

**HEALTH & SAFETY  
POLICY  
ORGANISATION & ARRANGEMENTS  
RISK ASSESSMENTS**

**&**

**PROCEDURES**

PA GROUP (UK) LTD  
THE GRANARY  
PINDEN FARM  
DARTFORD  
KENT  
DA2 8EA

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1.0 GENERAL HEALTH & SAFETY POLICY STATEMENT

It is the policy of PA Group (UK) Ltd to ensure that the health, safety and welfare of all of its employees are given the highest priority.

In accordance with its duty under Section 2(3) of the Health and Safety at Work etc. Act 1974, and in fulfilling its obligations to both employees and the public who may be affected by its activities, the Board of Directors of PA Group (UK) Ltd (the Company) has produced the following statement of policy in respect of health and safety. The Board of Directors gives health and safety matters the highest emphasis/aims, so far as reasonably practicable, to ensure that:-

- i) they comply with health and safety legislation relevant to the work activities, H&S and other requirements and commit to a program of continual improvement in OH&S management and performance.
ii) the working environment of all employees is safe and without risks to health
iii) adequate provision is made with regard to facilities and arrangements for their welfare at work.
iv) systems of work are safe, without risks to health and involve managers responsible
v) that persons, who are not in our employ, who may be affected by our activities, are not exposed to risks to their health and safety
vi) the company has a commitment to reduce exposure to injury and ill health.
vii information, instruction, training and supervision is provided, as necessary to all employees, to secure health and safety at work and to promote safety consciousness
viii) this policy is brought to the attention of all employees and copies are available to them
viii) adequate arrangements are made to enable employees to raise health & safety issues
ix) arrangements for the use, handling, storage and transportation of articles and substances for use at work are safe and without risk to health, and that adequate information is available detailing the conditions and precautions necessary, to ensure that when properly used, they present no risks to health & safety.
x) adequate funds are made available to meet the requirements of this policy.
xi) Company employees are reminded of their legal responsibility to ensure that this Health and Safety Policy is observed and that they are required to take reasonable care for their own health and safety at work and of those who may be affected by their actions, or by their neglect to co-operate with their employer to ensure that any duty, or requirement, for health and safety, imposed upon their employer by law, is performed, or complied with not to intentionally, or recklessly, interfere with, or misuse anything provided in the interests of health, safety, or welfare.
xii) the Company will retain the services of competent health and safety advisors and will review this policy annually.

This Policy Statement is to be read in conjunction with the responsibilities and arrangements in the Policy and applicable Safe Systems of Work.

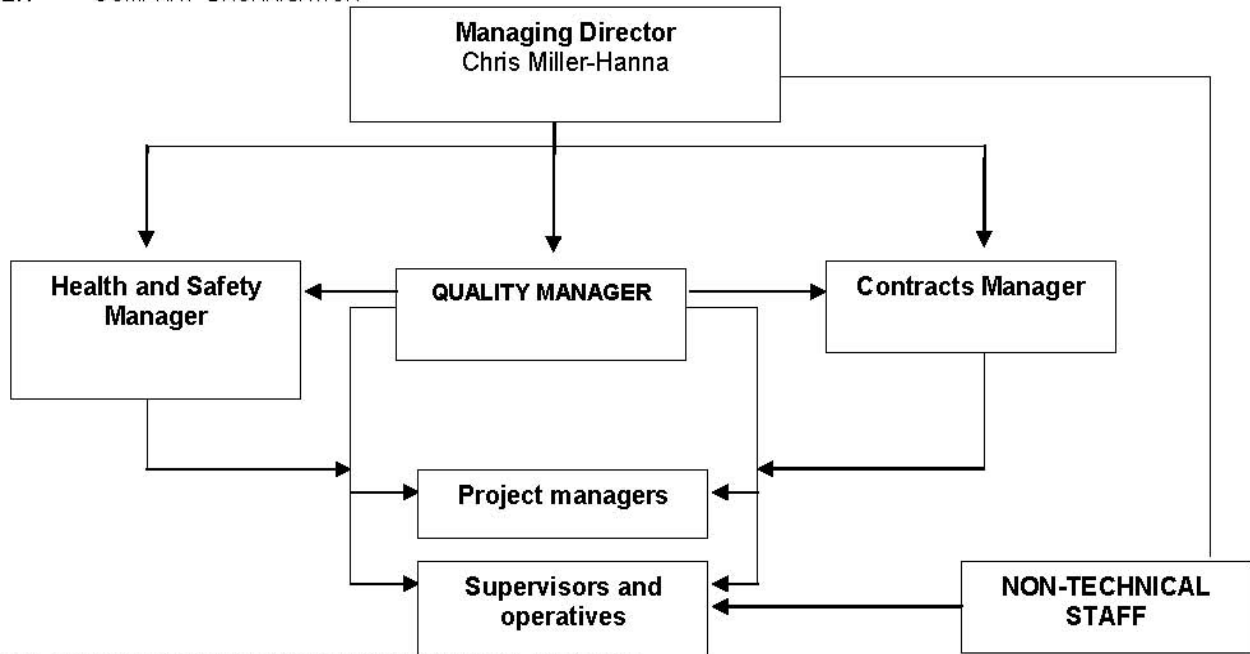
Signed..... Managing Director

Date.....

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## 2. ORGANISATION AND GENERAL ARRANGEMENTS

### 2.1 COMPANY ORGANISATION



The company is divided into the following work disciplines

Asbestos Removal	The Company maintains a license to work with asbestos, issued by the Health and Safety Executive.
Project Management	The Company manages asbestos removal works by others
Asbestos Surveying	The Company is accredited by UKAS as an Inspection Body
Demolition, Refurbishment & Fit Out	The Company carries out demolition, refurbishment and maintenance of all property types.
Contract Cleaning	The Company carries out general office cleaning and deep cleaning activities
Contaminated Land	The Company carries out desktop and site investigations and remediation of contaminated land

## 2.2 ORGANISATIONAL ARRANGEMENTS

### 1. HEALTH & SAFETY ASSISTANCE

Day to day health and safety matters are the responsibility of the Managing Director and Safety Manager who produce Safe Systems of Work, Method Statements and Risk Assessments. They may be assisted by the External Health and Safety Advisors.

Where it is recognised that specialist advice is needed, competent external advisors will be asked to assist.

### 2. Information & communication

The Company will ensure that suitable and relevant information relating to health, safety and welfare at the workplace is disseminated to both employees and relevant non-employees. Statutory notices will be displayed as specified.

### 3. Emergency procedures

The Company will ensure that arrangements are made to give warning of imminent danger to any personnel likely to be affected. Managers and Supervisors are responsible for ensuring that all employees and visitors, within an area, are informed of and are fully conversant with emergency procedures.

### 4. First aid

The Company will appoint and train suitable numbers of personnel to deal with minor accidents and emergencies. The people appointed for this will be made known to our employees. First Aid kits will be available on sites.

### 5. Induction of new employees

Health & safety training will be incorporated into induction training for all new employees, with basic important matters dealt with as soon as practicable. Occupational health matters, and safety procedures - with different emphasises for site and office workers. All such training will be given by a competent person.

### 6. Training

Training will be provided as and when required. All staff engaged in asbestos removal are trained in accordance with the requirements of CAR 2006 and are required to undergo refresher training at periods of no greater than 12 months.

All asbestos surveyors are qualified to BOHS P402 or BOHS Certificate of Competence in Asbestos (CoCA) level.

Additional training is provided by the company when the nature of the work undertaken dictates a level of competence in a work activity, the use of equipment (e.g. PASMA for mobile scaffolds) or entry to an area (e.g. confined spaces).

The competencies of all technical staff are recorded on a competency matrix and which is used to select staff for individual tasks and to identify training requirements (Training Needs Analysis - TNA).

### 7. Resource

To ensure adequate and qualified resource is available for all business activities.

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In addition the person managing a contract is responsible for ensuring that all site employees are given information about and understand their responsibilities re the following prior to being deployed to any site:

- a) the Health and Safety at Work Act
- b) the Company's Policy for health, safety and welfare
- c) emergency and fire procedures (including the location and use of extinguishers)
- d) first aid -names and locations of appointed persons and introduction to them, and position of first aid boxes and rules for their use
- e) use and availability of protective clothing and equipment
- f) general and specific hazards in and around their work area
- g) procedures for reporting accidents, injuries and property damage
- h) safe systems of work, where applicable
- i) welfare - location of toilets etc
- j) the health hazards associated with asbestos
- k) the reasons for and the precautions to be taken to protect themselves and others who may be affected by their work with asbestos from the dangers of asbestos fibre
- l) the need for a high standard of workplace cleanliness and personal hygiene
- m) the importance and significance of air sampling and the fibre counts attained
- n) the role of medical surveillance

## 2.3 GENERAL HEALTH ISSUES

### 1. **Health surveillance**

The Company will ensure that health surveillance of individuals is provided where required under statutory provisions - the objective being the early detection of adverse health effects thereby allowing further harm to be prevented. Health Surveillance will be used where:

- a) there is an identifiable disease or health risk related to the work concerned as shown by the risk assessment or under a specific set of regulations e.g. Control of Asbestos Regulations 2006
- b) valid techniques are available to detect the disease or condition
- c) there is a reasonable likelihood that the disease or condition may occur under the conditions of work
- d) surveillance is likely to further the protection of the employees concerned.

### 2. **Alcohol & drugs**

The misuse of alcohol or drugs may affect health, performance, and conduct at work and put safety at risk. The company will try to identify any possible problems and minimise their effects. (see also Misconduct)

### 4. **Smoking**

It is recognised that both smokers and non smokers have needs, and it is the company's intention to accommodate both wherever possible. Smoking is not permitted within any office buildings. In some situations, a smoking ban will be imposed in connection with increased fire hazards.

### 5. **Disabled persons**

It is recognised that there may be employees who require extra equipment, facilities or assistance, either routinely or in an emergency, and it is the company's intention to meet any such needs.

### 6. **HIV**

It is considered that the risk of infection is very low in this workplace. Any employees who have been diagnosed as HIV positive will be supported, their confidentiality respected and employment rights not affected. The company will take all suitable precautions to secure their safety, and of those working in close contact with them.

### 7. **Stress**

The company recognises that excessive pressures can have a negative effect on health and on performance at work. It is therefore concerned to recognise any such effects and to provide suitable support mechanisms for individual members of staff suffering, whether caused by the work or home environment.

### 8. **Working hours & night working.**

It is the company's intention to comply with the provisions of the Working Time Regulations, but the nature of the work demands some flexibility and so control will be exercised over total hours worked and appropriate rest breaks provided. All persons who participate in night or shift work will be carefully selected and the same standards of health, safety and welfare will be maintained. Should any problems be encountered as a result of such work, action will be taken to resolve the matter.

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**9. Young persons**

The company will comply with any statutory restrictions imposed upon work undertaken by young persons and any employed will be given raised levels of information, instruction, training and supervision necessary to enable them to work safely.

**10. Migrant Workers**

Overseas workers are vital in providing skills and filling labour shortages in the construction industry. Many are experienced trades people and some enter the workforce through the Highly Skilled Migrants Programme.

Overseas workers make up about 6% of the workforce in construction in the GB. HSE's Survey of Construction Workers, started in January 2005, suggests that in Greater London, overseas construction workers make up around 26% of the workforce.

Between April 2005 and March 2006, five foreign workers were killed in the construction industry in Britain. In the following year (between April 2006 and March 2007), a further five foreign workers were killed.

Vulnerable groups have been identified in the construction industry. Workers with limited English language skills can still obtain a Construction Skills Certification Scheme (CSCS) card. The Construction Skills touch screen health and safety test can be taken in a variety of languages or with the help of an interpreter.

Construction Skills, the Sector Skills Council for the construction industry, has developed web-based materials to help integrate overseas workers into the industry. It provides construction employers with information and support tools to help ensure that any overseas workers they employ are properly qualified, competent and safe.

Towards the end of 2007, HSE and the construction industry set up a Working Group to consider the health and safety of vulnerable workers in construction. A particular focus of this Group is migrant workers in construction and it is hoped that its proposals will help to further improve and increase the significant efforts that have already been made by HSE and the industry.

**PA Group will assess all staff for written and spoken English skills at interview stage as well as during induction; some staff may require further assessment and training before they are signed off to do particular tasks; this is especially important where communication problems may affect health & safety either office based or on site (particularly on construction sites). Staff must recognise visual and audible warnings and be aware of relevant actions to take; e.g. in a fire or a situation which requires immediate cessation of works.**

**Other areas of concern are where staff are given verbal instructions and written instructions (method statements; risk assessments) as well as instruction on operation of equipment/tools.**

**Managers and supervisors must carry out on site assessments and drills to ensure all staff and particularly vulnerable groups are risk aware and on site communications and instructions are readily understood.**

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## 2.4 HEALTH AND SAFETY RULES

The following rules relate to all employees at work, contractors and visitors and it is their responsibility to obey these rules and to behave in a safe manner whilst at work. Deliberate contravention will be considered as serious by the management and may lead to dismissal. **Contravention of Health & Safety legislation is a criminal offence and a prosecution can be taken against an employee by the enforcing authority.**

### Working practices

1. No machine, item of plant or equipment is to be operated by any person, unless they have been trained and are authorised to do so.
2. All machine guarding is to be in place and correctly adjusted, prior to machinery being used.
3. Any fault, defect, including damage, or malfunction in any item of machinery, equipment, tool or guard must be reported immediately.
4. No machine, plant or equipment is to be cleaned or left unattended whilst in motion, unless authorised to do so.
5. No repairs, maintenance or adjustments to machines, plant or equipment are to be carried out, unless authorised to do so.
6. All substances are to be used and stored only in accordance with written instructions and returned to storage after use.
7. All notices displayed in the workplace are to be read and employees are to ensure that they understand the instructions.
8. All safety equipment and facilities provided are to be used when required, and are not to be misused or wilfully damaged.
9. Protective clothing and safety equipment is to be stored in accordance with the instructions
10. The work area is to be kept clean and tidy at all times.
11. All waste is to be disposed of in the correct container.
12. All liquid spillage's are to be cleaned up immediately.
13. All emergency procedures relevant to the work area are to be obeyed.
14. Emergency exits and equipment are not to be obstructed.
15. Any use or damage to fire fighting equipment is to be reported immediately.
16. All injuries/ incidents must be reported as soon as possible and prompt medical assistance must be sought for any injury received at work.

## 2.5 MISCONDUCT

Any employee found to have acted in any one of the following ways shall be liable to the Company's disciplinary procedure:-

- a) Wilfully breaching the Safety Rules or the requirements of this Safety Policy.
- b) Ignoring health & safety advice given by management or their representatives.
- c) Failing to inform management of any safety defect to the building, site, or equipment that they may become aware of.
- d) Drinking alcohol or taking drugs on sites or Company premises, or being under the influence thereof whilst at work.
- e) Operating any machine, plant or equipment without authority, or removing any protective device without permission.
- f) Recklessly interfering with or misusing anything provided in the interest of health, safety or welfare at work, or with fire appliances and items provided for First Aid .etc.
- g) Defacing or removing notices, signs, labels or any other warning device.
- h) Misusing any chemical, flammable substance, toxic material etc., or compressed air, electric or pneumatic equipment.
- i) Taking part in horseplay or practical jokes.
- j) Making false declarations or interfering with evidence following an accident or dangerous occurrence.
- k) Committing a breach of any health and safety legislation with particular regard to the Control of Asbestos Regulations 2006 or any of the associated Approved Codes of Practice.

This list is not exhaustive.

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### 3.0 DUTIES OF INDIVIDUALS

- 3.1 Health & Safety Responsibilities of All Employees are to ensure that they:-
- a) understand and comply with the requirements of the Company's Safety Policy. b) co-operate on all aspects of health, safety and welfare.
  - c) appreciate their allocated responsibilities.
  - d) use the correct equipment for the task.
  - e) only use equipment which is in good condition and report all defects or any obvious safety or health hazards.
  - f) do not operate any equipment unless they have been fully trained and instructed in its operation.
  - g) do not endanger themselves or other persons through their actions or failures to act.
  - h) avoid improvisation.
  - i) refrain from horseplay.
  - j) do not abuse the welfare facilities.
  - k) maintain a high level of discipline in relation to work methods.
  - l) report all accidents and incidents.
  - m) inform management of any change to their state of health, either temporary or permanent, which might affect their working ability or their suitability to carry out any particular task or tasks.
  - n) when driving a company vehicle:-
    - i) carry out daily checks on their vehicles to ensure that they are safe and roadworthy.
    - ii) do not drive any vehicle unless they have been fully trained and instructed in its operation and comply with the traffic regulations at all times.
    - iii) inform management of any medical or legal impediment to their driving licence or any pending prosecutions.

### 3.2 Managing Director- Additional Responsibilities

- a) The Managing Director, Mr. C. Miller-Hanna has overall responsibility for the issue, updating, revision and implementation of the Safety Policy within the company. The Managing Director, can call upon specialist advice and competent persons as required. In the absence of the Managing Director overall responsibility is passed to the Company Secretary.
- b) External consultants 'Damon Rowley' are retained by PA Group (UK) Ltd to advise on Health and Safety Matters.

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- c) In addition to the principle responsibility for health and safety issues, the Managing Director together with the Health and Safety Manager have the following responsibilities and duties:-
- i. responsible for the provision and implementation of the company's safety policy so as to ensure compliance with all statutory requirements and codes of good working practice etc.
  - ii. responsible for practical implementation of the Safety Policy at the HQ;
  - iii. responsible for overseeing the implementation of the Safety Policy at other company locations and ensuring that other persons having individual responsibilities at such locations are maintaining compliance with this policy;
  - iv. responsible for keeping up to date with all relevant legislation etc. concerning health and safety at work and the dissemination of such information to all new and existing staff.
  - iv. responsible for the overall organisation and training of new and existing staff so as to ensure that they are able to carry out their work safely and that risk of accident or injury is minimised;
  - vi. responsible for ensuring that all employees and other people working for and on behalf of the company are aware of their own responsibilities and accountability for health and safety;
  - vii. responsible for ensuring that all employees are issued with personal copies of this (or subsequent revisions) Safety policy and Procedural Notes etc.
  - viii. responsible for dealing with breaches of health and safety within the company, and for investigating disciplinary action against employees who show disregard towards their own obligations and those of the company;
  - ix. responsible for the periodic health and safety inspection of the company's premises and other sites where company employees are working together with routine safety audits;
  - x. responsible for setting a personal example for high standards of health and safety awareness, and for personal commitment to the continuing improvement of health and safety standards within the company.
  - xi. At the head office, The Granary, Pinden Farm, Dartford, Kent, DA2 8EA Chris Miller-Hanna is responsible for health and safety arrangements and the implementation of the Safety Policy in respect of the office and laboratory accommodation. All relevant health and safety issues relating to this site are to be addressed to Mr. Miller-Hanna in the first instance. In the absence of Mr. Miller-Hanna all queries regarding health and safety issues at the office accommodation should be addressed to the Health and Safety Manager.
  - xii. To ensure adequate and qualified resource is available for all business activities.

