



Health & Safety Policy

The Harlestone Group

(Incorporating Harlestone Supplies, Harlestone Projects and Harlestone Fencing)

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Revision Record

Revision Number	Details of Revision	Review Date	Updated and reviewed by	Issue Date
V3	Developed section on Excavations, including services, COVID update	02.10.20	Thecla Connikie	08.10.20
V4	Updated logos, organogram and responsibilities, added reference to work at height operational procedure in 3.12 and 3.13. line added to 3.9, contents page update, revision record added	01.07.21	Tamsin Shawe, Sara Wilde, Silas Wilde, Thecla Connikie & Jane Standerwick H&S Consultant	05.07.21
V5	Amendment in work at height section 3.12 of or to and, Harlestone Group organogram amendment to fencing bullet points added in statement of intent in line with ISO45001, including commitment to legislation, controlling risk using hierarchy of controls, framework for objectives, formatting, amendment to front page incorporated businesses reference and revision record update Changed Organogram back so Harlestone fencing sits alongside Harlestone Projects. Updated reference to Supplies for Chief operating officer under projects and fencing sections	06.07.21	Thecla Connikie and Tamsin Shawe	09.07.21

1 Health & Safety Policy Statement

The policy of the **Harlestone Group (incorporating Harlestone Supplies Harlestone Projects including Harlestone Fencing)** is to provide and maintain a working environment that is safe and without risk to health. We believe that a quality Company is, by definition, a safe Company and as such, health and safety is equal in importance to our other main business objectives. Measurable Health and Safety Objectives will be set on an annual basis of which top management responsible for each department will take ownership for, progress will then be monitored and reviewed on a quarterly basis against key performance indicators.

In order to achieve this policy, the **Harlestone Group Ltd** will ensure that so far as is reasonably practicable:

- We provide and maintain plant and systems of work that are safe and without risks to health.
- Arrangements are made to ensure the safety and absence of health risks in the use, handling, storage and transport of materials and substances.
- We provide sufficient information, instruction, training and supervision to ensure the health and safety at work of our employees and others, such as contractors and visitors, who may be affected by our undertaking.
- We maintain any place of work under our control in a condition that is safe and without risks to health, for the prevention of work-related injury, ill health as appropriate to the purpose, the size and context of the organization activities and to the specific nature of its OH&S risks and OH&S opportunities; including the provision and maintenance of means of access and egress.
- We provide and maintain a working environment for our employees that is safe, without risks to health, and adequate in terms of facilities and arrangements for our employees' welfare at work.
- We adhere to all applicable health and safety, environment legislation and other requirements
- We commit to the control of OH&S risks using the hierarchy of controls
- We commit to worker participation and consultation and where they exist, workers' representatives, in the decision-making processes in the OH&S management system .

Under the Health and Safety at Work Act 1974, **all** employees have duties imposed on them whilst at work, to:

- Take reasonable care for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work.
- To co-operate with us to enable **The Harlestone Group Ltd** to meet our statutory health and safety requirements.
- Not to misuse or interfere with anything provided by **The Harlestone Group Ltd** in the interests of health and safety.

The **Harlestone Group Ltd** will provide sufficient resources to ensure that this policy is effectively carried out and will review it and the way it has operated on at least an annual basis.

The establishment of a sound health and safety culture is dependent on the active involvement of **all Harlestone Group Ltd** personnel in order for us to continually improve our health and safety performance to enhance the organization's OH&S performance;

Signed: 

Silas Wilde

Managing Director, The Harlestone Group Limited

Date: 6th July 2021

2 Organisation and Responsibilities

The achievement of the company's health & safety objectives require a clear definition of responsibility at each level within the Company. Health and safety is a management responsibility and is an integral part of the way in which the Company operates.

2.1 Managing Director

Responsible for the overall arrangements and for ensuring that the Company's operations are executed at all times in such a manner as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and others who may be affected by its operations.

In particular the Managing Director will:

- Ensure there is an effective Company policy for health and safety and that all employees, contractors and temporary workers are made aware of their individual responsibility.
- To understand and ensure, through the appointment of competent persons, that the Company's responsibilities as employers under the Health and Safety at Work Act 1974 and any relevant acts of parliament and statutory instruments are met.
- To ensure that all Directors and Managers understand and fulfil their responsibilities with regard to health and safety.
- Arrange for funds and facilities to meet the requirements of Company policy and legislation.
- Make provision for adequate and appropriate training to be given to all employees.
- To ensure notification and reporting procedures to the relevant statutory authorities are carried out.
- Set a personal example on all matters related to health and safety.

2.2 Directors

The Directors are accountable to the Managing Director for all matters relating to health, safety and welfare of employees and those affected by the Company's operations.

In particular Directors will:

- Understand and ensure that the implications and duties imposed by new acts of parliament, statutory instruments, H.S.E. guidance notes and codes of practice are acted upon to ensure the Company fulfils its legal obligations.
- Set, monitor and review health & safety objectives and targets and review progress at the monthly Executive Management Team meeting, where health & safety is an agenda item.
- Bring Company related health and safety matters to the attention of the Executive Management Team.
- Ensure good communication exists between employer and employees on health & safety matters.
- Liaise with the person appointed in the role of Safety Advisor over the full range of their duties and responsibilities, with respect to inspections, audits, report recommendations, changes in legislation and advice obtained from other sources.
- Ensure that an adequate programme of training for health and safety is established and that the safety culture is encouraged amongst employees.
- Support health & safety through the provision of adequate resources, both financial and physical to ensure health & safety legislation and any stated health & safety objectives are achieved.
- Set a personal example at all times by using the correct personal protective clothing/equipment and following all safety requirements and procedures.

2.3 Managers

Each Manager is responsible for their personal safety and that of all personnel under their authority, including others who may be affected by the Company's activities.

In particular they will:

- Understand and implement the Company safety policy.
- Appreciate the responsibilities of personnel under their authority and ensure that each employee knows their responsibilities with regard to health & safety.
- Conduct risk assessments on activities within their control ensuring the methods and systems of work are safe, ensuring the necessary procedures, rules and regulations designed to achieve this are formulated, published and applied.
- Provide written instructions of work methods outlining potential hazards and precautions, and ensure they are complied with.
- Ensure accident and near-miss reporting procedures are understood and complied with and assist with accident investigations where appropriate.
- Ensure all employees and sub-contractors are suitably trained and competent to carry out their prescribed tasks and the necessary licenses/certificates of competence are in force and appropriate.
- Ensure all new employees receive induction training, toolbox talks, safety instructions and their personal responsibilities as set out in this manual and are issued with personal protective equipment as required.
- Reprimand any employee for failing to discharge their health and safety responsibilities.
- Set a personal example with regard to health and safety matters.

