

COMPANY SAFETY POLICY

The Rowlinson logo is located in the top right corner of the page. It consists of the word "Rowlinson" in a bold, black, sans-serif font, enclosed within a rectangular border with rounded corners.

GENERAL STATEMENT OF SAFETY POLICY

1. The Company shall take all reasonable measures to ensure the safety, health and welfare at work of all employees in fulfilment of its moral, legal and economic responsibilities. These measures will also be aimed at protecting others who may be affected by our day to day work activities.
2. It is a function of management to provide the right circumstances under which work may be carried out safely. However, all employees must be aware that they have a legal duty, not only to work in a safe manner, but also to co-operate in efforts made to create safe working conditions.
3. The Managing Director is responsible for safety throughout the Company. Contracts Management and Site Supervision are responsible to the Board of Directors for safety throughout the Company.
4. Each Supervisor is responsible for implementing the Company Safety Policy and for complying with legal requirements at his place of work and setting a personal example. Site Supervisors are also appointed as Safety Supervisors for the purpose of the Construction (General Provisions) Regulations 1961.
5. Every employee is expected to be involved in safety matters and report any unsafe equipment or dangerous situation to their respective Supervisor.
6. Subcontractors are advised before orders are placed, and suppliers of materials and plant at the time of the order, of the need to comply with the Company Safety Policy. Supervisors are to ensure that all work is carried out safely using approved methods, equipment and materials.
7. The Company is a member of Construction Safety Services (NW) Limited who provides a service to sites by making frequent inspection visits to provide technical advice on safety and health. Reports are submitted regularly to the Managing Director.
8. The Company will make provision for such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practical, the health and safety at work of its employees.
9. The Company will make provision for adequate communication and advisory facilities.
10. The Company will appoint a CDM Co-ordinator and/or Principal Contractor as required under the Construction (Design and Management) Regulation and implement their requirements as necessary.
11. The Company has a good health and safety record and the co-ordination of every employee is necessary to ensure that standards are maintained or improved wherever possible.
12. Workplace monitoring is undertaken in the form of health and safety inspections. These will be undertaken by our appointed health and safety advisors. The frequency of the inspections shall be commensurate with the level of risk.
13. The Company health and safety management systems and policy will be audited annually or after an event that may indicate that the policy is no longer suitable or sufficient.

SIGNED

DATE

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STEVE WEIR
CONSTRUCTION DIRECTOR

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INDIVIDUAL RESPONSIBILITIES

1. MANAGING DIRECTOR

Main responsibilities are to:

- a. Initiate the Company's policy for the prevention of injury, damage and wastage
- b. Appoint a Planning Officer
- c. Appoint a Company Safety Officer to administer the policy
- d. Ensure that all levels of staff receive adequate and appropriate training
- e. Insist that sound working practice is regularly observed
- f. Make certain that in tendering, at planning stages and in production processes allowance is made for adequate welfare facilities and equipment to avoid injury, damage and wastage
- g. Ensure proper reporting, investigation and costing of injury, damage and loss; promote action to preclude recurrence and initiate analysis to discover accident trends
- h. Reprimand any member of staff failing to discharge satisfactorily the responsibilities allocated to him
- i. Arrange for funds and facilities to meet requirements of the policy
- j. Set a personal example

2. CONTRACTS MANAGER

Main responsibilities are to:

- a. Understand the Company's policy and appreciate the responsibility allocated to each grade
- b. See that tenders are adequate to cover sound methods of working and reasonable welfare facilities
- c. Implement the requirements of the Pre-Construction Information Pack prepared by the CDM Co-ordinator.
- d. Determine at the planning stage in conjunction with the Site Agent
 1. the most appropriate order and method of working
 2. provision of adequate lighting
 3. allocation of responsibilities with subcontractors and others and making all parties aware of the Company Safety Policy
 4. hazards which might arise from overhead or underground powerlines and identify any others - contact appropriate authorities to obtain the relevant drawings and information
 5. facilities for welfare and sanitation
 6. basic fire precautions

