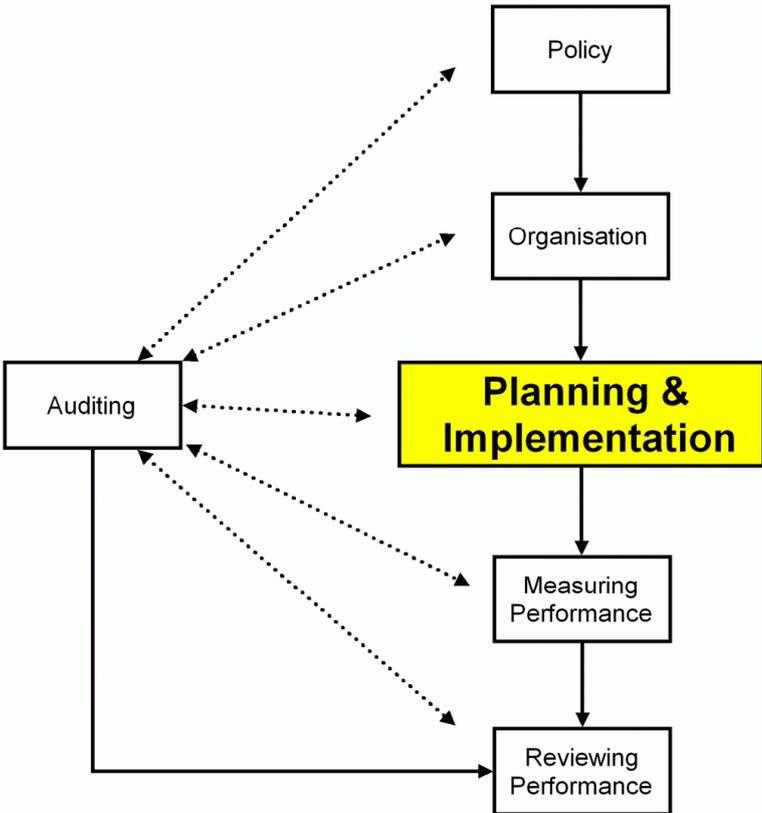
4.10 English Language

English is the language used to convey information and instructions including safety and other operational matters. Personnel who are unable to clearly understand both spoken and written English shall not be allowed access to the site without the express permission of Lakesmere site management.

Where the permission is granted, the sub-contractor/supplier shall ensure that at all times, a translator is available on the site who is capable of instructing the relevant personnel in safety and other operational matters.

The sub-contractor/supplier shall maintain written records countersigned by the translator confirming that he has checked that instructions given by him to the relevant personnel have been clearly understood by each of them. Such records shall include those for safety induction, emergency procedures, safety method statements and safety awareness talks.

Section 5 Planning & Implementation



Establishing performance standards to be measured against. The cornerstones of safety management are the identification of hazards, the assessment of risk, eliminating the risk or establishing and enforcing reasonable practicable control measures to minimise the risk

Appendix B provides an overview of the processes within Lakesmere. The purpose of this flowchart is to solely illustrate the main flow process of a typical design and installation of the building envelope. Please note that it is not comprehensive as it excludes Accounts/ Quantity Surveyors for example.

5.1 Performance Standards

This document details the performance standards for health, safety and welfare that must be adhered to. However a number of these arrangements are expanded upon in other documents such as: -

- Standing Work Instructions
- Guidance Notes
- Handbooks
- Memorandums & Notices

Section 6 identifies the specific performance standards that are used to measure health and safety performance. These measures are known as key performance indicators or KPI's. The KPI's are reviewed at the formal review meetings outlined in Section 7. Senior Management establishes targets for improvement or objectives to be achieved by the organisation or individual employees at the annual appraisals.

5.2 Lakesmere's Project Plan

The Contracts Manager or Project Manager is responsible for preparing Lakesmere's Project Plan that is unique to the contract. The Project Plan is designed to explain in detail how we will deliver a quality product safely to our client.

While not all the contents of the Project Plan are safety orientated it will include various safety elements such as the Method Statement, Risk Assessments, COSHH Assessments, Manual Handling Assessments and any method statements and risk assessments provided by the Supply and Fix Subcontractors to be used on the project.

The approved Project Plan will be discussed with various staff working on the project as a part of the site induction and a copy will be retained on in the site office and be available on request.

5.3 Method Statements

Method Statements are formed from the output of risk assessment and are used generally throughout the construction industry. They are prepared for all our projects.

All method statements should include the following:

- The client's details
- Details of the Project
- Description of the activities to be undertaken
- Specific equipment to be used
- Sequence of events or work method
- Significant hazards identified through the risk assessment
- Specific control measures to be adopted

The method statement, once submitted and approved/reviewed by the client, shall be formally communicated to all employees involved in the operation before commencing work.

5.3.1 Task Specific Action Plan(TSAP) (Addendum to Method Statement)

A TSAP will be prepared by Site Management, following changes to the Project Plan, by discussing and agreeing with the workforce the task shall be carried out in a safe and controlled manner. All operatives will sign the TSAP as an addendum to the method statement. Violations of the agreed plan will be treated as a disciplinary matter.

5.4 Risk Assessment

The identification of hazards, assessment of risk, establishing and enforcing of control measures to eliminate or control risk, are the cornerstones of effective safety management.

The Management of Health and Safety at Work Regulations 1999, Regulation 3, requires employers to make suitable and sufficient assessment of the risks to health and safety and to keep records of the significant findings. The Company has developed risk assessment processes to comply with this statutory requirement using a qualitative technique, which relies upon the judgement of a competent person: the Risk Assessor. The Risk Assessor must be appointed by Management having been deemed competent and received training in the particular techniques used.

The Control of Substances Hazardous to Health Regulations 1999, The Manual Handling Operations Regulations 1992, and other specific regulations operate under risk assessment basis and are subject to further sections within this policy.

5.4.1 Risk Assessment Library

A basic library of Risk Assessments has been prepared for all of the routine operations undertaken by Lakesmere. However they do not take account of the specific environmental conditions at the particular workplace, these are a **guide** only to help the risk assessor create a **specific** risk assessment.