2.4 Employees

The Health and Safety at Work Act 1974 places responsibilities on both the employer and employees alike, therefore the Company reminds employees of their duties under Section 7 of the act: ***To take care for their own health and safety and that of others who may be affected by their acts or omissions.*** Additionally, employees must also co-operate with the company to enable it to discharge its own responsibilities successfully.

Furthermore, all employees are expected to:

- Carry out assigned tasks and duties in a safe manner in accordance with instructions and to comply with safety policies, rules, procedures, regulations and codes of practice.
- Take reasonable care for their own and others health and safety in every respect of their work. To ensure that staircases, landings, corridors, gangways and escape routes are not obstructed and ensure all equipment and plant is used correctly.
- Not to operate any plant or equipment unless authorised.
- Report any accident, near-miss, dangerous occurrence or dangerous condition to their line Manager.
- Not participate in horseplay or place fellow employees in danger by their actions.

2.5 Safety Advisor

The primary role of the Safety Advisor is to advise the Directors and Managers on all safety, health and welfare matters to ensure the Company complies with its statutory obligations.

In particular the Safety Advisor will:

- Understand the application of the Health and Safety at Work Act 1974 and other legislation relevant to the Companies business.
- Keep up to date with changes in current legislation and to bring to the attention of the Director or Manager responsible any changes required to meet new legislation.
- Attend such courses/seminars run by external sources to enable accurate interpretation of legislation to enable implementation within the organisation.
- Recommend control measures and advise on the standard of P.P.E. issued to employees.
- Conduct health and safety inspections and prepare reports identifying any areas for improvement.
- Immediately contact the appropriate Director if situations are found that, in the opinion of the Safety Advisor, require immediate rectification or the stopping of any operation.
- Notify the Director responsible if the corrective action agreed after any workplace inspection is not implemented by the arranged date.
- When requested, carry out accident investigations and record the findings.
- Highlight areas where training/certification is required to meet the standards imposed by legislation, approved codes of practice or H.S.E. guidance.
- Bring new techniques for improving health, safety and welfare to the attention of the Directors and Managers as appropriate.
- To set a personal example by wearing appropriate personal protective clothing and equipment and observing all safety requirements and procedures.

For defined roles and responsibilities and organisation chart please see 3.34

3 Arrangements

3.1 Consultation

The Company sees communication between employees at all levels as an essential part of effective health and safety management as defined by the Health & Safety (Consultation with Employees) Regulations. Employees are consulted through quarterly health & safety committee meetings, during workplace risk assessments and through being actively encouraged to raise any health and safety concerns with their line Manager and at team meetings.

As a result of this consultation hazards are both identified and controlled and health and safety policies and procedures assessed and updated, as appropriate, to ensure their continuing suitability and effectiveness.

3.2 Communication

The Company will endeavour to communicate to employees their commitment to safety and to ensure that employees are familiar with the contents of the Company's health and safety policies. The Company communicates with its employees orally, in the form of directions and statements from Directors and Managers, in writing, in the form of directives and policy statements, and by example. The health and safety action group has a representative from each department attend to discuss, assign and resolve health and safety matters.

In addition to notice boards located in different locations around Company buildings the Company's server under the folders "WGSERVER2/Central Management/Health & Safety" contain all relevant health & safety policies, risk assessments and related documents and information.

3.3 Cooperation and Care

If we are to build and maintain a healthy and safe working environment, co-operation between employees at all levels is essential.

All employees are expected to co-operate with Directors and Managers and to accept their duties under this policy. Disciplinary action may be taken against any employee who breaches safety rules or who fails to perform his or her duties under this policy.

Employees have a duty to take all reasonable steps to preserve and protect the health and safety of themselves and all other people affected by their actions.

3.4 Safety Training

Organised by the Human Resources Manager, all employees receive induction safety training appropriate for their job which includes emergency arrangements and traffic management.

In consultation with the Safety responsible person, managers will organise additional safety training dependent upon the employee's role which could include PASMA, CSCS, IPAF, asbestos, abrasive wheel operations, underground services avoidance, forklift truck driving, first aid, fire marshal, etc. Managers are responsible for inducting new employees into their department, providing them with training and guidance in safe working practices and procedures prior to fulfilling their new role. Training will include advice on the use and maintenance of personal protective equipment appropriate to the task concerned.

Records of employee training are maintained by the Human Resources Manager.

Refresher safety training, including toolbox talks is provided to all employees as and when appropriate dependent upon the individual employee's role. A training matrix is in place to manage the expiry of training and to allow a review of training as it falls due.

3.5 Construction

The Harlestone Group is fully aware of its duties under the Construction (Design & Management) Regulations. When working as the Principal Contractor The Harlestone Group will satisfy themselves the client is aware of their duties, that the Principal Designers has been appointed and, when required, the HSE notified.

Directors will ensure the construction phase is properly planned, managed and monitored with adequately resourced, competent site management appropriate to the risk and activity.

Managers will ensure every contractor who will work on the project is provided with sufficient information to enable them to carry out their work safely and without risk to health, including the prompt supply of information when requested by the contractor.

Managers will ensure safe working, coordination and cooperation between contractors including regular on-site briefings between contractors and operatives.