### 3.3 Contracts Managers – Additional Responsibilities

Contracts Managers Have the following responsibilities:-

- a. to have an understanding of Company policy and the responsibilities of all levels of personnel;
- b. to have knowledge of the appropriate regulations and Codes of Practice and to ensure these are being observed by all company personnel;
- c. to ensure that adequate allowances are made in tenders for the provision of reasonable welfare facilities, necessary safety equipment and sound working methods;
- d. to ensure that work on contracts is carried out as planned, and appropriate regulations are observed;
- e. to undertake risk assessment and to establish safe working methods and safety precautions with site supervision before work commences;
- f. to ensure consistency in the methods of contract execution so far as is reasonably practicable;
- g. to ensure staff and operatives under their control are properly trained when commencing new working practices;
- h. to ensure all staff working with asbestos hold valid, current medical certificates;
- i. to monitor performance and ensure all work complies with current legislation, codes of practice and guidance notes;
- j. to ensure material, plant and equipment are properly stored, maintained and inspected and adequate records kept by a nominated competent person;
- k. to supervise the recording of all accidents/dangerous occurrences and inform the appropriate body;
- l. liaison with contractors and clients to ensure safe and efficient working.
- m. to show personal involvement and set a good example.

### 3.4 Project Managers – Additional responsibilities

Project Managers have the following responsibilities

- a. to have an understanding of Company policy and the responsibilities of all levels of personnel, and to have knowledge of the appropriate regulations and codes of practice;
- b. to ensure when setting up site that adequate welfare facilities, safety equipment and fire precautions, etc. are available;
- c. to institute sound working methods and ensure they are being followed;
- d. to give employees clear, precise instructions on their responsibilities for safe working methods;

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- e. to ensure personnel do not take any unnecessary risks and that safety equipment is used when and where required;
- g. to arrange for employees to receive training where and when required;
- h. to ensure all staff working with asbestos hold valid current medical certificates; including subcontractors and self employed staff
- i. liaison with contractors and clients to ensure efficient working
- j. To set a good personal example.

### 3.5 Site Supervisors –Additional responsibilities

Site Supervisors have responsibilities to ensure that:-

- a) written instructions are received to establish working methods, to explain the sequence of operations, to outline the potential hazards at each stage and indicate the precautions to be observed and that these instructions are not deviated from, without authorisation.
- b) On site: i) the precautions and work methods are checked with site management prior to commencing work ii) work is carried out as planned & relevant legislation complied with iii) the required protective equipment is issued to employees and visitors, is used correctly and that he sets a personal example by using it whilst on site (where necessary) iv) all plant on site is set up correctly and safely, guarded in accordance with the relevant legislation, and is only operated by trained and experienced personnel v) all repairs to plant on site are carried out in the proper manner vi) daily checks are carried out as specified vii) he liaises with site management on a day to day basis to ensure adequate safety standards are maintained viii) holds a site induction meeting as / when required ix) carries out risk assessments as site conditions change
- d) all employees under his control have received adequate and appropriate training and are competent to undertake their respective duties in a safe manner and that there is sufficient documentation on site to support this.
- e) new employees under his control are warned of known hazards.
- f) that any flammable or hazardous substances are stored and handled in accordance with established rules and procedures.
- g) potential hazards are identified and immediate action taken to remove or protect persons from them.
- h) he carries out initial investigations on all accidents and incidents and reports these to the occupier of the premises and PA GROUP (UK) LTD senior management by the quickest possible means.
- i) all employees under his control have current and valid medical certificates and quantitative face fit certificates.

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### 3.6 Safety Manager - Additional Responsibilities

Safety Managers are to ensure that:

- a) the Policy is effectively implemented in all functions under his control
- b) first aid facilities are available at all times
- c) potential exposure hours to asbestos fibres are recorded in personnel records
- d) all plant has the required certificates of inspection or examination or is in Quarantine
- e) under the MDs' instruction, the Company's policy for the prevention of injury, ill health and damage is initiated, effectively administered, monitored and that necessary alterations are made to reflect changes in legislation or company development

### 3.7 Operatives-additional responsibilities

Operatives have the following responsibilities:-

- a. to understand and comply with the company's safety policy;
- b. to have a general understanding of the legal requirements imposed upon them;
- c. to use correctly all tools, plant, protective equipment and safety clothing and equipment supplied;
- d. to ensure that work on contracts is carried out as planned, and appropriate regulations are observed;
- e. to undertake risk assessment and to establish safe working methods and safety precautions with site supervision before work commences;
- f. to ensure consistency in the methods of contract execution so far as is reasonably practicable;
- g. to avoid any improvisation which entails unnecessary risk;
- h. to report any defects in plant or equipment immediately;
- i. to carry out all duties in a good and workmanlike manner and to keep working areas in a clean and safe condition;
- j. to refrain from interfering with welfare facilities or any plant or equipment;
- k. to have a personal concern for safety, not only for themselves, but for fellow workers and other persons.

### **3.8 Administrative Staff - Additional Responsibilities**

Administrative staff have the following responsibilities:-

- a. to understand and comply with the company's safety policy;
- b. to have a general understanding of the legal requirements imposed upon them;
- c. to use correctly all work equipment
- d. to report any defects of office equipment immediately;
- e. to carry out all duties in a good and workmanlike manner and to keep working areas in a clean and safe condition;
- f. to have a personal concern for safety, not only for themselves, but for fellow workers and other persons.

## 4.0 ASSESSMENTS/ COMPLIANCE

This section is arranged in the form of assessments in response to the requirements of legislation relative to the normal activities carried out by the company.

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#### 4.1. ASSESSMENT OF COMPLIANCE

##### MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 (MHSW)

Applies to all business sectors and office staff

- PA Group (UK) Ltd carries out risk assessments to assess the significant risk to workers and any others that may be affected by their undertakings.
- Carry out a systematic general examination of their work activity (by risk assessment) and record significant findings.
- Determine the likelihood that harm will occur and its severity.
- Determine what measures must be taken to comply with the company's duty as employers under relevant statutory provisions.
- Make themselves aware of the risks and hazards associated in their work, identify and prioritise the measures that need to be taken to comply with the relevant statutory provisions, and in accordance with the principles of Schedule 1
- To review these risk assessments as necessary and revise the control measures accordingly.
- To employ specialist advice and / or measuring equipment etc. where necessary in respect of unfamiliar or specialist risks. (I.e. asbestos).
- Record significant findings of risk assessments, as to the hazard, control measures, persons at risk, such that we can demonstrate that such an assessment has been carried out, and can be reviewed and revised as necessary.

##### 1. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 5, HEALTH AND SAFETY ARRANGEMENTS

PA Group (UK) Ltd has arrangements in place to cover health and safety as regard to:

- Planning:
- Organisation:
- Control:
- Monitoring and review:

##### 2. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 5, HEALTH SURVEILLANCE

PA Group (UK) Ltd will provide health surveillance as is appropriate:

- As required by specific health and safety regulations.
- Where there is an identifiable disease or adverse health condition related to the work concerned.
- Where valid techniques are available to detect indications of the disease or condition;

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- Where there is a reasonable likelihood that a disease or condition may occur under particular conditions of work; and
- Surveillance is likely to further the protection of the health of the employees to be covered.

### **3. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 7, HEALTH AND SAFETY ASSISTANCE**

PA Group (UK) Ltd will ensure a:

- Competent person is appointed to apply the provisions of health and safety law, including MHSW, HSWA, Construction Regulations etc.,
- Competent person is appointed to apply and devise protective measures.
- Specialist consultant is appointed for advice when necessary.

### **4. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 8, PROCEDURES FOR SERIOUS AND IMMINENT DANGER AND FOR DANGER AREAS.**

PA Group (UK) Ltd will for all sites:

- Identify, by risk assessment, the foreseeable events that need to be covered by these procedures, (normally fire) and substances and parts of the building (site) might be involved.
- Establish procedures to be followed by any worker or others, if situations presenting serious and imminent danger were to arise. Giving clear guidance on when employees and others must stop work and how they should move to a place of safety, i.e. full evacuation of the workplace, or moving to a safer part of the workplace.
- Nominate a competent person(s) to implement the detailed actions, and ensure the person(s) understand their role.
- Ensure that specific health and safety regulations are complied with.
- Ensure that procedures take account specific tasks that may have to be performed in the event of an emergency are taken into account.
- Ensure that the procedures take into account the speed at which events can happen and ensure that all persons are able to get to a place of safety.
- Ensure that work will not be resumed after an emergency if a serious danger remains.
- Ensure that where different persons or employers share a workplace the separate emergency procedures take account of others in the workplace and are co-ordinated where appropriate.
- Ensure that these procedures are written down and notified to all persons concerned and are understood. They must form part of induction training. Test exercises will be carried out where necessary.

#### **Danger areas**

- In areas where the level of risk is unacceptable without special precautions being taken, prevent

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inadvertent access by other employees or persons.

- Ensure that suitable precautions are taken before persons enter the area and that those persons have had adequate instruction in those precautions prior to entry into the danger area.

#### **5. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 9, CONTACTS WITH EXTERNAL SERVICES**

PA Group (UK) Ltd shall ensure that any necessary contacts with external services are arranged, particularly as regards first-aid, emergency medical care and rescue work.

#### **6. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 10, INFORMATION FOR EMPLOYEES.**

PA Group (UK) Ltd will:

- Provide all employees with specific and relevant information regarding health and safety risks to which they may be exposed (as identified in the risk assessments)
- Information regarding the emergency procedures described previously, including the identity of staff nominated to assist in the event of evacuation.
- This information will be written down, and given to all employees, including trainees and those on fixed duration contracts.

#### **7. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 11, Cooperation and Coordination**

PA Group (UK) Ltd will:

- Co-operate with all other employers, self-employed persons, working on the same site (Workplace) as far as necessary to enable statutory duties to be complied with.
- Co-ordinate our own health and safety measures with those of the others where reasonable to do so.
- Take all reasonable steps to inform others of risks arising from our undertakings.

#### **8. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 12, PERSONS WORKING IN HOST EMPLOYERS' OR SELF EMPLOYED PERSONS UNDERTAKINGS.**

PA Group (UK) Ltd will:

- Provide every employer of any employees from an outside undertaking who are working in the undertaking of PA Group (UK) Ltd with information on the risks to those employees health and safety arising out of, or in connection with the conduct of PA Group (UK) Ltd undertakings, and the measures taken by PA Group (UK) Ltd in complying with the requirements of any legislation or regulations.
- Ensure all other employers or self employed persons of whom PA Group (UK) Ltd employees are working in the undertaking of, do provide PA Group (UK) Ltd with appropriate instructions and comprehensible information regarding any risks to those employees health and safety which arise out of the conduct by those other employers or self employed persons undertaking.
- PA Group (UK) Ltd will inform any employer for whom he is working of any hazardous substance, or procedure which may put employees at risk to their health and safety.

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**9. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 13, CAPABILITIES AND TRAINING.**

PA Group (UK) Ltd will:

Only allocate work to employees within that person's capability, and ensure the demands of the job do not exceed that person's ability to carry out the work without risk to themselves or others,

Take into account when assigning works the employee's level of training, knowledge and experience.

Provide additional training if needed. (Or not employ that person for that task).

Provide adequate health and safety training when an employee is: being recruited, or they are being exposed to new or increased risks, because of changes in responsibility, introduction of new, or changes, in work equipment, or systems of work in use.

Train all employees in emergency procedures where appropriate.

Periodically repeat training where necessary.

Ensure all training will take place during normal working hours.

**10. MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999 REGULATION 14, EMPLOYEES DUTIES.**

PA Group (UK) Ltd employees will:

Take reasonable care for their own safety and that of others who may be affected by their act and omissions at work, and shall use correctly all work items provided by PA Group (UK) Ltd, in accordance with their training and the instructions they receive to enable them to use the items safely.

Co-operate with PA Group (UK) Ltd to enable them to comply with statutory duties for health and safety. Notify PA Group (UK) Ltd management of any shortcomings in the health and safety arrangements even when no immediate danger exists, so that PA Group (UK) Ltd can take remedial action as needed.

**NOTE:** Temporary worker -any person employed on fixed duration contracts and those employed in employment business, but working under control of a user company.

PA Group (UK) Ltd will provide all temporary workers before commencement of his duties:

With comprehensible information on any special occupational qualifications or skill required to be held by that employee if he is required to carry out his work safely.

With any health surveillance required to be provided to that employees by or under any of the relevant statutory provisions.

All the information stated in the previous regulations (1-13)

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## 4.2. Assessment of Compliance

### Control of Asbestos Regulations (CAR) 2006

Applies to asbestos removal, asbestos surveying, refurbishment and contaminated land and office staff

The Company has a duty to protect their own employees, visitors, the occupier's employees, and people in the neighbourhood from the effects of asbestos fibres disturbed by its activities. The requirements of the Control of Asbestos Regulations 2006, subsequent amendments, ACOPs L143 and L127 Guidance Notes e.g. HSG247, HSG 248, HSG53, HSG213 pertaining thereto will be followed as far as reasonable practicable. Best industry practice as given by ARCA in their "Recommended Guidelines" and by ACAD in their "Best Practical Means" will also be incorporated into the working methods and practices of the Company. This approach should ensure the aims as expressed in the policy statement are met in respect of the core activity of asbestos removal.

#### 1. Control of Asbestos Regulations (CAR) 2006 Regulation 3: Application of the regulations

CAR 2006 applies to Asbestos Removal, Asbestos Surveying (with the exception of Regs 8, 9, 15(1), 18 (1) and 21) activities and Regulation 4 applies to the Office and Refurbishment activities

All asbestos removal works are assessed to determine whether Regs 8, 9, 14 (1), 18 (1) and 21 apply based on the following (taken from CAR2006)

*(2) Subject to paragraph (3), regulations 8 (licensing), 9 (notification of work with asbestos), 15(1) (arrangements to deal with accidents, incidents and emergencies), 18(1) (a) (asbestos areas) and 22 (health records and medical surveillance) shall not apply where -*

*(a) the exposure of employees to asbestos is sporadic and of low intensity;*

*(b) it is clear from the risk assessment that the exposure of any employee to asbestos will not exceed the control limit; and*

*(c) the work involves -*

*(i) short, non-continuous maintenance activities,*

*(ii) removal of materials in which the asbestos fibres are firmly linked in a matrix,*

*(iii) encapsulation or sealing of asbestos-containing materials which are in good condition, or*

*(iv) air monitoring and control, and the collection and analysis of samples to ascertain whether a specific material contains asbestos.*

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## **2. Control of Asbestos Regulations (CAR) 2006 Regulation 4: Duty to manage asbestos in non domestic premises**

### **Cleaning and Contaminated Land**

The asbestos register should be consulted before works are carried out on premises, although it is unlikely that cleaning or inspection activities.

Any requirements of the asbestos management plan for the premises must be complied with, and cooperation given to the duty holder.

### **Refurbishment projects**

Before carrying out refurbishment works on a non-domestic premises the company shall inspect the Asbestos register and asbestos management plan for the area affected.

If the works include penetrations into the structure of the building, any demolition works or extensive soft stripping, the company will also insist on an asbestos pre-refurbishment survey (Type 3 survey), unless, a survey has already been commissioned relating to the project or, the building is of post 2000 construction or, there is substantial documentary evidence that asbestos was not used in its construction. The company will cooperate with the duty holder in regard to any requirements imposed by the asbestos management plan.

#### Main Office Premises

The company will cooperate with the Duty Holder over the requirements of the Asbestos Management Plan for the premises.

PA Group Ltd is compliant with the requirements of this regulation

## **3. Control of Asbestos Regulations (CAR) 2006 Regulation 5: Identification of the presence of asbestos**

Before carrying out any asbestos removal, cleaning or refurbishment works the company will ensure that the extent of asbestos is known as far as practicable reasonable.

Asbestos surveys will be conducted in such a way as to determine the presence, location, extent and where applicable condition of any asbestos so far as is reasonably practicable within the scope/remit of the survey. PA Group Ltd is a UKAS accredited Inspection Body for asbestos.

PA Group (UK) Ltd is compliant with the requirements of this regulation

## **4. Control of Asbestos Regulations (CAR) 2006 Regulation 6: Assessment of work which exposes employees to asbestos.**

### Asbestos removal

An assessment in writing will be made prior to production of the Plan of work in order to

- a) determine whether the works need to be notified
- b) Which method of removal/remediation is most appropriate
- c) Which control measures are the most appropriate

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d) Which level of respiratory protection is required?

The assessment may be subject to change during the course of the works should site conditions change.

Additional risk assessments will be carried out for non asbestos risks which are covered by other legislation, depending upon site conditions. Again, these may be subject to change and any risk assessments must therefore be regarded as "live" documents.

### **Asbestos Surveys**

Due to the nature of asbestos surveys, the extent, location, content and condition of any asbestos present is usually unknown before the survey starts.

It is therefore assumed beforehand that any asbestos present is likely to be in poor condition and likely to release fibres if disturbed during sampling.

Appropriate controls are in detailed in the company's surveying procedures (Appendix A of this doc) to prevent exposure to asbestos of employees and others. These include, dust suppression during sampling, respiratory protection, exclusion zones, double bagging and labelling of samples, cleaning of the immediate sampling area, encapsulation of the sampling point.

### **Cleaning**

Cleaning will not take place in areas where asbestos is known to be in a loose or friable state.

## **5. Control of Asbestos Regulations (CAR) 2006 Regulation 7 Plans of Work**

the assessment a plan of work will be produced for all asbestos removal works. The Plan of Work is compliant with the requirements laid out in HSE Asbestos Licensing Unit/Asbestos Liaison Group ALG memo 06/08 Aide Memoire 06/08 '**How to draw up a plan of work (aka method statement)**'

Asbestos surveys are carried out in accordance with the standard procedures as laid out in Appendix A. Site Following specific details and contacts are detailed in the workbook provided for each project. Any deviations from the standard procedures will be detailed in the work book, which takes the place of the Plan of Work.

Other activities carried out by the company do not require a Plan of Work unless contaminated land/remediation includes asbestos waste in which case it will be treated like any other asbestos removal project.

## **6. Control of Asbestos Regulations (CAR) 2006 Regulation 8 Licensing of work with asbestos**

PA Group (UK) Ltd is licensed to work with asbestos

## **7. Control of Asbestos Regulations (CAR) 2006 Regulation 9 Notification of work with asbestos**

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Following assessment all works with asbestos which are not exempted under

Regulations 3 are notified to the relevant enforcing body 14 days prior to site set up.

### Waivers

PA Group (UK) Ltd will apply for a waiver of the 14 day notification period, on behalf of a client following receipt of a request in writing which will be passed on to the enforcing body, together with the completed form ASB5 and a Plan of Work. Work will not commence until the enforcing body has confirmed the granting of the waiver.

## 8. Regulation 10 Information, Instruction and Training

All personnel involved in work with asbestos have sufficient and appropriate training in line with the syllabuses laid out in Chapter 4 of HSE Guidance HSG 247: Asbestos: the licensed contractors' guide. If a new member of staff comes to the company with existing training certificates their validity must be verified by a senior manager before the staff member is permitted to work.

Operatives involved in asbestos removal works New operatives undergo new operative training with a UKATA training organisation before being permitted to work with asbestos. Operatives will undergo annual refresher training at a period of no greater than 12 months.

Supervisors of asbestos removal works

New supervisors undergo new operative training with a UKATA training organisation before being permitted to work with asbestos. Supervisors will undergo annual refresher training at a period of no greater than 12 months.

Directors and managers of PA Group (UK) Ltd that are involved in controlling asbestos removal operations within the company

Directors and managers will undergo Directors and managers' training with a UKATA training organisation before being permitted to work with asbestos. Directors and managers will undergo annual refresher training at a period of no greater than 12 months.

Asbestos surveyors are all trained to either BOHS P402, which requires annual refresher training or BOHS Certificate of Competence in Asbestos (CoCA), which does not. The technical manager is qualified to BOHS CoCA.