5.5 Preventing Falls

Falls from height are high on the inherent risks within the roofing and cladding industry, therefore, Lakesmere are committed to ensuring that all practicable steps are taken to minimise the risk of all falls from height. In the hierarchy of operation avoidance to working at height will be the first consideration and measures put in place to achieve that, however, where this is not practicle controls will be achieved through the effective use of:

- **PASSIVE CONTROL SYSTEMS**
- **Access Equipment**, e.g. Mobile Elevating Work Platforms (MEWP's), Lightweight Mobile Towers, Mastclimbers, Access Scaffolding, Ladders etc.
- **Safety Nets, Edge Protection**, e.g. trained safety netting contractors using approved equipment – in accordance with the code of practice BS 1263-1
- **Crash Decks** e.g. Boarded out catch platforms
- **ACTIVE CONTROL SYSTEMS**
- **Fall Restraint / Arrest Equipment**, e.g. Safety Harnesses and ancillary equipment.

All personnel involved in work at height will receive all necessary information, instruction and training to be deemed competent. All persons working at height will be instructed in the Work at Height Regulations 2005, however, management will ensure compliance with the established safe system of work through effective supervisory monitoring.

All work at height systems/control shall have a suitable rescue plan in place appropriate to the environment it is used and the available resources.

Work involving Fall Arrest equipment shall only be permitted with authority of the regional Construction Manager and or the regional Construction Director.

5.6 Work Equipment

All work equipment (including hand tools, appliances, lift trucks, scaffolding, netting etc) must be selected and suitable for the purpose for which it is to be used and only used for operations for which it is designed.

The use of work equipment is restricted to those persons appointed and trained to do so. Equipment must only be repaired and maintained by nominated competent persons. A service log recording all tests, repairs and maintenance must be kept for all plant equipment and vehicles.

Line-management must ensure that all employees receive all necessary information, instruction and training in the use of work equipment, including where appropriate written instructions.

Any work equipment found to be defective must be reported to their immediate Supervisor who will arrange for the equipment to be taken out of use, clearly marked as defective and arrange the necessary repairs.

5.6.1 Fall arrest netting and ancillary fall prevention equipment

Only companies that supply nets, edge protection etc must verify that it conforms to the relevant British and European standards are used and achieves the necessary category of protection for the location. Nets should be installed and supplied with a copy of the manufacturers Certificate of Conformity to BS EN 1263 Part 1. Edge protection to EN 13374-1.

5.6.1.1 Handover Inspection (Scaffolding & Safety Nets)

All scaffolding/edge protection and rigged nets are subject to a pre-handover inspection by nominated competent person representing the installation company.

Alteration to the scaffolding/edge protection and the repair of nets and ancillary equipment must only be undertaken by nominated competent persons who have received appropriate certified training from the equipment manufacturer. All net repairs must be undertaken in accordance with the manufacturer's recommendations.

5.6.2 Mobile Plant & Vehicles

All mobile plant and commercial vehicles must be subject to regular maintenance and servicing in accordance with the manufacturer instructions and statutory provisions e.g. The Provision and Use of Work Equipment Regulations 1998 (PUWER 98). In addition all mobile plant and commercial vehicles must be subject to a delivery inspection before use and weekly formal inspections by the operator verified on the plant register by the site manager..

Any defects identified must be reported immediately to the Site Manager with the findings and remedial action recorded in the report. All mobile plant with a risk of rolling over must be fitted with an appropriate rollover protection system and seatbelt(s).

5.6.2.1 Mobile Elevating Work Platforms (MEWP's)

MEWP operators must hold a current CPC Card, IPAF Operators Certificate or equivalent. Certain working environments shall require the additional qualification of PAL + i.e. restricted access/rough terrain. This may be stipulated by clients.

All employees using Boom type MEWP's at height or manoeuvring Scissor Type MEWP's around site shall be subject to the wearing and use of fall restraint equipment. All MEWP's shall have a clearly designated anchor point within the platform that is capable of sustaining the likely forces imposed.

Operators must ensure that all MEWP's are capable of being operated from the ground controls in case of emergency where the platform may need to be manoeuvred from the ground i.e. the security key left in the ignition.

All MEWP's shall be provided with adequate guarding to the operator controls to remove the risk of inadvertent operation and provide protection from damage to such systems.

5.6.2.2 Mobile Access Towers

Operatives who are required to erect, alter and dismantle lightweight Mobile Access Towers must hold a PASMA Certificate or work under the supervision and direction of a competent person who possesses a PASMA Certificate.

5.6.2.3 Mast Climbers

Operatives who are required to operate mast climbers must hold the appropriate IPAF certificate or work under the supervision and direction of a competent person who possesses the appropriate IPAF certificate.

Installation, maintenance and dismantling of such shall be carried out by a suitable qualified supplier.

Where supplied by a principal contractor the responsibility to maintain mast climbers need to be clearly identified and communicated for all users/supervisors. This includes the management of defects and servicing.

5.6.2.4 Telehandlers / Fork Lift Trucks

Only appointed Lift Truck Operators, who have received training from an approved body and are deemed competent, as detailed in the Health and Safety Executives Approved Code of Practice COP L117 Rider Operated Lift Trucks; Operator Training, are permitted to drive fork lift trucks. All fork lift truck operations to be carried out in accordance with HS (G) 6 Lift Trucks.

5.6.3 Demarcation Zones

Clearly identified demarcation zones shall be established to prevent unauthorised access around all areas of lifting, lifting equipment and operatives working overhead, i.e. MEWP use, to prevent persons from being struck by falling objects.

Additional devices such as debris fans, crash decks etc shall be provided where the above measures are not suited.

No material or object shall be thrown from height as this is liable to cause injury to any person or property, therefore prohibited.

Where operations on high rise structure entail close proximity to railways, roads and the general public all tools shall be fitted with individual restraint lanyards and materials provided with securing devices not reliant on operator hand grip alone.