In consultation with the client and principal designer The Harlestone Group will ensure a suitable construction phase plan:

- Is prepared before construction work begins
- Developed in discussion with, and communicated to, contractors affected by it
- Implemented and kept up to date as the project progresses
- Demonstrates the designers and contractors they engage are competent and adequately resourced
- Ensures suitable welfare facilities are provided from the start of the construction phase.
- Takes reasonable steps to prevent unauthorized access to the site
- Defines how site rules will be enforced
- Is provided, (or relevant parts of the plan), and other information to contractors, including the self-employed, in time for them to plan their work
- Defines the methods of communication with the Principal Designer on design carried out during the construction phase, including design by specialist contractors, and its implications on the plan.
- Provides the Principal Designer promptly with any information relevant to the "Health & Safety File"
- Ensures all workers have been provided with suitable health and safety induction, information and training.
- Includes carrying out regular toolbox talks with the teams
- Ensuring that the workforce is consulted about health and safety matters

In order to meet the requirements of the Management of Health & Safety at Work Regulations 1999 all site operatives will be required to:

- Read and sign method statements and risk assessments (RAMS) for all work to be undertaken.
- Follow all safety instructions given by the Project Manager
- Follow the emergency procedures
- Provide all necessary information to confirm their competency to undertake the role i.e., CSCS, IPAF and PASMA qualifications
- Use any machinery, equipment, dangerous substance, transport equipment provided by The Harlestone Group in accordance with training and instructions given.
- Inform the Harlestone Group of work situations that represent a serious and immediate danger to health and safety and of any shortcomings in the health and safety arrangements.
- Attend all training and induction sessions, toolbox talks, and "Safe Start" meetings provided by The Harlestone Group and the Client.

3.6 Workplace Risk Assessments

It is the policy of The Harlestone Group to comply with the Management of Health and Safety at Work Regulations. Managers are responsible for ensuring appropriate workplace risk assessments are carried out in order to effectively control operational hazards and reviewed and updated if there are significant changes in the nature or scale of operational hazards.

Workplace risk assessments will provide an opportunity to review the continuing effectiveness of safety policies and procedures and to identify areas where revision may be necessary.

Managers are responsible for ensuring risk assessment, including method statements (RAMS), information is effectively communicated to all employees, temps and subcontractors who may be working on their project or in their department. Managers ensure that any control measures identified in risk assessments or RAMS are effectively implemented.

3.7 Permit to Work

A permit to work can be considered as a specialised Safe System of Work (SSoW) under which certain high-risk activities may only be carried out with specific permission of the Authorised Person. Permits to Work (PTW) are an important means of ensuring the Health and Safety of employees, contractors and other people. Non-routine high-risk tasks such as Hot Work, work on live electrical systems, digging near underground services etc. can produce health and safety risks over and above those normally encountered. Therefore, a PTW is a specialised risk assessment to control these risks. It is the policy of The Harlestone Group to implement a permit to work for work activities that require any enhanced risk controls.

3.8 Workplace Equipment

It is the policy of The Harlestone Group to comply with the law as set out in the Provision and Use of Work Equipment Regulations and Lifting Operations and Lifting Equipment Regulations.

Managers will ensure all equipment used in the workplace is safe and suitable for the purpose for which it is used.

Managers are responsible ensuring all employees are provided with adequate information and training to enable them to use work equipment safely.

The use of any work equipment, which could pose a risk to the well-being of persons in or around the workplace, will be restricted to authorised persons.

All work equipment will be maintained in good working order and repair and, where required, independently checked and inspected.

All employees will be provided with such protection as is required to protect them from the dangers occasioned by the use of work equipment.

All work equipment will be clearly marked with health and safety warnings where appropriate.

Statutory examinations take place annually and biannually for the relevant ventilation equipment and lifting equipment. Weekly checks are documented, and visual checks take place before each use.

3.9 Excavations

In planning any excavation, or breaking ground a competent person is to carry out a risk assessment and decide on the method of work that will be adopted to ensure there is no collapse of the sides or slippage of material and services are to be avoided. For every excavation this assessment must take into consideration the ground conditions and the specifics of how the sides of the excavation will be supported. Spoil material must be stored well away from the excavation and there must be a secure means of access / egress where required. A permit to dig is to be completed in its entirety, in all cases with attached asset location plans obtained from utility service providers. For Western Power, the Map Response Team can be contacted via the following: Tel: 0121 623 9780 Fax: 0121 623 9223 WPDMapResponse@westernpower.co.uk An online mapping service is available at www.westernpower.co.uk/locationplans

All location plans must be dated within the last three months and be scaled at 1:500 to ensure visibility of services.

In the event the excavation is to be left unattended or at the end of the working shift measures must be put in place to protect the opening for example fencing and warning signage or covered. Where there is a likelihood children or others could gain access into site the fencing must be rigid and of sufficient height to prevent access for example 2m high heras. All excavations in public areas must be fenced. For excavations of 3 metres or more the risk assessment method statement is to consider whether it is to be classified a confined space.

All inspections are to be supervised by a competent person (competent person qualifications and training for the relevant roles for each project shall be listed in the CPP, Risk Assessment and Method statement as required) who shall be responsible for carrying out an inspection at the start of each shift prior to work starting. For those that require side supports inspections should take place after a fall or dislodgement of material, after any event likely to affect its strength or stability and at least once every 7 days. Inspection reports are to be kept on site until the excavation is closed and kept for 3 months minimum after completion and readily available upon request from authorities.

3.10 Service Avoidance

Underground Services

It is always safer to assume that there are underground services present in the ground. Assumptions should not be made on the depths of existing services or that services are not present.

As mentioned in the above section excavations safe systems of work are to be established and completed before work commences including a completed site-specific risk assessment method statement. Electricity services should be made dead prior to works, where this is not possible a safe system of work is to be established to factor in live cables to decide a method which would prevent injury.

A permit to dig and where relevant its equivalent (dependant on the Principal Contractor requirements) is to be completed in its entirety and signed off by all relevant parties with the location plans attached.

Site emergency contact details are to be included in the site pack with up-to-date relevant contact details that are readily accessible in the event of an emergency.

Asset location plans on overhead and underground services in the vicinity of the site is to be made available prior to excavation works (obtained within the last 3 months) taking place obtained by the

relevant utility distributors and checked. A CAT and genny scan that has been calibrated is to take place to ascertain the exact location of services by a competent person, even if the location plans say there are no services. The area should be checked for signs that services maybe in the area and where detected marked out with line marker or other visible method.

The location of services must be physically located, marked and made known to all concerned.

Prior to machine digging (not where there is live cables) all underground services should be located by digging trial holes by hand using insulated tool (spade or shovel), of which also requires a permit.

Further guidance can be sort on hand digging techniques in HSE guidance HS(G)47 "Avoidance of danger from underground services.

Warning markers should be used when the location of services have been identified.

All workers to be briefed on particulars before the commencement of work in the morning safe start meeting to raise awareness of the hazards involved in the work ahead which are to take into account the work environment and indications of services in the area.

