

10 Health & Safety Policy

10.1 General Statement of Policy

10.1.1 Herring Plant Hire Ltd. is committed to ensure the Health and Safety of all personnel working for or on behalf of the Company, and all others who may be affected by the activities of the Company. This Policy is written with guidance provided by the Health & Safety Executive (HSE) and is in compliance with the Health & Safety at Work etc. Act 1974.

10.1.2 It is our individual responsibility, together with the Company Management, to ensure that our working environment is safe, without significant risks and meets the appropriate statutory requirements. All levels of management and employees have a vital role in the implementation of our health and safety programme and their personal co-operation is essential to its success.

10.1.3 It is our policy to:

- Prevent accidents, injuries and cases of work related illnesses.
- Identify and eliminate or provide adequate control of the health and safety risks arising from our work activities.
- Provide and maintain all necessary plant and equipment in a safe working condition.
- Ensure the safe transport, handling, use and disposal of materials and substances.
- Provide information, instruction and supervision for employees and, where appropriate, others who may be affected .
- Ensure all employees are competent to do their tasks, and to give them adequate instruction.

10.1.4 Company management, together with individual supervisors and employees, have specific responsibilities for implementing and monitoring this Safety Policy, to ensure all statutory obligations appropriate to our business are met at all times and ensuring that health and safety considerations are always given priority in planning and day-to-day supervision of work.

10.1.5 The company will ensure that the necessary resources and funds are available to meet these health and safety requirements, and that the facilities exist for effective consultation between management and employees on matters of Health and Safety.

10.1.6 Martin Herring, Director, is the person having particular responsibility for health, safety and welfare and will review this policy as appropriate in line with changes in health and safety legislation, Approved Codes of Practice and Guidance Notes applicable to the company's activities.

10.1.7 The Company will make arrangements to provide each employee with access to a copy of the Company's Health and Safety Policy and a copy of this statement will be displayed prominently in all workplaces.

10.1.8 All employees must contribute to safety by complying with all associated statutory Regulations Company safety rules and procedures, and customer site safety rules. Neglect of health and safety requirements will be regarded as a serious matter and may invoke the disciplinary procedure.

10.1.9 The Company commits to monitor and review the Company's Health & Safety performance and objectives against this policy on an annual basis, and to implement any improvements this review should identify.

10.2 Health & Safety Arrangements

10.2.1 The following section details the practices and procedures employed by Herring Plant Hire Ltd. to discharge its duties under the Health & Safety at Work Act 1974 and meet the aims of the Company's Health & Safety policy.

10.2.2 The CDM Regulations & Activities on sites operated by Client's

10.2.3 The Construction, Design & Management Regulations 2015 places added management duties on companies within the construction industry. Herring Plant Hire Ltd., when so appointed by the client or Principal Contractor, will carry out the duties of Contractor or Sub-Contractor as defined by the regulations in a manner that ensures compliance.

10.2.4 Whether the regulations apply to a contract or not the Company consider good management practice and competent supervision to be of paramount importance throughout all contracts.

10.2.5 The principal work of the Company is carried out on behalf of our clients, on sites or premises either owned by, or under the control of those clients. In these situations employees working at these sites shall be subject to the Health & Safety rules and procedures of the client or of the site in question. These will typically include:

- Fire Safety and Emergency Procedures;
- Accident Reporting Procedures and First Aid Arrangements;
- Personal Protective Equipment;
- Site vehicle and pedestrian traffic rules.

10.2.6 To this end prior to commencing any work on a new contract the Company shall establish with the client what, if any, specific site rules apply to the activities to be carried out by the Company, and what arrangements are in place for the induction of contractors on site. The Company shall then arrange for all employees to assigned to the job to undergo a site induction in these arrangements as per the client's own procedures.

10.2.7 In addition, where required by the client, the Company shall submit risk assessments and/or method statements for review and approval by the client prior to commencing work on site.

10.2.8 Risk Assessments

10.2.9 The Company acknowledges its responsibility and duty, under the Health & Safety at Work Act 1974, to ensure that our working environment is safe and without significant risks, and

therefore undertake suitable assessment of risks in accordance with the Management of Health & Safety at Work Regulations 1999.

10.2.10 All activities carried out both on Company premises and on client's sites will be subject to a Risk Assessment to identify and implement the necessary controls, both physical and procedural, to maintain adequate control of risks.