Annual refresher training is given where appropriate.

Refurbishment personnel have appropriate Asbestos Awareness training.

Cleaning staff do not fall into the list of at risk groups that require asbestos awareness training as presented in Para 124 of ACoP L143 Work with asbestos containing materials.

## 9. Control of Asbestos Regulations (CAR) 2006 REGULATION 11 PREVENTION OR REDUCTION OF EXPOSURE TO ASBESTOS

The Company will try to prevent exposure to asbestos but where this is not possible, the suitable systems of work. If exposure cannot be reduced to below the control limit, RPE suitable for both for the task and operative, will be used (provided by the Company). When deciding what type of mask and filter is necessary, the MPR (Minimum Factor) in excess of

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this specified for the work. The Company will have measures in force to prevent the escape of airborne dust and for the decontamination of equipment. In case there is an uncontrolled release, emergency procedures will be available for limiting the risks to health. Procedures, including daily checks, will be in force to ensure that control measures are properly used or applied.

The Company will apply good working practices to keep sites in a clean state during work & ensure that they are thoroughly cleaned on completion.

To ensure that unprotected workers do not enter unknowingly areas contaminated by asbestos will be designated either as an "asbestos area" or "respirator zone", and suitable warning signs put in place.

#### **10. Regulation 12 Use of control measures**

The choice of control measures to be used is determined by the results of the assessment and is dependant upon material type, work to be carried out i.e. removal, repair, encapsulation or sampling.

The control measures used are selected from guidance provided by HSE, Asbestos removal Contractors Association (ARCA) and Asbestos Control and Abatement Division (ACAD) part of the Thermal Insulation Contractors Association (TICA).

Typically controls employed on licensed asbestos removal projects will consist of containment within a sealed area, dust suppression by wetting by injection or spraying of a surfactant solution or local exhaust ventilation with a class H vacuum cleaner and air management utilising negative pressure units (npus). Further controls will be in the form of signage to prevent unauthorised access to work areas, use of PPE and RPE, decontamination facilities and waste management.

#### **11. Control of Asbestos Regulations (CAR) 2006 Regulation 13 Maintenance of Control Measures**

##### **Enclosures**

Enclosures are constructed to a sufficient standard to prevent the egress of asbestos fibres and a smoke test is conducted before asbestos removal starts. A negative pressure to prevent fibres through any leaks is maintained by the use of npus. Daily checks are carried out by the supervisor to ensure that all seals are maintained.

##### **Plant**

All plant is kept maintained to a high standard. Any defective equipment is reported and removed from use and quarantined until repaired or disposed of. All plant is visually inspected on a daily basis when in use and record of inspection including defects kept and made available for inspection by an enforcing inspector. All portable electrical equipment used on site is Also PAT tested at least 6 monthly.

All air filtering plant, vacuum cleaners and npus are subjected to a Di-Octyl Phthalate (DOP) test every 6 months to ensure that the filtration system is still effective in preventing the egress of airborne asbestos fibres back into the atmosphere. Records of tests are kept on site with each piece of plant and made available for inspection by an enforcing inspector.

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Wet injection equipment is thoroughly inspected and tested at least once every 12 months by a competent person to ensure that they still perform to the manufacturers specification and records kept and made available for inspection by an enforcing inspector.

#### Hygiene Units

All hygiene Units (aka decontamination units or Dues) are inspected daily to ensure that they are clean and in working order and compliant with Regulation 23 of L143 and Chapter 8 of HSG247. The npu is DOP tested on a 6 monthly basis and the boiler is also tested on a regular basis.

#### Respiratory Protective Equipment (RPE)

RPE is checked daily by the operative before use and at least every 30 days by a competent person. Any defects are recorded and if necessary the mask is placed into quarantine until it can be repaired. In addition a seal check is carried out every 6 months. Each set of RPE is numbered and reserved for the use of an individual.

### **12. Control of Asbestos Regulations (CAR) 2006 Regulation 14 Provision and Cleaning of Protective Clothing**

All coveralls used for asbestos works are of Category 3 Type 5 or 6 and suitable for use with hazardous dust. All coveralls are disposable and are used for only one shift at a time. Dirty coveralls are double bagged and disposed of as asbestos waste. Similarly all towels are disposable.

Footwear for use during asbestos removal is easily cleanable and is cleaned by the operative at the end of each shift. Separate footwear is used during transit.

All Personal Protective Equipment PPE and RPE is provided by the company.

Other items of PPE are provided as and when required such as hard hats, high visibility vests or jackets, harness, safety footwear, ear protection. All RPE and PPE is inspected by the user before use.

### **13. Control of Asbestos Regulations (CAR) 2006 Regulation 15 Arrangements to deal with accidents, incidents and Emergencies**

PA Group has procedures for dealing with accidents, incidents and emergencies

### **14. Control of Asbestos Regulations (CAR) 2006 Regulation 16 Duty to prevent or reduce the spread of asbestos**

PA Group (UK) Ltd has procedures to prevent the spread of asbestos by the use of control measures such as wet stripping, enclosures, exclusion zones, air management, decontamination facilities and the containment of waste. Air tests are used to monitor the effectiveness of such controls.

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**15. Control of Asbestos Regulations (CAR) 2006  
Regulation 17 Cleanliness of premises and plant**

Working enclosures and hygiene units are cleaned at the end of each shift. All tools and plant used in the enclosure is also cleaned and will be subjected to a disturbed air test as part of the 4 stage clearance process. Dustless methods are used for cleaning at all times i.e. Class H vacuum cleaners and 'tak rags'.

At the end of each asbestos removal job, the enclosure is subjected to a 4 stage clearance by an analyst independent UKAS accredited laboratory before a certificate of reoccupation can be produced.

**16. Regulation 18 Designated areas**

Areas where asbestos removal work is to be carried out are clearly demarcated with warning signs and where applicable either polythene sheeting or a warning tape (where an enclosure is not deemed necessary following risk assessment) or hoarding/fencing to form a physical barrier. These may be designated asbestos areas (under the control of the company built not necessarily requiring the use of RPE or a respirator zone, where access is prohibited without the use of RPE e.g. asbestos enclosure.

Transit and waste routes are also demarcated and supplied with signage along the route. Transit and waste routes are to be kept clear to prevent slips trips and falls and to facilitate cleaning in the unlikely event of an accidental release of asbestos along the route.

**17. Control of Asbestos Regulations (CAR) 2006  
Regulation 19 Air Monitoring**

All air monitoring including stage 3 of the 4 stage clearance is conducted by an independent laboratory accredited by UKAS to EN 17025. The laboratory may be employed by the client or by PA Group (UK) Ltd, depending on the client's requirements. In addition to stage 3 of the 4 stage clearance procedure, air tests may be used to establish:

- a) likely exposure during asbestos removal (personal testing),
- b) the effectiveness of controls within the enclosure (personal samples and static samples
- c) the integrity of the enclosure (background /leak tests), ambient levels before works starts (background tests)
- d) and the levels following completion of works e.g. following removal of the enclosure (reassurance tests)

All or none of the above may be employed on a particular project.

Air tests may also be used to determine asbestos exposure to surveyors and for reassurance following a Type 3 survey.

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**17. Control of Asbestos Regulations (CAR) 2006 Regulation 20 Standards for air testing and site clearance certification**

All air testing carried out on behalf of PA Group (UK)Ltd is conducted by a laboratory accredited by UKAS to standard EN 17025 Analysts carrying out the stage 2 and 4 of the 4 stage clearance are also accredited to EN 17020 for the this part of the works. All air monitoring is required by PA Group (UK) Ltd to be compliant with the guidance given in HSG248 Asbestos: the analysts' guide.

**19. Control of Asbestos Regulations (CAR) 2006 Regulation 21 Standards for Analysis**

All samples collected by or on behalf of PA Group (UK) Ltd for asbestos identification are analysed by a laboratory accredited to EN17025 as a testing body.

**20. Control of Asbestos Regulations (CAR) 2006 Regulation 22 Health records and medical surveillance**

All personnel engaged in asbestos removal are required to undergo an asbestos medical every 2 years by a doctor appointed by the HSE for such examinations.

Two copies of the certificate will be requested .One copy will be kept by the person on whom the examination was carried out the other will be kept by PA Group for a period of no less than 40 years. A copy of each current medical certificate authenticated by a senior member of management will be made available on site in the supervisor's site file for inspection by an enforcing inspector.

**21. Control of Asbestos Regulations (CAR) 2006 Regulation 23: Washing and changing facilities**

A Hygiene Unit aka Decontamination Unit (DCU) will be made available on site for all licensable work and in some cases for non licensable works such as textured coating removal and pre demolition/refurbishment surveys (Type 3).

The unit will be fully compliant with the requirements of the Regulation 23 and Chapter 8 of HSG 247.where possible the unit will be attached directly to the airlocks of the enclosure. If this is not possible it will be placed as near as practicable to the airlock.

**22. Control of Asbestos Regulations (CAR) 2006 Regulation 24 Storage, distribution and labelling of raw asbestos and asbestos waste**

All asbestos waste is double bagged in UN approved asbestos waste bags before it leaves the asbestos removal enclosure. It is either transported straight to a vehicle or stored on a locked skip before removal form site to a licensed hazardous waste tip.

All asbestos waste packages are labelled in accordance with the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004

**23. Control of Asbestos Regulations (CAR) 2006 Part 3 Prohibitions and related provisions**

PA does not use asbestos for any purpose.

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### 4.3. Assessment of compliance Control of Substances Hazardous to Health Regulations 2002

PA Group (UK) Ltd is not involved in the extraction, manufacture, Importation, supply, use or reuse of any asbestos containing materials Applies to all business sectors and office staff.

#### 1 PURPOSE AND SCOPE OF ASSESSMENT

1.1 This document represents a comprehensive new assessment prepared in accordance with the requirements of the *Control of Substances Hazardous to Health Regulations 2002 (COSHH)*. The relevant duties imposed by the regs are as follows:-

- a. Regulation 6 Assessment;
- b. Regulation 7 Prevention or Control of Exposure;
- c. Regulation 8 Use of Control Measures etc;
- d. Regulation 9 Maintenance, Examination and Testing of Control Measures;
- e. Regulation 10 Monitoring of Exposure at the Workplace;
- f. Regulation 11 Health Surveillance;
- g. Regulation 12 Information, Instruction and Training;
- h. Regulation 13 Emergency Procedures.

1.2 Regulations 6, 7, 8, 9 and 13 apply to the protection of employees, other persons at the premises and anyone else likely to be affected by the work in question. Regulations 10, 11 and 13 apply to the protection of employees and other persons at the premises. The same duties apply to sub-contractors and tenants at the premises.

1.3 Employees have a duty under the Health and Safety at Work Act 1974 (Section 7 (b)) to co-operate with their employer so as to enable the employer to comply with any duties imposed. COSHH regulations have been made under the provisions of the *Health & Safety at Work Act 1974*.

1.4 Regulation 8 of the COSHH regulations places a duty on employees to make full and proper use of any control measures, and to report any defects.

1.5 Attention is drawn to regulation 5 of COSHH, which specifies certain hazards to which COSHH does not apply, each being controlled by specific regulations e.g. Asbestos and Lead.

1.6 Work with asbestos constitutes a major proportion of this company's work. It is well understood that asbestos is specifically excluded from COSHH (Regulation 5.1a), and is to be dealt with under The Control of Asbestos Regulations 2006.

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- 1.7 All information relating to asbestos matters is dealt with in the company's safety policy and related guidance notes together with the appropriate UKAS manuals, which have been compiled in strict accordance with current legislation and guidance from the Health and Safety Executive.
- 1.8 The Company will not carry out work which is liable to expose any employees to substances hazardous to health, unless a suitable and sufficient assessment has been made of the risks created by that work and of the steps necessary to comply with the COSHH Regs.
- 1.9 The assessment shall be reviewed annually, if there is reason to suspect that it is no longer valid, or if there has been a significant change in the work.
- 1.10 If exposure cannot be prevented, the following control measures will be considered:- i) the total enclosure of the operation and/or process ii) diluting or substituting with a less hazardous substance iii) the provision of local exhaust ventilation to either totally remove or reduce the airborne hazardous substance at source and dispose of it safely iv) the regular and effective cleaning of the workplace.
- 1.11 PPE will be provided as a backup, rather than an alternative to the above. Any PPE or Respiratory Protective Equipment provided will be suitable for the purpose and the person, and will be of a type either approved by, or conform to a standard approved by the H S E.

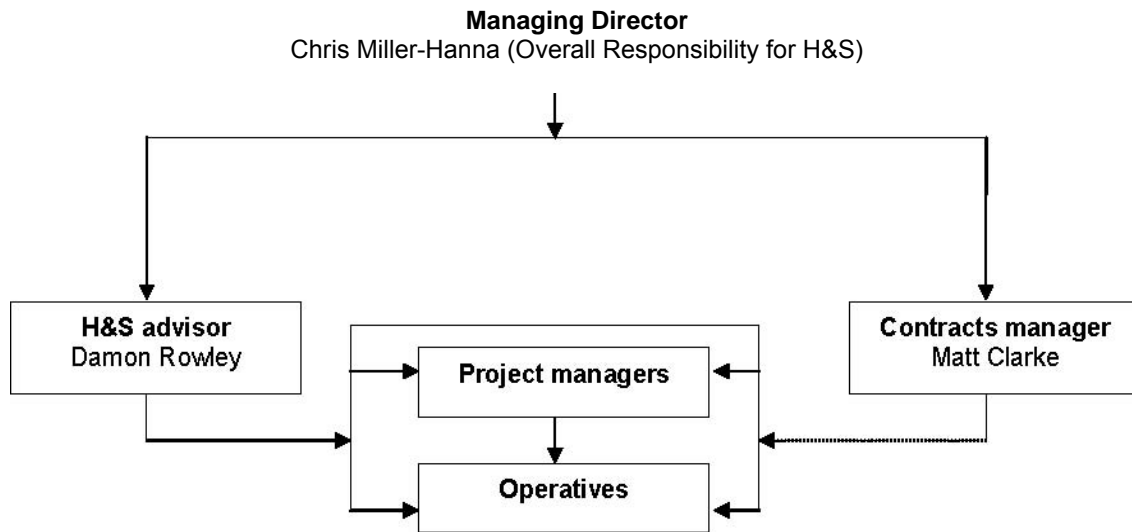
## 2. Substances assigned a Workplace Exposure Limit (WEL)

Where there is exposure to this as specified in Schedule 1 of the Regs, exposure shall not exceed those limits and will be reduced so far as is reasonably practicable.

- 2.1 Appropriate surveys of substances taken onto sites or existing in the site environment, will be undertaken and COSHH data obtained / provided to Supervisors as required. Competent persons with knowledge of the work processes involved will undertake such assessments.
- 2.2 Information will be made available to any persons likely to be exposed to hazardous substances and any employees involved will receive appropriate training.

### 3. PERSONNEL

#### 3.1 COMPANY ORGANISATION



#### 4.4. Assessment of compliance

##### **The Health and Safety (Consultation with Employees) Regulations 1996**

Applies to all business sectors and office staff

1. These require effective participation by employees in health & safety matters which affect their work environment.
2. The Company will ensure that the relevant employees are consulted :
3. before introduction of new measures / technology
4. before appointment of competent persons who will provide Health & Safety assistance before implementation of emergency procedures on provision of statutory information and training programmes
5. Suggestions or comments on ways in which our health and safety performance can be improved are actively encouraged, and all suggestions will be considered at the regular board meetings. Regular on site Toolbox Talks are carried out to encourage employee consultation on health & safety matters; issues raised at such meetings are brought to the attention of the board by the appropriate manager.
6. PA Group (UK)) Ltd employs an independent Human resources company to deal with staff matters
7. PA Group (UK) Ltd is compliant with these regulations where they apply

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## 4.5. Assessment of compliance Workplace (Health, Safety and Welfare) Regulations 1992

Applies to all business sectors and office staff

1. For the purposes of this assessment the workplaces may be divided into three discrete categories:

- a. Main Office, including;
  - i. Base Laboratory, comprising of –
    - (1) Counting Room;
    - (2) Bulk Sample Room;
  - ii. Stores;
  - iii. Offices;
- b. Mobile Laboratories;
- c. Site Locations, sub divided according to work activity;
  - I. Asbestos removal
  - II. Refurbishment
  - III. Bulk Sampling
  - IV. General Inspection
  - V. Cleaning

2. Main Office.

- a) Maintenance -Assessed under *the Provision and Use of Work Equipment Regulations 1998*.
- b) Ventilation -The minimum requirement of 5 to 8 ls<sup>-1</sup> per person is supplied by natural ventilation assisted by six fans each capable of exceeding that requirement.
- c) Temperature - During working hours the temperature is maintained between 16°C and 23°C respectively by gas fired central heating when cold and by fans when hot.
- d) Lighting - Suitable and sufficient lighting is supplied as far as possible by natural lighting. When necessary this is augmented by fluorescent lighting suspended from the ceiling and localised desk lighting.
- e) Cleanliness - Three times a week the office is cleaned by contract cleaning staff. The bulk room, counting room and spillages are dealt with in house in accordance with requirements as dictated by current HSE and UKAS guidance.
- f) Space -In accordance with the provision that every person should have sufficient floor area, height and unoccupied space for the purposes of Health Safety and Welfare. Using the formula set down in Regulation 10 of the above regulations each person

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should have at least 11m<sup>3</sup>. This requirement is more than satisfied under maximum use conditions and is far exceeded under normal use.

- g) Workstations - Each workstation and chair is suitable and sufficient for the use for which it is intended and used. Each person normally engaged in work at the main office has their own workstation adjusted in accordance with their own comfort requirements.
- h) Floors - All floors and floor coverings are in compliance with the above regulations.
- i) Falls & Falling objects - There is perceived to be no risk from falling objects at the main office. The risk of falling is no greater than normal.
- j) Windows - The large windows are protected against damage by large wooden support beams, the remaining windows and glass doors are constructed from wire reinforced glass. All those designed to be opened can be done so safely. Windows and glass doors are cleaned regularly by contract cleaners.
- k) Sanitary Conveniences -Two sanitary conveniences are provided for use at the main office. Both are kept clean and tidy and are provided with hot and cold running water, soap and towels.
- l) Drinking Water -An adequate supply of wholesome drinking water is available and readily accessible, filtered water is available if preferred.
- m) Accommodation for Clothing -Space for storage of specialist clothing is provided in the storeroom in addition to normal cloakroom facilities.

### 3. Mobile Laboratories.

- a. The mobile laboratories are converted vans which are used to travel to site and for the preparation filters and analysis of slides resulting from air monitoring. All meet UKAS requirements regarding the safety and welfare of the analyst including factors such as workstation, chair, heating, lighting, ventilation, lack of vibration and noise, cleanliness and maintenance. Specialist changing facilities are not required when air testing. Toilet facilities cannot be provided hence the facilities on site or public facilities are utilised.