IF YOU DAMAGE AN UNDERGROUND CABLE you must immediately clear the area of personnel, because the cable could still be live, or become live again. If a machine is still in contact with the cable, instruct the driver to JUMP clear. Do not touch any part of the machine.

In the event of an emergency please refer to the emergency contact details in the site pack.

Overground Services

The established safe systems of work is to be used including risk assessment method statements, permits to dig, asset location plans with details of types of services to ascertain level of risk and type of risk and a safe start meeting should be held highlighting significant hazards, the environment and control measures to be adhered to.

Information on Overground services are to be obtained in the vicinity of the area of works. No works should take place in the area if information is not available or incomplete. Warning signage of overhead cables and post markers are to be used. If work needs to take place near overhead services enquiries should be made to the Regional Electricity Company to obtain the accurate information on clearance distances for post markers etc and the precautions to be taken. A method statement should be produced consulting HSE guidance note GS6 "Avoidance of danger from overhead power lines and where western power are the known or suspected distributor consult Western Powers "Avoidance of Danger from Electricity Overhead Lines and Underground Cables". Shrouding request is to be made by contacting Western Power (**DBYD**) on 0800 096 3080 www.westernpower.co.uk/Worknear-overhead-lines.

Site emergency contact details are to be included in the site pack with up-to-date relevant contact details.

In the event of an emergency please refer to the emergency contact details in the site pack.

All workers to be briefed on particulars before the commencement of work in the morning safe start meeting to raise awareness of the hazards involved in the work ahead which are to take into account the work environment and indications of services in the area and precautions to be taken.

3.11 Personal Protective Equipment

It is the policy of The Harlestone Group to comply with the law as set out in the Personal Protective Equipment at Work Regulations.

Managers will take all reasonable steps to ensure hazards are controlled at source by technological methods and systems of work along with suitable Personal protective equipment (PPE) to each employee who may be exposed to any risk while at work.

All personal protective equipment provided by The Harlestone Group will be properly assessed prior to its provision to ensure it provides effective protection. Face fit testing of protective masks is routinely carried out by the Company therefore employees required to wear PPE masks are not permitted to have beards as this would prevent the mask from fitting correctly.

All personal protective equipment provided by The Company will be maintained in good working order.

All employees provided with personal protective equipment by The Harlestone Group will receive comprehensive training and information on the use, maintenance and purpose of the equipment.

The Harlestone Group will ensure that all personal protective equipment provided is used and used properly by its employees. Any employees who fail to use or look after personal protective equipment correctly may face disciplinary action by the Company.

3.12 Work at Height

The Company is committed to comply with the Work at Height Regulations. The Company will wherever possible avoid work at height however where this is unavoidable appropriate work equipment or other measures to prevent falls will be used.

The Company recognises that work at height poses a significant risk and this policy places duties on the Company, its employees and contractors under its control by ensuring:

- All work at height is properly planned and organised
- All work at height takes account of weather conditions that could endanger health & safety
- Those involved in work at height are trained and competent
- The place where work at height is done is safe
- Equipment for work at height is appropriately inspected and records maintained
- The risks from fragile surfaces are properly controlled
- The risks from falling objects are properly controlled.

Managers are responsible for ensuring any work at height activities are risk assessed and the appropriate control measures implemented in order to ensure:

- No work is done at height if it is safe and reasonable to do it other than at height
- The work is properly planned, appropriately supervised and carried out in as safe a way as is reasonably practicable
- There is a plan for emergencies and rescue
- The most suitable equipment is used
- Only competent persons are allowed to use work at height equipment and are adequately supervised.

Employees are responsible for ensuring any equipment provided for work at height is used appropriately and that any control measures identified in the relevant risk assessment are complied with.

See also, Harlestone OPERATIONAL PROCEDURE – WORK AT HEIGHT Document.

3.13 Lifting Operations

All employees and subcontractors will ensure that any lifting equipment used is erected and used in strict compliance with relevant statutory provisions, Codes of Practice, Health & Safety Guidance Notes and where appropriate to the manufacturer's instructions

All lifting gear or equipment brought into the workplace or site must comply with the requirements of the relevant statutory provisions.

The lifting equipment is to be of adequate strength and stability for each load, having regard in particular to the stress induced at its mounting or fixing point.

Every part of a load and anything attached to it and used in lifting it is of adequate strength.

Before any lifting operation is carried out with a new item of lifting equipment, a current test certificate for that appliance along with any other reports, registers or certificates as is necessary is to be made available for inspection (Normally 6 months for personnel lifting and 12 months for general lifting).

Where Lifting Equipment for lifting persons is used is such designed to prevent a person using it being crushed, trapped or struck or falling from the carrier; and that a person trapped in any carrier is not thereby exposed to danger and can be freed.

The company will particularly ensure that, before bringing onto the workplace or site a crane or other lifting appliance, will establish that a suitable standing is provided and that the ground can support the weight, which it is likely to have imposed upon it.

Consideration must also be given to overhead electrical cables and the possibility of arcing.

A written Method Statement, Lifting Plan and Risk Assessment specific to the situation will be required prior to implementation of the lifting operation, which clearly identifies the measures necessary to control any potential hazards and risks, which may arise.

See also, Harlestone OPERATIONAL PROCEDURE – WORK AT HEIGHT Document.

3.14 Manual Handling Operations

It is the policy of The Harlestone Group to comply with the law as set out in the Manual Handling Operations Regulations.

The Company carries out risk assessments of working practices which identify any manual handling hazards in order that appropriate control measures can be implemented to minimise the risks.

Risk assessments will take into account the load, working environment, the task itself and any individual's own capabilities. Manual handling training is given to all employees regardless of their role and regular toolbox talks remind employees of the risk of manual handling and the lifting correct techniques they must adopt. All possible steps will be taken to reduce the risk of injury to the lowest level possible.

Managers ensure that all work involving manual handling has been assessed, recorded, made known to staff, and that the required control measures are fully implemented.

It is the duty of all employees to make full and proper use of any equipment or system of work provided by the Company for the purposes of safer handling operations.

3.15 DSE (Display Screen Equipment)

It is the policy of The Harlestone Group to comply with the law as set out in the Health and Safety Display Screen Equipment Regulations.

The Harlestone Group will take appropriate steps to reduce health risks associated with the use of DSE by adopting a policy based upon care, support, assessment and education. Users of DSE are defined as someone who uses DSE on a regular, continuous basis.