10.2.11 The Risk Assessments shall be prepared using standard generic formats developed in accordance with the above regulations, and their associated Approved Code of Practice and Guidance. The assessment determines the level of risk by taking into account the severity of the potential hazard, the complexity of the task and how often the task is to be carried out. From this assessment the necessary control measures, safe methods of work and/or protective equipment can be determined.

10.2.12 Accidents at Work

10.2.13 All accidents occurring on Company premises or involving Company personnel or activities on client's sites, shall be recorded by the Company using the Company's own Accident Report form which can be obtained from the Administration Team and reported to Company management so they can be investigated accordingly.

10.2.14 Where required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) such accidents shall be reported to the HSE.

10.2.15 In general the following must be reported to the appropriate authorities under law: -

- Any death or major injury
- Any reportable occupational diseases
- Any injury that results in an employee being absent from work for more than seven days or unable to carry out their normal duties for more than seven consecutive days
- Any reportable dangerous occurrences
- A more detailed summary of such reportable injuries, dangerous occurrences and reportable diseases can be obtained from the Administration Team.

10.2.16 In addition, all incidents occurring on client's sites shall also be reported to the client to allow them to record and investigate the incident in accordance with their own reporting procedures.

10.2.17 Records of all accidents, and those of any subsequent investigations, shall be retained by the Company for a minimum of five years after the incident has occurred.

10.2.18 First Aid Arrangements

10.2.19 The Health & Safety (First Aid) Regulations 1981 requires that all employers make adequate provision for first aid in respect of its employees.

10.2.20 To this end, when working on client's sites Company employees are subject to the First Aid arrangements of the client, to be provided by the client/principal contractor as required by the

Health & Safety (First Aid) Regulations 1981, and its Approved Code of Practice and Guidance: First Aid at Work L74. Details of the specific arrangements in place shall be determined by Company management prior to commencing work, and shall be included in the relevant site induction that all Company employees will undergo.

10.2.21 On company premises, and where a client does not provide the necessary first aid arrangements, appropriate arrangements will be made for the provision of first aid in accordance with the above regulations.

10.2.22 Fire Precautions & Emergency Procedures

10.2.23 On company premises a Fire Risk Assessment shall be carried out on the premises as per the Regulatory Reform (Fire Safety) Order 2005, and appropriate control systems and emergency procedures prepared accordingly. This assessment shall be reviewed on an annual basis, or if there is a significant change to the workforce, the premises or to the hazards to which the workforce may be exposed.

10.2.24 For activities carried out on client's sites then the risks of fire, where present, shall be included in the relevant risk assessments and method statements for those activities, along with appropriate control systems and emergency procedures where necessary, and provided to the client to incorporate into their own fire risk assessments and procedures. At these locations, Herring Plant Hire employees shall, in the event of a fire, follow the emergency procedure for that location.

10.2.25 Staff shall receive all necessary training in these systems and procedures, either as part of their Company induction, or as part of the client's own site induction. All fire safety equipment, under the control of the Company, shall be routinely tested and inspected as required by relevant legislation and industry standards, and staffed provided with instruction in its use.

10.2.26 Manual Handling

10.2.27 It is the Company Policy that all Manual Handling Operations shall be avoided wherever possible, or appropriate mechanical systems or aids employed as necessary. Where this is not possible then any Manual handling operations are assessed as part of the standard risk assessment process as described in section 2. above, to ensure that such operations meet the requirements of the Manual Handling Operations Regulations 1992 (as amended).

10.2.28 In the event that the initial assessment identifies specific operations as having a significant risk then a manual handling risk assessment shall be carried out on those operations and a safe method of work identified and included in the method statement. Any training requirements shall also be identified by this process.

10.2.29 The risk assessment shall be carried out in line with the above regulations and their associated guidance, Manual Handling: Guidance on Regulations L23, and shall cover all areas of the operation including load, task, environment and individual.

10.2.30 Guidance on safe manual handling techniques and use of mechanical handling aids supplied is provided in Appendix B of this policy.

10.2.31 Control of Substances Hazardous to Health

10.2.32 It is Company policy to avoid, where reasonably practicable, exposure of employees, or other individuals who may be affected by the Company's activities, to any substances classified as hazardous to health. To this end assessments shall be carried out on all substances used by the Company and its employees in the performance of its business, as per the Control of Substances Hazardous to Health (COSHH) Regulations 2002.

