



Company Health & Safety Policy

Company Environmental Policy



ARRANGEMENTS IN FORCE CONTENTS LISTING

SECTION:

1. Risk Assessment and Safety Analysis of Tasks and Operations.
2. Project Safety Method Statements.
3. Principal Contractor Liaison.
4. Safety Management Procedures and Reference Sources
5. Training
6. Safety Inductions
7. Safe Working at Heights
8. Work Equipment used by the Company
9. Fire Safety and Prevention
10. Drivers of Company Vehicles
11. Personal Protective Equipment
12. Occupational Health
13. First Aid Arrangements
14. Safety Inspections, Auditing and Sampling Arrangements
15. Accident / Incident Record Keeping
16. Investigation of Accidents and Near Miss Incidents
17. Health & Safety File
18. Response to New Legislation / Safety Management Standards
19. Sub-Contractors and Self Employed Individuals
20. Consultation and Communication with Employees
21. Employment of Young Workers
22. Record Keeping and Data Protection
23. Alcohol & Illegal Drugs
24. Disciplinary Procedures
25. Overlap of Working Arrangements with other Contractors
26. Environment

INTRODUCTION

1. This section of the Safety Policy document outlines the responsibilities delegated to respective duty holders and states what is expected of each department and each individual duty holder in respect of the planning and management of health, safety and welfare at locations where IDD Contracts Ltd (The Company) is the occupier, or where the Company is an appointed trade contractor.
2. In each instance the emphasis is on planning, thereby reinforcing the IDD Contracts Ltd commitment to being pro-active in all aspects of health & safety management.
3. The phrasing refers to each incumbent duty holder.
4. Duty holders must refer to and take account of the requirements expressed within the organisational structure insofar as they may affect responsibilities assigned to them.
5. Directors who delegate tasks to employees must take account of:
 - the complexity of the responsibility/ies;
 - the nature of the project and the work location/s;

and be satisfied that the employees / operatives have sufficient training and the necessary competencies to discharge properly the responsibilities delegated to them.

1. THE DIRECTORS

1.1 The Directors of IDD Contracts Ltd shall ensure the development and maintenance of safe systems of work and supporting documentation for employees and other persons working at locations under the control of the Company. This shall be achieved by:

- Assigning to suitably experienced and competent individuals clearly defined duties and responsibilities for the planning, management, implementation and review of health, safety and welfare;
- Providing the necessary in-house expertise and external support to enable duties and responsibilities to be effectively discharged;
- Arranging for the necessary safety awareness training for all employees, taking account of legislative requirements and internal procedures and controls.

1.2 The Directors shall ensure that authoritative health, safety and welfare reference sources are available to enable delegated duty holders to effectively discharge their responsibilities in respect of the planning and management of health, safety and welfare which shall be maintained to nationally recognised standards and controls. Such reference sources may include publications issued by the HSE¹, BS/EN² publications, or other reputable trade sources.

1.3 The Directors shall allocate a general and project-specific financial provision to resource the planning, management and training requirements for health, safety and welfare. Such financial provision shall be sufficiently adequate to enable the demonstrable discharge of:

- Relevant statutory duties
- Insurance requirements
- Principal Contractor requirements
- Company requirements.

1.4 Financial allocations shall be reviewed and accounted for during Board meetings and individual project reviews, taking particular note of:

- The Health and Safety at Work etc Act 1974;
- Codes of Regulations specific to construction operations;
- Codes of Regulations which influence occupational health controls and standards, and

¹ Health and Safety Executive

² British/European Standards

Safety Policy – Section 2: Organisation

- The requirements of the Management of Health, Safety and Welfare Regulations 1999.
- Construction Design Management Regulations 2007.

2. DIRECTOR RESPONSIBLE FOR CO-ORDINATING THE SAFETY MANAGEMENT PROGRAMME

2.1 In line with the commitment of the Company, the Managing Director is delegated responsibility for planning and co-ordinating the Company safety management programme. The Managing Director shall have the full support and co-operation of all employees and service providers.

2.2 Core requirements for ensuring the effectiveness of the IDD Contracts Ltd safety management system are summarised as follows:

- a. Ensuring the IDD Contracts Ltd safety management system is effectively planned and implemented;
- b. Ensuring that the established safety awareness training programmes are current, maintained and implemented, and take account of current legislative requirements, current industry invention and internal procedures and controls for all employees / operatives working under the control of the company.
- c. Actively communicating IDD Contracts Ltd safety management initiatives to all operatives and service providers;
- d. Appraising reports and commentaries (including those from Principal Contractors) on the standards of compliance with and effectiveness of planned safety management controls on site;
- e. Appraising new or revised in-house safe working procedures or controls, prior to presenting them for Partner approval;
- f. Reviewing reports and commentaries about incidents resulting in injury, work induced ill-health and/or damage incidents;
- g. Ensuring that personnel involved in pre-tender negotiations take account of in-house and Principal Contractor requirements in respect of the planning and management of health, safety and welfare, and ensuring that the evaluation allows for sufficient funding to discharge those duties effectively;
- h. Assigning to suitably experienced and competent individuals clearly defined duties and responsibilities for the planning, management, implementation and review of health, safety and welfare;

Safety Policy – Section 2: Organisation

- i. Having available the necessary in-house expertise and external support to enable duties and responsibilities to be discharged effectively;
- j. Keeping up-to-date on developments in the planning and management of health, safety and welfare which influence or affect Company operations or trading.

2.3 Additionally, the Managing Director shall:

- a. Report to Directors on developments in the planning and management of health, safety and welfare in general, and the internal implications of such developments.
- b. Notify the Directors about the standard of safety management being achieved on project and work locations under the control of the Company.
- c. Provide the Directors with data, analysis, causative factors and recommendations in respect of any incidents resulting in injury, ill-health or damage;
- d. Report to the Directors on the Company's involvement with the Health and Safety Executive;
- e. Report to the Directors on Principal Contractors' requirements and initiatives which may influence the planning, resourcing and management of health, safety and welfare on site;
- f. Liaise with specialists, including design duty holders, who influence or affect the planning, implementation, maintenance or monitoring of health, safety and welfare at work;
- g. Prepare a safety management report for the Directors at prescribed intervals.

2.4 The appointed Managing Director shall have the full support of all fellow Directors and shall be allocated adequate time and provided with such professional assistance as may be necessary to enable the practical and effective discharge of the responsibilities delegated.

2.5 The Managing Director shall allocate sufficient time to properly discharge the responsibilities assigned, which may include time for:

- Studying and appraising reports;
- Meeting with the appointed Company Safety Advisor;
- Attending training courses and briefings;

Safety Policy – Section 2: Organisation

3. COMPANY SAFETY ADVISOR.

3.1 The appointed Safety Advisor is ultimately accountable to the Managing Director.

3.2 The Directors are adamant that the Safety Advisor shall be given the full co-operation and assistance of all Company operatives and appointed service providers.

3.3 In addition, the Company Safety Advisor shall be:

- Allocated sufficient time to enable the proper and effective discharge of the responsibilities delegated to him;
- Authorised for such Continuous Professional Development (CPD) as may be necessary to ensure up-to-date awareness and management techniques are available for the enhancement of Company safety management systems.

3.4 The responsibilities assigned to the Company Safety Advisor are:

- a. To advise the Managing Director and other Directors on developments and initiatives in the planning and management of health, safety and welfare insofar as they may foreseeably influence the Company's decision making;
- b. Ensure that Company safety management (and allied) procedures are in line with current legislative requirements and comply with sources of authoritative guidance.
- c. Conduct impartial and open investigations into incidents involving the Company which result in injury, occupationally induced ill-health, or damage, and report in accordance with Company procedures;
- d. Liaise with and advise planning and procurement personnel on matters influencing or impinging on the Company's safety management programme and associated initiatives;
- e. Discuss with Principal Contractors and prospective Principal Contractors their specific requirements and controls for the planning and management of safety on their sites, and evaluate how and to what extent IDD Contracts Ltd's on site health & safety systems may be influenced or affected;
- f. Comment and provide opinion on technological innovations and developments whereby internal health, safety and welfare initiatives and standards may be further advanced;

Safety Policy – Section 2: Organisation

- g. Ensure that arrangements are in place for the issue of company health & safety documentation (and all appropriate revisions) to nominated individuals.
- h. Arrange and/or present in-house safety briefings on selected safety management issues and initiatives;
- i. Audit monitor and report on the applied safety management standards on sites.
- j. Ensure that safety related records, including those required by statute, are available, maintained up to date and accurately provided.
- k. Liaise with the Health and Safety Executive on developments in health and safety management standards;
- l. Liaise with the Company's insurers on issues influencing or affecting existing or proposed safety management programmes or initiatives;
- m. Liaise with Company personnel on either current or potential health & safety matters / issues which may affect IDD Contracts Ltd's on site operations.

3.5 The Company Safety Advisor shall be available to provide assistance and guidance to all Company personnel on matters involving the planning and management of health, safety and welfare standards.