### 4. Site Locations.

- a. Asbestos removal and refurbishment sites generally fall within the Construction (Design and Management) Regulations 2007 and adequate provision for Health Safety and Welfare as required under those regulations will be made.
- b. Where PA Group (UK) Ltd staff are carrying out asbestos bulk sampling, surveying and cleaning activities on premises controlled by others, they are required to provide adequate provision for Health Safety and Welfare of PA Group employees.
- c. Where the above activities are being carried out on a non occupied or derelict site, PA Group will assess the requirements for Health, Safety and Welfare measures and make adequate provision

## 4.6 Assessment of compliance Provision and Use of Work Equipment Regulations 1998

Applies to all Business Sectors and office staff

- 1 The provision and use of work equipment should be considered in conjunction with the following legislation:
  - a. The *Health and Safety at Work etc. Act 1974*;
  - b. The Control of Asbestos Regulations 2006;
  - c. The *Noise at Work Regulations 2006*;
  - d. The *Electricity at Work Regulations 1989*;
  - e. The *Control of Substances Hazardous to Health Regulations 2002*;
  - f. The *Management of Health and Safety at Work Regulations 1999 (as amended 2002)*;
  - g. The *Workplace (Health, Safety and Welfare) Regulations 1992*;
- 2 Work Equipment, means any machinery, appliance, apparatus or tool and any assembly of components which, in order to achieve a common end, are arranged and controlled so that they function as a whole.
- 3 Use includes starting, stopping, programming, setting, transporting, repairing, modifying, maintaining, servicing and cleaning and other related expressions.
- 4 For the purposes of this assessment work equipment may be divided into the following areas:
  - a. Office equipment, photocopiers, printers, computers, guillotine, vacuum cleaners, floor polishers etc;
  - b. Transport, vans and cars;
  - c. Tools used for maintenance of equipment;
  - d. Bulk Sampling Tools;
  - e. Test equipment, microscopes, sampling pumps, heaters, laboratory apparatus, (chemicals are not included);
  - f. Means of access, scaffolding, ladders etc.
  - g. Power tools power drills/screwdrivers, floor tile lifters, reciprocating saws,
  - h. Abrasive wheels
  - i. Hand Tools

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- j. Asbestos removal specialist equipment and plant, class H vacuum cleaners, negative pressure units, injection equipment, smoke generators, decontamination Units.
- 5 Common sense prevails throughout the assessment and implementation of procedures. While the prime duty for ensuring health and safety rests with the employer employees have duties to, as set out by regulation 12 of the *Management of Health and Safety at Work Regulations 1999 (as amended 2002)*.
- 6 Employees have a duty to:
- a. take reasonable care for their own health and safety and that of others who may be affected by what they do or don't do;
  - b. co-operate with their employer on health and safety;
  - c. not interfere with or misuse anything provided for their health, safety and welfare.
- 7 All work equipment is assessed on:
- a. Suitability;
    - i. its initial integrity,
    - ii. the place where it will be used;
    - iii. the purpose for which it will be used.
  - b. Maintenance;
    - i. all equipment should be in efficient working order and in good repair,
    - ii. routine, planned and preventative maintenance.
  - c. Specific risks;
    - i. use of work equipment is restricted to those persons given the task of using it,
    - ii. repairs, modifications, maintenance and servicing of that work equipment is restricted to those persons who have been specifically designated to perform operations of that description.
  - d. Information and instruction;
    - i. adequate health and safety information and where appropriate, written instructions pertaining to the use of equipment,
    - ii. details of the conditions in which and the methods by which the work equipment may be used,
    - iii. foreseeable abnormal conditions.
  - e. training (where required);
    - i. for operators, supervisors and managers.



- f. conformity with community requirements.
- 7** Continued
- g. protection against specific hazards;
    - i. falling objects,
    - ii. rupture or disintegration of equipment,
    - iii. fire or overheating,
    - iv. explosion,
    - v. discharge of any article or gas, dust, liquid or vapour.
  - h. controls and control measures do not apply.
- 8** The majority of equipment was provided for use before 1/1/93 and all equipment complies with the particular legislation implementing the relevant EC product directive.
- 9** Office Equipment; photocopiers, printers, computers, guillotine, etc,
- a. all equipment is designed, constructed and used for the purpose for which they were intended and for the place where it is to be used.
  - b. equipment is maintained in accordance with manufacturers recommendations by recommended dealers only. PA Group (UK) Ltd does not carry out its own equipment maintenance for this equipment.
  - c. specific risk in this case is limited to electrocution. All equipment purchased complies with the current electrical and safety legislation.
  - d. all equipment is supplied with a manufacturers handbook which is available to all users. All new staff are instructed in the use of all equipment with which they are unfamiliar.
  - e. the risk from correct use of this equipment's is considered negligible.
- 10** Transport: Vans and Cars. (See Procedure Note 15)
- a. all equipment is designed, constructed and used for the purpose for which they were intended and for the place where it is to be used. All vehicles meet all relevant EC and UK legislation.
  - b. equipment is maintained in accordance with manufacturers recommendations by recommended dealers only. PA Group (UK) Ltd does not carry out its own equipment maintenance for this equipment.
  - c. specific risk in this case is limited to road traffic accidents. All staff are expected to obey all road and carriage way regulations.

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**10** Continued.

- d. all equipment is supplied with a manufacturers handbook which is available to all users. New staffs are in possession of full, clean driving licences, and have previous driving experience.
- f. the risk from correct use of these equipment's is considered low.

**11** Tools used for equipment maintenance;

- a. all equipment is designed, constructed and used for the purpose for which they were intended and for the place where it is to be used.
- b. equipment is maintained in accordance with manufacturer's recommendations by competent staff and replaced when damaged or worn.
- c. specific risk in this case is limited to electrocution. All equipment purchased complies with the current electrical and safety legislation.
- d. all equipment is supplied with a manufacturers handbook which is available to all users. All new staff are instructed in the use of all equipment with which they are unfamiliar.
- f. the risk from correct use of these equipment's is considered negligible.

**12** Tools used for bulk sampling;

- a. all equipment is designed, constructed and used for the purpose for which they were intended and for the place where it is to be used.
- b. equipment is maintained in accordance with manufacturer's recommendations by competent staff and replaced when damaged or worn.
- c. specific risk in this case is limited to electrocution. All equipment purchased complies with the current electrical and safety legislation.
- d. all equipment is supplied with a manufacturers handbook which is available to all users. All new staff are instructed in the use of all equipment with which they are unfamiliar.
- e. the risk from correct use of this equipment's is considered negligible.

**13** Test equipment; microscopes, slide warmers, vaporisers, balances, fume cabinets, sampling pumps etc. Note: PA Group currently does not undertake air monitoring activities or asbestos testing activities, but may do so in the future

- a. all equipment is designed, constructed and used for the purpose for which they were intended and for the place where it is to be used.
- b. Equipment is maintained in accordance with manufacturer's recommendations by competent staff and replaced when damaged or worn.
- c. Specific risk in the case is limited to electrocution. All equipment purchased complies with the current electrical and safety legislation.
- d. All equipment is supplied with a manufacturer's handbook which is available to all users. All new staff are instructed in the use of all equipment with which they are unfamiliar.
- e. The risk from correct use of this equipment's is considered negligible.

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- 14** Means of Access: ladders, scaffolding etc. (see procedure notes 3 to 6 inclusive)
- a. this aspect of work is not under the direct control of the company. When on site(s) the asbestos removal contractor or specialist scaffolding company provide means of access where required.
  - b. no individual is required to use any means of access they consider unsafe. The need for care when using such equipment is stressed to all staff.
  - c. some guidance is given under the respective procedure note in the safety policy.
  - d. the risk from proper use of access equipment is considered low.

PA Group (UK) Ltd is compliant with these regulations where they apply

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## 4.7. Assessment of compliance

### Personal Protective Equipment at Work

#### Regulations 1992

Applies to all business sectors

- 1 In accordance with Regulation 3 of the above legislation as set out in the Health and Safety Executive publication Personal protective equipment at work, *Personal Protective Equipment at Work Regulations 1992 – Guidance on Regulations (L25)* the regulations do not apply where more comprehensive regulations are already in existence.
- 2 Such is the case for the following legislation:
  - a. The Control of Asbestos Regulations 2006;
  - b. The Control of Noise at Work Regulations 2005;
  - c. The Construction (Head Protection) Regulations 1989;
  - d. The Control of Substances Hazardous to Health Regulations 2002;
- 3 The personal protective equipment supplied by PA Group (UK) Ltd is supplied in compliance with the relevant legislation listed above. As such only regulation 5 of the *Personal protective equipment at work Regulations 1992* apply. This regulation requires that all personal protective equipment is compatible so that as required may be used in conjunction as circumstances dictate.
- 4 It is the case that ear defenders may be worn with head protection and/or eye protection without detriment to their respective protective properties. In addition these protective measures are compatible with the personal protective equipment and respiratory protective equipment used for protection against asbestos.

PA Group (UK) Ltd is compliant with these regulations where they apply

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## 4.8 Assessment of compliance

### Manual Handling Operations Regulations 1992 *(As amended 2002)*

#### Applies to all business sectors and office staff

- 1 In accordance with the Health and Safety Executive publication Manual handling, *Manual Handling Operations Regulations 1992* Guidance on Regulations L23 (2002 edition), an assessment of all manual handling activities was carried out taking into account, the task, the load, the working environment and each individuals capability. The assessment check-list in Appendix 2 of the above mentioned guidance was used to frame the assessment.
- 2 The assessment recorded that during normal procedures there was no significant risk of injury when moving test equipment to and from sites.
- 3 Loads handled were not bulky or awkward and fell well below the weight criteria set out in Appendix 1 of the above guidance.
- 4 On certain occasions it may be necessary to carry test equipment in excess of the ten metres set out in the guidance. However as the loads do not exceed the weight limits and are designed to be easily carried this does not present a significant risk. Rests may be taken as frequently as required. When accessing confined spaces or heights assistance will be sought where necessary.

PA Group (UK) Ltd is compliant with these regulations where they apply

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## 4.9 Assessment of compliance

### Health and Safety (Display Screen Equipment) Regulations 1992

Applies to all business sectors and office staff

- 1 In accordance with paragraph 22 of the Health and Safety Executive publication *Display Screen Equipment Work Health and Safety (Display Screen Equipment) Regulations 1992 Guidance on the Regulations L26*, where no significant risks are indicated and no individual user or operator is identified as being especially at risk the assessment need not be recorded.
  
- 2 It is assessed that in the case of PA Group (UK) Ltd, site personnel are occasional users at best and for the majority of time are non users. Office based staff are regular users. Annexes A and B respectively of the Health and Safety Executive publication *Display Screen Equipment Work Health and Safety (Display Screen Equipment) Regulations 1992 Guidance on Regulations L26* are included for the purpose of employee information.

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## **4.10 Assessment of compliance**

### **The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2007**

Applies to asbestos removal

The Approved Supply List will be consulted in order to determine whether goods are classified as "dangerous" and all the relevant legislative requirements will be followed. Vehicles will be suitable for the purpose and marked as necessary. Training and guidance will be given to those involved. It is envisaged that aside from asbestos waste, only small amounts of the other substances used on site will be carried and so this is not a major risk area.

PA Group (UK) Ltd is compliant with these regulations where they apply

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## 4.11 Assessment of compliance

### CONFINED SPACES REGULATIONS 1997

The Company will try to plan work to avoid entry into confined spaces wherever possible. Should such work be necessary, a full risk assessment will be made by a competent person and a safe method of work devised. Procedures will be established for any foreseeable emergencies and any employees involved will have received appropriate training.

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## 4.12 Assessment of compliance

### THE REGULATORY REFORM (FIRE SAFETY) ORDER 2005 (FSO) 1

It is the company's intention **to** implement these by carrying out a risk assessment for the office premises and putting in place and maintaining any fire precautions identified as necessary. In addition suitable information, instruction and training will be provided to employees involved.

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## 4.13. Assessment of compliance

### CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2007

1. These Regulations give statutory management responsibilities for certain construction projects in order to ensure health and safety matters are correctly identified and dealt with. Whenever this Company is appointed as Principal Contractor, the appropriate duties and regulations will be complied with.
2. Those involved in tendering for work shall check that any safety requirements included in contractual specifications are covered by this Policy. Any extra requirements are to be noted and arrangements made so these may be satisfied in good time.
3. As a contractor, the Company acknowledges its obligations to co-operate with the Principal Contractor and CDM coordinator and will make every effort to do so. The P C will be provided with any information which might affect safety or justify a review of the Health & Safety Plan.
4. The Company will :
  - a) comply with any directions given under Reg. 16(2)(a) and with any rules applicable in the Health & Safety Plan.
  - b) promptly advise the PC about events reportable under RIDDOR Regs 1995
  - c) provide information which the PC is expected to supply to the PS
  - d) ensure that before work commences each of his employees, sub-contractors and self-employed workers knows:
    - i) the names of the CDM coordinator and Principal Contractor
    - ii) the contents of the Health and Safety Plan as relevant to them.
5. THE CONSTRUCTION (HEALTH, SAFETY & WELFARE) REGS 1996 HAVE NOW BEEN INCORPORATED INTO CDM AS SCHEDULE 4.
6. These apply to construction work carried out by a person at work - see regulations for relevant definitions. They include responsibilities for both employers and employees and provide the essential framework relating to all activities involved in construction work.
7. Topics covered : safe places of work ; precautions against falls ; falling objects ; work on structures ; excavations, cofferdams and caissons ; prevention or avoidance of drowning ; traffic routes, vehicles, doors and gates ; prevention and control of emergencies ; welfare facilities ; site-wide issues ; training, inspection and reports.
8. The Company will ensure that the relevant requirements of these Regulations have been fulfilled before allowing employees or others under their control to use sites for the first time.

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## 5.0 PROCEDURAL NOTES AND SPECIFIC ARRANGEMENTS

- 5.01 This section is arranged in the form of Procedural Notes, Codes of Practice and Safe Working Methods. Each part is intended for a specific purpose and deals with a particular workplace location or hazard. Each item is relevant to the work of the company, and refers to a health and safety issue which is likely to be encountered by employees.
- 5.02 It is intended that this information should be revised and amended as necessary; and that additions should be made when changes in relevant legislation etc. are introduced, or when otherwise considered advisable. This intention is in accordance with sections 1.5, 2.5, and 2.8 of this policy document, and contributions and suggestions for improvements are encouraged.
- 5.03 Section 5 of this policy document contains guidance, instructions and specific notifications regarding matters which are of immediate concern but for which a procedural note has not yet been drawn up. Please refer to section 5 for recent information and details of proposed revisions to procedural notes.

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## Procedure Note 1

### Procedures for New Employees

Applies to all sectors of the business and office staff

- 1 Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible.
- 2 Issue the new employee with a copy of the Company Safety Policy, explain its purpose and ensure that the employee has read and understood it before they sign to acknowledge receipt.
- 3 Ascertain if the new employee has any disability or illness which could prevent him/her carrying out certain operations safely or which will require additional protective measures.
- 4 Show the new employee where copies of the regulations are kept.
- 5 Warn the new employee of any potentially hazardous areas of operation at the workplace, in the office or on site, and explain the measures to be undertaken to minimise any residual risks. For employees whose duties involve site visits and surveys, Procedural Note P18 will be explained.
- 6 Warn the new employee of any prohibited actions on site or in the workplace, e.g. working without a safety helmet or other protective clothing/equipment, operating plant unless authorised, "horseplay", etc.
- 7 If there is any training or instruction required, inform management and have it arranged, e.g. abrasive wheels, cartridge tools, scaffold inspection, etc.
- 8 Issue all necessary protective clothing, e.g. safety helmet, goggles, ear defenders etc.
- 9 Show the new employee the location(s) of the first aid box(es) and explain the procedure in the event of an accident, in particular the necessity to report and record all accidents, however trivial they may appear at the time.
- 10 All operatives employed by PA Group (UK) Ltd on asbestos related works will have a lung function test and medical check by the appointed doctor every two years.
- 11 All operatives employed by PA Group (UK) Ltd on field work are required to attend the CCNSG safety course.

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## Procedure Note 2

### Site Offices

Applies to Asbestos removal, Refurbishment, Asbestos Surveys

- 1 Where applicable site offices will comply with the requirements of the *Construction (Design and Management) Regulations 2007* and *HSE Guidance CIS18 (revised) Provision of Welfare Facilities at Fixed Construction sites* or *CIS46 Provision of Welfare Facilities at transient construction sites*.
- 2 The company director shall carry out a Fire Risk Assessment as required under *The Regulatory Reform Fire Safety Order 2005*. All fire precautions in accordance with these Regulations shall be supplied and maintained.
- 3 All Fire extinguishers shall comply with the relevant British Standard and will be serviced and maintained at regular intervals. Training will be provided to members of staff in their use.
- 4 The Manager will ensure that all offices are cleaned out daily and that waste paper is not allowed to accumulate.
- 5 Any liquefied petroleum gas heating appliance shall be used in accordance with the requirements of company policy.
- 6 Any electrical installation shall be to the requirements of the IEE regulations and shall be installed, tested and maintained by qualified electricians only. Portable Appliance testing (PAT) is carried out at least every 6 months on all portable equipment used on site

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## Procedure Note 3

### Work at Height Regulations 2005

Applies to all business sectors

1. The Work at Height Regulations 2005 was designed to implement the European Commission Temporary Work at Height Directive (2001/45/EC).
2. The Health and Safety Commission consider this a priority issue, as falls from height are the biggest cause of fatal accidents at work and the second biggest cause of major injuries.
3. The Work at Height Regulations (2005) adopt a risk based approach so that compliance is proportionate to the risk involved. This approach dovetails into other legislation requiring risk assessments to be carried out.
4. 'Work at height' is defined as "work in any place – from which, if no action was taken a person could fall a distance, liable to cause personal injury", this could be above or below ground level.
5. There are other existing legal provisions that deal with work at height, some of which will be revoked by the Work at Height Regulations:
  - b. The Workplace (Health, Safety and Welfare) Regulations 1992;
  - c. The Construction (Health, Safety and Welfare) Regulations 1996;
  - d. The Construction (Design and Management) Regulations 2007;
6. Other provisions generally apply to specific industries. However, this policy has been produced to accommodate the requirements as they affect PA Group (UK) Ltd's undertaking.
7. This policy document is not intended as a substitute for the Work at Height Regulations ( 2005) but as an introduction to them and a detailed guidance document which, when implemented in conjunction with the associated Code of Practice for Access and Work at Height, for PA Group (UK) Ltd, should ensure compliance.
8. Those that manage or undertake work at height should do so in accordance with this policy. This would include any PA Group (UK) Ltd employee who authorises work or contracts on behalf of the company.
9. Where the initial Risk Assessment for the work indicates a personal lack of knowledge, competence or a lack of existing adequate control measures, additional detailed guidance is given in Appendix 1(to be suitably referenced in the final document). 'Access and Work at Height Guidance.
10. Should any doubt remain following reference to the recommended guidance, the work should be referred to the HSE office for guidance or passed to a competent authority, such as Estates Services, before a contract is made, for planning, management and execution.
11. Compliance with his policy and the accompanying Code of Practice for Work at Height at PA Group (UK) Ltd is mandatory for all employees, contractors, self employed persons and visitors who undertake or manage work at height.

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## Procedure Note 3

### Work at Height Regulations 2005

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#### Requirements for safe work at height:

12. The overriding principle for Work at Height is to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury.
13. The prescribed hierarchy for safe work at height is as follows:
  - a. AVOID the risk by not working at height, where it is reasonably practicable to carry out the work safely other than at a height do so.
  - c. PREVENT falls - where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing so far as is reasonably practicable people or objects falling. This might include ensuring the work is carried out safely from an existing place of work or choosing the right work equipment to prevent falls.
  - c. MITIGATE the consequences of a fall - where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment and preventing those not involved with the work entering the hazardous area.
14. At all stages give collective protective measures (e. g. guard rails nets, airbags, etc.), precedence over personal (e.g. safety harnesses) protective measures.
15. The Work at Height Regulations (2005) requires you to:
  - a. Assess the risk to determine a safe way to work,
  - b. Follow the above hierarchy,
  - c. Plan and organise the work taking account of emergency measures, possible weather and environmental conditions.