5.6.4 Ladders

The selection of ladders as the method of access and egress and place of work must be subject to risk assessment and only selected as a last resort. When ladders are selected for use after considering the nature and duration of the work and eliminating all other options as impracticable, they must be used in strict adherence to the following safe system of work:

- a) All ladders used by the Company must conform to the British Standard specifics listed below or equivalent standards: -
 - i. BS 1129 Timber ladders, steps, trestles and lightweight staging for industrial use.
 - ii. BS 2037 Aluminium ladders, steps and trestles for the building and civil engineering industry.
 - iii. EN 131
- b) Set the ladder against a structure at an angle of 75° or at a ratio of 4:1 (4 up to 1 out).
- c) The ladder should be footed by colleague until secured. If it is not possible to safely tie-off the ladder at the top, then it should remain footed throughout the task.
- d) Reposition the ladder as necessary and never overreach from the ladder.
- e) When accessing another structure (e.g. a scaffold platform) from a ladder ensure that the ladder extends at least 1m above the landing or a suitable alternative handhold provided.
- f) All operatives to receive basic instruction and training in the safe use of ladders. Supervision to monitor operations to ensure adherence to the safe system of work.
- g) The use of ladders is for short duration only - 30 minutes maximum.

- h) Where ladder use is adjacent to leading or perimeter edges and the operative is above the provided edge protection a fall restraint system shall also be used to supplement the systems currently provided for fall protection.

5.6.5 Lifting Operations & Lifting Equipment

Under BS7121 A person(s) shall be Appointed Person (AP) who has received appropriate training to be deemed competent, to plan and supervise lifting operations, as necessary to ensure they are carried out in a safe manner.

To ensure Lifting Equipment (e.g. cranes, lorry-loaders, hoists, telehandlers etc.) and lifting accessories (e.g. chains, slings, shackles gin wheels and ropes etc.) is maintained in good order the site manager is responsible for the suitable storage, maintenance and inspection of all lifting equipment and accessories used by Lakesmere on our sites, as required by the Lifting Operations & Lifting Equipment Regulations 1998 (LOLER'98).

All lifting equipment shall be inspected and thoroughly examined, as required by Regulation 9 of LOLER'98. Copies of all inspection reports and certificates shall be kept on site and made available for examination when required.

A Slinger / Signaller (Banksman) shall be appointed to assist the crane/telehandler operator in execution of all lifting operations. All appointed Slinger / Signallers are competent, having received formal training to CITB standard or equivalent.

The Slinger / Signaller must visually inspect all lifting equipment before each use. Any defects identified must be reported to the immediate Supervisor, with the equipment removed from use and clearly marked as defective.

All lifting equipment must have the Safe Working Load (SWL) clearly marked on it, with the required Safe Working Load established before use. Suitable storage accommodation must be provided to prevent physical damage or deterioration.

Lakesmere guidance on lifting accessories and use can be found in LCL250

5.6.6 Portable Electrical Equipment

It is the policy to use 110v or battery operated hand tools wherever possible. Where 240v hand tools are to be used they must be used in conjunction with a residual current device (RCD).

It is the Company policy that all Site electrical equipment is tested at the start of each new project then inspected and portable appliance tested (PAT) every 3 months, by a competent engineer. All RCD's must be tested every 6 months.

All office based equipment shall be subject to inspection and/or testing on a 24 month basis unless changes have been made by a suitably trained person which will require such before return to service. All NEW equipment shall be tested during the routine 24month following service entry.

An inventory of all equipment must be maintained at each work location and all new equipment is added to the list. Each piece of equipment must be clearly marked with the date of the test and the date of re-testing.

Pre-use checks of portable electrical equipment shall be carried out by all users under the guidance of HSG 107 and/or CITB Toolbox Talk 37. All defective equipment shall be removed from service until repaired by a competent person or replaced with serviceable equipment.

5.6.7 Machinery Guarding

All dangerous moving parts creating a danger zone must be assessed and the Company must establish and enforce all reasonably practicable control measures by following the hierarchy of control measures defined in Regulation 11 of the Provision and Use of Work Equipment Regulations 1998.

5.6.8 Abrasive Wheels & Disc Cutters

All employees required to use abrasive wheels must receive the necessary training and instruction in the safe use and changing of abrasive wheels, such as angle grinders/cutters etc.

All discs shall be stored in accordance with manufacturers recommendations, all damaged discs to be removed from service and destroyed.

5.6.9 Cartridge-Operated Tools

Only responsible and competent persons may supervise, check the acquisition, issue, use, return and maintenance of cartridge-operated tools.

Before use a risk assessment must be undertaken by a competent person. Operators will be properly trained in the use of the equipment and be made aware of the hazards which may arise. No under eighteen year olds may operate cartridge-operated tools.

Cartridge-operated tools must be stored in an unloaded state in a place that is secure and dry.

The issue of tools and cartridges should be strictly controlled on a daily basis. Cartridges should be stored in a metal box, keeping different strengths of cartridges separate and clearly identified. All spent strips to be removed to the designated waste point daily and any un-used strips returned to secure store at the end of each shift.

In the case of a misfire the cartridge-operated tool should be held in position for at least 30 seconds to allow for any delayed detonation. Misfired cartridges should be stored in a metal box for safe return to the manufacturer.

Cartridge-operated tools are used in accordance with the Provision and Use of Work Equipment Regulations 1998.

5.6.9 Company Vehicles

Where Lakesmere issues a company vehicle, or a hired vehicle, the driver is required to drive safely, to conform to the current legislation regarding the Highway Code and in accordance with Lakesmere's Vehicle Policy.

5.7 Occupational Health

5.7.1 Manual Handling

The Manual Handling Operations Regulations 1992 requires employers to avoid manual handling operations and where they can not be avoided to make an assessment of the risk of injury to establish control measures to reduce those risks as low as reasonably practicable.