4. PLANNING AND PROCUREMENT

4.1 Responsibilities are delegated to individuals involved in planning and procurement on behalf of IDD Contracts Ltd.

4.2 For the purposes of this Safety Policy document, Planning and Procurement duty holders may refer to any individual within any department who is authorised to negotiate or specify on behalf of the Company. This may include:

- Designers
- Contracts Managers
- Purchasers
- Operational Managers/Supervisors
- External Health & Safety Advisors

4.3 Such employees are empowered to make decisions influencing and affecting the planned safety management programme, by:

- a. Employing individuals within the Company;
- b. Appointing service providers, including sub-contractors to carry out specified work for the company;
- c. Specifying or purchase work equipment for use by the Company;
- d. Designing or configuring structures on behalf of the Company;
- e. Specifying or purchasing products or materials for use by the Company;
- f. Specifying of purchasing personal protective equipment (PPE) for use by the Company;
- g. Specifying or arranging logistics for or on behalf of the Company;
- h. Specifying or arranging project Programmes of Work for IDD Contracts Ltd work packages.

4.4 In each instance, the individual / personnel concerned shall be aware of the safety and risk management requirements which affect their decision making.

Safety Policy – Section 2: Organisation

4.5 Essential to each activity will be:

- a. Awareness of and ensuring compliance with relevant statutory requirements and associated authoritative guidance;
- b. Understanding and complying with the process of design risk assessment in respect of the assembly/installation of Company designs;
- c. Awareness of and complying with IDD Contracts Ltd pre-qualification requirements for sub-contractors and service providers;
- d. Understanding and arranging for the dissemination of safety related information issued by suppliers and/or service providers;

4.6 Individuals involved in planning and procurement responsibilities shall maintain and arrange for regular liaison with the Company Safety Advisor for assistance with their decision-making process.

4.7 Personnel involved in the preparation of tender bids are required to attend in-house safety awareness briefing for planning and procurement managers. Briefings explain the importance of securing compliance with safety legislation and associated guidance on planning and resourcing health, safety and welfare at work, and also assists in promoting more detailed analysis of planning and co-ordination requirements insofar as they may influence the Company's on site activities.

4.8 When items of equipment are hired from both internal and external sources procurement personnel must ensure (so far as is reasonably practicable to do so) that all relevant documentation i.e. manufacturer's instruction booklets, certificates of equipment conformity etc are provided along with the equipment. Items of portable electrical equipment must also display evidence that the equipment has been PAT tested in accordance with the statutory requirements to enable appropriate project / office management to update the on site PAT test register to include such equipment at the earliest opportunity.,

5. PROJECT MANAGER / SUPERVISOR

5.1 General Requirements

5.1.1 The Directors recognise and acknowledge the extent of the responsibilities delegated to Project Managers & Supervisors in the employ of the Company in respect of day-to-day management and supervision for health, safety and welfare.

5.1.2 In order to assist Project Managers / Site Supervisors with the effective discharge of their delegated responsibilities, the Directors require that they:

- a. are provided with and partake in safety management awareness training commensurate with their responsibilities; and
- b. have available specialist safety assistance via the Company Safety Advisor, for planning and managing health, safety and welfare on site.

5.1.3 Project Managers & Supervisors report directly to the Contracts Manager on all matters concerning or affecting the planning, management or control of health, safety or welfare matters on site.

5.2 Delegated Responsibilities

5.2.1 The following general responsibilities for co-ordinating and managing health, safety and welfare are delegated to each Project Manager / Supervisor:

- a. Administrative -
 - i. Display in a prominent position and draw to the attention of all workers a copy of the Health and Safety Executive poster, *Health and Safety Law - What you should know*;
 - ii. Display on the site office notice board (where available) and or make reference to at Company project specific inductions the following documentation (which may be retained within the IDD Contracts Ltd Project Health & Safety File where it is not practical to display on site): The Company's current Employer's Liability Insurance Certificate and a copy of the *Statement of Intent* from the Company's Safety Policy Document.
 - iii. Check the availability and accuracy of the overall project Safety Method Statement;

Safety Policy – Section 2: Organisation

- iv. As part of the safety induction process, explain and distribute for review relevant Health & Safety documentation including the approved Safety Method Statements and Risk Assessments to all employees and other individuals working under the control of the Company prior to the commencement of work on site.
- v. Where possible, display for reference by operatives copies of approved Safety Method Statements relevant to the current phases of work on site.
- vi. Check and verify items identified in the approved general or Task Specific Safety Method Statement which require action, and the timescale for the action to be taken;
- vii. Have and maintain sufficient copies of records, which may include the following³:
 - Testing for portable and transportable electrical equipment;
 - Record of safety inductions and attendees;
 - Record of safety tool-box talk / safety briefing presentations and attendees
 - Record of operative Method Statement Awareness Register documentation.
 - Record of operative Risk Assessment Awareness Register documentation.
 - Record of operative Personal Protective Register documentation.
 - Record of Inspection for access equipment used for working at height where there is a statutory requirement for a competent inspection of such equipment. e.g. mobile towers etc.;
 - Record of Inspection for access equipment used for working at height. in accordance with company requirements e.g. MEWPS, podium steps etc.;
 - Safe operating/use instructions for work equipment and tools.
 - Instruction manuals for all equipment used on site.
- viii. Maintain copies of all approved Safety Method Statements as submitted by all sub-contractors working for IDD Contracts Ltd on site;

³ Precise requirements for each project shall be detailed in the general Safety Method Statement

Safety Policy – Section 2: Organisation

- ix. Ensure all injury treatments (first-aid) are recorded in the Company Accident Book and ensure that all Data Protection requirements e.g. injured party personal details are strictly complied with;
- x. Complete injury/damage incident data for issue to the Company Nominated Safety Advisor in accordance with instructions specific to the site;
- xi. Ensure that any incident within the remit of RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) is reported *without delay* to the Managing Director;
- xii. Complete Supervisor point of work inspection tours documentation in accordance with Company requirements.

c. Planning –

- i. Assist the Company Safety Advisor in the planning and preparation of on-site safety inductions for employees and others who may be attending site on behalf of IDD Contracts Ltd.
- ii. Liaise with the resident supervisors representing each independent (sub) contractor employed on site by IDD Contracts Ltd and establish the responsibilities for health, safety and welfare delegated to them;
- iii. Identify and arrange for regular liaison with the Principal Contractor's safety co-ordinator on site in respect of planned and applied safety management standards.

c. Monitoring Compliance with Planned Safety Management Standards -

- i. In accordance with company requirements carry out a site safety tour, noting and recording up-to-date standards of control in respect of:
 - Pedestrian access to and egress from Company work areas
 - Identification and maintenance of vehicular traffic/mobile plant routes, insofar as they may influence Company logistics;

Safety Policy – Section 2: Organisation

- Display and accuracy of signage identifying emergency evacuation routes and muster points;
 - Adequacy and maintenance of temporary and emergency luminaires;
 - Display and maintenance of safe condition status safety signs, including identification of welfare point/s i.e. safety glasses cleaning points and drinking water points;
 - Maintenance, suitability and hygiene standards of welfare, administrative and storage units;
 - Clearing and removal of waste/surplus materials generated by IDD Contracts Ltd;
 - Control of storage of company materials, components and equipment on site.
 - Positioning, suitability, integrity and maintenance of leading edge protection at areas where the Company is working;
 - Maintenance, display, positioning of and compliance with prohibition status safety signs;
 - Identification of and compliance with tasks, operations, processes and/or locations subject to formal Permit-to-Work controls;
 - Liaison with third party contractors whose personnel / work processes impinges upon IDD Contracts Ltd work areas,
 - Standards of safe working at heights, including controls for the prevention of falls of persons or materials;
 - Ensuring the availability and correct wearing of PPE (personal protective equipment) which has been assessed as necessary by IDD Contracts Ltd;
- ii. On completion of any safety tour, the Site Supervisor will discuss his findings with Company operatives, placing particular emphasis on any disregard for planned safety management controls;
- iii. Where the Project Manager / Supervisor identifies any activity by third parties which could foreseeably compromise the safety of Company personnel, the concerns shall be notified to the Principal Contractor's safety co-ordinator without delay so that remedial action may be taken. Additionally, the Senior Partner must also be notified of such activities without delay.

Safety Policy – Section 2: Organisation

- 5.3** Delegation of Responsibilities to other Members of the Management Team
- 5.3.1 Some of the responsibilities listed above may be delegated to other members of IDD Contracts Ltd site-based management team who are authorised and trained to properly carry out the control/s. Where this is the case, arrangements shall be recorded in the general Safety Method Statement for the project.
- 5.3.2 Where responsibilities are delegated, it is the duty of the Site Supervisor to ensure they are properly discharged.
- 5.4** Other Responsibilities - The Site Supervisor may:
- a. Accompany the Company Nominated Safety Advisor (or appointee) during safety management inspections or audits, if required to do so;
 - b. Meet with Principal Contractors' visiting/resident safety advisors and discuss the findings of their inspections on site insofar as they affect IDD Contracts Ltd;
 - c. Attend safety briefings arranged by the Principal Contractor on site and report back to the Company Partner's.
 - d. Discuss the implementation of safety management controls with the Company Project Manager during visits to site;
 - e. Be fully conversant with the requirements of this Safety Policy document.
- 5.5** Co-operation and assistance - All IDD Contracts Ltd personnel and service providers are required to co-operate with and assist the Site Supervisor in the discharge of his responsibilities.