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### Procedure Note 3

## Work at Height Regulations 2005

- d. Make sure that those working at Height are competent to do so, understand the risks and the Risk Assessments.
  - e. Use appropriate work equipment,
  - f. Manage risks from working round or on fragile surfaces
  - g. Carry out inspections on equipment to be used and the work area it's self.
16. The Work at Height Regulations (2005) requires that you plan your work correctly, to ensure it is carried out in a safe manner.
18. The workforce and worker representatives should be involved at all stages when planning any work at height.
19. Consulting the workforce will encourage them to be more aware of risks from work at height and their duties under health and safety law. It will also help you to comply with your duties;
20. Provide supervision proportionate to the findings of the risk assessment and the experience and capability of the people involved in the work. A worker may be trained to a nationally accredited standard, but he will still need to be acquainted with the layout and the peculiarities of the site and have the task(s) required of him/her carefully explained;
21. Make sure that those affected understand the risk assessment and what they must do to comply with it. This may be " tool box " talk or briefings to make sure workers are aware of hazards and when they should ask for further assistance. The activity may also affect others on the site not just your employees, inform and discuss with these people how you plan to carry out the work.
22. Plan for emergencies and rescue.
- a. If required have a rescue plan in place before the work starts. This plan should be reviewed throughout the lifetime of the project and update it if there are any substantial changes to the work being carried out.
  - b. The plan needs to take account of possible risks to rescuers.
  - c. You should not assume that the emergency services will be able to affect a rescue in all situations; especially within the necessary time (read references on suspension trauma).
22. The risk assessment and planning arrangements should take into account the effects that the weather can have on outdoor work at height.
- a. The Provision of Work Equipment Regulations 1998 (PUWER 98) require that work equipment is suitable for the conditions intended and that suitable and sufficient lighting is provided at any place where work equipment is in use.

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## Procedure Note 3

### Work at Height Regulations 2005

- b. Lightning, wind, rain, snow, ice, temperature and sun will change the working conditions during the job and may increase the risks that need to be addressed. Protective gloves, sun block or non-slip footwear may help, but your risk assessment should consider wider aspects such as whether bulky clothing could get caught up in machinery or make access more dangerous.
  - c. The build-up of mud on ladders, for example, will make them less safe, as would placing ladders on slippery surfaces, heat exhaustion must also be taken into account if conditions are hot, humid.
23. Make use of appropriate work equipment
- a. The Work at Height Regulations (2005) recognises that work at height can be performed safely in a number of different ways, using a wide range of work equipment. The choice of equipment will depend on the risk assessment. Whatever equipment is selected it should be of sound construction in suitable material, be of adequate strength and be free from obvious defects.
24. Choosing the right equipment for the task
- a. The choice of equipment involves "reasonable practicability" and must prevent a person falling or, to the extent that cannot be achieved, mitigate the distance and consequences of such falls.
  - b. Choices should be thought through.
  - c. A ladder may reach the workplace but if workers need to climb it for long duration or with heavy or bulky equipment, scaffolding is likely to be more appropriate.
  - d. On the other hand, the risks of installing scaffolding should be considered, especially for work of short duration, where a Mobile Elevating Work Platform might be more appropriate.
25. Selecting the right equipment for access and egress:
- a. Selecting equipment for access or egress will depend on the particular use envisaged. For frequent access, you should consider more permanent arrangements.
  - b. For example, if a scaffold is to be in place for some time, the erection of a staircase with handrails would be more appropriate than a ladder tied in place, especially if bulky loads are being carried up a long flight. You should also consider the use of hoists or other methods if this will reduce the risks of falls.

### Procedure Note 3

## Work at Height Regulations 2005

26. Systems of work or means of access should be designed so that workers do not have to climb over guardrails or other parts of the access structure. If frequent access is required it may be appropriate to use gates, which will allow access when required and also protect those working on the scaffold by providing a barrier. For work on high-rise buildings, which may take considerable periods of time to complete, the use of mast climbing work platforms or suspended platforms may be appropriate. These should only be erected, altered, operated or dismantled by those with the necessary competence and in accordance with the manufacturer's instructions.
27. Mobile Elevating work platforms should not generally be used as a means of access to or from another structure or surface -climbing out of Mobile Elevating Work Platforms in these circumstances has injured several people.
28. However, Mobile Elevating Work Platforms may be used for this purpose if they have been specifically designed for it, or as part of a properly planned operation where, in exceptional circumstances, this is the safest way to gain access to a place of work at height. In such cases suitable fall protection should be worn and correctly anchored.

### Work equipment

#### 29. Ladders

- a. Ladders, including fixed ladders and stepladders, are commonplace and used in most employment sectors. However, people often seriously underestimate the risks involved in using them. Around a dozen people are killed and more than 1,500 seriously injured each year while using ladders.
  - b. There are many types and sizes of ladders, portable, suspended, step, interlocking, extension, mobile and fixed ladders. They must meet the requirements of the Work at Height Regulations (2005). Ladders are classified as work equipment under the Provision and use of Work Equipment Regulations 1998 and therefore should be suitable for the task in hand.
  - c. Ladders should only be used as work equipment, either for access and egress or as a place from which to work, where a risk assessment shows that the use of other work equipment is not justified because of the low risk and the short duration of the job or unalterable features of the work site. The risk assessment is essential and should consider not only those using the ladder but others who could be affected, such as passers-by. The safety of sole workers who use ladders, such as window-cleaners, depends significantly on their correct use, and adequate training is essential.
  - d. Safety should not be compromised by haste to complete the job. All ladders must be used in accordance with the manufacturers' instructions.
30. If ladders are to be used to work from, and not just for access or egress, make sure:
- a. A secure handhold and secure support are available at all times;
  - b. The work can be reached without stretching;
  - c. The ladder can be secured to prevent slipping.
- 31 All ladders are numbered and listed on the company's equipment register and fitted with a 'laddertag'. Each ladder is inspected before each use by the user and will be placed into quarantine if a defect is found. A further monthly inspection is carried out by a competent person

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and the results recorded for each ladder.

### Procedure Note 3

## Work at Height Regulations 2005

32. It is tempting to try and ensure that all the work is completed without having to go down the ladder and move it, but overreaching while working from a ladder is a major cause of falls even for experienced workers.
33. Detailed advice and guidance for those using ladders is contained within the Code of Practice at Annex I Guidance applicable to ladders and their use.

#### **Make sure those working at height are competent**

34. Regulation 5 of the Work at Height Regulations (2005) requires that any person undertaking work at height should be competent to do it or, if being trained, is supervised by a competent person. Competence is a combination of appropriate practical and theoretical knowledge, training and experience, which collectively should enable a person to:
  - a. Undertake safely their specified activity at their level of responsibility,
  - b. Understand fully any potential risks related to the work activity (tasks and equipment) in which they are engaged; and
  - c. Detect any defects or omissions and recognise any implications for health and safety with the aim of specifying appropriate remedial actions that may be required in relation to their particular work activity.

This could include refusing to do a particular task if the potential risk is assessed as being too great, pending reassessment or a risk reduction strategy.

#### **Fragile Surfaces:**

35. We need to manage the risks posed by fragile surfaces i.e. surfaces where there is a risk of a person or object falling through, these surfaces may be either close to or part of the structure on which work is to be done and will include vertical or inclined surfaces.
36. In 2001/02 fragile surfaces (including fragile roofs, ceilings and skylights) accounted for 10 fatalities and 150 major and over three day injuries at work. (RIDDOR reportable)
37. Any surface from which work at height is carried out must be strong and stable enough so that any foreseeable loads, persons plus the materials/ loads they may be required to carry placed on it, will not lead to its collapse.
38. Duty holders should consider whether work on a fragile surface could be done in a way which does not expose workers to risk by having to stand on or near the surface, E.g. can the work be done from below?
39. Duty holders should consider the whole installation, including the fixings of the surface material.
40. It is also vital to consider the dynamic forces of the person falling from height onto the surface, and the effect of ageing on the surface material and the deterioration caused by weather, environment, impact and any structural alterations.

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## Procedure Note 3

### Work at Height Regulations 2005

41. Roof lights in non-fragile roofs can be difficult to see they may have been painted over and in bright sunshine they can blend in with the surrounding sheets. Remember that fragile surfaces can also be vertical, or nearly so, as well as horizontal. For example some, mainly older, skylights may have large vertical glass sections which people can fall through.
42. If the work requires regular or occasional access where there is a fragile surface, permanent fencing, guards or other measures to prevent falls should be in place.
43. Where a risk of falls remains, fall arrest equipment is required, so far as is reasonably practicable.

#### **Falling Objects:**

44. If it is determined that a falling object could injure someone, steps need to be taken to ensure that this is prevented.
45. Ways of preventing objects rolling or being kicked off the edge might include toe boards or solid barriers, or attaching them to people or fixed structures. Any guards used (including brick guards) must be robust and would usually require a mid rail. Personal items, such as mobile phones, can cause serious injury if they hit someone.
46. High visibility netting may be one way of dealing with this risk, another might be to ensure personal items or other equipment not necessary for the task are left in a safe place before working at height.
47. Rubbish chutes used to dispose of materials from height need to be properly erected managed so that the debris does not hit anyone either as it goes down the structure or when it hits the skip or pile at the bottom.
48. It is also important to impress on workers the risk of injury to people when using hoists, other ropes or hand-to-hand methods to move work equipment or other goods such as scaffold clips.
49. Loads and equipment need to be stored correctly so they do not collapse or fall at any time and cause injury. The logistics method of storing material on work surfaces may need to take into account that the workers access smaller amounts at height and that surplus are stored on ground. These issues special consideration in relation to the duty of any person under an employer's control, to the extent of their control.

#### **Danger Areas:**

50. Where workers are adjacent to an area where there is a danger of falling (for example near to fragile surfaces) or being struck by an object, the employer needs to make sure, so far as reasonably practicable, that people whose presence is not necessary are prevented from entering the area.
51. The Work at Height Regulations (2005) also requires that clear indication of this area is given, for example through physical isolation and / or notices. This will alert those who may need to access the site to recover objects or carry out maintenance work to take suitable precautions, such as attaching themselves to fall protection systems or wearing head protection.

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### Procedure Note 3

## Work at Height Regulations 2005

#### Inspection:

52. Equipment for work at height requires regular inspection to ensure that it is safe to use. Marking the equipment may be required to ensure that it is obvious when the next inspection is due.
53. Formal inspection, as required by these Regulations, should not be a substitute for any pre-use checks or routine maintenance. Inspection does not normally include the checks that are a part of the maintenance activity although certain aspects may be common.
54. Nor does inspection include a pre-use check that an operator should make before using work equipment for work at height. Also, while inspections need to be recorded, such checks do not.
55. The Work at Height Regulations (2005) require that, where the risk assessment under Regulation 3 of the Management of Health and Safety at Work Regulations (1999) identifies a 'significant risk,' suitable inspections should be carried out.
56. A significant risk is one that could be foreseeable result in a major injury or worse, which is likely for most falls from height.
57. The purpose of an inspection is to identify whether the equipment is fit for purpose and can be used safely and that any deterioration is detected and remedied before it results in unacceptable risks. An inspection can vary from a simple visual or tactile check, to a detailed comprehensive inspection, which may include some dismantling/testing. A competent person should determine the nature, frequency and extent of any inspection taking account of such factors as the type of equipment, how and where it is used, its likelihood to deteriorate, etc.
58. For example, if equipment is to be used in onerous outdoor conditions it may need more regular inspections than similar equipment used indoors. Periods between inspections should be chosen on the basis of risk assessment, and should be reviewed in the light of experience.
59. Further information is available in INDG 367 for rope positioning systems that require inspection before use. Lifting equipment covered by the Lifting Operations and Lifting Equipment Regulations (LOLER) will also be subject to thorough examination by a Competent Person. (See Lifting Operations and Lifting Equipment Regulations, ACoP and Guidance) .
60. Regulation 12 of the Work at Height Regulations (2005) requires that a weekly inspection is carried out for scaffolding, as previously required by the Construction (Health, Safety and Welfare) Regulations (1996).
61. Where work equipment is hired to the user, it is important that both parties agree, in writing, exactly what inspection has been carried out and that information is available and can be passed to the workers. Further details on inspection of work equipment are in Regulation 6 of Provision and Use of Work Equipment Regulations, ACOP and Guidance.

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## Procedure Note 3

### Work at Height Regulations 2005

#### Maintenance:

62. Inspection and thorough examination are not a substitute for properly maintaining equipment. The information gained in the maintenance process, inspection and more technical thorough examinations should inform one another; the processes should be complementary.
63. If a maintenance log exists then make sure it is kept up to date and accessible to the competent person performing the inspection or thorough examination. The maintenance process also needs proper management:
- a. Planned preventive maintenance involves replacing parts or making necessary adjustments at pre-set intervals so that risks do not occur as a result of the deterioration or failure of the equipment; and
  - b. Condition-based maintenance involves monitoring the condition of safety-critical parts and carrying out maintenance whenever necessary to avoid hazards which could otherwise occur. This would include, for example, hydraulic systems in a mobile elevating work platform or safety critical parts of window cleaning cradles.
  - c. Frequency of maintenance will depend on the equipment, the conditions in which it is used and the manufacturer's instructions.
  - d. Where work equipment is hired to the user, it is important that both the hire company and the person responsible for hiring the equipment establish which party will carry out safety-related inspection and maintenance. This important for equipment on long-term hire and the terms of the agreement between the hirer and the user should record this responsibility. Both parties should agree, in writing, exactly what they are responsible for and that information should be passed to the workers.
65. All those performing maintenance work should be competent to do so. They should have the skills, experience and knowledge of the relevant equipment. Therefore they should be able to identify defects / potential defects and be aware of their significance know what action to take as a result.

#### Record Keeping:

66. Regulation 12 of the Work at Height Regulations (2005) requires employers to record inspections that relate to the site safety or to the work equipment so that in the event of an accident they can provide useful information.
67. A health and safety inspector may legally ask to see these records, therefore they must be stored in a way that is accessible but is tamper proof. Records may be kept on a PC or laptop along as it is capable of being printed out.

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## Procedure Note 3

### Work at Height Regulations 2005

#### Inspection for Work at Height:

68. Regulation 13 of The Work at height Regulations requires that the surface conditions and other permanent features where work at height will be taking place are checked on each occasion before work starts in order to identify whether there are any obvious defects.
69. Thorough examination under the Lifting Operations and Lifting Equipment Regulations (1998):
70. Lifting equipment used for people or loads, which is subject to Regulation 9 of Lifting Operations and Lifting equipment Regulations (1998), requires a more detailed comprehensive inspection -called a through examination -which may include some dismantling and/or testing.
71. However it is important to remember that some items of equipment for work at height, for example a mast climbing platform, will have some parts which are subject to thorough examination under Lifting Operations and Lifting equipment Regulations (1998, but also others such as floors and guardrails which will not be subject to Lifting Operations and Lifting equipment Regulations (1998) and may need to be inspected more often.
72. Where Scaffolding is provided to provide access for licensable asbestos works (including ancillary works) where there is a foreseeable risk that the scaffolding activity is likely to disturb asbestos then the scaffold company must be licensed by the HSE for such works, Further detail can be found in CAR 2006 and Approved Code of Practice 'Work with Materials Containing Asbestos' (L143) and Asbestos Licensing Group Memo 04/08. Scaffold companies must be fully assessed to ensure that they are competent and have relevant training before being authorised for PA Group Projects. Not that 14 day notification applies for such works and this is separate and independent to the notification required of the asbestos removal contractor.

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## Procedure Note 4

### Roof work

#### Applies to asbestos removal, asbestos surveys and refurbishment

- 1 The *Construction (Health, Safety & Welfare) Regulations 1996*, and the Health and Safety Executive guidance document HSG33 (Health and Safety in Roof work). *The Provision and Use of Work Equipment Regulations 1998*.
- 2 At the tender or negotiation stage, the type(s) of roof configuration, methods of guarding, means of access, load bearing factors, etc. will be noted and allowed for in accordance with the above mentioned legislation and guidance.
- 3 At the pre-contract stage the contracts manager together with the supervisor will arrange:
  - a. means of access, type(s) of guarding etc., are erected by a competent person;
  - b. for suitable methods of lifting and lowering materials from the roof;
  - c. provide a plan to ensure that safe working practices are carried out;
  - d. ensure, where necessary, suitable and sufficient crawling boards, ladders etc., are available and in good condition;
  - e. ensure where necessary safety nets and/or harnesses are available;
  - f. ensure that equipment and materials to be stored on the roof do not overload the structure;
  - g. ensure that suitable and sufficient materials be made available to cover openings in the roof;
  - h. ensure that all employees are aware if the roof material is of a fragile nature;
  - i. ensure that the client or main contractor is notified if the roof is of fragile material.
- 4 Technicians will require training in the use of:
  - a. crawling ladders, staging, etc.;
  - b. safety nets/harnesses;
  - c. programme of decking sequences;
  - d. hoist operator training;
  - e. general safe working practices.

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## Procedure Note 4

### Roof work

- 5 The project manager will ensure:
- a. that, where applicable i.e. if work is being carried out on a sloping roof of more than 30 degrees, or less than 30 degrees but which is slippery, all necessary edge protection is in place and of sound construction;
  - b. that all roof openings are covered;
  - c. that, where necessary, crawling ladders, safety nets and harnesses are being used;
  - h. that means of access and egress is unobstructed and securely fixed;
  - e. that correct loading procedures on the roof have been carried out;
  - f. that weather conditions are suitable for roof work;
  - g. that any lifting appliance in use is correctly set up and that the operative is competent in its operation;
  - h. that, where necessary, operatives are wearing safety helmets or that the area where a hazard is present is cordoned off;
  - i. that all registers and notices, i.e. "Fragile Roofs", are on site and in use.
- 6 The main hazards associated with roof work are:
- a. falls off edges through openings or through fragile materials or due to deterioration of roofs due to age;
  - b. overloading of roofs, especially on re-roofing contracts;
  - c. weather, winds, snow, rain, ice, etc.;
  - d. fire hazards through using gas torches, boilers, etc. on the roof;
  - e. electric shock through not having ensured that power lines in the vicinity of the area being worked upon are dead;
  - f. dropping of materials or tools on top of operatives below.

*Revised 16<sup>th</sup> February 2009*

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## Procedure Note 5

### Electrical Power Tools

Applies to asbestos removal, asbestos surveys, refurbishment

- 1 The following regulations apply to the use of electrical power tools on site or other workplace:
  - a. The *Construction (Design and Management) Regulations 2007*;
  - b. The *Electricity at Work Regulations 1989*;
  - c. The *Personal Protective Equipment at Work Regulations 1992*;
  - d. The *Workplace (Health, Safety and Welfare) Regulations 1992*;
  - e. The *Provision and Use of Work Equipment Regulations 1998*.
- 2 Guidance on the safe use of electricity on construction sites is found in the following publications:

*HSG47 Avoiding Danger from Underground Services 2001* *HSG107 Maintaining portable and transportable electrical equipment 2004* *HSG141 Electrical Safety on Construction Sites 1995*
- 3 All electrical equipment on company sites will be supplied, installed, maintained and used in accordance with the above standards.
- 4 At the tender or negotiation stage the above standards will be taken into account.
- 5 The project manager will arrange the temporary electricity supply and distribution on site in accordance with the above standards. All temporary supplies will be installed by competent electricians and tested in accordance with the IEE regulations.
- 6 The project manager will ensure that all power tools provided for use on site comply with the relevant British Standard.
- 7 No power tools or electrical equipment of greater than 110 volts shall be used on sites.