Lakesmere recognise that manual handling is inherent part of the construction industry and that the special handling techniques used in loading out a roof, handling wall panels and sheets of glass are essential enabling skills. These skills are taught as part of various manufactures' training schemes

5.7.2 Hazardous Substances

All suppliers of materials are required to provide all relevant health and safety information (MSDS) about their products to form the basis of the COSHH risk assessment. This information is to be requested for each product before procurement stage, so that consideration can be made for the use, handling and storage of that substance as per COSHH.

The COSHH risk assessment must be carried out by an appointed competent person, usually the Contracts Manager or Project Manager.

Information and controls identified in the COSHH assessment shall be communicated and provided to the person who has the potential for exposure to the substance in use by the site/line manager.

5.7.3 Asbestos

As the majority of our works is classified as New Build the problem with asbestos should not arise, however when Lakesmere is involved in refurbishment projects then the client will be required to produce a copy of the Asbestos Survey that should have been conducted in accordance with the Control of Asbestos Regulation 2006.

In the event that this survey report is not available then Lakesmere will arrange for a asbestos survey to be undertaken before any work on the building commences. The purpose of the survey is to make certain that materials containing asbestos can be identified; to reduce the risk of accidental exposure and establish suitable contingency measures should asbestos materials be accidentally disturbed.

Only approved asbestos contractors may be used to handle asbestos.

All buildings occupied by the business shall be subject to the Asbestos regulations and the landlord shall be responsible for the identification and management of asbestos materials. The landlord shall make available any registers and reports issues under these regulations.

5.7.4 Noise

Similar to other pieces of legislation, the Noise at Work Regulations 2005, requires a risk assessment to be made, to ascertain the noise levels employees are exposed to, establishing and implementing precautions to avoid or protect against excessive noise levels.

5.7.5 Vibration

A risk assessment has been conducted on the small hand tools used, (drills, zippers, abrasive wheels etc) in conjunction with the manufacturers data sheets.

It has been deemed the tools used warrant low risk. However if we are involved in work that requires the use of larger tools i.e. concrete breakout etc, then a specific risk assessment will be conducted on that activity and the equipment used

All work where applicable will be carried out in accordance with the Control of Vibration at Work Regulations 2005 and supporting HSE guidance'.

5.7.6 Health Screening

All new employees must complete a pre-employment medical questionnaire, which is contained in the application form. The recruiting manager must vet the medical questionnaire.

5.8 Overhead Powerlines & Underground Services

All work under or adjacent to overhead power lines must be subject to risk assessment with a specific method statement prepared. As a minimum this work must be undertaken in accordance with the HSE guidance note GS6 *Avoidance of Danger* and relevant power companies from overhead electric power lines.

5.9 Protection of the Public and others

All reasonably practicable measures must be taken to secure the workplace to prevent the public and others (such as fellow workers, visitors, trespassers etc.), especially children being at risk of an injury. Each location must be assessed considering the nature of the work and the location of the workplace and its environment, to establish the necessary control measures.

5.10 Personal Protective Equipment

All Personal Protective Equipment purchased must meet the necessary European Standards and carry the CE Mark. The risk assessment process together with our client arrangements (i.e. Site Rules, Permit-To-Work Systems) should identify a requirement for PPE. Personal Protective Equipment will only be specified as a last resort in the hierarchy of controls.

An assessment of the PPE must be carried out as required by the Personal Protective Equipment Regulations 1992, to ensure the correct selection and suitability for the user.

Employees have a statutory duty to use PPE provided as part of a safe system of work and not misuse or interfere with it.

All new employees receive a full issue of PPE when they commence employment. If any item of PPE required is missing, expired, damaged or defective then it shall be replaced upon request. A record of all PPE issued must be maintained, signed for by the recipient. No charge can be made to employees for the issue of standard PPE.

It is Company policy that suitable gloves should be worn at all times on the site

5.11 First Aid & Emergency Arrangements

When Lakesmere are employed as principal contractor then an assessment will be made of the risk of serious and imminent danger at the workplace and Lakesmere will ensure that control measures for dealing with emergencies are established.

The arrangements at each workplace include: -

- Raising the alarm and communication with the emergency services
- First aid
- Fire fighting capabilities
- Emergency Evacuation
- Assembly
- Appointed persons, training, drills and exercises

First aid equipment and trained personnel to administer first aid will be provided and maintained in accordance with the Health and Safety (First Aid) Regulations 1981, Approved Code of Practice and Guidance L74, as a minimum standard.

It is the intention of Lakesmere to comply with the site-specific arrangements made by our Clients.

5.12 Welfare Facilities

Welfare facilities are normally provided by the Principal Contractor, however where Lakesmere are responsible to provide welfare facilities they will be provided in compliance with the Construction (Design and Management) Regulations 2007 and the relevant Approved Code of Practice and Guidance.

Office welfare to be provided in accordance with Workplace (Health, Safety & Welfare) Regulations 1992

An employee found to be defacing or misusing the Welfare Facilities will face the disciplinary action.

5.13 Housekeeping

Housekeeping is an essential feature of accident prevention e.g. trip hazards, fire hazards etc. All employees must maintain the highest standards of housekeeping at all times. The subject of housekeeping must be integrated into all monitoring and auditing arrangements to ensure high standards of housekeeping are maintained.

5.14 Smoking at Work

It is Company policy not to permit smoking within its premises, including offices, toilets, car parks or company owned vehicles. Smoking may only be in a designated smoking area. Smokers must ensure that all smoking material is properly extinguished.

See: separate Lakesmere's Smoking Policy.

5.15 Substance Abuse at Work

Alcohol or drug abusers can adversely affect the safety of themselves and fellow workers whilst at work. Therefore if any employee or subcontractor is known to be, or strongly suspected of being affected by alcohol or drugs they are to be referred to their immediate supervisor who must arrange for their removal from the workplace. Employees are not permitted to bring substances of abuse onto company premises or to work.

Any employee who is required to take prescription substances that may affect their performance at work must inform their immediate Supervisor. Alternative duties may be allocated to these employees and they must be prohibited from driving/operating plant equipment and working at height. The Company tolerance for alcohol consumption during the working hours and its affects at work is inline with the current Road Traffic and Highways Legislation.