6. RESPONSIBILITIES OF WORKERS

6.1 Tradesmen and operatives assigned to a project where the Company is working shall be required to co-operate with and assist IDD Contracts Ltd site management in achieving and maintaining a safe place of work, and to co-operate with others with regard to health and safety requirements and controls.

6.2 A similar requirement is imposed on sub-contractors' personnel working under the control of IDD Contracts Ltd.

6.3 No worker may start work on a site with IDD Contracts Ltd unless they have attended the Principal Contractor's safety management induction and the IDD Contracts Ltd site-specific safety induction where the details of the controls for promoting and co-ordinating safe systems of work will be explained.

6.4 Tradesmen and other operatives employed by or working under the control of IDD Contracts Ltd shall:

- Notify our site management of any unsafe circumstances or conditions which they may identify;
- Make themselves aware of the safety rules in force;
- Report to the site management any incident which results in injury or damage and ensure the information is properly recorded when reported;
- Use only materials and plant which they have been competently trained and authorised to use, and only use equipment in accordance with the manufacturer's/supplier's instructions and directions;
- Not use/borrow work equipment belonging to other contractors or third parties;
- Understand and check safety notices and signs displayed on site and comply with their requirements/instructions;
- Wear correctly and without alteration all items of personal protective equipment provided for their use (both mandatory PPE and task specific PPE).
- Make recommendations for improvements to the safety management controls on site and liaise with Company Project Management accordingly.
- Not endanger themselves or others by any action or omission in relation to health, safety or welfare issues;
- Attend and partake in safety tool box talks and safety briefings presented by IDD Contracts Ltd's site management and/or Principal Contractor;

Safety Policy – Section 2: Organisation

- Co-operate and comply with any instructions issued by the Principal Contractor's authorised managerial staff.

Safety Policy – Section 2: Organisation

7. IDD CONTRACTS LTD's RETAINED SAFETY MANAGEMENT ADVISORS

7.1 IDD Contracts Ltd has retained the services of an independent safety management consultancy in order to assist the Company discharge the duties assigned under the following Regulations:

- The Management of Health and Safety at Work Regulations 1999 (Reg.7);
- The Construction (Design and Management) Regulations 2007.

7.2 Duties carried out by the Company Safety Advisor will include: safety audits/inspections, preparation of safety documentation, preparation and presentation of safety awareness training modules, incident investigations.

7.3 The Principal of the safety management consultancy shall liaise at all times with the Company Directors and provide whatever safety management assistance may be required or considered necessary.

7.4 The appointed advisers are:

Summit Health & Safety Management Limited
2 Hickmans Lane
Lindfield
Sussex
RH16 2BH

Tel: 01444 455910 / 07595 936087

Email: summithsm@hotmail.co.uk

Document Revision History:

Revision 1 – March 2012

Safety Policy . Section 3: Arrangements in Force

INTRODUCTION

1. The Directors of (IDD Contracts Ltd) shall consider and ensure formalised controls in respect of the following arrangements for the management of health, safety and welfare of people employed by or working under the control of the Company and others whose activities may overlap with our activities.
 2. The following key points will always be addressed and assessed with the conclusions appropriately documented:
 - Pre-tender health and safety information issued by the Company & Principal Contractors
 - Company task, operation, process or location risk assessments
 - Project Health & Safety Plans
 - Project-specific Safety Method Statements
-

Note:

Office / Factory Procedures

All premises where IDD Contracts Ltd staff and service providers work are subject to safety management procedures and controls that are supplementary to this Policy Arrangements in Force documentation.

The procedures shall be distributed in full to all appropriate duty holders and explained to all IDD Contracts Ltd staff and service during their Company induction.

1. RISK ASSESSMENT AND SAFETY ANALYSIS OF TASKS AND OPERATIONS

- 1.1 All tasks and operations carried out by or on behalf of the Company shall be subject to a safety analysis which shall seek to identify the following factors:
 - Significant risks
 - Frequency of the activity
 - Potential consequences
 - Control requirements
 - Communication of controls
- 1.2 Such analysis will enable a series of generic safe working procedures to be developed from which detailed and specific risk assessments may be drafted to take account of circumstances unique to the project, location and environment. Many of the work activities

Safety Policy . Section 3: Arrangements in Force

carried out by the Company are repetitive; we therefore build-in generic controls to our safety management systems in order to promote consistency.

1.3 The structure, terminology, presentation and communication of these procedures will at all times be geared towards the needs of our workforce so as to ensure that the safety control is comprehensible and practical for everyone it is intended to protect (where appropriate signs or digital images may be used to enhance communication and understanding).

1.4 Risk assessments and safety analysis will be tailored to be project / location specific and will be subject to ongoing review.

1.5 Headings to be addressed when recording risk assessments will always include:

1. Task description and location of work area
2. People affected by the task
3. Relevant hazards identified
4. Foreseeable risks arising, frequency of exposure and potential severity of identified risks
5. Control measures for eliminating or mitigating the identified risks.

1.6 Where required and practical to do so, project health & safety documentation (risk assessments & method statements etc) may be translated into the native language of a percentage of our on site workforce. Such translation (where practical to do so) will be carried out by reputable translation service providers.

2. PROJECT SAFETY METHOD STATEMENTS

2.1 Project Safety Method Statements prepared by IDD Contracts Ltd are primarily for individuals employed by or working under the control of the Company. They are also intended to provide assurance to Principal Contractors that all health, safety and/or welfare requirements relevant to a project and our specific work packages are properly resourced.

2.2 Safety Method Statements will not include information or controls that are contained in established safe working procedures or risk assessments.

2.3 The preparation of Safety Method Statements will be influenced by and take account of relevant pre-tender health and safety information prepared by Principal Contractors. In all cases, the following headings shall be incorporated into the Safety Method Statement where appropriate and relevant:

- Principal Contractor details
- Project address
- Description of the planned schedule of works

Safety Policy . Section 3: Arrangements in Force

- Key points influencing the work package (extracted from the Principal Contractor's pre-tender safety information)
- The names and contact details for IDD Contracts Ltd project management team.
- Planned works and sequence of works to be carried out.
- Details of IDD Contracts Ltd specific on site welfare provisions including:
 - Administrative area.
 - First-aid provisions and designated trained personnel.
 - Plant & material storage facilities, and delivery/distribution arrangements
- Mandatory and task specific personal protective equipment (PPE) requirements and provisions.
- Occupational health controls and requirements
- Plant and work equipment specified for the project
- Identified safety critical issues
- Acknowledgement of compliance with the Principal Contractor's emergency arrangements.
- Arrangements for and co-ordination of overlap with other contractors
- IDD Contracts Ltd communication of safety controls
- Arrangements for issuing variations to health & safety documentation i.e. method statements.
- Identification of restrictions and limitations notified by the Principal Contractor
- Plant / equipment specified for potential use on the project together with a schedule of products/materials subject to COSHH 2002 (as amended).
- Arrangements for safe working at heights, including the prevention of falls of persons or materials
- Schedule of work equipment for use by the Company
- Arrangements for assisting in securing the safety of all third parties, including, where appropriate members of the public
- Details of site-specific safety inductions
- Schedule of Company emergency contact telephone numbers

2.4 The Safety Method Statement shall be drafted, phrased and presented so as to be comprehensible to all IDD Contracts Ltd personnel working on site. It will be subject to ongoing review and, where necessary, revised and updated as work is progressed or where changes to the original scope of works are introduced. As previously highlighted in Section 1.6 method statements may be translated into languages native to a percentage of our workforce where a requirement has been identified at the time of the project specific Company induction.

2.5 Having regard for the fact the general Safety Method Statement will be prepared prior to attending site, it will be necessary from time to time to prepare and record task-specific safety method statements which summarise the safety management controls required for the task, process, operation or location where the work is to be progressed.

3. PRINCIPAL CONTRACTOR LIAISON

(To be considered in conjunction with **Part 2: Organisation and Responsibilities**)

3.1 In order to plan for and properly resource IDD Contracts Ltd's safety management requirements and achieve acceptable standards in keeping with the objectives of the Directors, it is essential to have input from Principal Contractors and take account of their requirements. To this end, the following matters will be addressed.

3.1.1 When invited to tender for or negotiate a contract, it is essential that the IDD Contracts Ltd management team liaise with the Principal Contractor (or their nominated representative) about their safety management standards. Sources of information to be assessed may include:

- The Pre-tender Health and Safety Plan prepared by or on behalf of the Principal Contractor.
- The Preliminaries incorporated into the Bills of Quantities;
- Risk assessments prepared by design duty holders;
- Formal instructions served by the Principal Contractor, or other person/organisation authorised to represent them, on matters affecting or influencing the health, safety, welfare or environmental standards.