The project manager will ensure that the temporary electrical supply is installed and tested as planned.

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## Procedure Note 5

### Electrical Power Tools

- 9 Immediate preventative action will be taken against any person abusing or incorrectly using electrical equipment on site.
- 10 The project manager will ensure that all power cable is installed clear of access ways and preferably above head height.
- 11 The project manager will ensure that any portable generator or other electrical equipment is fitted with an earth rod and connection and maintained in good condition.
- 12 Only authorised persons will be permitted to repair or alter electrical equipment. Any defects noted in electrical equipment. Any defects noted in electrical equipment must be reported to the supervisor so that immediate steps can be taken to have defects remedied by the site electrician or hire company.
- 13 All cable connections must be properly made, under no circumstances is insulation tape to be used for any repair or joint in extension cables.
- 14 On festoon lighting, all bulb sockets are live. Steps are therefore to be taken to protect open sockets when the bulb is not fitted as well as the fragments of glass or broken bulbs being a hazard. It must be remembered that the protruding filament wires would still be live.
- 5 Power tools must be maintained in good condition with casing intact and a label fitted showing voltage and other information.
- 16 Regular inspections of all electrical equipment on site will be carried out by a competent electrician.

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## Procedure Note 6

### Abrasive Wheels

Applies to asbestos removal, refurbishment

- 1 The following regulations relate to the provision and use of abrasive wheel machines or portable tools:
  - a. The *Provision And Use of Work Equipment Regulations 1998*,
  - b. The *Personal Protective Equipment at Work Regulations 1992*,
  - c. HSE guidance note HS(G) 17 - *Safety in the use of abrasive wheels*; Revised in line with PUWER (2000)
  - d. BS4481- Bonded Abrasive Products part 1&2
  - e. BS EN166 Personal Eye Protection Specification
- 2 The project manager will ensure that any abrasive wheel machine hired or owned by the company will be provided and maintained in accordance with the regulations.
- 3 The project manager, will ensure that sufficient operatives have been trained in the use of Abrasive Wheels, and that the names of the persons trained are entered in *the Abrasive Wheel Register*.
- 4 The project manager will ensure that any operative required to change discs or wheels has been trained and appointed in accordance with the regulations.
- 5 The project manager will ensure that suitable storage facilities are available for abrasive wheels and that sufficient quantity of suitable eye protection and other protective equipment is available and issued as required.
- 6 The project manager will ensure that *Forms 2345 (Abrasive Wheels Placard)* is displayed properly.
- 7 The directors will ensure that any person required to use an abrasive wheel machine or tool will be given instructions in the precautions required by a person trained under the above regulations.
- 8 The project manager will ensure that any abrasive wheel machine or tool being used with any defect which could give rise to injury is taken out of use immediately.

## Procedure Note 6

### Abrasive Wheels

- 9 The following safe system of work should be adopted when working with abrasive wheels:
- a. every abrasive wheel should have marked on it the maximum permissible speed in revolutions per minute;
  - b. the spindle speed of every power driven machine used for abrasive wheels should be clearly marked on the equipment;
  - c. the spindle speed should never exceed the maximum permissible speed of the abrasive wheel;
  - d. abrasive wheels should only be mounted and changed by a person who has been trained for the purpose. The competent person must be appointed by management and this info should be entered in the Register (*Form 2346*);
  - e. every abrasive wheel shall be provided with a strong and efficient guard and only that part of the wheel which has been exposed to carry out the work shall remain unguarded;
  - f. the guard shall be strong enough to contain the wheel if it breaks up;
  - h. the machine should be easy to stop with the switch being in a position which is easy to reach. In the case of hand held portable machines such as angle grinders, a spring loaded trigger should be provided which will automatically cut off the power when it is not depressed;
  - i. a cautionary notice (*Form 2345*) should be displayed so that employees using abrasive wheels can read it.
  - j. all reasonable care should be taken to ensure the operator of an abrasive wheel is not standing on a slippery floor or has any other obstruction which could cause him to fall;
  - k. the main hazards associated with abrasive wheels are:
    - i. bursting of the wheel or disc;
    - ii. injuries from flying particles;
    - iii. cuts to hands and legs;
    - iv. dusts from certain types of materials;
    - v. loose clothing tangled in disc;
    - vi. electric shock;
    - vii. noise;
    - viii. fire and explosion.

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## Procedure Note 7

### Entry into confined spaces

Applies to all business sectors

- 1 . The *Confined Spaces Regulations 1997*, requires that a healthy and safe atmosphere be maintained in confined spaces and that adequate testing shall be carried out to ensure that the atmosphere is safe before persons are allowed to enter.
- 2 Details of practical steps which must be taken to ensure the health and safety of all persons employed in confined spaces, are set out in the above regulation.
- 3 At the tender or negotiation stage the need for protective equipment and precautionary measures will be considered and allowance made for this.
- 4 Prior to the start of work the project manager will consider what type of precautionary measures are necessary, and ensure that all such precautions and equipment are available before persons enter the confined space.
- 5 The project manager will brief all staff concerned about the hazards to be encountered prior to the start of work. Such briefings will include details of each person's duty in protecting other persons and himself. When necessary such duties will be put in writing.
- 6 Each person employed on work in the confined space will be trained to deal with all foreseen hazards and to handle all equipment provided.
- 7 The project manager is responsible to ensure that equipment which is defective is replaced promptly and to enforce the correct use of equipment by personnel under his supervision.
- 8 Each person has a duty to work in a responsible manner and to take due care of his own health and safety and that of other persons.
- 9 The main hazard arises when persons enter confined spaces before suitable testing of the atmosphere has taken place and action taken to render the atmosphere harmless.
- 10 When conditions make it necessary, entry into confined spaces will only be permitted after issue of a permit to work. The terms and conditions of such permits must be strictly adhered to at all times.
- 11 When work in confined spaces is undertaken, there will, at no time, be less than two persons present.

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## Procedure Note 8

### Manual Handling and Lifting

Applies to all business sectors and office staff 1 The following regulations apply to manual handling or lifting:-

- a. The *Construction (Design and Management) Regulations 2007*;
  - b. The *Manual Handling Operations Regulations 1992 (as amended 2002)*
  - c. *Manual handling Guidance on Regulations – HSE publication L23 (3<sup>rd</sup> edition 2004)*;
  - d. The *Provision and use of Work Equipment Regulations 1998*;
  - e. The *Lifting Operations and Lifting Equipment Regulations 1998*;
- 2 These regulations state, "A person shall not be employed to lift, carry or move any load so heavy as to cause injury".
  - 3 The project manager will ensure that materials are handled, as far as possible, by machine and where the use of machines are impractical, that sufficient labour is available to handle any heavy or awkward loads and that instructions are issued on the handling of those loads.
  - 4 The project manager will instruct operatives in the correct methods for lifting and handling loads as required.
  - 5 The project manager will ensure that a supply of suitable gloves are available for issue as and when required, for the handling of such materials which could cause injury to hands.
  - 6 The company will encourage the wearing of safety footwear and the supervisor will caution any employee or sub - contractor wearing unsuitable footwear.
  - 7 Management will not require any operative to lift a load which is likely to cause injury.

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## Procedure Note 9

### Noise & Dust Control

Applies to asbestos removal and refurbishment

- 1 **Noise** is covered by the following regulations:
  - a. The *Noise at Work Regulations 2006*;
  - b. The *Control of Pollution Act 1974*.
- 2 At the tender or negotiation stage, the above standards will be taken into account.
- 3 The project manager will ensure that information on the noise level of any plant which it is intended to hire or purchase is obtained and taken into account before hiring or purchase takes place.
- 4 The project manager will ensure that any static plant to be installed on site is situated in a position which takes account of the effects of noise on the workforce and public.
- 5 If noise is perceived to be a problem then the contracts manager will arrange for the site to be assessed by a competent person who will draw up procedures to be used on that site.
- 6 Where the level is less than 80dB(A) no further action is required by the regulations, however it is company policy to reduce noise to a minimum.
- 7 Where the level exceeds 80dB(A) but is less than 85dB(A) then all personnel will be advised about industrial hearing loss and instructed to wear hearing protection.
- 8 In the event of levels being in excess of 85dB(A) and/or 200 Pascal's then personnel will be advised about industrial hearing loss and instructed to wear hearing protection.
- 9 Where areas of high noise have been identified these areas will be designated , "Ear Protection Zones" in accordance with BS 5378, and the wearing of ear protection will be mandatory.
- 10 Adequate records of all surveys carried out together with subsequent action taken will be kept.
- 11 Supplies of ear defenders or other hearing protection will be made available where it is not possible to reduce the noise level to a safe limit.
- 12 The project manager will be responsible for training operatives in the use of noise control equipment and ensuring such equipment is adequate and properly maintained.

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- 13 **Dust** is covered by the following regulations:
  - a. The *Control of Pollution Act 1974*.
- 14 At the tender or negotiation stage, the above standards will be taken into account.
- 15 The project manager will ensure that information on the noise level of any plant which it is intended to hire or purchase is obtained and taken into account before hiring or purchase takes place.
- 16 The project manager will ensure that any static plant to be installed on site is situated in a position which takes account of the effects of noise on the workforce and public.
- 17 If noise is perceived to be a problem then the contracts manager will arrange for the site to be assessed by a competent person who will draw up procedures to be used on that site.
- 18 Where the level is less than 80dB(A) no further action is required by the regulations, however it is company policy to reduce noise to a minimum.
- 19 Where the level exceeds 80dB(A) but is less than 85dB(A) then all personnel will be advised about industrial hearing loss and instructed to wear hearing protection.
- 20 In the event of levels being in excess of 85dB(A) and/or 200 Pascal's then personnel will be advised about industrial hearing loss and instructed to wear hearing protection.
- 21 Where areas of high noise have been identified these areas will be designated , "Ear Protection Zones" in accordance with BS 5378, and the wearing of ear protection will be mandatory.
- 22 Adequate records of all surveys carried out together with subsequent action taken will be kept.
- 23 Supplies of ear defenders or other hearing protection will be made available where it is not possible to reduce the noise level to a safe limit.
- 24 The project manager will be responsible for training operatives in the use of noise control equipment and ensuring such equipment is adequate and properly maintained.

## Procedure Note 10

### Welfare and First Aid

Applies to all business sectors and office staff

- 1 The following regulations apply:
  - a. The *Construction (Design and Management)) Regulations 2007*;
  - b. The *Health and Safety (First Aid) Regulations 1981*;
  - c. The *Workplace (Health, Safety and Welfare) Regulations 1992*;
  - d. The *Management of Health and Safety at Work Regulations 1999 (as amended 2002)*.

#### Generally

- 2 Management will ensure the arrangement of suitable and adequate welfare facilities.
- 3 Management will arrange for the training of appointed “first aider(s)” and “first aid appointed person(s)” appropriate to first aid requirements.
- 4 Appointed “first aiders” will receive training, and be certified, by an organisation approved by the HSE for the purpose of the *Health and Safety (First Aid) Regulations 1981*
- 5 Duties of “first aiders” and “first aid appointed persons” include the following:
  - a. Take charge, of a situation if there is a serious illness or injury, e.g. to call for an ambulance or medical assistance.
  - b. administering, where possible, any emergency treatment of casualties and ensuring an ambulance or doctor is called if the circumstances warrant;
  - c. ensuring proper stocks of first aid items are kept and the box or cupboard is clearly identified and readily and speedily accessible;
  - d. ensuring First Aid notices are posted in conspicuous positions giving the name of the appointed person(s);
  - e. Recording in a treatment book any incidents requiring first aid assistance;
  - f. Informing company management of any reportable accidents / occurrences as soon as possible.

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## Procedure Note 10

### Welfare and First Aid

- 6 All accidents must be entered in the BI 510 accident book which is kept with the first aid box. See also procedure note 16 – Accident Reporting.

#### Site Welfare and First Aid

- 7 All work will be tendered or negotiated for taking into account the requirements of the above legislation.
- 8 The project manager will establish the welfare and first aid requirements before work starts. The project manager shall make an assessment of the first aid needs appropriate to the circumstances of each workplace. Welfare facilities should take into account sub -contractors' requirements if applicable. As a minimum the following should be supplied;
- a. a place to shelter from bad weather, to deposit clothes not worn during working hours, warm themselves and dry clothing;
  - b. the accommodation should include sufficient seats and tables for taking meals and have facilities for boiling water. If more than 10 persons are employed on site, facilities for heating food should also be included. A supply of drinking water should be available clearly marked, "Drinking Water";
  - c. adequate means of washing should be provided;
  - d. a suitable toilet should be provided. It may be that in some cases the public conveniences are near the work.
- 9 Where the company is operating as a sub - contractor, the site manager will arrange with the main contractor, before company employees are sent to site, that all the necessary welfare and first aid arrangements are available for use.
- 10 The project manager will ensure that all planned welfare facilities are provided and that they are maintained to the required standards.
- 11 On all sites trained first aiders or first aid appointed persons will be available to care for first aid equipment and treat injuries. Details of who such persons are will be clearly displayed at all sites and offices.

## Procedure Note 10

### Welfare and First Aid

#### Office Welfare and First Aid

- 13 Fully stocked First Aid boxes are provided within the office and are located at (i) stationary room, (ii) kitchen/canteen. Richard Meehan is the Appointed Person with regard to the provision of first aid within the office environment.

First Aider: Matt Clarke & Becky Saunders

Eye wash facilities within laboratory.

All surveyors are provided with First Aid Kits. Any accidents or incidents on site are to be reported immediately to Richard Meehan and the details entered into the Accident Book. This is in addition to any RIDDOR notifications. The Accident Book is kept within reception.

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## Procedure Note 11

### Personal Protective Equipment

Applies to all business sectors

- 1 The legislation covering personal protective equipment includes:
  - a. The *Personal Protective equipment at Work Regulations 1992*.
  - b. The *Construction (Head Protection) Regulations 1989*;
- 2 All work will be tendered for or negotiated for taking into account the requirements of the above regulations.
- 3 Before work starts the project manager will ascertain what, if any, additional protective equipment is required, and that sufficient equipment of a suitable standard is made available before the start of work.
- 4 The project manager will ensure that all operatives involved have been trained in the use and maintenance of the protective equipment issued and wear such equipment as and when required to do so.
- 5 The project manager will periodically check to ensure all protective clothing and equipment required is being worn when required. Failure or refusal to wear clothing or equipment provided may result in suspension or dismissal.

## Procedure Note 12

### Office Safety

Applies to office staff and cleaning

1. The following legislation applies:
  - a. The *Health and Safety at Work Etc. Act 1974*;
  - b. *The Regulatory Reform Fire Safety Order 2005*.
  - c. *The Health and Safety (First Aid) Regulations 1981*;
  - d. *The Control of Electricity at Work Regulations 1989*;
  - e. *The Reporting of Injuries Diseases and Dangerous Occurrences Regs 1995*;
  - f. *The Workplace (Health, Safety and Welfare) Regulations 1992*;
  - g. *The Management of H&S at Work Regulations 1999 (as amended 2002)*
  - h. *The Provision and Use of Work Equipment Regulations 1998*
2. In essence the regulations require a reasonable standard of office accommodation for all office employees. This includes an adequate level of lighting, heating and ventilation to maintain a temperature of not less than 16 degrees Centigrade, and the offices to be kept clean and not overcrowded.
3. Accidents can be avoided by ensuring cables are not allowed to trail across places where people are liable to walk and passageways are kept free of obstructions such as open filing cabinet drawers etc.
4. Under The Fire Precautions Workplace (Amendment) regulations 1999 it is a responsibility of the employer to assess the fire risks in all their premises, ensure that fire can be detected and personnel warned, ensure that there are suitable emergency escape routes, provide fire fighting equipment that is maintained and tested and have plans for emergencies in place and have staff trained to implement them. Fire is probably the biggest hazard in an office, the following points should be noted;
  - a. electrical socket outlets should not be overloaded by operating several appliances from a single socket;
  - b. all electrical connections should be properly made and cables clamped to plugs and machines;
  - c. electric cables should not be placed under carpets where they can overheat;
  - d. ensure all personnel know where all the nearest fire exits are;
  - e. all fire extinguishers must be fixed to the walls on brackets;
  - f. ensure all personnel know where the nearest extinguisher is located and institute a regular inspection of that equipment;
  - g. impress on all the staff the importance of switching off fires and heaters and to remove cigarettes and cigarette ends from desks at the end of each day.

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## Procedure Note 13

### Transport

Applies to all business sectors

- 1 The following regulations relate to the use of company transport:
  - a. Road traffic regulations and Highway Code;
  - b. *The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004*
  - c. *Working with ADR - An introduction to the carriage of dangerous goods by road 2004*;
  - d. Dept of Transport Code of Practice – *Safety of loads on vehicles*;
  - e. *The Construction (Design and Management) Regulations 2007*; (when vehicles are in use on construction sites).
- 2 The use of company transport is restricted to designated, authorised, licensed and insured drivers only, and only when using vehicles on business, unless prior permission is obtained.
- 3 When driving company vehicles authorised personnel must employ defensive driving techniques and show courtesy and consideration to other road users at all times.
- 4 Drivers must park vehicles in a safe location before receiving or making calls via mobile telephones. Drivers must not, under any circumstances, attempt to conduct a telephone conversation whilst driving.
- 5 All vehicles are purchased, maintained and used in accordance with current vehicle and road traffic regulations.
- 6 All drivers must maintain the interior and exterior of their vehicles in a clean condition and report all accidents, defects and damage immediately. Drivers are not expected to undertake maintenance with the exception of checking water, oil, fuel and brake fluid levels and tyre pressures. Periodic inspection of lights, wipers, towing hitches, roof racks or other accessories must be carried out.
- 7 Before towing a decontamination unit the driver is to satisfy himself that the trailer is securely attached, the brakes and the lights are working.
- 8 Each vehicle is to be air monitored at a regular interval within both the load area and the passenger space to ensure that no contamination is present.
- 9 In the event of an accident the procedure as set out by the insurance company must be followed.

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## Procedure Note 13

### Transport

- 10 In the event of any waste or contaminated material being released during the transportation the vehicle is to be parked as far as possible out of danger, locked and the emergency services alerted. All staff are to leave the vehicle and telephone the office to request assistance to decontaminate and retrieve the vehicle.
- 11 Under no circumstances must unprotected staff re-enter the vehicle for any reason, any reason, any enquiries from the authorities are to be referred to the office.
- 12 Towing- Personnel who hold a full UK/EU driving licence issued before 1 January 1997 may tow a trailer where the combined weight of trailer and tow vehicle does not exceed 8.25 tonnes Maximum Allowable Mass (MAM) without undergoing an additional driving test. Personnel who hold a full driving licence issued since 1 January 1997 must undergo an extra driving test in order to tow a trailer of up to MAM 750kg behind a vehicle of up to MAM 3.5 tonnes.