Office based employees receive DSE training as part of their induction training which is followed by the employee carrying out an initial assessment of their workstation using the guidance received in their training.

If an employee reports a problem when using DSE then the Human Resources Manager will arrange for an individual risk assessment to be carried out, whereupon the employee will be advised of any risks to their health and the measures required to protect them from such risks.

Employees must follow the training and risk assessment advice given to them and make full use of the adjustment capabilities of their workstation to avoid potential health problems.

3.16 Control of Noise

The main hazard associated with exposure to noise is noise induced hearing loss or impairment. This can be caused by long term exposure, or by short but highly intense noise levels. Once the hearing is damaged there is no medical cure, and the hearing capacity loss is permanent.

Another hazard is impaired communications which could lead to other problems due to unheard or misinterpreted instructions.

It is the policy of The Harlestone Group to comply with the law as set out in the Control of Noise at Work Regulations and to ensure that, as far as reasonably practicable, our employees and others undertaking work for The Harlestone Group, are not exposed to levels of noise that could adversely affect their health. All work activities will be risk assessed to identify where levels of noise exposure may be detrimental to the health of those involved or in the proximity of the activity.

The Harlestone Group will take all reasonably practicable action to eliminate harmful noise exposure through design and procurement policies. Where it is not possible to eliminate the noise the level of exposure will be reduced as far as reasonably practicable. Where individuals are exposed to levels of noise that may be harmful to their health, they will be subject to ongoing health surveillance to ensure their hearing is not damaged.

The Company will use appropriate control measures to reduce any noise levels that reach 85dB. If noise levels cannot be reduced below 85dB the Company will provide staff with hearing protection as well as information, instruction and training in its use.

The Harlestone Group provides routine audiometric monitoring as part of their health surveillance programme for employees who are regularly exposed to noise in the workplace.

3.17 Vibration (HAV & WBV)

The Harlestone Group recognises its responsibilities to comply with the Control of Vibration at Work Regulations.

The vibrations caused by many items of work equipment (particularly handheld equipment) can cause long term health problems to those who use the equipment. The Control of Vibration at Work Regulations 2005 are designed to protect against the hazard and sets out the duties of employers and employees with regard to preventing Hand Arm Vibration Syndrome (HAVS) and other related conditions.

The Harlestone Group understands that regular frequent exposure to vibration through either hand arm vibration or whole-body vibration can lead to permanent health effects; the Company provide a self-assessment health monitoring form to staff for completion to allow for early identification and surveillance.

3.18 Electrical Safety

The Company is committed to comply with the Electricity at Work Regulations applicable to its operational activities. The Company will ensure:

- Fixed building wiring systems are inspected and certified every 5 years
- Safe and suitable electrical equipment is provided
- Preventive maintenance work is completed in a timely manner
- Portable electrical appliances are routinely inspected and tested for electrical safety, (PAT)
- Persons carrying out electrical work on behalf of the Company are competent to do so and safe systems of work are followed.

3.19 Control of Substances Hazardous to Health (COSHH)

It is the policy of The Harlestone Group to comply with the law as set out in the Control of Substances Hazardous to Health Regulations.

It is the responsibility of each Manager to control the hazards associated with substances used on their project or in their department, whether directly used in a process or as a by-product of a process.

All substances purchased are assessed to determine if safer alternatives are available and, where none are available, what controls are required in order to reduce the risk to an acceptable level.

Only competent employees are permitted to carry out COSHH assessments using information obtained from safety data sheets (SDS). The assessment will identify the hazard controls required to be implemented.

The Harlestone Group will ensure that exposure of employees to hazardous substances is minimised and adequately controlled in all cases.

All employees who will come into contact with hazardous substances will receive comprehensive and adequate training and information on the health and safety issues relating to that type of work.

COSHH assessments will be reviewed periodically, whenever there is a substantial modification to the work process and if there is any reason to suspect that the assessment may no longer be valid.

3.20 Control of Asbestos

It is the policy of The Harlestone Group to comply with the law as set out in the Control of Asbestos Regulations.

Workers do not work with asbestos containing materials.

During the pre-site survey and before commencing work on site the Contracts Manager is responsible for requesting a copy of the asbestos survey and information on the location of possible asbestos containing materials.

If asbestos was discovered during site activities, then work would immediately stop until the customer or site owner have made the area safe.

3.21 Health Surveillance

The Company will ensure that employees are provided with health surveillance where it is assessed as being appropriate and as is necessary to safeguard their health. The health monitoring form is used to highlight any issues for further investigation on an annual basis.

Health surveillance may involve regular medical checks of workers involved in processes where there may be an identifiable disease or adverse health effect related to exposure and where there are valid techniques for detecting early signs of the disease or effect. These will include audiometric testing and lung testing. Workers also have access to employee assistance for advice and counselling and access to medical diagnosis.

3.22 Fire Safety

It is the policy of The Harlestone Group to comply with the law set out in the Regulatory Reform (Fire Safety Order).

Reference should be made to the Company's "Fire Safety & Emergency Evacuation Policy" for details of the Company's fire safety procedures.

3.23 Accident Reporting & Investigation

It is the policy of The Harlestone Group to comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) and Health & Safety (First Aid) Regulations.

The Harlestone Group sees accident investigation as a valuable tool in the prevention of future incidents. In the event of an accident resulting in injury an accident record must be completed detailing:

- The person who had the accident
- The circumstances of the accident
- The nature and severity of the injury sustained
- The time, date and location of the incident
- The date of the report

The accident will be reported to the appropriate Manager or Director who will investigate the circumstances of the incident in order to determine if further investigation is required by the Company's Health & Safety Advisor, who will attempt to discover why the accident occurred and what action should be taken to avoid a recurrence of the problem.

Dependent of the nature of the incident the Human Resources Manager will notify the incident reporting centre as required by RIDDOR.

3.24 First Aid

The company shall make an assessment of the level of First Aid required based on the guidelines in “The First Aid at Work Regulations”. This shall include decisions on the number of qualified First Aiders required, the level of qualification required, and the number and content of First Aid kits.

Notice boards around the Company list the names and contact numbers of the trained First Aiders.

Each qualified First Aider is responsible for the proper use and maintenance of each first aid kit and reporting all accidents to a Manager or Director.