3.1.2 Provision of the on-site welfare arrangements as provided by the Principal Contractor throughout the construction phase of the project including:

- Canteen
- Drying room
- Sufficient toilet and washing facilities
- Supply of drinking water
- First-aid facilities and provisions¹
- Office/administrative facilities for both the Principal Contractor and trade contractors

3.1.3 Logistics management, including:

- Operational time restrictions
- Identification of requirements for planning and co-ordinating, public safety

¹ See also Sections Nos 13 – First Aid Arrangements and 15 – Accident Record Keeping

Safety Policy . Section 3: Arrangements in Force

- On site traffic management and co-ordination
- Identification and signing of dedicated pedestrian routes on and around the site
- Delivery/storage arrangements for IDD Contracts Ltd materials and components
- Distribution arrangements for moving materials/equipment around site.
- Transfer and removal from site of production waste arising from IDD Contracts Ltd on site activities.
- Security arrangements.

3.1.4 Safety management standard setting arrangements, including:

- The name of the Principal Contractor's safety advisor.
- Any restrictions/limitations in respect of the import of materials for use on site
- Controls for co-ordinating overlap between IDD Contracts Ltd and other trade contractors on site
- The Principal Contractor's Safety Induction requirements.
- Frequency of project supervisory safety meetings.
- Site-specific disciplinary standards
- Emergency evacuation drills and their anticipated duration
- Principal Contractor's requirements for the presentation and approval of IDD Contracts Ltd Safety Method Statements

3.2 **IDD Contracts Ltd Management**

3.2.1 The following IDD Contracts Ltd planning and procurement managerial team may be required to appraise and take account of all available information at the earliest opportunity during the preparation of any bid:

- Company Directors
- Contracts Managers
- Safety Advisor
- Project Managers / Supervisors;
- Sales Managers;
- Administrative / purchasing personnel.

4. SAFETY MANAGEMENT PROCEDURES AND REFERENCE SOURCES

- 4.1 IDD Contracts Ltd health & safety documentation is cascaded electronically to the designated Project Managers &, Supervisors and also provided in hard copy within the Project Health & Safety File. Such documentation is used to brief operatives at induction and at the time of appropriate revision throughout the construction phase of the project.
- 4.2 Details of IDD Contracts Ltd safety management procedures can be obtained from the company Health & Safety Advisor.
- 4.3 IDD Contracts Ltd is primarily guided by the authoritative information prepared by the HSE and other reputable organisations and fully refers to and utilises such reference sources when planning/compiling & reviewing safe working procedures and internal health & safety controls.
- 4.4 Manufacturers' instruction manuals and suppliers' Safety Data Sheets shall also be available for all plant, materials and substances used in the course of project works. This information shall be referred to when planning safe systems of work and when compiling Risk & COSHH assessments.

5. TRAINING

- 5.1 Safety management awareness training shall be arranged to include topics applicable to the Company's operations. The training programme shall be initiated in the following ways:
- To a planned schedule and timescale relevant to the current point of the work programme.
 - To meet on-site operational requirements and objectives
 - In response to new/revised legislation and/or standards
 - In response to new equipment invention and revised working procedures.
- 5.2 The Company Safety Advisor maintains a Company training matrix & associated spreadsheets in respect of all safety awareness training initiatives to highlight operative competence and the expiry of relevant training certificates.
- 5.3 Safety awareness training both internal & external is focussed on the company's operational requirements and includes:
- a. Safe use of work equipment
 - b. Safe working at heights and the prevention of falls
 - c. PASMA mobile tower courses.
 - d. Use of mobile elevated work platforms (MEWPS)

Safety Policy . Section 3: Arrangements in Force

- e. Occupational health, including:
- identification of and safe systems of work in respect of hazardous substances
 - use of respiratory protective equipment
 - hand-arm and whole body vibration protection
 - manual handling techniques & operations
 - noise control
 - correct use of personal protective equipment
 - fire prevention management
 - first aid training

5.4 Frequent health & safety briefings are held with relevant departmental members of staff i.e. from the Estimating, Design & Procurement Departments to ensure that both generic and project specific health & safety requirements are being effectively assessed and managed,

5.5 Where practicable, and depending upon circumstances, safety management awareness training shall be prepared and delivered in-house, or alternatively delivered by external organisations who offer the required level of competence training in specialist areas e.g. first aid, use of mobile elevated work platforms etc.

5.6 Where practicable, the results of all safety management awareness training presentations shall be subject to formal testing both practicable (in respect of the safe use of equipment) and written (to assess the delegates understanding of the course content).

5.7 Having regard for the operations in which the Company is involved and the various premises where work is carried out, high emphasis will be given to initial site safety inductions and on-going site safety briefings by the project management team and the Company Health & Safety Advisor (where relevant).

6. SAFETY INDUCTIONS

6.1 All employees of the Company are involved in decision-making regarding the planning, management or application of safe systems of work. It is essential, therefore, that each employee receives an initial safety induction when joining the Company.

6.2 Inductions shall be provided to all new members of staff as soon as possible however within one month of commencing employment for supervisory and administrative staff and prior to commencement on site for operational personnel working under the control of IDD Contracts Ltd.

Safety Policy . Section 3: Arrangements in Force

- 6.3 The initial induction for supervisory and administrative staff shall address the following:
- a. An introduction to the role and objectives of Directors and project management with regard to the planning and implementation of the Company safety management programme;
 - b. An explanation of the role and function of the Company Safety Policy document.
 - c. An explanation of the importance of the core arrangements and procedures sections detailed within this Policy document
 - d. An explanation of the role and function of IDD Contracts Ltd's safety management controls and procedures.
 - e. Lines of communication in respect of health and safety matters including requirements for reporting injuries, ill-health, dangerous occurrences and near-miss incidents;
 - f. Introduction to and explanation of Company safety management reporting forms.
- 6.4 Before commencing work on site, all staff (administrative and operational) and service providers working on a project shall attend a formal project specific IDD Contracts Ltd safety induction where the following items shall be covered:
- a. Method Statement and relevant Risk Assessment briefings (which are recorded)
 - b. Identification of the key duty holders on site with regard to the communication and co-ordination of health, safety and welfare, and the responsibilities delegated to them;
 - c. Verbal English language assessment and translation requirements / procedures (where necessary).
 - d. Identification of the planned sequence of works to be carried out by IDD Contracts Ltd;
 - e. Identified safety critical tasks, operations and processes and planned safety management controls;
 - f. Explanation of any project restrictions and/or limitations in force on the project;
 - g. Notification of site-specific emergency procedures and how amended information will be cascaded to all personnel on site.

Safety Policy . Section 3: Arrangements in Force

6.5 Prior to commencing work on site, supervisors appointed by specialist sub-contractors employed by IDD Contracts Ltd shall attend a site-specific safety induction that shall include:

- a. Details of the IDD Contracts Ltd supervisory team and their respective responsibilities for health, safety and welfare allocated to the project;
- b. Details and explanation of the prevailing Site Safety Rules in force on the project;
- c. Awareness of the specialist sub-contractors -
 - Safety Method Statement
 - Risk assessments²
- d. Confirmation of the sub-contractors arrangements for their initial induction, and for their personnel subsequently seconded to site.

6.7 All attendees at safety inductions shall be required to register their attendance and acceptance of the information as relayed to them at induction or as amended whilst the work is on going.

7. SAFE WORKING AT HEIGHTS – Use of Fixed Scaffolding by IDD Contracts Ltd.

7.1 There may be situations where employees or individuals working under the control of IDD Contracts Ltd are required to gain access to or egress from work areas by means of, or to work from, tubular steel scaffolding. In such circumstances, arrangements for the safe use of the scaffold (or any part of) will be recorded in the current revision of the IDD Contracts Ltd Safety Method Statement.

7.2 Where the Company is required to use tubular steel scaffolding for access/egress or working purposes, the following must be in place:

- Scaffold commissioning and Statutory inspection arrangements shall be carried out by a competent person in accordance with the Principal Contractors requirements;
- Records of inspection shall be maintained by the Principal Contractor (or their nominated representative) e.g. appointed trade contractor.
- Any restrictions or limitations in respect of the use of the scaffold structure (or any part of) will be notified to and noted by the IDD Contracts Ltd management;

7.3 Where tubular steel scaffolding is specified and hired by IDD Contracts Ltd specialist sub-contractors will be appointed. The appointed sub-contractor shall ensure that the scaffold is constructed in accordance with the prevailing BS/EN Standard. Additionally, the following controls will be enacted:

- The appointed sub-contractor will provide a project specific Method Statement to

² The sub-contractor's resident supervisor must be in possession of the Safety Method Statement/risk assessments at the induction.