The Company reserves the right to test any employee who it suspects of abusing drugs. Also the right to dismiss any employee who is found to be positive or who refuses to comply with the request for a test to be undertaken.

5.16 Young Persons at Work

A young person at work is a person under the age of eighteen (18) years old and can be an employee, visitor or student on work experience.

A young person is not permitted to operate/drive plant equipment. The young person will be assigned to a mentor who train, guide, instruct and act as the key link between site management and the young person.

Before a young person starts work e.g. trainee, apprentice etc. a suitable and sufficient risk assessment must be carried out on all their activities. Any residual risk that remains that can not be eliminated and has been controlled so far as is reasonably practicable must be communicated to their parents/guardian and written consent obtained. Any known medical conditions must be declared at this briefing.

Apprentices are subject to annual appraisal – see also QMS CP01 Administration – 4.11

5.17 Dealing with the Enforcing Authorities

A Contracts Manager, Project Manager or Site Manager will meet any representative of an Enforcing Authority e.g. the Health and Safety Executive, Local Authority, Environment Agency, Police etc., unless this responsibility has been delegated to another appointed person. The visiting officer must be directed to the Site Manager or if they wish to proceed unaccompanied the Site Manager must be notified directly.

Full co-operation must be given to assist them in the execution of their duties.

If enforcement action is taken such as a Prohibition Notice or Improvement Notice issued, then the Site Manager to whom it is issued must comply with any immediate requirements and contact a Director and the external Health & Safety Consultants directly.

The Health & Safety Consultant will be able to provide the Site Manager with any practical interpretation and advice on the necessary corrective action required to comply with the Notice.

Site Management will liaise with the relevant inspector and inform him/her of corrective action taken and confirm this in writing. If as part an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution, then a company appointed solicitor should be present.

5.18 Work on or near the railway

All projects undertaken for the rail authority or a rail authority approved contractor on or near the railway must be carried out in strict compliance with the rail authorities document '*Contractor Conditions Safety*' and their line safety standards. In addition Lakesmere has developed a sector specific safety arrangements policy/system that is Achilles Link Up Approved and shall be used in such environments.

5.19 Confined Spaces

All activities involving work in confined spaces must be carried out in compliance with the *Confined Spaces Regulations 1997*, Approved Code of Practice and Guidance.

5.20 Office Safety

All clerical and administration employees are required to receive general office safety instruction and training, as appropriate.

Offices must be kept in a clean and tidy condition. Tripping hazards must be controlled or avoided. Filing cabinets must not be left open when unattended.

5.20.1 Display Screen Equipment User & Operator

The Health & Safety (Display Screen Equipment) Regulations 1992, requires employers to identify Users and Operators (operators are the self-employed, agency workers and

contractors) of display screen equipment and to carry out an assessment of their work activities and workstation.

A User (or Operator) is defined as a person dependent on using a display screen, who is required to use equipment every day for a minimum of two (2) hours. Once Users (or Operators) have been identified, a competent assessor must undertake the risk assessment. Following the assessment the control measures established as reasonably practicable will be implemented and could include: -

- Redesigning tasks and work routines to include regular breaks.
- Provide correct workplace equipment to improve ergonomics.
- Make changes to the environment e.g. lighting, ventilation, temperature etc.
- Provide User/Operator training and instruction.

5.20.2 Eye Tests & Corrective Devices

All employees, who have been identified as DSE Users and use corrective devices for sight (glasses or contact lenses) for close work, are required to wear them when operating DSE.

Eye tests are paid for by Lakesmere for DSE users on production of a valid receipt. The employer is also liable to pay for basic glasses to correct vision defects caused by DSE work.

5.21 Document Control

This SMS is issued in an electronic controlled format to ensure that it is maintained up to date with revisions.

All hard copies are to be viewed as uncontrolled. Before using them, the revision number and date must be checked with the electronic version to ensure that the hard copy is not obsolete.

The SHEQ Manager will issue amendments to this manual as required.

5.22 Records Management

All records of formal monitoring and auditing, accident investigation reports, training records, PPE registers, records of inspection and testing, minutes from review meetings, risk assessments and medical reports shall be retained in accordance with company procedures. All records should be kept in such a manner that they are readily retrievable and protected where practicable from damage, deterioration or loss.

The Information Management System (IMS) commissioned in 2005 contains records in electronic format and is under the control of the IMS Manager.

5.22.1 Accident Books / Accident Records

All accidents resulting in personal injury must be recorded in an accident book. These are usually located in the administration department within the area offices or in the site office. Employees must ensure that they are aware of the location of the accident book.

The HSE accident book BI 510 will be used and is designed to comply with the Data and Protection Act with a tear off accident report. These reports must be submitted to the H&S/QA Manager as soon as practical. Photocopies may be retained on site provided they are in a secure location with no danger of inadvertent revelation of the information.

The issuing office must make sure that each Accident Book is uniquely numbered. The person completing the Accident Record must ensure that the record carries a unique number. For guidance on the numbering system see the appropriate Standing Work Instruction

Accident Records shall be removed from the Accident Book and forwarded to the H&S/QA Manager at Head Office. These Accident Records may be photocopied by the Site Manager for their files but to comply with the Data Protection Act the records must be securely locked away from casual observers.

For accident investigation see 6.1

5.23 Variation Management

Work-related injuries occur when significant changes are made to the work operation without considering any new hazards that may arise or implementing the appropriate new control measures.

All new work instructions or requests for alterations or modifications from the client that vary from the original scope of work should be directed through the Site Management who will record their variations on the appropriate company forms i.e. Confirmation of Instruction and Confirmation of Work Done.