10.2.33 The COSHH Assessments shall be prepared using the Company's COSHH assessment form. This has been designed in accordance with the above regulations and their associated Approved Code of Practice and Guidance Notes L5, and shall detail the following:

- Identification of hazardous substances;
- Assessment of risks;
- Control measures required;
- Emergency Actions;
- Health surveillance required;
- Instruction, information and training to be provided to employees.

10.2.34 Information to support the completion of these assessments is obtained primarily from the Material Safety Data Sheet (MSDS) for the substance in question. It is the responsibility of those ordering such products to obtain a MSDS from the manufacturer/supplier (who have a legal duty to supply this information).

10.2.35 Other sources of information may be used, including product labelling, chemical information websites and literature or safety related websites, as well as direct job related experience.

10.2.36 Completed assessments are placed in the Company COSHH file, which is held in the main Company office, and which also contains a substance inventory, listing all substances used by the Company at that location. Copies of this file and its assessments shall be made available to employees as required.

10.2.37 Only those chemicals and substances listed in the substance inventory should be used, and only for the purposes they are specified for. Where necessary detailed training in the use of specific chemicals will be provided and records of such training maintained by the Company. Any new substance introduced by the Company must undergo this assessment process before it can be used.

10.2.38 Control of Noise at Work

10.2.39 The Company recognises its responsibility under the Control of Noise at Work Regulations 2005, to protect its employees from exposure to excessive noise levels that may result in damage to an individual's hearing. It also acknowledges the duties placed on it by the above regulations. To this end:

- The Company shall, as part of its standard risk assessment processes, make a preliminary assessment of noise exposure for any activities that may result in high levels of noise to determine if there is any potential risk to employee's health and safety resulting from this exposure.

- If such a risk is identified then the Company shall seek external specialist advice to determine the level of risk and, where necessary, to identify means of reducing the risk or controlling exposure, as required by the Control of Noise at Work Regulations 2005.
- Where such control measures are required the Company shall, where reasonably practicable, preferentially employ physical or engineering based measures to reduce or control exposure. Personal Protective equipment shall only be used as a last resort.

10.2.40 Control of Vibration at Work

10.2.41 The Company recognises its responsibility under the Control of Vibration at Work Regulations 2005, to protect its employees from exposure to excessive levels of vibration in their day to day work activities, and the duties placed upon it by these regulations. To this end:

- As part of the standard risk assessment process, then for any activities that may expose employees to high levels of vibration, a preliminary assessment shall be made to determine if there is any potential risk to employee's health and safety resulting from this exposure.
- If such a risk is identified then the Company shall seek external specialist advice to determine the level of risk and, where necessary, to identify means of reducing the risk or controlling exposure, as required by the Control of Vibration at Work Regulations 2005.
- Where such control measures are required the Company shall, where reasonably practicable, preferentially employ physical or engineering based measures to reduce or control exposure. Personal Protective equipment shall only be used as a last resort.
- The Company shall take into consideration when purchasing new equipment the potential levels of vibration generated by the operation of that equipment and endeavour wherever practicable to purchase equipment that generates low levels of vibration.

10.2.42 Personal Protective Equipment

10.2.43 It is the policy of the Company to remove hazards and reduce the level of risk, where reasonably practicable, through physical and engineering controls, and safe systems of work, and to use personal protective equipment (PPE) only as a last resort.

10.2.44 General PPE requirements for employees will be dependent on the requirements of the client at the site in question, but will generally include overalls, Hi-Vis clothing, safety helmets, gloves and safety footwear as a minimum.

10.2.45 Where specific activities or locations require the use of additional PPE, this is detailed in the relevant risk assessment and/or individual site rules, and shall be provided by the Company. This includes, for example, eye or face protection, special protective gloves etc., if handling hazardous substances, or ear protection when operating equipment generating high noise levels.

10.2.46 General PPE requirements shall be communicated to staff as part of their Company/Site induction and normal job training, along with instruction in the correct use of the PPE. Specific job and/or site PPE requirements shall be communicated via the risk assessment and/or site induction.

10.2.47 Employees are required to wear the specified PPE where risk assessments, method statement or site rules require such equipment to be worn. They also have the responsibility to take reasonable care of PPE issued to them and to use it according to instructions. Any loss or defect should be reported to Company Management immediately. Any failure to wear the specified PPE where required shall be considered a breach of company safety rules and may result in disciplinary action.