Safety Policy . Section 3: Arrangements in Force

- IDD Contracts Ltd for approval. The documentation shall clearly identify the description of scaffold, any limitations and the location of the proposed structure.
- The scaffold shall not be accepted unless the handing-over inspection is carried out with the IDD Contracts Ltd supervisor (or nominee) in attendance;
- The workers required to use the scaffolding will be inducted in respect of the safe use and limitations of the scaffold;
- The scaffold shall be subject to inspection weekly and a record of the findings of the inspection maintained on site;
- During periods when the scaffold is not in use or is withdrawn from service, a prohibition status notice shall be prominently displayed - legend: %Scaffold out of use - No access permitted+or similar.

7.5 Under no circumstances may any individual employed by or working under the control of IDD Contracts Ltd modify or alter any scaffolding or fixtures/fittings attached to or associated with the scaffold structure.

(See also Section 8 – Work Equipment used by the Company).

8. WORK EQUIPMENT USED BY THE COMPANY

8.1 All power operated work equipment owned, hired-in or allocated to the Company shall:

- be suitable and specified for the task/operation in progress;
- be operated by competently trained operatives who hold valid training competence certificates for the specific work equipment (if applicable)
- be used and maintained in accordance with the manufacturers instructions and guidelines.
- Have been PAT tested in accordance with the Statutory requirements (if applicable)

8.2 Where the use of Mobile Elevated Work Platforms (MEWPS) has been specified, specific care must be taken to ensure that all platform loads (operatives, equipment and materials) does not exceed the safe working load (SWL) as stipulated by the manufacturers for the specific equipment.

8.3 Operators of all work equipment allocated to a project shall be inspected daily prior to initial use and/or in accordance with manufacturers instructions.

8.4 All defective or suspect plant / equipment shall be removed from service immediately, have the operating keys removed (where applicable) and be clearly marked "Faulty do not use". If the equipment is owned or hired by IDD Contracts Ltd the user of the equipment must notify the IDD Contracts Ltd Project Manager (or Supervisor) at the earliest opportunity. If in doubt, always consult the Company Safety Advisor. The IDD Contracts Ltd project

Safety Policy . Section 3: Arrangements in Force

management team shall notify the owner/ manufacturer/hire-company immediately with a view to getting the defective equipment removed from site as soon as possible.

8.5 Equipment owned by the operator must be taken out of use immediately and removed from site until such time as a repair has been carried out by a competent person. Any faulty electrical equipment must be re-PAT tested prior to being allowed back on site.

8.6 Any individual who is suffering ill health, or taking prescribed medication that may affect their ability to operate powered plant shall notify the IDD Contracts Ltd Project Manager immediately and will not be allowed to use such equipment until the matter has been assessed.

9. FIRE SAFETY AND PREVENTION

9.1 Fire safety and prevention plans, prepared by the controllers of premises and/or Principal Contractors for whom IDD Contracts Ltd works, shall be complied with.

9.2 Any issues / advice / comments brought to the attention of IDD Contracts Ltd Project Management and or the Company Health & Safety Advisor will be notified to the Principal Contractor (or their appointed representative) at the earliest opportunity.

Such comments may typically be in respect of noted issues relevant to:

- compartmentation;
- fire points; and
- emergency evacuation routes

9.3 Individuals employed by or working under the control of the Company shall be required to co-operate fully with any fire or emergency evacuation drill organised by the Principal Contractor, IDD Contracts Ltd or their appointed nominee.

9.4 In the event of any work under the control of IDD Contracts Ltd being progressed in proximity of dedicated emergency evacuation routes, this shall be notified to the Principal Contractor's Project Management representative so as to enable the potential effect of our work on the planned emergency evacuation route to be re-assessed and arrangements altered if necessary.

10. DRIVERS OF COMPANY VEHICLES

10.1 Individuals employed by IDD Contracts Ltd who are authorised to drive vehicles (i.e. cars, vans) supplied by the Company, or who are authorised to use their own vehicles on Company business, must:

- a. At all times hold a current driving licence, appropriate for the vehicle;
- b. Present their licence for validation when commencing employment, or at any subsequent time when requested;
- c. Report to the Managing Director any medical condition which could compromise their driving capability;
- d. Report without delay any incident involving an accident or other damage to a company vehicle or their own vehicle whilst being used on authorised company business.
- e. Notify the Company without delay any circumstances which result in:
 - penalty points being issued;
 - an endorsement being recorded; or
 - a licence being revoked or suspended.
- f. Maintain the vehicle in a road-worthy condition and comply with the vehicle manufacturer's servicing intervals and Company maintenance procedures;
- g. Not carry any products, goods or materials for which the vehicle is not rated, scheduled or insured (this may include flammable products or bulk items which may cause overloading to the vehicle.
- h. Not consume or be under the influence of alcohol or drugs whilst in charge of the vehicle, or consume any other substance which would compromise their driving ability;
- i. Comply with the Company's policy on the use of mobile phones whilst driving;

10.2 Drivers of vehicles operated under the control of the Company must adhere to the specific terms and conditions that are detailed in the relevant employee Company handbook and accepted as a condition of each employee's Contract of Employment.

11. PERSONAL PROTECTIVE EQUIPMENT

11.1 On all Company projects there shall be a requirement for all operatives to wear the following mandatory items of PPE:

- Safety helmet
- Appropriate safety footwear
- High-visibility tabard / coat
- Specified hand protection
- Specified eye protection

11.2 Other PPE shall be supplied as identified in task operation or process risk assessments and the following items shall be considered for each operative working under the control of the Company (this list is not exhaustive):

- Appropriate hearing protection
- Respiratory protective equipment (RPE)
- Appropriate clothing to take account of extremes of temperature
- Overalls / coveralls
- Forearm gauntlets
- Safety harnesses and relevant attachments
- Task specific alternative eye protection e.g. safety goggles
- Task specific alternative hand protection e.g. rigger gloves

11.3 PPE will be provided without cost to the operative and must be used in accordance with the manufacturer's instructions. In addition, such equipment must not be tampered with or adapted. IDD Contracts Ltd will replace all items of PPE worn out or damaged whilst being used for its intended purpose, however, any item of PPE found to have been tampered with / misused by the user may incur an administration fee to replace. Anyone guilty of tampering / adapting / misusing any item of PPE in breach of Section 8 of the Health & Safety at Work etc Act 1974 may be subject to appropriate disciplinary action against him / her. Records of PPE issued on a specific site basis shall be maintained whilst the construction phase of the project is on going.

11.4 **Training** . Where applicable employees shall be instructed in the correct use and maintenance of all items of PPE issued to them, along with an explanation of the limitations of the PPE. Such training may be refreshed at site level by means of safety tool box talks / awareness briefings.

11.5 **Storage of PPE** - For the duration of the project, provision shall be made for the storage of any item of PPE in line with the manufacturer's/supplier's recommendations.

Safety Policy . Section 3: Arrangements in Force

11.6 **Selection, Specification and Purchase of PPE** . The Health & Safety Advisor is responsible for the specification of all PPE used by IDD Contracts Ltd. PPE is subject to constant evaluation and takes account of:

- Market innovation
- The task, operation, process or location where the item will be used;
- The limitations of the item;
- The relevant EN:BS specification;
- The individual requirements of the wearer

11.7 Any **sub-contractors** employed by IDD Contracts Ltd shall supply and maintain appropriate PPE for their employees and/or individuals working under their control.

12. OCCUPATIONAL HEALTH

12.1 Occupational health considerations relevant to IDD Contracts Ltd's activities and its workforce are addressed in the following ways:

12.2 Assessments

12.2.1 On-going assessments are conducted in respect of:

- Control of substances hazardous to health (COSHH)
- Hand-arm/whole body vibration syndrome
- Noise at work
- Manual handling
- Harmful materials

12.2.2 Results of the assessments shall be notified to all employees.

12.2.3 Manufacturers'suppliers'sMaterials Safety Data Sheets shall comprise part of the reference source for the purpose of conducting occupational health risk assessments. In all cases, over-riding priority shall be given to individual needs, taking account of any pre-existing medical conditions.

12.2.4 Dependant on the working requirement and the assessment information available at the time of each specific review, work limitations may be imposed or alternative more detailed information requested.

12.2.5 All operatives working either directly for or under the control of IDD Contracts Ltd are required to complete a Company Occupational Health Declaration either prior to commencement of work if working on site, or at the earliest opportunity if employed in an administrative capacity. Operatives working nights on a regular basis will be required to complete a more detailed Occupational Health Declaration.

12.3 Occupational Health Assessments

12.3.1 Where necessary, the Company shall arrange such medical or occupational health assessments as may be required, such circumstances to include:

- Statutory requirement for a medical assessment of an individual working under the control of the Company;
- Request from an individual working under the control of the Company for an occupational health assessment;
- Request by the Company for an individual working under its control to undergo an occupational health assessment.

13. FIRST AID ARRANGEMENTS

13.1 The Company will ensure there are adequate and sufficient first-aid facilities for all operatives employed by or working under the control of IDD Contracts Ltd.

13.2 IDD Contracts Ltd will arrange for first aid training for employees. Precise arrangements for first-aid attendances will be recorded in each project Safety Plan and agreed with the Principal Contractor.