- e. Provide instructions where necessary to establish the working method, to explain the sequence of operations, to outline potential hazards at each stage and indicate precautions to be adopted
- f. Carry out Risk Assessments and prepare a Site Safety Plan outlining working methods and precautions with site management before work starts
- g. Obtain Work Method Statement from subcontractors where necessary
- h. Ensure that work, once started, is carried out as planned and that the Construction and Design Management Regulations are observed on site
- i. Forward the appropriate form (F10) to the Safety Officer and Health and Safety Executive on the commencement of new sites or appointment as principal contractor
- k. Set a personal example.

3. SITE AGENT AND GENERAL FOREMAN

Main responsibilities are to:

- a. Organise sites so that work is carried out to the required standard with a minimum risk to men, equipment and materials
- b. Know the broad requirements of the Construction CDM Regulations 2007 and other relevant legislation
- c. See that the CDM Regulations 2007 and other legal requirements are observed on site: that all registers, records and reports are in order and that the 'competent' appointed has sufficient knowledge of plant or machinery to evaluate all aspects of its safe operation
- d. Give all Trades Foreman and Gangers precise instructions on their responsibilities for correct working methods: see that they do not require or permit men (particularly apprentices) to take unnecessary risks.
- e. Arrange delivery and stacking of materials to avoid doubling risks by double handling: position plant effectively; ensure that the electricity supply is installed and maintained without endangering men and equipment
- f. Plan and maintain a tidy site
- g. Implement arrangements with subcontractors and other contractors on site to avoid any confusion about areas of responsibility
- h. Ensure that all plant sent is safe and fully efficient; is guarded and equipped with safety devices and is tested in accordance with the CDM Regulations 2007 and all other current relevant health and safety legislation.
- i. Make certain that all plant operators and banksmen are only employed on equipment for which they have been thoroughly trained
- j. Check that periodic tests, inspections and maintenance are carried out
- k. Ensure that all repair and maintenance work carried out on site is done in a proper manner and that emergency repairs are dealt with properly as soon as possible afterwards

- l. Attend promptly to all plant defects notified or call the attention of site management to the need for dangerous plant to be put out of service until it can be properly repaired
- m. Check that hired plant is safe and that, where appropriate, copies of current test certificates are available
- n. Ensure suitable protective clothing is available where appropriate and that it is used
- o. Ensure that a qualified first aider is appointed and all items of first aid equipment are available and their location known to employees
- p. See that proper care is taken of casualties and know where to obtain medical help and ambulance service in the event of serious injury. (Nominate other to act in emergency)
- q. Accompany the Safety Officer/Advisor on site visits and act on his recommendations
- r. Liaise with Fire Brigade on fire prevention. Comply with Code of Practice for fire prevention on construction sites

4. TRADES FOREMAN AND GANGER

Main responsibilities are to:

- a. Be familiar with the CDM Regulations 2007 applicable to the work on which their gangs are engaged and insist that these regulations are observed
- b. Incorporate safety instructions in routine orders and see that they are obeyed
- c. Restrain men from taking unnecessary risks
- d. Ensure that new employees, particularly apprentices, learn to take safety precautions
- e. Commend operatives who, by action or initiative, eliminate hazards
- f. Discourage horseplay and reprimand those who constantly fail to consider their own well being and that of others around them
- g. Report defects in plant or equipment
- h. Set a personal example

5. OPERATIVES

Main responsibilities are to:

- a. Use correct tools and equipment for the job; use safety equipment and protective clothing supplied, e.g. ladders, safety helmets, belts, goggles, etc. When protective clothing and/or equipment is issued to an employee for the purpose of undertaking a specific task or duty, the employee must fulfil his/her requirements with regard to any statutory provisions concerning the wearing and/or use of that clothing or equipment
- b. Keep tools in a good condition
- c. Report to supervisor any defects in plant or equipment