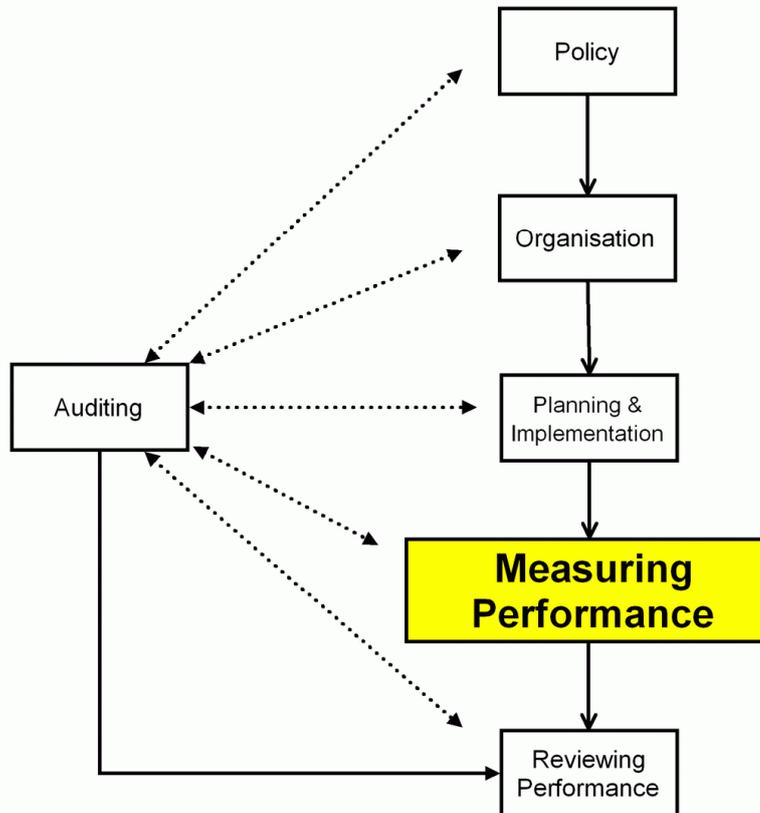
Site Management will arrange a risk assessment any significant changes to the work operation, these will be communicated to the principal contractor.

See:

Method Statement

Task Specific Action Sheet

Section 6 Measuring Performance



To gauge success in health and safety performance Lakesmere must measure its performance against pre-determined standards. Monitoring performance by means of:

- Re-active Monitoring of incidents
- Pro-active Monitoring to ensure compliance with statutory, common law, company and clients requirements.
- Creating key performance indicators (KPI's) to measure against the established performance targets for continuous improvement

6.1 Reactive Monitoring

6.1.1 Accident Reporting & Investigation

Certain injuries, ill health and dangerous occurrences are required by law to be reported to the enforcing authority (usually the Health & Safety Executive), under the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 1995 (RIDDOR).

It is the policy of Lakesmere to investigate all RIDDOR accidents and any near misses. The purpose of the investigation is to identify the cause and to establish and enforce measures to prevent reoccurrence and not to apportion blame. While we promote a 'just and fair culture' there may be some apportion of personal responsibility. Investigations must not lay blame indiscriminately; all accident investigations shall be objective, open and fair.

All employees and labour only subcontractors are encouraged to report all accidents or incidents no matter how minor. The reporting of these incidents to the Company shall always remain a high profile topic e.g. regularly repeated toolbox talks, notices etc...

Any employee who fails to report a work-related accident or fails to cooperate with or deliberately misleads an investigation will be referred for disciplinary action.

All injuries must be reported to the immediate line-manager who will ensure that the appropriate level of investigation is undertaken and the records kept.

6.1.2 Level of Accident Investigation

It is Lakesmere's policy that all RIDDOR incidents are fully investigated, usually by our Safety Consultants.

Usually in the case of near-misses it will be the Contracts Manager, Project Manager or SHEQ Manager will decide whether to investigate or not.

The Accident Record must be completed for all accidents and in addition to the Accident Record a full investigation report should be prepared for more serious incidents.

It is the responsibility of the SHEQ Manager to ensure that RIDDOR injuries, ill health and dangerous occurrences are reported. However this duty may be performed by others (e.g. H&S Consultants). If the HSE telephone, facsimile or electronic mail service is used to report, then the HSE reference number must be recorded on the Accident Record.

6.1.3 Near Miss & Hazard Reporting

Prevention is better than cure! Near misses are painless lessons to learn from. All incidents not resulting in injury (i.e. Near Misses and RIDDOR Dangerous Occurrences) must be reported to site management. In addition employees all have a duty to report any hazards identified so that an assessment can be made to eliminate or control the risks arising out of that hazard.

6.1.4 Accident Records, Classification & Statistics

As mentioned in section 6.1.1 above, accident reporting and investigation is an essential part of the Safety Management System and Company policy.

Accident Records are compiled at source, copies of the Accident Record, RIDDOR F2508 forms and full accident investigations reports are retained by the SHEQ Manager at Head Office.

See *the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995* for an explanation of what constitutes a Major, a Three-Day injury, and a Dangerous Occurrence

6.2 Proactive Monitoring

The purpose of proactive monitoring is ensure that the established performance standards are being adhered to and to help prevent an accident or ill health. The primary objective of the monitoring is not just to identify failure in the form of unsafe acts or conditions, but to measure success and recognise positive good behaviour.

6.2.1 Site Management Monitoring

The Project Manager or Site Manager shall undertake Health and Safety inspections on their site and these will be recorded on LM127 *Workplace Inspection Report*.

Where appropriate the principal contractor will be advised of potential problems that are outside the control of Lakesmere's site management, using LCL/192 *Site Memo*.

6.2.2 Inspections & Audits

Site Inspections are usually carried out fortnightly by the the SHEQ Team. Although this may vary according to the size and type of project. .

The Site Inspection/audits are carried out using 'Yellow Jacket' (a Mace Sustain system) and is applied across the group. This enable active management of observations, actions, audit and inspection plans and close outs.

6.3 KPI's

Audits shall carry a KPI score with a business benchmark of 80% to be achieved.

If any KPI scores zero then the whole site score is recorded as 0% and the relevant regional office notified so that corrective action can be undertaken immediately.

However where Lakesmere are not responsible for welfare facilities then a zero rating under this KPI will not affect the whole site score.