13.3 Where first-aid facilities are agreed with and provided by the Principal Contractor and/or occupier of the premises, this information shall be recorded in the Safety Method Statement for the project.

13.4 The Company will provide an adequate number of first-aid containers on each project.

13.5 All first aid treatments shall be recorded in the Company accident book. Records of first aid treatments shall be analysed for the purpose of reviewing the risk assessment register and identifying training requirements.

13.6 It shall be the responsibility of the competently trained members of the IDD Contracts Ltd Project Management team (under the control of the designated Contracts Manager) to ensure that all first aid containers are adequately stocked at all times.

13.7 **Data Protection** - Having regard for the requirements of the *Data Protection Act 1998* in respect of the recording of first aid treatments, The IDD Contracts Ltd policy is to detach appropriate records from the Company accident book to detach the record of treatment and return it to Head Office without delay. Where a Principal Contractor requests information for the purpose of data collection and assessment of accident/injury trends, full co-operation shall be forthcoming except for personal details prescribed within the Data Protection Act.

(See also Section 15 . Accident Record Keeping.)

14. SAFETY INSPECTIONS, AUDITING AND SAMPLING ARRANGEMENTS

14.1 In addition to our internal arrangements, our retained safety management advisors as detailed in Section 2 (Organisation) 9.4 are Summit Health & Safety Management Ltd. Summit Health & Safety Management Ltd are authorised to conduct formal Safety Sampling and general Safety Audits on Company projects.

14.2 All reports provided by Summit HSM Ltd will be forwarded to the Company Managing Director and circulated as prescribed by Company procedures.

14.3 Safety audits shall comment on and allocate a rating to each of the following standards when relevant on a specific project:

- Administration

Safety Policy . Section 3: Arrangements in Force

- Welfare
- Site access / safe working
- Access/egress around site and housekeeping
- Safe working at heights
- Work equipment
- Occupational health standards and controls
- Fire prevention management standards and controls
- Environmental standards
- Personal protective equipment

14.4 In order to achieve a satisfactory status, a rating of 85% or above must be achieved. All issues noted however not closed out at the time of inspection are duly recorded and subsequently followed up by the Company Safety Advisor.

14.5 Where internal remedial actions are requested a deadline for such remedial actions to be carried out is always detailed in the Inspection Report.

14.6 Safety Inspection Reports are distributed to the IDD Contracts Ltd Contracts Manager, other members of the IDD Contracts Ltd Project Management team and the Principal Contractor as detailed in the project Health & Safety Plan. The ten point inspection criteria forms the basis of Company Health & Safety Key Performance Indicators which are distributed to the IDD Contracts Ltd Directors on a monthly basis.

14.7 The IDD Contracts Ltd Health & Safety Advisor holds regular Health & Safety Review meetings with Company Directors where recent on site performance, future changes in the scope of works, manpower revisions & new contracts are discussed.

14.8 Safety sampling techniques may be used to randomly select a single heading (from those listed under 14.3 above) and appraised over a number of sites. This will enable an assessment of the effectiveness of planned safety management controls, their understanding by the workers and their application in practice. This information will assist in evaluating safety management training requirements and identifying controls and procedures requiring review.

14.9 The Company Safety Advisor (or nominee) shall be authorised to serve Priority Action Notices on projects, tasks/processes or individuals as may be considered necessary. In circumstances where a task, operation, process or location is deemed to constitute an imminent risk, the operation may be suspended and labour withdrawn pending a re-assessment of the activity. In such situations the Principal Contractor will be notified accordingly.

15. ACCIDENT / INCIDENT RECORD KEEPING

15.1 Records of first-aid treatments provide an essential reference source for the Company to identify injury patterns and potential causative factors. Therefore the Company Safety Advisor and the Directors place considerable emphasis on the importance of prompt and accurate recording of information and analysis of the data.

15.2 **Accident Record Book** - An accident record book shall be maintained at each of the following locations:

- Head office
- All project locations where IDD Contracts Ltd's involvement is on a day-to-day basis (e.g. Monday-Friday)

15.3 **Explaining First-aid Requirements** - Employees, visitors and other individuals who are provided with first-aid facilities by IDD Contracts Ltd shall have the following explained³:

- Company requirements for reporting injuries and/or ill health
- Location of first-aid points
- Location of the accident record book
- The name(s) of the First-aider or Appointed Person.
- Details of any additional on site first aid facilities i.e. Medical Room and relevant personnel i.e. Site Nurse.

15.4 Recording First-aid Treatments

15.4.1 All first-aid treatments shall be recorded by the IDD Contracts Ltd first-aider or other named person⁴. Where any person who is injured in any way, regardless as to how apparently minor, carries out their own first-aid treatment, they shall enter the accident record book (or ensure that an entry is made).

15.4.2 Where an injury is suffered by any individual working under the control of the Company or at a location controlled by the Company, details shall be recorded in the Company accident record book.

15.4.3 In the event of an injury incident not being reported immediately⁵, the circumstances and details shall be recorded in the accident report book at the earliest opportunity once they are made known to an appointed Company supervisor / manager.

³ This information will also be provided during premises or site safety inductions

⁴ Each project-specific Safety Method Statement shall include details of and arrangements for first-aid attendances

⁵ Project/location specific controls and arrangements for accident reporting shall be detailed in the Construction Phase Health and Safety Plan or Safety Method Statement prepared for the site.

15.5 Details to be entered in the Company Accident Book

In accordance with statutory requirements, the following details, based on the information available at the time the incident is reported shall always be entered in the accident book:

- a. Full name, home address and occupation of the person who had the accident
- b. Details of the person completing the accident record.
- c. Signature of the person completing the entry in the accident book together with
- d. the date of the entry
- e. Details of the accident, together with the date, time and location where the accident happened
- f. How the accident happened and details of any first aid materials used in the treatment
- g. If the incident is within the remit of RIDDOR⁶, details of how and when⁷ it was reported to the Health and Safety Executive.

15.6 Late Notification of Injury Incidents

Where an individual reports an injury some time following the incident, IDD Contracts Ltd Project Management to whom the event is reported shall complete the Accident Book entry in the normal way, recording the information as explained by the person concerned.

15.7 Refusal by any person to provide Information following an Injury/First-aid Treatment

In the event an individual who is required to, refuses to report an injury and have details recorded in a IDD Contracts Ltd Accident Book, the refusal, along with any available information, must be notified WITHOUT DELAY by the responsible manager/supervisor to the Managing Director.

15.8 Accident Record Book Controls

15.8.1 Accident record books used by the Company shall be sequentially numbered and maintained under the control of the IDD Contracts Ltd Company Safety Advisor. Each record shall be retained at Head Office for a minimum of three years.

15.8.2 The IDD Contracts Ltd Health & Safety Advisor (or his nominee) shall be delegated responsibility for investigating all accidents and ensuring that all appropriate close out actions are duly recorded.

15.8.3 All injuries recorded in IDD Contracts Ltd Accident Books and appropriate close out actions are notified to the IDD Contracts Ltd Directors by way of an Accident Book Notification Schedule.

⁶ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995

⁷ The seriousness or gravity of the event may not always be immediately apparent at the time an incident is reported. If subsequently it is confirmed the incident is within the remit of RIDDOR, this section may be entered and dated accordingly.

Safety Policy . Section 3: Arrangements in Force

15.8.4 Data collated and analysed from Company accident record books shall be used when preparing, reviewing or revising risk assessments and when reviewing, assessing or planning safety awareness training programmes.

15.9 Confidentiality and Disclosure of Information contained in

IDD Contracts Ltd Accident Record Books

15.9.1 In accord with the requirements of the *Data Protection Act 1998*, each entry shall be removed from the record book on completion and forwarded to the IDD Contracts Ltd Safety Advisor for secure filing in accordance with approved guidance.

15.9.2 The Company recognises and acknowledges Principal Contractors' initiatives in the identification of injury incident causation and data collection in order to provide meaningful information. IDD Contracts Ltd for its part, will contribute fully to such initiatives whilst complying with the restrictions imposed by the *Data Protection Act* and, in this respect, the only information that will be withheld will be personal details.

15.9.3 In the event detailed information about an incident is requested by an individual or organisation such as:

- the Department of Work and Pensions
- the Health and Safety Executive
- the next of kin or an authorised member of the individual's family to whom an entry refers;
- a legal representative of the individual to whom an entry refers;
- IDD Contracts Ltd insurers or their authorised representatives;

the request must be made in writing to the Company Safety Advisor and release of any information approved by the Company Managing Director. Subsequently, where a copy of an accident book entry is cleared for release to an authorised organisation or individual, the copy shall be:

- a. signed for (if collected by hand from the Company's premises); or
- b. if posted, sent by recorded delivery.

15.10 Training

Managers and supervisors who may be responsible for recording or explaining requirements for making entries in IDD Contracts Ltd Accident Books will be provided with appropriate training, instruction and guidance in order that they may properly and effectively discharge their delegated responsibilities. All queries should be referred to the Company Health & Safety Advisor without delay.

(See also Section 13 . First Aid Arrangements.)