3.25 Control of Legionella

Although operating from rented premises the Company recognises its responsibilities to manage the operation and maintenance of its water systems and works closely with the Landlord to comply with current and relevant guidelines and legislation relating to the management and control of legionnaires disease.

Control measures include:

- Identify and assess the risk of Legionella resulting from work activities
- Develop, implement and maintain appropriate and suitable management systems to the inspection, analysis and, where required, plant treatment procedures
- Maintain adequate records in order to demonstrate compliance to regulations.

3.26 Lone Working

The Harlestone Group acknowledges that there may be an increased risk to the health and safety of its employees working alone. A lone worker can be anyone who works by themselves for significant periods of their working time and is engaged in activities which place them in a situation without direct contact with other staff, or without direct supervision during an activity that places that person at significant risk of exposure to a hazard or hazards.

Some common examples are:

- A person working in the yard areas
- Those working in an office on their own
- People working outside normal hours on their own
- Mobile workers who work away from the Company offices on their own.

The Company carries out suitable risk assessments in order to identify significant lone working hazards and have put in place suitable control methods to minimize these risks.

3.27 Control of Contractors

The Harlestone Group have a duty to ensure that any contractor working at its head office and sites are competent to perform the task safely without unacceptable risk to other employees, members of public and any others on the site.

Contractors are vetted and approved prior to commencing work. The Company assesses each contractor’s ability to provide a suitable safe management system, including risk assessments, method statements and training for their workers and will only employ contractors who have a proven safe record.

Contractors working at remote sites on behalf of the Group will be required to satisfy the requirements of the Client this may include drug and alcohol testing and will need to adhere to the site rules of the Principal Contractor. Site Specific Risk assessments will be provided by The Harlestone Group and Contractors will be required to read and understood them and sign to say this is so.

3.28 Yard Safety

Traffic management arrangements are in place at Head Office and are communicated to all those that arrive on site. The Harlestone Group recognises there is a duty to provide a safe working environment therefore a combination of safety signage, induction training, risk assessments and communication boards have been introduced to outline safe working practices. There is currently a 5-mph speed limit, the car park is kept outside the yard areas, clearly marked, and signed and segregated pedestrian walkways are available with visible crossing points. All delivery drivers, visitors and workers are prompted to follow the site rules.

3.29 Young Persons

The Harlestone Group recognises the importance of protecting young person's when working for the Company either as a permanent employee or a work experience placement.

To ensure young persons are adequately protected and kept safe the Company will:

- Carry out appropriate risk assessments and record the findings
- When appropriate, notify relevant parties, i.e., school, parents/guardians, know the key findings of the risk assessment and control measures before they start work
- Decide on the most appropriate control measures, including prohibiting certain them from carrying out certain tasks
- Ensure the young person is suitably supervised and their ability to carry out tasks is monitored and controlled during their working time with the Company.

3.30 Driving for Work

Please refer to the Company's "Driving for Work" policy for details related to driving for work.

3.31 Measuring Safety Performance

Individual employee roles have been allocated particular responsibilities for health and safety, including responsibilities for monitoring and maintaining systems. Monitoring and evaluating health and safety performance is a continuous process, which the Company recognises as a normal function of managing health and safety.

Audit and inspection regimes are in place to assess and monitor workplace activities. Project site audits take place monthly by an external consultant. Thorough annual audits take place for Achilles' certification. An annual audit takes place through our health and safety consultant of the office procedures and the yard. Health and safety initiatives are in place to encourage workers to use their initiative and suggest improvements.

Where the results of monitoring indicate areas of weakness or breaches in terms of regulations, stated policies, procedures or hazard controls, this will give rise to corrective actions and preventive action.

Accident and incident trends will be monitored to ensure that lessons are learnt from past mistakes and the ongoing safety of workers is achieved.

Organisational health and safety objectives are reviewed regularly and communicated to the workforce.

3.32 Control of COVID 19

Measures have been put in place in line with industry and government guidance to ensure social distancing takes place and facilities available to ensure cleanliness.

All workers are briefed on measures in place which are set out in the risk assessments which everyone would have signed to acknowledge they have read and understood. Measures for visitors are also outlined.

Everyone will need to complete a disclaimer before entering the premises as a precautionary measure which will ascertain if any symptoms or possible contact with infected individuals. Anyone who has will be required to leave the site and isolate for the period set out by the government. Reminder signage is available to remind people of what measures are to take place.

3.33 Other Hazards

Please see the employee handbook for policies on health and safety such as smoking and fire safety.

3.34 Health & Safety Organisation The Harlestone Group

Harlestone Projects Roles and Responsibilities

- **Silas Wilde Managing Director**
Accountable for health, safety & wellbeing of all Company employees & subcontractors
- **HR Consultant**
Providing HR advice, training, induction, main point of contact for H&S Advisor
- **Health and Safety Advisor Consultant**
Providing health & safety advice, guidance, communication on news and updates and coordination of activities to facilitate, health and safety policy update, Management and Committee Meeting Chair, Health monitoring
- **Director**
NEBOSH trained H&S responsible person for the Group, day to day operations of H&S for Sales, Drawing office, Projects and Workshop
- **Operations Director**
Overseeing operational health and safety. Direct report where recurrent issues for problem solving
- **Chief Operating Officer**
Overseeing operational health and safety for Harlestone Projects, delegating and facilitating day to day operations of H&S for Sales, Office and Workshops
- **Head of Sales**
Responsibility for day-to-day operational health & safety of employees in the sales and estimating operations at Head Office
- **Production Manager**
Ensuring the coordination of workshop health and safety inspection checks are completed in a timely fashion, Fire Evacuation Coordination and actions. Responsibility for day-to-day operational health & safety of employees in workshop, yard and purchasing operations at HO
- **Workshop /Yard Supervisor**
Responsible for; employee induction, Risk Assessment Method Statement, Toolbox Talks, Equipment, subcontractor safety, incident reporting reporting
- **Contract Managers /Supervisors**
Responsible for; employee induction, Project safety pack preparation, equipment, arranging PPE, subcontractor safety, incident reporting
- **Projects Administrator**
Responsible for issuing toolbox talks, DSE assessments, arranging training and keeping associated records
- **Buyer**
Ordering PPE, safety signs and other health and safety related orders

Note: All workers are responsible for the health and safety of themselves and others. First aiders and fire wardens exist throughout the teams to ensure a co-ordinated approach.