6.4 Accident Statistics

Accident Statistics are use to measure the specific elements of the Safety Management System as an indicator of health and safety performance. The main statistics, based on RIDDOR, are: -

- Accident Frequency Rate (AFR)
- Annual Incident Rate (AIR)
- Severity Rate
- Duration Rate
- Mean Duration.
- Lost Time Frequency (LTF).

In addition all accidents and incidents are recorded by category, both nationally and regionally.

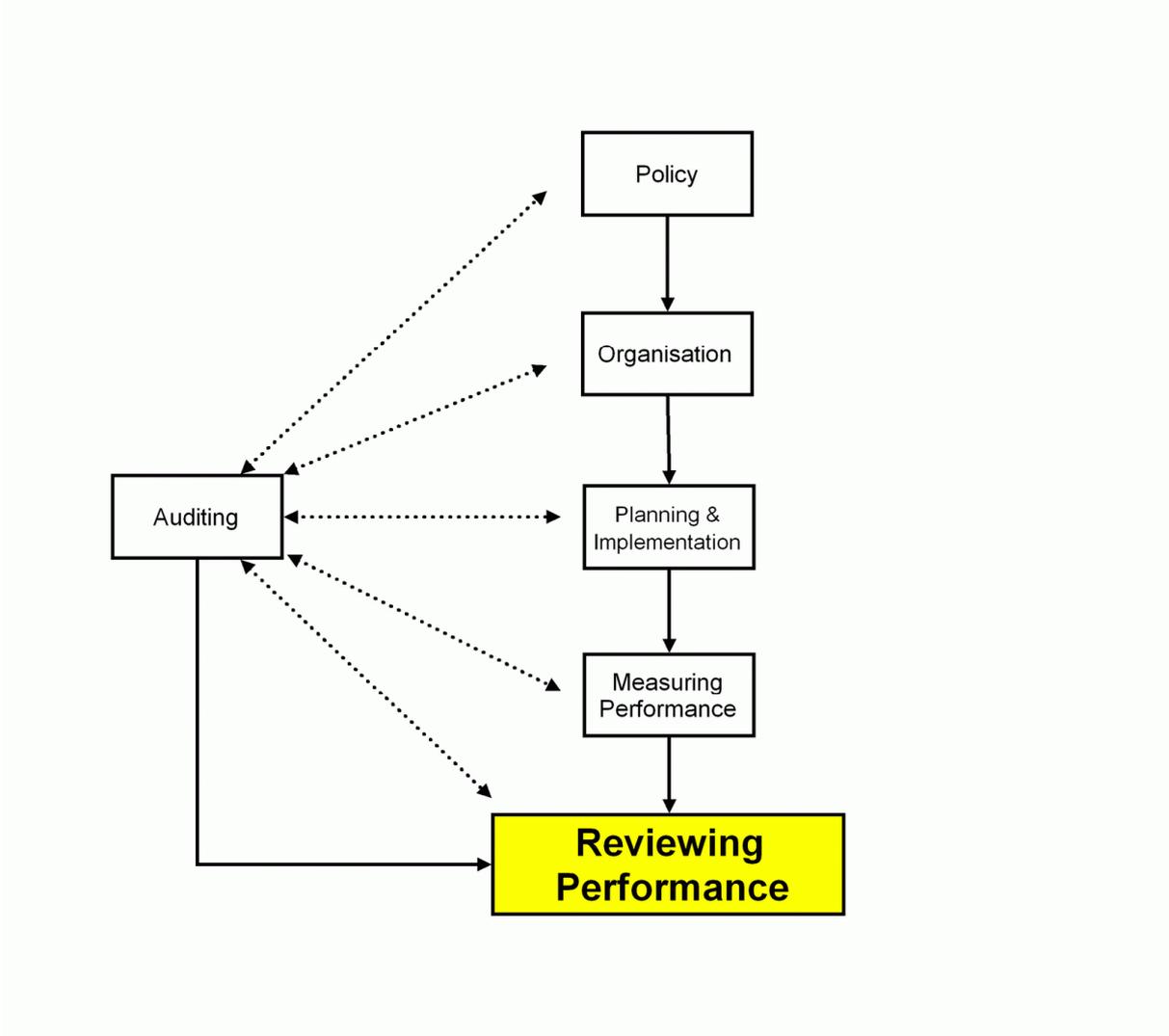
Accident Statistics are used to review health and safety performance at the various formal review forums detailed in Section 7.

Formula used:-

- $AFR = \text{Number of RIDDOR injuries} \div \text{Hours worked} \times 100,000$
- $AIR = \text{Number of RIDDOR injuries} \div \text{Employees} \times 100,000$
- $\text{Severity Rate} = \text{Hours Lost} \div \text{Hours Worked} \times 100$
- $\text{Duration} = \text{Hours Worked} \div \text{No of RIDDOR incidents}$
- $\text{Mean Duration} = \text{Hours Lost} \div \text{number of RIDDOR incidents}$
- $LTF = \text{days lost} \div \text{hours worked} \times 1,000,000$

It is important to note that the primary purpose of the KPI's and Statistics is not to penalise failure but to identify opportunities for improvement and recognise success. It is very important not to place too much emphasis on achieving targets as this may have a negative effect resulting in deliberate under reporting.

Section 7 Reviewing Performance



Forums for reviewing performance are essential elements of the SMS for learning from experience and applying lessons learnt.

7.1 Review Meetings

To achieve excellence in health and safety performance we need to regularly evaluate our performance in order to maximise learning and take appropriate action, thus ensuring 'Continuous Improvement'

There are a considerable number of review meetings conducted although not all these meetings are health & safety orientated, see appropriate documentation for these meetings.

7.2 Operation's Management Meeting (OMM)

The H&S/QA Manager will prepare for each monthly OMM a Safety Report providing the OMM with statistical information and summaries of incidents, site inspections, changes in legislation and other items that the OMM need to discuss and agree a course of action.

7.3 Management Review

A Management Review of the Health & Safety Policy will be held annually between the Directors, Area Managers from the regions/business units (or their appointed representatives) the SHEQ Manager.