15.11 NEAR MISS INCIDENT REPORTING

Managers and supervisors must ensure that at induction all operatives working on site under the control of the Company are aware of the requirement to report all near miss incidents to IDD Contracts Ltd Project Management.

IDD Contracts Ltd Project Management must ensure that all internal procedures in respect of the notification and closing out of all near miss incidents are strictly adhered to at the earliest opportunity.

A Company Near Miss Incident Report Form found within the appropriate section of the project specific Health & Safety File must be completed and forwarded (electronically if possible) to the Company Health & Safety Advisor who will be responsible to ensure that all such incidents have been thoroughly investigated, closed out and reported in accordance with the Statutory requirements under RIDDOR (Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995).

IDD Contracts Ltd Project Management will be responsible for the initial notification of any Near Miss Incident with all relevant third parties e.g. suppliers / other contractors and the

Principal Contractor in writing again at the earliest opportunity and then must ensure that any such third parties provide any required responses as soon as possible to enable the matter to be closed out.

16. INVESTIGATION OF ACCIDENTS AND NEAR MISS INCIDENTS

16.1 All accidents/incidents that result in injury or may have resulted in an injury to:

- any person in the employ of or working under the control of the Company;
- any person in the employ of a third party;
- a member of the public;

or cause or may have caused damage to equipment or property, and which arise out of an activity under the control of IDD Contracts Ltd shall be subject to investigation by the Company Safety Advisor or his nominated representative.

16.2 All appropriate internal documentation, together with reference to recognised authoritative guidance, will be considered when determining the Chain of Accident / Incident Causation.

16.3 For all significant injuries / dangerous occurrences reportable under RIDDOR a report will be issued as necessary in respect of all accidents/incidents, taking account of all substantiated facts identified during the investigation and equipment and processes involved in or associated with the specific accident/incident. Conclusions and Recommendations will form part of the investigation report.

Safety Policy . Section 3: Arrangements in Force

16.4 All investigations shall have the full co-operation and assistance of all personnel working under the control of the Company.

16.5 The over-riding objective of investigation reports will be to ensure the health and safety at all times of all persons working at or visiting IDD Contracts Ltd work places. Company procedures, including safe systems of work and equipment used during IDD

Contracts Ltd work processes, are subject to constant review and revised accordingly where beneficial.

16.6 To close out all Accidents / Incidents not Reportable under RIDDOR, the Company Safety Advisor will hold a brief meeting with the person who sustained an injury / or was involved in a near miss incident at work at the earliest opportunity to determine the following:

- That the Accident / Incident circumstances as detailed within the Accident Book and on the IDD Contracts Ltd Injury Report Form / Near miss Incident Form (when relevant) are correct and to possibly expand on the information previously provided.
- To better establish the accident circumstances
- To establish what the person(s) involved in the accident / incident have learnt from the event and to offer constructive advice where applicable to reduce the likelihood of that person suffering a similar accident in the future or being involved in a similar near miss incident.
- To record the accident / incident circumstances for accident / incident trend analysis which may lead to revised working practices to possibly reduce the likelihood of similar accidents being sustained by IDD Contracts Ltd personnel at work.
- To close out each minor accident / incident review the person who sustained the injury or was involved in the near miss must sign the review sheet together with the Company Safety Advisor.
- Review sheets are filed together with all other relevant documentation e.g. Accident Book Record and retained by the IDD Contracts Ltd Health & Safety Advisor at Head Office for a minimum of three complete years after the accident / incident date.

17. HEALTH AND SAFETY FILE

17.1 IDD Contracts Ltd personnel will assist the Principal Contractor with the development of the contract Health and Safety File in order to discharge responsibilities imposed by either contractual or statutory requirements.

18. RESPONSE TO NEW LEGISLATION / SAFETY MANAGEMENT STANDARDS

18.1 Where applicable legislative amendments or revisions to safety management standards are introduced during the period of this Policy document, a safe working procedure/guidance will be issued to employees.

18.2 Where appropriate, and to comply with health and safety legislation, amendments or revisions to safety management standards, IDD Contracts Ltd will introduce revised safe working procedures/guidance and issue such revisions as may be applicable to all employees or persons working under the control of the company.

18.3 In order to ensure the effectiveness of and compliance with changes, safety awareness training will be arranged accordingly.

19. SUB-CONTRACTORS AND SELF-EMPLOYED INDIVIDUALS

19.1 Sub- contractors employed by IDD Contracts Ltd shall be required to provide evidence of their safety management controls prior to appointment.

19.2 Once approved they shall be provided with the necessary and available information relating to safety management requirements to enable them to plan and resource their work effectively so as to comply with and implement general and site-specific safety management controls.

19.3 Self-employed individuals retained by the Company shall be subject to and comply with all safety management controls and procedures as apply to personnel directly employed by IDD Contracts Ltd.

20. CONSULTATION AND COMMUNICATION WITH EMPLOYEES

20.1 The Directors of IDD Contracts Ltd are committed to communicating and consulting with all employees on matters of health, safety and welfare. Standards of consultation and communication will be guided by authoritative health and safety publications produced by the Health and Safety Executive (HSE).

20.2 **Purpose** - To ensure that safe working procedures and controls established by or under consideration by the Company have meaningful input from employees. This may include:

- Having the means to receive and issue regularly relevant information on health and safety topics;
- Having an effective system to communicate on issues of health and safety throughout the Company;
- Ensuring the dissemination of information (e.g. accident and ill-health reporting) and that all employees are aware of the requirements;
- Meeting the Company's legal obligations to inform, instruct and train employees;
- Having controls in place to comply with legislation regulating consultation.

20.3 Format

20.3.1 During attendances on site, the Company Safety Advisor will discuss the effectiveness of task risk assessments and Safety Method Statements with workers.

20.3.2 Opinions expressed by workers will be taken into account when preparing new, or updating existing, safety management procedures and controls,

20.4 **Communication** - Communicating safety management objectives, standards and requirements will involve a variety of sources, including:

- Relevant Information provided by the Health and Safety Executive;
- Relevant audio/visual training materials;
- Training presentations and discussions;
- In-house safety updates / briefings;
- Preparation of comprehensible information, supplemented where beneficial with digital images or other appropriate graphics;
- Promotional safety posters / notices.

Safety Policy . Section 3: Arrangements in Force

20.5 **Consulting Employees** . Where practical to do so IDD Contracts Ltd consults its employees on various health & safety matters. Such consultation includes (this list is not exhaustive)

- Consultation Committees formed to gain opinions on specific and or various health & safety matters / subjects.
- One to one discussions between the Health & Safety Advisor and employees / operatives.
- Planning health and safety training;
- Introduction of new technology/aids;
- On site health & safety standards
- On site welfare provisions
- Operatives opinions of Personal Protective Equipment (PPE) as provided
- The trialling / assessment of new / alternative PPE which the company is evaluating.

21. EMPLOYMENT OF YOUNG WORKERS

21.1 Young Persons

21.1.1 It is not IDD Contracts Ltd's policy to employ young workers under 18 years of age.

21.1.2 However should IDD Contracts Ltd employ or control the work carried out by young people, each task, operation or process shall be subject to a formal risk assessment before the young person starts work. In each case it is Company policy to:

- a. Explain to the young worker at their initial employment induction the findings of the risk assessment;
- b. Instruct that the relevant operative provides a copy of the risk assessment to their parent/guardian;
- c. Ensure covering documentation for the risk assessment identifies the source of the appraisal in the event of subsequent dialogue with the parent/guardian.

21.1.3 Young workers will at all times be under the direct supervision of an authorised and responsible employee of the Company who, in turn, will be aware of the restrictions and limitations imposed by the Company on the tasks, operations or processes which the young person will be involved in. Each Safety Method Statement will be specific about the controls in force with regard to young persons at work.

Safety Policy . Section 3: Arrangements in Force

21.2 Work Experience

21.2.1 It is not Company policy to employ individuals under the age of 18 on construction sites. However, where a training provider, school or organisation involved with approved Work Experience schemes seeks to place a trainee in that age Company with the Company, the following criteria will always apply:

- a. The Company Safety Advisor will be the point of contact for the organisation seeking the placement;
- b. The candidate will, for the purposes of health, safety and welfare, be classified as an employee of the Company;
- c. The risk assessment for the tasks, operations and processes the proposed candidate will be allowed to be involved in will be jointly carried out by:
 - the safety professional representing the organisation seeking the placement, and
 - the IDD Contracts Ltd appointee responsible for discharging duties and responsibilities assigned under Regulation 7 of the *Management of Health, Safety and Welfare Regulations 1999*;
- d. Prohibitions and restrictions will be clearly identified within the risk assessment report/s.

21.2.2 All personnel employed by or working under the control of the Company who are working with, or whose work overlaps with trainees on placement with the Company, will be subject to a specific safety awareness briefing.

21.3 The Company is aware of and accepts that young persons or trainees on placement will not have the experience of mature personnel in respect of safety at work. Consequently where the Company employs young persons or trainees, the standard of control, direction and supervision will be considerably higher than that for experienced and competent personnel.