10.2.48 Work Equipment

10.2.49 All working equipment employed by the Company shall be suitable for the work to be undertaken and comply with the Provision and Use of Work Equipment Regulations 1998 (PUWER) and, where applicable, the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). As such, where these regulations, together with their Approved Codes of Practice, require equipment to be maintained, tested and inspected to specific standards then the necessary maintenance, testing and inspection shall be carried out. In addition test and inspection standards recommended by manufacturer's and relevant industry governing bodies are also maintained where appropriate.

10.2.50 Responsibility for ensuring that equipment is properly maintained in accordance with the regulations above lies with Martin Herring, Director. Inspection and certification of equipment to the standards specified in the above regulations, ACoP's and industry standards is carried out either internally by the Company's own employees, where they have received the necessary training/instruction to carry out such inspections, or by external specialist contractors. All Inspection and Certification documentation for equipment is held by the Company at its main office.

10.2.51 The general day to day maintenance of equipment shall be conducted by the individual employee using the equipment. They shall also be responsible for conducting any pre-use daily or weekly checks and inspections, and reporting any faults and failures to Company Management.

10.2.52 Where a contract requires the use of a specialised item of equipment that must be hired then the Company shall only use reputable hire companies that supply equipment with all necessary inspection and test certification. Responsibility for ensuring such companies are used and that all necessary certification is obtained lies with Martin Herring. If no certification is available the company will not hire equipment. The Company shall also ensure that employees are suitably trained and qualified to operate such equipment, or shall engage suitably qualified sub-contractors to operate said equipment.

10.2.53 Electricity at Work

10.2.54 The Company will ensure compliance with the Electricity at Work Regulations 1989, and all of its associated guidance, in all of its operations for the health and safety of its employees and others who may be affected by their undertaking. To this end the Company will ensure that:

- Any installations, repairs or alterations carried out by the Company will be performed by a suitably trained and qualified electrician;

- Work involving electrical equipment or electricity in any way is properly assessed as part of the individual risk assessment;
- Any electrical hand tools and portable appliances used by the Company shall be connected to electrical systems by means of correct sockets and plugs, and are properly protected from adverse weather conditions where appropriate;
- All electrical hand tools and portable appliances will be inspected visually prior to use and any defective equipment removed from service until repaired or replaced;
- All electrical hand tools and portable appliances owned by the Company will undergo Portable Appliance testing (PAT) on a routine basis.

10.2.55 Likewise, where said work is conducted on client's sites, the client shall ensure that:

- All electrical supplies and appliances supplied for use by the Company have been properly installed by a suitably trained and qualified electrician;
- Where required, a suitable electrical supply is provided, with correct sockets and, where appropriate, properly protected from adverse weather conditions;

10.2.56 Transport & Vehicles

10.2.57 The Company supports the promotion of safe driving practises, both on the public highway and when on Company or client's premises. To this end :

- The Company will ensure all drivers are suitably trained and competent before they are allowed to drive any vehicle, company owned or otherwise, in the course of their duties;
- Where employees drive vehicles on the public highway as part their duties then the Company shall check the driving licenses of these drivers on a six monthly basis;
- All Company vehicles shall undergo regular maintenance and safety checks, and shall be serviced on a routine basis;
- Drivers of vehicles must report all faults and defects to the Company Management immediately;
- Journeys, particularly long distance ones, shall be properly planned so as to allow sufficient time, including rest stops, to complete the journey safely. Where necessary the planning should include consideration of potential road traffic issues, weather conditions and overnight stops.

10.2.58 With respect to site vehicles, which the Company hire out to clients, then:

- Employees shall not drive any specialist site vehicle without suitable training and/or current licence. The Company shall check that such training/licences are valid on an annual basis;

- It is forbidden for any person other than the driver to ride on dumpers, fork lift trucks etc., not constructed for the carriage of passengers;
- It is forbidden for any person to ride on hoists not designed for the carriage of passengers;
- Vehicles must not be left running whilst unattended and if unattended they must be left in a safe position.

10.2.59 Working at Heights

10.2.60 The Company will ensure that all its work is in compliance with the Work at Height Regulations 2005 (as amended), and all of its associated guidance, in all of its operations for the health and safety of its employees and others who may be affected by their undertaking. To this end the Company will ensure that:

- Working at heights is avoided so far as is reasonably practicable;
- Where such work is unavoidable it shall be properly assessed, planned and organised as part of the risk assessment and method statement;
- It shall employ equipment and/or other measures so as to prevent falls, or where the risk of a fall cannot be removed, such equipment and/or measures so as to minimise the distances and consequences of a fall should one occur;
- The risk assessment shall, where appropriate, take account of weather conditions that could endanger health and safety;
- Those involved in carrying out the work are suitably trained and competent;
- The place where the work is done is safe;
- The equipment used is appropriately inspected;
- The risks from falling objects are properly controlled.