An agenda must be set and minutes of the meeting taken to record findings and actions. The agenda of each meeting must include

- a) Accident Performance and Prevention
- b) Significant Issues rising from formal monitoring and auditing.
- c) Revision in legislation
- d) Training Requirements
- e) Recommendations from the Interim Review Meeting

7.4 Interim Review

At each monthly regional operational management meeting (OMM) H&S performance is reviewed through reports and actions instigated to provide improvement.

7.5 Post Contract Review

In the spirit of continuous improvement the Contracts Manager or Project Manager will chair the Post Contract Review Meeting. It is important that this meeting holds frank and meaningful exchange of information without being a 'witch hunt' because people rarely learn if they are constantly under a barrage of criticism. The key element of the meeting is learning from previous experience, carrying forward good practice and eliminating bad.

The meeting will receive confidential reports from site management regarding the performance of key suppliers, consultants and subcontractors used on the project.

The meeting may recommend that a particular company or individual be removed from our supply database and thus not be used on future contracts.

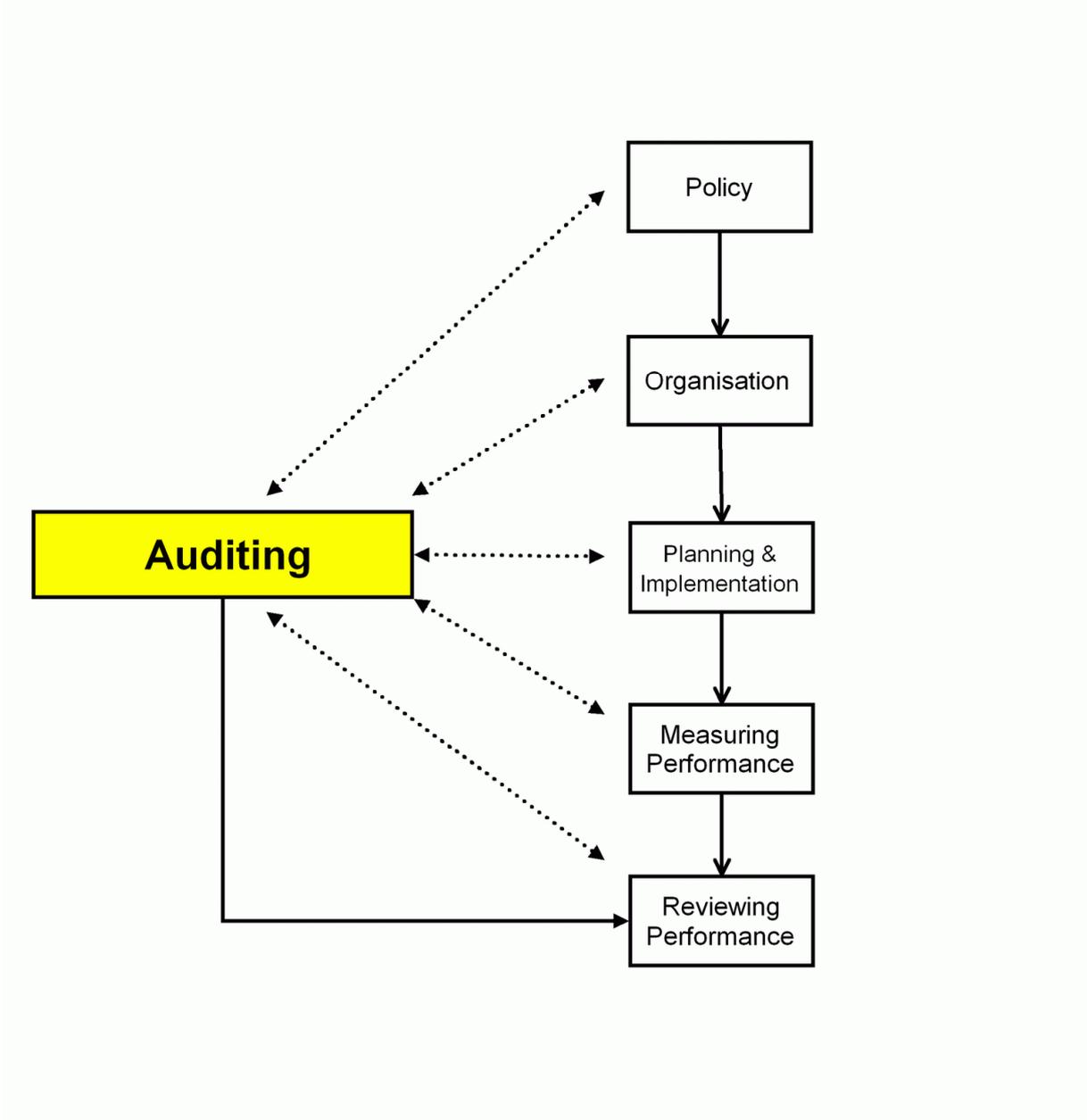
7.6 CDM Review

The Design Managers are responsible for arranging the design review of their team. This design review must be by a qualified designer trained in CDM and independent to the design he/she is reviewing. No one is permitted to review their own design.

Minutes of the meeting should be taken to record findings and actions.

See also: Quality Management System (QMS)

Section 8 Auditing



Producing systems for auditing the SMS and commitment to continuous improvement involves the constant development of policies, the organisation, approaches to implementation and techniques of risk control.

8 Auditing

8.1 Internal Audits

The audit of our SMS at site level will be conducted by the SHEQ Team to ensure its effectiveness. The audits are usually carried at regular basis or at the request of a Senior Manager.

An annual audit of each of the Regional Offices will be conducted by the SHEQ Manager who may be accompanied by the Regional Manager/Director. A full audit report is produced detailing the findings of the audit and any recommended actions.

The SHEQ Manager will prepare reports for the monthly Operation's Managers Meeting (OMM) that will be held in the separate regions. These reports will be on Quality, Environmental and Safety issues and have arisen from audits, site inspection reports, accident records and NCR's received during the month.

See also: CP07 Internal Audits and Management Review of Lakesmere's QMS