22. RECORD KEEPING AND DATA PROTECTION

22.1 Collection of Data

22.1.1 In order to maintain accurate and effective documentation / records, information on the planning and management of health and safety is stored by means of both paper-based records (manually retrievable) and retrievable electronic files.

22.1.2 In all circumstances it is the policy of the Company to maintain a record keeping system, regardless of description, that provides protection for the privacy of all employees (current and former) where personal data is stored.

Safety Policy . Section 3: Arrangements in Force

22.2 Description of Data

22.2.1 Some health and safety data retained by the Company is classified as *sensitive* personal data and may include records of:

- physical injury suffered during the course of employment (e.g. relevant extract from the Company Accident Book);
- occupationally induced ill-health (sickness records);
- Occupational Health Declarations
- safety awareness training;
- safety management audits, safety sampling or safety inspections where the employee is named in the reporting document.

22.2.2 Other data that directly refers to named employees may include:

- Safe working procedures developed in support of this Policy document;
- Safety Method Statements;
- Records of assessments of significant risks;
- Equipment Inspection Registers
- Permit-to-Work controls.

22.3 Processing of Data - Data processing may comprise any or all of the following:

- collection or gathering information;
- subsequent retrieval of information;
- disclosure of data to any source.

22.4 Requests for Information on Individual Data Stored

22.4.1 Any employee may request a copy of health and safety information which refers to that specific individual. Information will be released and explained. Such requests should be made in writing to the IDD Contracts Ltd Health & Safety Advisor at the Company Head Office.

22.4.2 In the event a current or former employee considers that the data stored causes unwarranted distress, they may request that such records be removed or deleted and the processing of the data should cease.

23. ALCOHOL AND ILLEGAL DRUGS

23.1 Any individual working under the control of the Company found to be indulging in the taking of illegal drugs or substances, or who is deemed to be under the influence of alcohol at the commencement of their shift, shall not be allowed onto the Company's premises or locations and may face disciplinary action by the Company.

23.2 Where the Principal Contractor has provided guidance (at induction) of alcohol consumption and timescales of non consumption prior to the commencement of work such information will be cascaded to all personnel working under the control of IDD Contracts Ltd and the operatives understanding of the information as provided will be recorded.

23.3 Should any operative working under the control of the Company be found to be taking illegal substances or drinking alcohol whilst at work, they will be requested to leave their work location immediately and may be subject to the disciplinary procedures of the Company.

23.4 All operatives working for or under the control of IDD Contracts Ltd will comply with any specific requests or requirements in respect of ad-hoc or mandatory drug or alcohol testing. Failure to do so will result in their permanent removal from site.

24. DISCIPLINARY PROCEDURES

24.1 IDD Contracts Ltd considers the wilful disregard of safe working procedures and controls by any individual employed by or working under the control of the Company to be unacceptable. The following contraventions will result in the offending individual being suspended from work pending an internal inquiry, or either issued with a yellow or red card in accordance with current company procedures.

- a. Failure by supervisory duty holders to notify and explain to their subordinates the controls in force for specific projects and/or significant risks, and the procedures in force for their protection and safety;
- b. Working in a manner where safety management controls and requirements are disregarded to such an extent that the activity or action may be considered threatening to the individual themselves or to other people;
- c. Malicious misuse of or damage to any items which have been provided in accordance with Section 8 of the Health and Safety at Work, etc Act 1974 to assist in maintaining health, safety or welfare standards, including:
 - personal protective equipment (PPE)
 - first aid provisions and facilities
 - welfare facilities
 - safety notices, instructions or signs.

24.2 Where it is considered necessary by an authorised supervisor or manager to invoke this disciplinary procedure, the resulting inquiry shall be undertaken without undue delay and shall:

- a. Allow representations to be made by or on behalf of the individual concerned;
- b. Make provision for notifying the individual of the activity or action which caused the breach of the safe working procedure or control;
- c. Notify formally and without delay the findings of the inquiry and the decision arrived at.

24.3 Should an employee wish to appeal against the disciplinary action imposed on him/her, an appeal must be made in writing and received within seven working days of notification of the conclusion of the inquiry. Any such formal appeal must be made to the Company Managing Director. The Managing Director's subsequent decision will be final for the purpose of Company procedures.

24.4 During an inquiry the individual concerned will be entitled to have a representative present who will have the right to make submissions, observations or other relevant contributions on their behalf. Similarly, the individual will be provided with copies of all relevant documentation relating to the incident to enable as full as possible an understanding of the decision-making process.

25. OVERLAP OF WORKING ARRANGEMENTS WITH OTHER CONTRACTORS

25.1 Where the Company's operations overlap those of other contractors or are under the control of a third party, every reasonable effort shall be made to facilitate and assist in a joint safety management venture.

25.2 That notwithstanding, where the actions of third parties are considered to endanger personnel working under the control of the Company, the Company reserves the right to suspend operations pending the removal or control of the perceived risk.

25.3 In all such circumstances, arrangements for control and co-ordination by the Principal Contractor will be taken into account and incorporated into our safe systems of work for the project.

26. ENVIRONMENT

26.1 IDD Contracts Ltd is committed to ensuring as far as is reasonably practicable to reducing its carbon footprint at all locations where it has a presence.

26.2 The Directors of IDD Contracts Ltd have delegated day to day responsibility for reporting on the effectiveness of its environmental procedures to the Company Health & Safety Advisor

26.3 Promoting the Company Environmental Policy and ensuring that this document is up to date. Such information forms an integral part of both the employee and operative Company Induction where relevant procedures / awareness requirements are cascaded to all personnel.

26.4 To help reduce the IDD Contracts Ltd carbon footprint the following procedures are implemented and audited on a regular basis. Such audits are carried out by the Company Health & Safety Advisor and form part of his Site Inspection Reports (see Section 14.6).

26.5 The following procedures are implemented at relevant IDD Contracts Ltd locations to help reduce the day to day environmental impact its operations has on the environment (this list is not exhaustive):

- Regular review and updating of all working procedures and practices which have an impact on our environment.
- Examination and assessment of all plant and machinery which may have an environmental impact.
- Provide suitable information and training to our employees and others under our control on the necessity to carry out their duties such that any environmental impact is minimised.

Safety Policy . Section 3: Arrangements in Force

- Project Management have day to day responsibility to ensure that IDD Contracts Ltd on site activities are conducted in an environmentally friendly manner. Such activities are reviewed / scored / amended by the Company Health & Safety Advisor as part of his site inspection disciplines.
- Recycling both materials and consumables where practicable to do so.
- Reducing energy consumption by implementing workplace initiatives e.g. turning off lights when not required, turning off equipment when not in use.
- Ensuring that all waste is disposed of in accordance with Local Authority requirements.
- Reducing the impact of waste materials e.g. chipping production waste at source where practicable.
- Ordering raw materials from sustainable sources e.g. timber
- Bulk ordering of materials to reduce future transport requirements
- Ensuring that work equipment used at all IDD Contracts Ltd locations is fit for purpose and maintained in accordance with the manufacturer's recommendations.
- Promoting the use of public transport for employees on company business.
- Rewarding operatives for recommending changes in work practices / procedures which reduces the IDD Contracts Ltd carbon footprint.

26.6 A copy of the current IDD Contracts Ltd Environmental Policy Statement will be displayed at all company locations (where it is practical to do so) and also cascaded to all IDD Contracts Ltd operatives (and those working under the direct control of the Company) at induction.



HEALTH & SAFETY POLICY STATEMENT OF INTENT

This 2013 revision of the IDD Contracts Ltd Health & Safety Policy Statement further consolidates and reinforces the corporate commitment to take all reasonably practicable steps to secure a safe working environment for all persons employed by, working under the control of, or who may be affected by the tasks, operations or processes of the Company. The revision takes account of recent and anticipated legislative developments in occupational safety, health and environmental standards.

The Directors of IDD Contracts Ltd requires the planning and management of health, safety and welfare to be treated with the same degree of diligence as other Company objectives, including quality, client satisfaction and production considerations. To this end, DVC will constantly review, develop and implement appropriate amendments to our health & safety management system at all locations where IDD Contracts Ltd operates.

The Directors are committed to ensuring that sufficient resources, including fiscal, personnel and training, are allocated to achieve the safety management objectives of the Company.

By implementing this policy, and the safety management processes and procedures as developed, IDD Contracts Ltd fully complies with its legal and moral obligations. Compliance with these systems shall be a mandatory requirement for all staff and service providers.

All IDD Contracts Ltd personnel will be consulted on all health & safety matters which may affect them within their workplace, and operatives are encouraged to communicate with management on all health & safety matters.

The company is committed to promote a positive Health and Safety culture and its health & safety management system shall be subject to constant review and amendment as and where necessary to achieve this requirement.

A copy of this Statement shall be notified to all personnel at Induction and prominently displayed at all locations where the Company operates and shall be drawn to the attention of all individuals.

N Freeborn

N Freeborn

Director

Date of Issue 1st March 2013