Harlestone Supplies Roles and Responsibilities

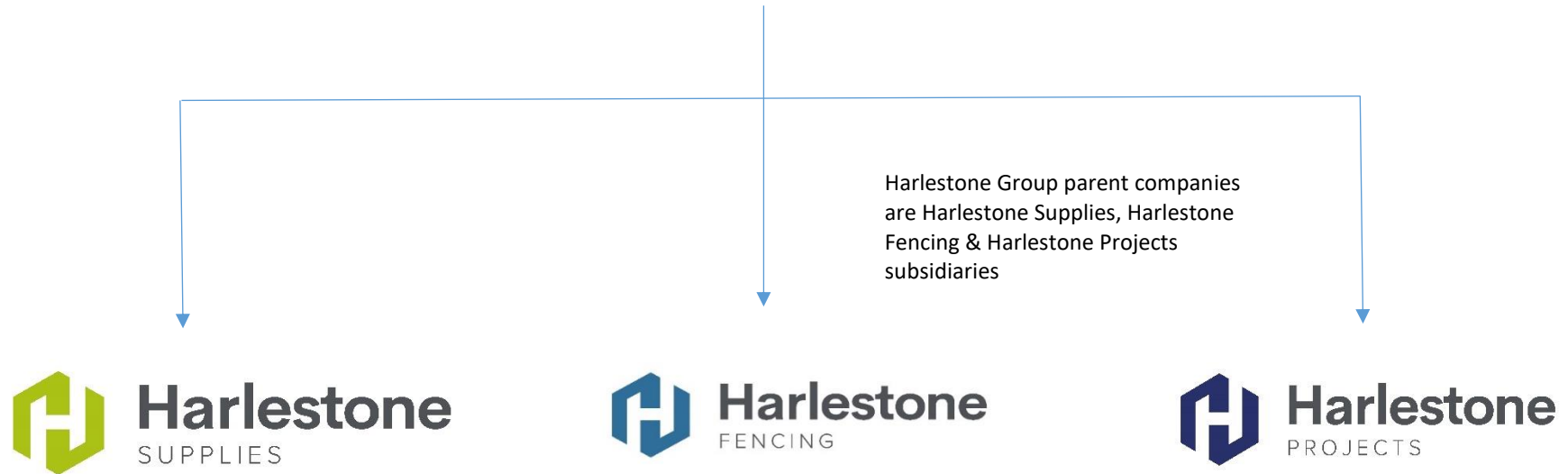
- **Silas Wilde Managing Director**
Accountable for health, safety & wellbeing of all Company employees & subcontractors
- **HR Consultant**
Providing HR advice, training, induction, main point of contact for H&S Advisor
- **Health and Safety Consultant**
Providing health & safety advice, guidance, communication on news and updates and coordination of activities to facilitate, health and safety policy update, Management and Committee Meeting Chair
- **Operations Director**
Direct report where recurrent issues for problem solving
- **Chief Operating Officer**
H&S responsible person for Harlestone Supplies, delegating and facilitating day to day operations of H&S for Sales, Office and Workshop
- **Production Manager**
Ensuring the coordination of workshop health and safety inspection checks are completed in a timely fashion, Fire Evacuation Coordination and actions. Responsibility for day-to-day operational health & safety of employees in workshop, yard and purchasing operations at HO
- **Workshop Supervisor**
Responsibility for day-to-day operational health & safety of employees in workshop including RAMS reviews, equipment and workshop cleaning schedules, giving TBTs on relevant subjects and RAMS.

Note: All workers are responsible for the health and safety of themselves and others. First aiders and fire wardens exist throughout the teams to ensure a co-ordinated approach.

Harlestone Fencing Welsh Division Roles and Responsibilities

- **Silas Wilde Managing Director**
Accountable for health, safety & wellbeing of all Company employees & subcontractors
- **HR Consultant**
Providing HR advice, training, induction, main point of contact for H&S Advisor
- **Health and Safety Consultant**
Providing health & safety advice, guidance, safety alerts, site inspections, training, Risk Assessment Method Statements updates and Construction Phase Plan
- **Operations Director**
Direct report where recurrent issues for problem solving
- **Chief Operating Officer**
H&S responsible person for Harlestone Fencing, delegating and facilitating day to day operations of H&S for Sales, Office and Workshop
- **Admin and Operation Co-ordinator**
Health & Safety project packs Welsh Water require for site, organising required training, record keeping, issuing TBTs. Recording accident Stats equipment arrangements Induction preparation. Regular safety check in.
- **Contracts Manager**
Site specific Construction Phase Plan preparation and Risk Assessment Method Statements approval for each site. Induction approval. Liaise with Safety Advisors and report to Directors on developments
- **Contracts Supervisor**
Risk Assessment Method Statement Preparation