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## Procedure Note 14

### Accident Reporting, Injury or Ill Health

Applies to all business sectors and office staff

The following legislation applies:

- a. The *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*;
- 2 All injuries resulting from accidents on site or in other workplaces, however minor, must be reported by the site supervisor and recorded in the Accident Book. This applies to injuries received by sub contractors, members of the public, visitors etc., as well as company employees.
- 3 In the event of a fatal or major injury or ill health to any person or dangerous occurrence as defined by the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*, the following persons must be informed immediately by telephone;
  - a. the relevant emergency services (if applicable);
  - b. the Health and Safety Executive (addresses and telephone numbers can be found on the Health and Safety Law Poster which is to be displayed at every workplace);
  - c. a Company Director.
- 4 The Company Director will check that the Health and Safety Executive have been informed of fatal or major injury by telephone and will confirm details of the accident in writing within ten days using a *Form 2508*.
- 5 The following injuries require immediate notification:
  - a. the death of any person (whether an employee or not) as a result of an accident arising out of or in connection with work;
  - b. any person (whether an employee or not) suffering any of the following injuries or conditions as a result of an accident arising out of or in connection with work;
    - i. fracture of the skull, spine or pelvis;
    - ii. fracture of any bone;
      - (1) in the arm or wrist, but not in the hand: or
      - (2) in the leg or ankle but not in the foot;
    - iii. amputation of;
      - (1) a hand or foot: or

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## Procedure Note 14

### Accident Reporting, Injury or Ill Health

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- iv. The loss of sight of any eye, a penetrating injury to an eye, or a chemical or hot metal burn to the eye;
  - v. either injury (including burns) requiring immediate medical treatment, or loss of consciousness, resulting in either case from an electric shock from any electrical circuit or equipment, whether or not due to direct contact;
  - vi. Loss of consciousness resulting from lack of oxygen;
  - vii. decompression sickness (unless suffered during an operation covered by the *Diving Operations at Work Regulations 1997*, requiring immediate medical treatment;
  - viii. either acute illness requiring medical treatment, or loss of consciousness resulting in either case from the absorption of any substance by inhalation, ingestion or through the skin;
  - ix. acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a pathogen or infected material;
  - x. Any other injury which results in the person injured being admitted immediately into hospital for more than 24 hours.
- 7
- Where an accident results in the person being unable to return to their normal duties for more than three consecutive working days following the day of the accident a written report, to be in the approved form, shall be sent to the enforcing authority within seven days.
- P16.07 Where an employee suffers a reportable injury and dies as a result of the injury within a year of the accident the Managing Director or his appointee shall report to the enforcing authority the subsequent death.
- 8
- The following dangerous occurrences must be notified immediately:
- a. the collapse of, the overturning of, or the failure of, any load bearing part of;
    - i. any lift, hoist, crane, derrick, or mobile powered access platform, but not any winch, teasel pulley block, gin wheel, transporter or runway;
    - ii. any excavator; or
    - iii. any pile driver frame or rig having an overall height, when operating, of more than seven meters;
  - b. electrical short circuit or overload attended by fire or explosion which resulted in the stoppage of the plant involved for more than 24 hours and which,  
  
taking into account the circumstances of the occurrence, might have been liable to cause the death of, or any of the injuries or conditions covered previously to any person;

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## Procedure Note 14

### Accident Reporting, Injury or Ill Health

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- c. an explosion or fire occurring in any plant or place which resulted in the stoppage of that plant or suspension of normal work in that place for more than 24 hours, where such an explosion or fire was due to the ignition of process materials, their by-products (including waste) or finished products;
- d. a collapse or partial collapse of any scaffold which is more than five meters high which results in a substantial part of the scaffolding falling or overturning; and where the scaffold is hung or suspended, a collapse of the suspension arrangements (including the outrigger) which causes a working platform or cradle to fall more than five meters;
- e. An explosion, collapse, bursting of a closed vessel (including a boiler or boiler tube), internal pressure vessel, above or below atmosphere, which results in the stoppage of that plant, or suspension in that place, for more than 24 hours and/or liability to cause death/injury, etc.;
- f. sudden uncontrolled release of one tonne or more of highly flammable liquid, (defined in *HFL and LPG regulations 1972, Regulation 2*), flammable gas or liquid above its boiling point from any system, plant or pipeline;
- g. unintended / partial collapse of more than five tonnes of material, building, floor, or wall, of workplace (not under construction, alteration or demolition);
- h. failure of a container or load bearing part, whilst being raised or lowered,  
*Defined Freight Containers (Safety Convention) Regulations 1984, Regulation 2;*
- i. where cable exceeds 200 volts and plant or equipment makes unintentional contact;  
or an arc is caused due to close proximity.

10 On receiving a medical certificate from an employees doctor stating that the employee is suffering from any of the following, the Managing Director, or his appointee shall complete and return a *Form 2508A* to the enforcing authority, keeping a copy on the files;

- a. Mesothelioma
- b. Lung Cancer;
- c. Asbestosis.

P16.10 Any claim made for Industrial Disablement Benefit by an employee will result in Form BI 76 being received by the Company. This will be completed by a Company Director and returned to the Department of Health as required.

11 An accident book BI 510 will be available on each site to ensure any injured employee can record details of his accident.

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## Procedure Note 14

### Accident Reporting, Injury or Ill Health

- 12 All accidents and potentially dangerous incidents must be investigated, as soon as possible. Detailed written reports must be made for each investigation, to include statements from witnesses and photographs where applicable.

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## Procedure Note 15

### Administration and Monitoring of Health and Safety

#### Safety Representatives and Committees

Applies to all business sectors and office staff

- 1 Applicable legislation includes;
  - a. The *Health and Safety at Work etc., Act (1974)*;
  - b. The *Safety Representatives and Safety Committee Regulations 1977*;
  - c. The *Management of Health and Safety at Work Regulations 1999 (as amended 2002)*
  - d. The *Health and Safety (Consultation with Employees) Regulations 1996*;
  - e. *Consulting workers on health and safety. Safety Representatives and Safety Committees Regulations 1977 (as amended) and Health and Safety (Consultation with Employees) Regulations 1996 (as amended). Approved Codes of Practice and guidance L146 HSE*
  
- 2 A Contractor employing more than twenty persons (either on one or several sites) is obliged to appoint a safety supervisor experienced in the employers work and with suitable qualifications to advise on the observance of all statutory regulations and supervise safe conduct of the work.
  
- 3 A person nominated by management will be responsible for the monitoring of health and safety on site and in the office, keeping suitable records and reporting to the Managing Director.
  
- 4 Time will be made available at board meetings and regular management meetings to discuss Health and Safety matters, which will be given equal weighting with business matters.
  
- 5 Management will make routine site inspections to check on Health and safety, and make adequate records of their findings.
  
- 6 In addition unannounced safety audits will be carried out and findings reported to management.

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## Procedure Note 16

### Site Visits

#### Applies to all business sectors

#### Unoccupied buildings and sites

- 1 As a general rule do not visit an empty building or unoccupied site on your own. Make sure that someone knows where you are, and at what time you expect to return.
- 2 Do not take chances. Do not visit an empty building if you think it unsafe. Do not visit an unoccupied site if you think it dangerous. Anticipate hazards.  
  
Common dangers include:
  - a. the possibility of partial or total structural collapse.
  - b. rotten or insecure floors and stairs.
  - c. hidden pits, ducts, openings, etc, fragile construction, e.g. asbestos or plastic sheets on roofs.
  - d. space which has not been used or ventilated for some time.
  - e. unprotected live services.
  - f. contamination by chemicals or asbestos.
  - g. intruders who may still be around.
  - h. biological contamination by vermin or birds, or chemical poisoning from substances put down to control them.
  - i. injury and biological contamination from sharps such as exposed nails, broken glass and discarded syringes
  - j. lack of natural or artificial lighting.
- 3 Plan the visit and make sure that you take with you appropriate equipment and protective clothing. Apart from stout shoes and a hard hat, remember that unoccupied buildings can be dirty, damp, cold and dark; so go prepared.
- 4 Familiarise yourself beforehand with the plan of the building, particularly the exit routes. Make sure that security devices on exits will allow you to reach safety quickly.
- 5 Look for defects in the floors ahead, e.g. wet areas, holes, materials that might be covering up holes.
- 6 Walk over the structural members (e.g. joists, beams, etc) whenever possible - do not rely on floorboards alone.

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## Procedure Note 16

### Site Visits

- 7 Do not walk and look around at the same time. Keep one hand free at all times when moving. Do not walk and try to take notes at the same time. Make sure that you are in a safe and balanced position when taking photographs or taking measurements. Avoid over stretching. This can lead to overbalancing.
- 8 Check on provision of edge protection when approaching stairwells, lift shafts, roof perimeters, etc. Do not assume that services (e.g. cables, sockets, pipes, etc) are safe or have been isolated.
- 9 If you suspect the presence of gas, inflammable liquids, dangerous chemicals or free asbestos fibre leave the building immediately. Advise the building owner of your suspicions.
- 10 If you sustain cuts, penetration by nails or other serious injury, seek immediate medical advice. The disease known as Tetanus can be activated by cuts from rusting nails etc or from materials infected by bird droppings. Weil's disease can be contracted from rat's urine entering the body via cuts, etc.
- 11 Always heed these three golden rules:
  - a. do not rush.
  - b. if uncertain do not proceed -seek advice or assistance.
  - c. do not smoke or use naked flame.

#### Occupied buildings and building sites

- 12 The Contractor or building owner/occupier has a responsibility for the safety of persons lawfully on site. Do not enter sites or buildings without permission, and immediately report to the person in charge. Comply with all requests from the contractor, building owner/occupier, their authorised representative or other supervisory staff. Report to the contractor, building owner/occupier when you arrive, and when you leave the site.

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## Procedure Note 16

### Site Visits

- 13 Wear suitable clothing, in particular protective headgear (a hard hat) and stout shoes or boots. Do not wear thin-soled or slippery shoes. Avoid wearing loose clothing which might catch on an obstruction. Hard hats should not be stored in areas affected by direct sunlight and should generally be replaced every two years.
  
- 14 Check that ladders are securely fixed and that scaffold planks are secure and adequately supported. Beware of overhead projections, scaffolding and plant, and proceed with caution. Particular care is necessary in windy, cold, wet or muddy conditions. Keep clear of excavations and beware of openings in floors, etc. Do not lean on guard rails, scaffoldings, etc. Do not interfere with any temporary barriers, guard rails or lights. Beware of ladders on which the rungs may have rusted or rotted, and never climb a ladder which is in poor condition or not securely fixed or appropriately footed.
  
- 15 Do not touch any plant or equipment. Keep clear of machinery and stacked materials. Watch out for temporary cables, pumps, hoses and electrical fittings.
  
- 16 Do not walk and look around at the same time. Keep one hand free at all times when moving. Make sure that you are in a safe and balanced position whenever making notes or taking photographs.
  
- 17 Report to the contractor anything that comes to your notice on the site as being unsafe, such as:
  - a. the possibility of partial or total structural collapse.
  - b. rotten or insecure floors and stairs
  - c. hidden pits, ducts, openings, etc, fragile construction, e.g. asbestos or plastic sheets on roofs.
  - d. materials suspected of containing asbestos.
  
- 18 (refer also to other items within Section 1)

## Procedure Note 17

### Conflicts of Interest Policy

#### Policy Statement

It is PA Group policy that employees and others acting on PA Group's behalf must be free from conflicts of interest that could adversely influence their judgment, objectivity or loyalty to the company in conducting PA Group business activities and assignments. The company recognizes that employees may take part in legitimate financial, business and other activities outside their PA Group jobs, but any potential conflict of interest raised by those activities must be disclosed promptly to management.

#### What it means

- Request management approval of outside activities, financial interests or relationships that may pose a real or potential conflict of interest. Remember that management approval is subject to ongoing review, so you need to periodically update your management on your involvement.
- Avoid personal relationships with other PA Group employees where parties in the relationship may receive or give unfair advantage or preferential treatment because of the relationship.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of PA Group.
- Even the appearance of a conflict of interest can damage an important company interest.
- Obtain necessary approvals before accepting any position as an officer or director of an outside business concern.
- Contact the director or general manager and notify your management prior to serving on the board of directors of a bona fide charitable, educational or other non-profit organization.

#### What to avoid

- Working with a business outside your PA Group responsibilities that is in competition with any PA Group business.
- Accepting a gift that does not meet the standards in the *PA Group Business Gifts and Entertainment Policy*.
- Having a direct or indirect financial interest in or a financial relationship with a PA Group competitor, supplier or customer (except for insignificant stock interests in publicly-held companies).
- Taking part in any PA Group business decision involving a company that employs your spouse or family member.

- Having a second job where your other employer is a direct or indirect competitor, distributor, supplier or customer of PA Group.
- Having a second job or consulting relationship that affects your ability to satisfactorily perform your PA Group assignments.
- Using non-public PA Group information for your personal gain or advantage or for the gain or advantage of another, including the purchase or sale of securities in a business PA Group is interested in acquiring, selling or otherwise establishing or terminating business relations with.
- Investing in an outside business opportunity in which PA Group has an interest, except for having an insignificant stock interest in publicly-held companies.
- Receiving personal discounts or other benefits from suppliers, service providers or customers that are not available to all PA Group employees.
- Receiving personal honoraria for services you perform that are closely related to your work at PA Group. Your supervisor should approve occasional honoraria, such as for a company presentation or symposium.
- Having romantic relationships with certain other employees where:  
There is an immediate reporting relationship between the employees.  
There is no direct reporting relationship between the employees but where a romantic relationship could cause others to lose confidence in the judgment or objectivity of either employee, or the relationship could cause embarrassment to the company.  
**Note:** In some circumstances, romantic relationships between employees may raise compliance issues under the PA Group Harassment Policy.

Should any issues arise from a conflict of interest it will be addressed in line with our retained HR consultants guidance at all times. The aim would be to objectively resolve any issues via amicable solution. Should this not be possible a more formal route as agreed by HR will be sought?

If external conflicts of interest arise these will be objectively assessed with the aim to resolve any issues via amicable solution. Should this not be possible PA Group will take advice from its retained solicitors?

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## Procedure Note 18

### Equal Opportunity Policy

#### Equal Opportunities (General)

PA Group believes that everyone has the right to be treated with dignity and respect at work. We have adopted an equal opportunities policy which commits the company to fair, unbiased and objective employment practices and a work environment which is free of harassment and victimisation. It is the responsibility of every employee to assist the company in meeting this commitment. For this reason, acceptance of and adherence to the company's equal opportunities policy form part of every employee's contract of employment.

#### Equal Opportunities Policy (Summary)

This Equal Opportunities Policy Statement and Policy Statement on Harassment at Work are designed to implement the commitment of the Employer to Equal Opportunities. It is the responsibility of every employee to ensure his or her own conduct conforms to the expected standards and reflects these Policy Statements.

The aim of the policies is to encourage harmony and respect amongst individuals so as to promote good working practices with a view to maximising the performance and the return to the Employer and the employees.

If Equal Opportunities are not applied then valuable talent and potential are wasted. Moreover when unfair discrimination, harassment, bullying or victimisation takes place they bring about a climate of fear, insecurity and poor work performance. As well as being unlawful it affects profitability and morale. It is therefore vital that every employee understands his or her responsibilities. Equal Opportunities are taken very seriously by the Employer and wilful failure to apply the policies or evidence of discrimination, harassment, bullying or victimisation will result in disciplinary action which may include your dismissal.

#### Equal Opportunities (Policy Statement)

1. The Employer seeks to employ a workforce who reflects the diverse community at large because the Employer values the individual contribution of people irrespective of sex, age, marital status, disability, sexual orientation, gender reassignment, race, colour, religion or belief, ethnic or national origin.
2. All employees will be treated with dignity and respect. The Employer will use its best endeavours to provide a working environment free from unlawful discrimination, harassment or victimisation on the grounds of sex, age, marital status, disability, sexual orientation, gender reassignment, race, colour, religion or belief, ethnic or national origin.
3. The Employer recognises its legal obligations including those under the Race Relations Act, the Sex Discrimination Act, the Equal Pay Act, the Disability Discrimination Act, the Part-time and Fixed-term Workers legislation and the Employment Equality (Sexual Orientation) and (Religion or Belief) Regulations.

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4. The Employer undertakes to review periodically its selection criteria and procedures to maintain a system where individuals are selected, promoted and treated solely on the basis of their merits and abilities.
5. The Employer will not tolerate acts which breach this policy and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated and may be subject to the disciplinary procedures of the Employer. The Employer further seeks to give all employees equal opportunity and encouragement to progress within the organisation by implementing a positive action plan.
6. If an existing employee becomes disabled the Employer will make every effort to retain him or her within the workforce whenever reasonable and practicable.
7. Whenever reasonably practicable to do so the Employer will install in existing premises facilities for people with disabilities. Whenever the Employer invests capital in new or refurbished premises every practicable effort will be made to provide for the needs of staff and customers with disabilities.
8. The Employer undertakes to distribute and publicise this policy statement to all employees and elsewhere as from time to time appropriate.
9. Any employee who believes that they may have been subjected to treatment which breaches this policy may raise the matter through the grievance procedure of the Employer.

#### Policy Statement (Harassment at Work)

1. The Employer believes that the dignity of every person must be respected. Harassment of colleagues or visitors is unacceptable and will be regarded as gross misconduct. The highest standards of conduct are required of everyone regardless of seniority.
2. The Employer recognises that harassment may take many forms. It may be directed towards persons of either sex. It may relate to a person's ethnic origin, religion or belief, age, sex, sexual orientation, physical or mental attributes or some other personal characteristic.
3. Harassment may involve action or inaction, behaviour, exclusion, comment or physical contact that the recipient finds objectionable or offensive. It may result in the recipient feeling threatened, humiliated, intimidated, patronised, demoralised or less confident in their ability. Condoning such conduct may be harassment in itself. The test of harassment is, at least in part, subjective.
4. Examples of unacceptable conduct include:-
  - verbal abuse, or insulting behaviour
  - sexist or racist jokes, jokes about an individual's sexual orientation or jokes about an individual's physical or mental attributes
  - the display or circulation of sexually suggestive or racially abusive material
  - bullying, coercive or threatening behaviour

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- the ridicule or exclusion on the grounds of sex or sexual orientation or on the grounds of disability
  - unsolicited or unwelcome sexual advances, including touching, staring or commenting
  - comments of a sexual nature about a person's appearance or dress.
5. Harassment, particularly on the grounds of sex, sexual orientation, race, disability, religion or belief, will be regarded as gross misconduct for disciplinary purposes. Accordingly, employees guilty of harassment run a serious risk of summary dismissal.
  6. Equally, an allegation of harassment must not be made lightly. If it is found that an allegation of harassment has been made without foundation and maliciously then this will also be regarded as gross misconduct for disciplinary purposes.
  7. All complaints of harassment should be made to your manager through the grievance procedure unless the complaint is regarding this person when you should complain to that person's superior.

This policy also covers and considers all current legislation & regulations as follows:-

- Race Relations Act 1976 amended by Race Relations (Amendment) Act 2000
- Sex Discrimination Act 1975 amended by Equality Act 2006
- Disability Discrimination Act 2005
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientations) Regulations 2003
- Employment Equality (Age) Regulations 2006

See procedural notes 19, 20 & 21 for further details.

## Procedure Note 19

### Racial Equality Policy

We are fully committed to the promotion of equality and our commitment is strengthened by this specific policy on race equality.

We aim to:

- promote equality of opportunity and eliminate unlawful racial discrimination across all areas of the our organisation;
- Promote good relations between different racial groups in our daily business;

#### Racial Harassment

Racial harassment is defined as occurring when someone's actions or words, based on race, religion, colour, ethnic or national origins, are unwelcome and violate another person's dignity or create an environment that is intimidating, hostile, degrading, humiliating or offensive. Examples may include: oral or physical abuse, derogatory comments and/or jokes, written abuse including graffiti, the display of offensive material and different treatment.