10.2.61 In practice, the principal work of the Company does not involve any significant work at height, other than for access to site vehicles. To this end the Company shall use vehicles fitted with appropriate access systems that either remove the need to work at height or provide a means of safe access to the necessary areas of the vehicle.

10.2.62 Sub-Contractors

10.2.63 Before engaging a Sub-Contractor, either to provide a service in support of Company operations or to carry out work on specific projects the Company Management shall assess the sub-contractor and ensure that their procedures, operations and personnel are suitably qualified and competent to carry out the necessary work in accordance with this Policy and the Health & Safety at Work Act 1974.

10.2.64 This assessment shall generally take the form of requesting from the proposed Sub-Contractor documented evidence of their competency to carry out the proposed work, for

example by providing information on employee qualifications and experience, working practices etc. Furthermore the Company will require all proposed Sub-Contractors to demonstrate that they have sufficient and appropriate insurance in place.

10.2.65 Prior to commencing work the Sub-Contractor will be provided with a copy of this policy and asked to sign a declaration stating that they are conversant with the Health & Safety at Work Act and its associated Regulations, that they understand the requirements of the Company Policy and its rules, and that they agree to work in accordance with the Act and this Policy.

10.2.66 Monitoring and Audits

10.2.67 As part of the Company's Health & Safety Management System the Company shall monitor its performance to ensure compliance with legislation and this policy. As part of this monitoring the Company undertakes a programme of inspections and audits of Company premises, equipment and activities.

10.2.68 Training

10.2.69 All employees undergo a Company Induction programme on commencement of employment. This includes training in the Company Health & Safety Policy and its associated practices and procedures, including emergency procedures, accident reporting, first aid arrangements etc..

10.2.70 Where employees are working on client's premises, they shall also undergo a site induction, carried out by the client that shall include training in the relevant site safety and working procedures and rules, including emergency procedures, accident reporting, first aid arrangements etc..

10.2.71 Additional, specialized training is provided to employees as required to meet regulatory and business needs. Training records are reviewed on an annual basis to ensure that employees training levels meet the necessary legislative and industry standards.

10.2.72 All employee training records are held at the Company's main office.

10.2.73 Housekeeping and Welfare Facilities

10.2.74 Welfare facilities are provided on Company premises in accordance with the standards required by the Workplace (Health, Safety & Welfare) Regulations 1992. Where employees are working on client's sites, then facilities will be provided by agreement with the client, either by installation of dedicated facilities for Herring Plant Hire staff, or by making arrangements with the client to use their facilities.

10.2.75 All employees are responsible for maintaining their working environment in a clean and safe condition, not only for themselves but also for other workers and persons who may be affected by the work being carried out.

10.2.76 General guidelines for good housekeeping include:

- Orderly arrangement of activities, operations and equipment;
- Provision of a definite place for each item, article or substance;

- Keeping each article or substance in its designated place or returning it if removed;
- Provision of adequate disposal arrangements of scrap, waste and surplus materials;
- General cleanliness of all work areas and equipment;
- Sufficient working spaces and adequate level passageways for safe access and egress;
- Adequate space for materials, tools and portable equipment;
- Anticipation of waste, scrap, spillage, leakage, dust, splashing and provision of some means of control;
- Only the materials required for that day to be taken to the workplace and return all surplus materials to the stores or stockpiles at the completion of the job or end of the day;
- Removing any obstruction found, do not leave it for someone else, removal and control of all sharp objects especially nails;
- Keep changing rooms, canteens, offices and all facilities clean and free of build-up of waste materials;
- Never ignore a housekeeping hazard, put it right.

10.2.77 Regular inspections will be undertaken by the Company Management to ensure housekeeping standards are maintained and welfare facilities are not misused.

10.2.78 Consultation and Communication

10.2.79 The Company recognises its duties under the Health and Safety At Work Act 1974 to consult with its employees on matters of health and safety. Due to the nature of the company, with employees located on a number of client's premises, it meets these duties, and the requirements of the Health and Safety (Consultation with Employees) Regulations 1996, through the use of team briefings, and the issue of notices and memorandum as necessary.

10.2.80 As well as discussing health and safety matters and job specific issues the team briefings are also used to communicate broader Company issues when necessary, and act as a forum for employee feedback, which is communicated to Company Management.