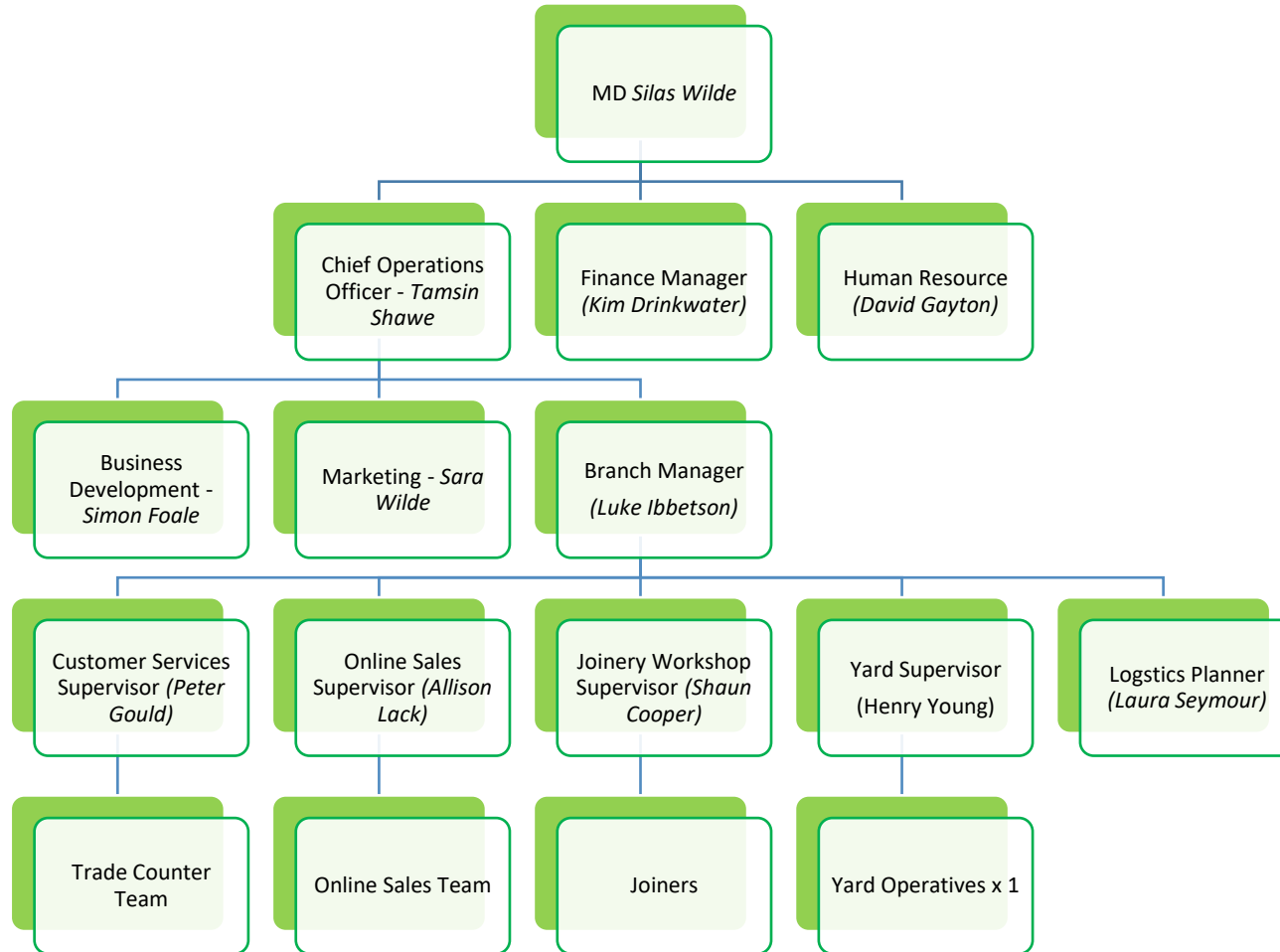
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 **Harlestone**
GROUP

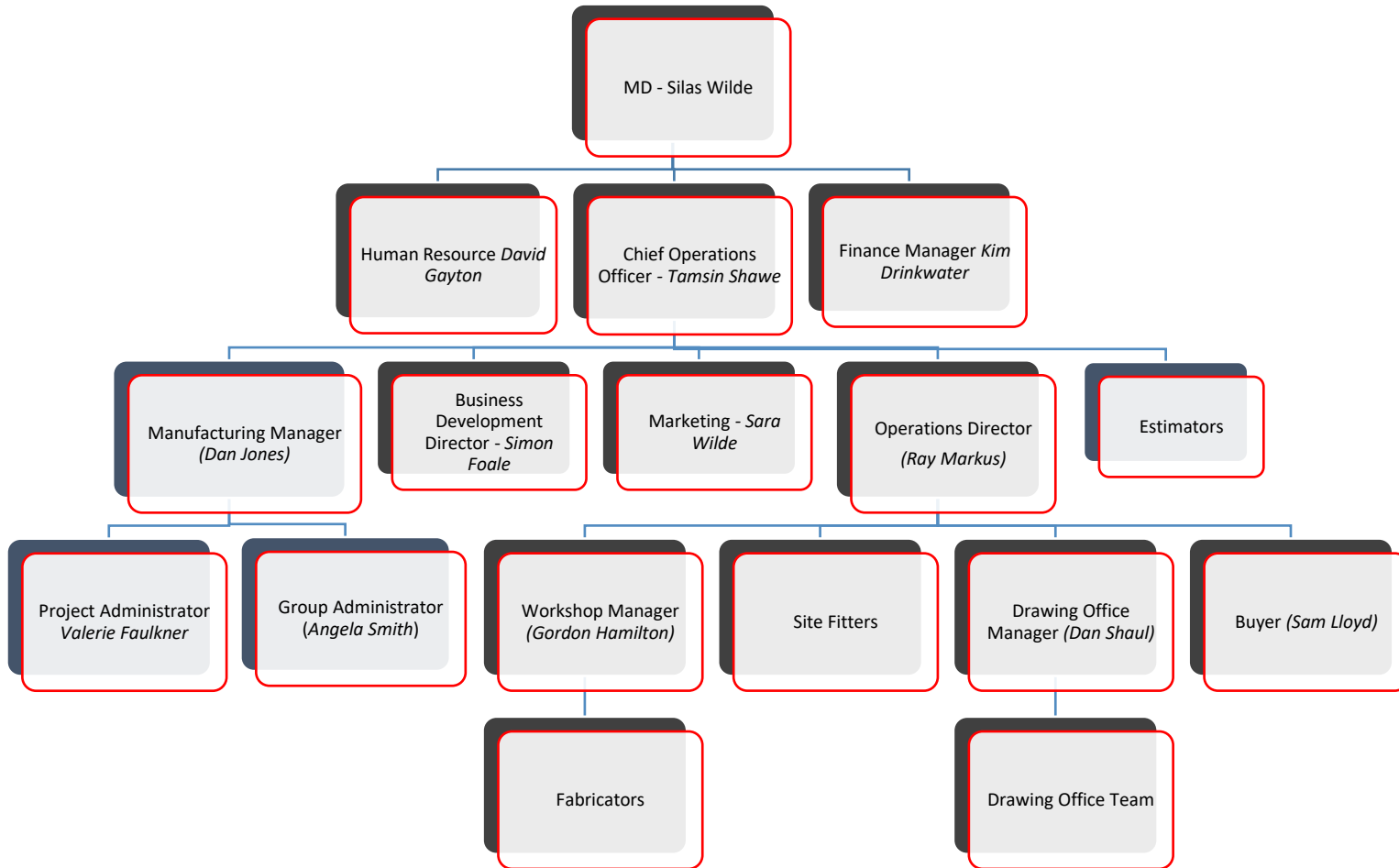
The Harlestone Group & Health & Safety Management System Team



Harlestone
SUPPLIES



Harlestone
PROJECTS



Wales