We expect each individual within the Company community to show respect for others irrespective of their culture, ethnic or religious background, to report incidents of racism to an appropriate person and to be prepared to act as a witness for any racist incident that they may experience.

The Company aims to meet the specific duties of the Race Relations (Amendment) Act by

1. Assessing the impact of our policies, including our race equality policy, on employees of different racial groups by collection and analysis of student data
2. Monitoring by reference to those racial groups, the admission and progress of employees by subject groupings
3. Analysing data to identify any barriers to progression and take steps to remove barriers
4. Publishing our policy statement and the results of our assessment and monitoring under (1) and (2) on our website
5. Consulting with the Company's employees

To meet our specific duty on employment we will:

- collect ethnic monitoring data in relation to employees on recruitment, training and promotion
- analyse the data to find any patterns of inequality
- take necessary action to remove barriers and promote equality of opportunity
- publish the results of the monitoring each year.

We will monitor and assess the policy's effectiveness on an annual basis and will publish results in our Management Review Process.

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## Procedure Note 20

### Promoting Disability Equality Policy

We recognise that many disabled people face barriers to access and achievement in employment and we are committed to eliminating discrimination and harassment on grounds of disability and promoting equality of opportunity between disabled people and other people.

In order to meet the general duties of the Disability Discrimination Act 2005, we must;

- Promote equality of opportunity between disabled people and other people;
- Eliminate direct or indirect discrimination;
- Eliminate harassment of disabled people that that is related to their disabilities;
- Promote positive attitudes towards disabled people;
- Encourage participation by disabled persons in public life; and
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled people more favourably than other people.

It is the responsibility of every individual within the company to treat people with respect, regardless of their disability status, and to make a positive difference to disability equality within the company.

In order to meet our specific duties under the DDA 2005, we have developed a Disability Equality Policy and review this within the annual management review. We will also carry out the following:

- Gather evidence to inform action by monitoring the recruitment, development and retention of employees, and gather information on the effect of policies and practices on the educational opportunities and achievement of disabled students.
- Assess the impact or likely impact of our policies and practices on equality for disabled people.
- Publish an annual report (Management Review) containing a summary of the steps taken to meet the disability equality duty over the past year, the results of monitoring and impact assessment activities and what action will be taken as a result.

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## Procedure Note 21

### Gender Equality Policy

The Equality Act 2006 places a positive duty on organisations to eliminate discrimination and harassment on grounds of sex and promote equality between men and women (including transgendered men and women). In order to meet this duty, we will;

- Produce and publish an equality scheme identifying our gender equality objectives, including equal pay objectives and actions to meet them;
- Monitor and review progress;
- Review the scheme every three years;
- Gather and use information on how the company's policies and practices affect gender equality in the workforce and in the delivery of services, and;
- Conduct and publish gender impact assessments of all policies and practices

We acknowledge that there is a significant gap between women's and men's pay and that job segregation still exists in the UK. We intend to facilitate change through our Gender Equality Scheme and by working towards a number of gender equality objectives over the next three years. After this time we will review our progress and renew our Scheme.

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## Procedure Note 22

### Environmental Policy

PA Group recognises its moral and legal responsibilities with respect to all environmental issues. The company will minimise any adverse impact of its activities on both the local community in which it operates and on the global environment.

The company's objectives attempt to address specifically factors within our sector to which we can realistically make improvements. The Objectives of the company are as follows:

- To maintain our environmental management system to meet the requirements of BS EN ISO 14001:2004 to which we are accredited;
- To create awareness amongst staff of environmental issues relating to our business;
- To identify areas where environmental improvements can be made;
- To incorporate environmental consideration into the purchasing processes;
- To disseminate information to staff relating to environmental matters;
- To provide appropriate advice to clients on environmental matters;
- To take into account environmental considerations associated with our work;
- To monitor our environmental performances against set objectives and targets;
- To comply with all legal requirements relevant to our business and other requirements to which we may subscribe;

The company's organisation for the promotion and implementation of this policy is the same as that provided in our Health and Safety Policy. Overall responsibility for issuing, updating, revising and implementing the Environmental Policy rests with the Managing Director, Chris Miller-Hanna. In his absence, responsibility is passed to the Quality Manager. These responsibilities include:

- Implementation of the Environmental Policy at our head office.
- Overseeing the implementation of the Environmental Policy at other company locations.
- Ensuring that other persons with individual responsibilities are complying with the policy.
- Organising and training new and existing staff so as to ensure that they carry out their work with proper regard to environmental matters.
- To ensure that all necessary records are kept.
- To monitor the company's environmental performance in relation to set targets.
- To ensure that PA Group staff are continuously aware of current/changing environmental legislations, objective and targets.

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**Aims of the Policy**

A preliminary assessment of environmental issues relevant to our activities suggests that the following should be addressed in our Environmental Policy:

- Minimize any adverse impact of the company's operations in so far as they may cause any disturbance to the local environment and reduction in the quality of life of local residents;
- Take steps to conserve natural resources; in particular those that are nonrenewable;
- Minimise emissions to atmosphere water and land;
- Minimise waste arising from our operations and ensure that such waste is properly disposed;

The issue of noise arising from activities at our head office may be the cause of nuisance to neighbours. This is the only potential and significant adverse impact of our business to the local community, although operating within a business centre means this impact will be minimal. Whilst no complaints, formal or informal, have been received, the issue of noise may arise in the future. Therefore the attention of all the staff is drawn to the need to minimise noise when entering the premises outside normal working hours. In particular, attention is drawn to noise arising from motor vehicles in this connection.

The company is not by virtue of the nature of its business a consumer of non-replenishable resources, save being a consumer of energy, which may draw on such resources. The construction of our office premises is such that we have sole control over the usage of energy for lightning, heating and water within the premises.

The consumption of electricity for lighting and office equipment is minimised by taking steps to ensure that all non-essential equipment is switched off outside normal working hours. This practice is brought to the attention of all staff.

The office premises are heated by an electric heating system. The heating system is controlled by a thermostat and timing circuit, which is programmed to minimise heating and thereby gas consumption. Company cars follow European Directives Euro 3 and Euro 4 on emission of CO<sub>2</sub>. Usage of train and buses is encouraged.

The consumption of water at the office premises is confined to domestic activities such as beverage making, cleaning and sanitary facilities. The supplier meters water consumption.

**Waste**

We recognise that the disposal of waste arising from our activities, be it by landfill or incineration, may have adverse effect on the environment. Special regulations apply to the disposal of asbestos waste arising from our operations. Arrangements must be made with a contractor licensed by the Waste Regulator for the transport and disposal of this waste.

It is the responsibility of the Quality Manager and Project Managers to ensure that all asbestos waste is conveyed and disposed of in accordance with the Hazardous Waste Regulations 2005.

PA Group' policy is to recycle paper and plastic. This is disposed of in appropriate waste containers situated in our premises. The Managing Director will undertake periodic audits to ensure that adequate records are kept.

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Where such an incident should occur at head office, it is responsibility of the Technical Manager to notify the enforcement authority. Where such an incident occurs on site it is the responsibility of the appropriate Project Manager to make the notification. All notifications must be advised to the Technical Director.

There are no significant emissions to the atmosphere, save that from motor vehicles, associated with our activities. It is a requirement that all managers give consideration to the use of public transport for both themselves and any staff under their control in travelling to and from clients' sites. It is recognised that equipment may need to be transported to and from some sites on a daily basis.

Where journeys involve personnel only and travel by public transport is conveniently available and then it will be used in preference to a company vehicle. In particular, company vehicles are not to be used for regular journeys from our head office into central London area.

Emissions to air from motor vehicle usage associated with our business has been addressed as follows:

- By encouraging staff attending sites within the M25 to use public transport such as train & underground.
- By ensuring company vehicles are leased or purchased in compliance with the EU Directive emission limit (related to NO<sub>x</sub>, CO, HC) Euro 4 and 5 (2005).

There is no other emission to water or land associated with the activities except those arising from disposal of waste.

## **Procedure Note 23**

### **Prompt Payment Policy**

We will give a discount on specific contracts (TBC) should our payment terms be met in full for the duration of the contract with breaks six monthly. The standard discount is 3% but is negotiable on a contract basis.

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## Procedure Note 24

### Continuous Improvement

Continuous improvement refers to regulations 17(2) (e) and 17(5) and must be read in conjunction with regulations 5 and 6.

#### Purpose

To ensure the following opportunities for continuous improvement are developed to provide short-term solutions (corrective action) and to provide long-term 'root cause' solutions (preventive action).

- Employee and contractor suggestions
- Customer complaints and compliments
- Internal system failures
- Product and service non-conformance
- Supplier and sub-contractor problems
- Procedure changes and improvements
- Internal audits and external assessments

**Corrective action** is defined as action providing immediate short-term solutions.

**Preventive action** is defined as action derived from pro-active identification of potential issues before they occur.

#### Roles and responsibilities

##### **All employees and contractors**

All employees and contractors should have a responsibility and authority to submit continuous improvement proposals. These can occur when non-conforming services, systems, processes or procedures are discovered, or an opportunity for improvement is identified.

##### **(TBA)**

The (TBA) has the overall responsibility and authority to record and respond to continuous improvement proposals, to verify the effectiveness of corrective and preventive actions, and to provide appropriate reports for the management review meeting.

##### Administration

Administration has the day-to-day responsibility and authority to maintain continuous improvement record files.

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## **Procedure**

### **1 Improvement opportunity identified**

1.1 The originator of the improvement opportunity should submit a continuous improvement. This may be by completing a manual form or entering the details into an electronic form on line.

1.2 A continuous improvement number is allocated for tracking purposes, from a continuous improvement log record. An electronic system could usually self-generate these.

### **2 The (TBA) reviews the continuous improvement proposal**

2.1 If the continuous improvement proposal is accepted, the (TBA) approves it.

2.2 If the continuous improvement proposal is not accepted, the (TBA) will enter an explanation into the continuous improvement system, including the reason for rejection. The continuous improvement proposal is then referred back to the originator. The originator should have the opportunity to modify the continuous improvement proposal if appropriate.

2.3 The modified continuous improvement proposal may be resubmitted for consideration.

### **3 The (TBA) allocates a priority**

3.1 The (TBA) then allocates a priority and a target date for the development and implementation of the continuous improvement.

### **4 The (TBA) identifies continuous improvement/corrective/preventive actions**

4.1 The corrective action is intended to provide immediate short-term solutions, addressing the actions required to correct the immediate problem. The preventive action will prevent re-occurrence of the problem or maximise the return from the opportunity.

### **5 Assign employees and/or contractors to implement corrective actions**

5.1 The (TBA) assigns a named individual to be responsible for the implementation of the corrective action.

### **6 (TBA) verifies corrective and preventive action**

6.1 The (TBA) is to carry out a 'mini' audit of items completed on the continuous improvement form to verify a solution has been developed. What is checked is to be recorded in the quality assurance verification section.

### **7 (TBA) reviews corrective/preventive action**

7.1 If a review shows the corrective/preventive action is not satisfactory, the (TBA) will raise a new continuous improvement form.

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7.2 If the corrective/preventive action is satisfactory, the (TBA) will sign and date the continuous improvement form.

## **8 Administration**

8.1 Update continuous improvement record and file continuous improvement form

## **9 Administration to provide a summary for management meeting**

## **10 Management review**

10.1 Analysis of continuous improvement opportunities is to be carried out and the outcome of the analysis, including any trends, common causes or recurring issues, reported to the management review meeting by the (TBA).

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## Procedural Note 25

### Guidance Notes for Risk Assessment Form

1. Prior to carrying out the risk assessment, write out the procedure in the form of a method statement or safe operating procedure or refer to an appropriate existing procedure [e.g. standard manual] to ensure that you have included and considered all of its components.
2. Under the provisions of the Management of Health and Safety at Work Regulations (1999) a risk assessment must be carried out for any work activity or procedure at work. This can initially be a simple consideration of the activity/procedure in order to identify potential hazards. Should none be identified, no further action is required. If a potential hazard or hazards are detected, then you must carry out a full assessment using this form.
3. Remember to consider all potential hazards. Some hazards may come from substances, including chemicals and biological agents. There may be mechanical hazards, such as crushing and laceration, from equipment. Others may be associated with the physical location or layout of the work activity (e.g. low beams, slippery floor, confined space, lone or outdoor work). For those dealing directly with people, personal violence may be the main hazard. Be aware that additional hazards are often created from a combination hazards. For example, a process involving hazardous flammable substances which also uses electrical equipment may pose hazards of both an electrical and chemical nature and of fire (from the interaction between the two). Finally, remember that an untrained person [e.g. undergraduates in workshops, laboratories or out in the field] may well be at greater risk to themselves or pose a greater risk to others.
4. The hierarchy of control measures employed should primarily be aimed at eliminating or reducing the hazards in a procedure, followed by containment options and only as a last resort by personal protective equipment (PPE). Examples of control measures include: replacement of the process or substance with a safer alternative; engineering controls, such as machine guards or the enclosure of the process in a protective chamber or fume cupboard; appropriate training, PPE, health surveillance; written procedures [Safe Operating Procedures, Method Statement, Permit to Work] and supervision by an appropriate person. The level of supervision must always be appropriate to the competence of the individuals involved in the work activity. For chemicals you may find it useful to use the safety phrases which are on the Material Safety Data Sheets which are provided by the manufacturer. These are also available on CD ROMs from manufacturers and on Internet web sites.

Any special training required to ensure that persons involved in the work activity can operate safely should be detailed. This is particularly important so that persons can understand and comply effectively with a Standard Safe Operating Procedure (SOP), Scheme of Work, Method Statement, or Permit to Work, where this has been formulated.

You should record when each control measure has been implemented and the new numerical risk rating following its implementation. The aim should be to achieve a progressive reduction down to a final risk rating of 6 or less.

5. Risk should be calculated for an existing activity taking into account any control measures in place. This is estimated by considering both the likelihood of exposure to a risk and the severity of the consequences of such an exposure.

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The calculation of risk should be done as follows:

Select an appropriate number for both Likelihood and Severity from the bottom of the table and multiply them together. Cross reference your score on the coloured part of the table and this is your risk rating.

### Score method and significance

<b>P=probability</b>	<b>S=severity of occurrence</b>	<b>Risk rating = P x S</b>
1. Remote	1. Negligible	Low = 1 – 9
2. Unlikely	2. Minor injury	Medium = 10-18
3. Possible	3. First aid	High = 19 - 36
4. Likely	4. Reportable injury	
5. Probable	5. Major injury	
6. High	6. Death	

6. Include all persons potentially at risk. This may not only be those directly involved, but also those working in the vicinity either at the same time or afterwards, maintenance staff and those carrying out waste disposal. Remember that visitors must also be considered.
7. Contingency planning is required to limit the extent of the risk arising from an accident or emergency (e.g. uncontrolled release or spill of a hazardous substance) and for regaining control of the area as quickly as possible.
8. Appropriate arrangements for monitoring the efficacy and continued employment of the control measures must be put in place. This may include regular inspections and maintenance checks.

For the majority of work with hazardous substances which come under COSHH Regulations atmospheric monitoring should not be necessary for protecting health, providing sufficient thought has gone into ensuring the adequacy of control measures in relation to risks, and the control measures are properly used and maintained.

Such monitoring must be employed where appropriate for substances with an occupational exposure limit [Occupational Exposure Standard (WEL's) or Maximum Exposure Limit (WEL)]. Lists of those chemicals which have been assigned a WEL are given in the HSE publication "EH40", copies of which are available from OSHEU. This publication is revised annually and only the most recent version should be used.

9. A copy of the risk assessment must be given to every individual carrying out the activity and each copy must be countersigned by the holder.
10. The risk assessment must be reviewed at regular intervals. There is no specified interval in Safety Law, but, we recommend the following simple guide depending on the estimated level of risk:

- 0-5 – every 3 years
- 6-10 – every 2 years
- 12-25 – every year



You must also review the assessment whenever there has been a significant change in the procedure or work circumstances or there is any reason to suspect that the original assessment is no longer valid. Examples would include new information on the hazard indicating a higher or lower level of risk, personnel changes (young person, pregnant woman, untrained person, etc), changes in equipment or substances used, change of location, following an accident or incident

**Note:** Certain procedures or activities will be covered by specific legislation, the requirements of this legislation must be complied with and consideration taken in any risk assessment. If you are unsure whether this applies to the activity in question, please consult with a member of OSHEU.

**WARNING!** Completion of the assessment is not an end in itself, merely the beginning. You must consider it as an active document for frequent reference, particularly when preparing associated method statements, safe operating procedures and training.

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## Procedural Note 26

# Communication, Co-Operation & Co-Ordination Policy

### Introduction

The purpose of this policy is to make sure that we communicate effectively with our employees and sub-contractors. The Policy is a corporate document that is reviewed regularly and is revised if necessary.

### Key Principles

We are committed to ensuring that managers communicate with employees and other stakeholders effectively and are trained in communication techniques using proven skills. Effective communications must be timely, complete and in the appropriate quantity. Communication must also take place in an appropriate manner and must extend to all that need the information, and must be frequent enough to ensure a steady flow of information. In summary, effective communications is not just about giving information; it is about providing useful information in such a way that the recipient understands it.

### Responsibility for communications

We are all responsible for communicating effectively with colleagues. We are responsible for ensuring that managers and others who communicate through formal channels (e.g. team-briefs, toolbox talks) are trained to do so and use agreed procedures for doing so, but those persons themselves are responsible for using the channels effectively and to the benefit of their departments and teams. The company is responsible for providing different channels of communications and for setting out policies, procedures and training for each of those channels. The company is also responsible for managing the use of these channels and for monitoring their effectiveness.

Employees must be willing to use these channels and to receive information

### Types of information

There are different types of information within the organisation, and these are:

1. Corporate information - this relates to or involves the company as a whole, such as corporate briefing messages.
2. Operational information – this relates to the services provided by the company or to the activities taking place within teams or divisions. It is the information you need to carry out your day-to-day job
3. Organisational information – this relates to the company as an organisation of individuals, for example, training information.

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4. Social information – Informal information that is not directly related to work matters but which helps to develop teams and relationships within the company.

Each of these types of information might be relevant to the entire company or to specific divisions or departments, depending upon the information itself.

### **Channels of communication**

The company has identified several formal channels of communication with employees, each of which can be used to convey corporate, operational, organisational, trade union or social information as appropriate.

The channels of communication are team briefings:

- emails or memos
- notice boards
- Clipboard and the Performance Plan
- whole staff meetings

Policies and procedures exist as separate documents for these channels of communication. As is the case for this Internal Communications Policy, those documents are subject to regular review and revision as required.

### ***Hierarchy of meetings***

In addition to the many operational meetings that take place within all teams and divisions of the company, there is a hierarchy of meetings that discuss strategic matters at the appropriate management level. We communicate any resulting decisions from these meetings to staff.

### ***Training***

Managers who are responsible for implementing this Internal Communications Policy must be able to do so effectively. This means they must feel competent and confident to advise their staff on internal communications and must be aware of the contents of this policy. Our Employee Development and Appraisal Scheme should identify and address any training needs. Training can also be carried out more immediately if needed. Arranging such training is the responsibility of your line manager and is organised through the Personnel team.

### ***Monitoring***

This Internal Communications Strategy is reviewed annually and is revised if necessary.

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