- d. Develop a personal concern for safety – for themselves and for others, particularly newcomers and young people
- e. Avoid improvising which entails unnecessary risk
- f. Warn new men of known hazards
- g. Refrain from horseplay and abuse of welfare facilities
- h. Suggest ways of eliminating hazards
- i. Co-operate with the Company in carrying out its statutory duties
- j. Set a personal example

INDIVIDUAL RESPONSIBILITY IN SAFETY, HEALTH AND WELFARE

The Safety Officer / Advisor

- a. Advises management on
 - 1) Preventing injury to personnel and damage to plant and equipment
 - 2) Further improvement in sound working methods
 - 3) Legal requirements affecting safety, health and welfare
 - 4) Use of protective clothing and equipment
 - 5) Suitability from a safety viewpoint, of new and hired plant and validity
 - 6) Potential hazards on new contracts before work starts on the site safety organisation and fire precautions required
 - 7) Method of safe working arising from new developments
 - 8) Changes of legislation
- b. Carries out surveys and inspections in association with management to see that only safe plant, equipment and methods of working are in operation and that all regulations are being observed and provide reports
- c. Determines the cause of any accident or dangerous occurrence and recommends means for preventing recurrence
- d. Advises on the recording and analysis of information on injuries, damage, loss, assesses accident trends and reviews overall safety performances
- e. Keeps contact with official professional bodies and H.M. Inspectorate, etc.
- f. Keeps up to date with recommended codes of practice and safety literature and circulates information applicable
- g. Encourages within the Company an understanding that injury prevention and damage control are an integral part of business and operational efficiency
- h. Takes part, if required, in safety committees and liaises with safety representatives
- i. Assists with training for all levels of employee and suggests posters, slides, films, and film strips to promote awareness of injury prevention and damage control
- j. Sets a personal example

SUBCONTRACTORS

- a. Before commencing work the subcontractor must submit to the Company his own Statutory Health and Safety Policy Statement, organisation and arrangements under the Health and Safety at Work Act and provide work Method Statements, Risk Assessments, COSHH Assessments, where required
- b. Must comply with the terms and agreements of Conditions of Subcontractors appointment
- c. Must take reasonable care to ensure their employees are safe in and about their work and that all other persons who may be affected by it are safe. This means they must provide safe means of access to working places and systems of work, competent trained workmen, adequate supervision and adequate plant and appliances in good order and safe condition.
- d. It is the duty of every subcontractor to work in accordance with Statutory Legislation
- e. Where the Company does not specifically provide shared welfare facilities, it is the subcontractors responsibility to ensure that necessary facilities are provided for their own employees and must provide all statutory notices and documentation applicable to the work to be carried out
- f. Must submit to Rowlinson Constructions Limited the name of an individual who will be responsible for safety supervision on site and for the application of subcontractors safety policy
- g. Must keep a clean and tidy site and any accommodation to a reasonable standard
- h. Must ensure that protective clothing and equipment is provided and used by his employees when required
- i. Must use temporary and portable electric lighting, tools and plant not greater than 110 volts or less when necessary
- j. Must co-operate with the main contractor in carrying out its statutory duties and act on the recommendations of the Safety Officer/Advisor
- k. Make reference to the Company's Safety Policy and the need to work within it

ACCIDENT REPORTING PROCEDURE

- a. ALL injuries sustained by employees whilst in the course of their employment shall be recorded in the appropriate accident book (B1 510) kept on site or at any place where their business is conducted
- b. All injuries involving loss of time over 3 days to be recorded in the General Accident Register, which is sustained
- c. Major accidents and dangerous occurrences and near misses:

The Site Agent/Foreman must telephone:-

The Contracts Manager who will in turn inform the Health and Safety Executive and the Safety Officer where required under legislation

- d. The Contracts Manager will either report the incident as soon as practicably possible by telephone to HSE Caerphilly on 0845 345 0055 or complete Form F2508 and forward to H.S.E. within 7 days
(Absence of 3 days due to Accidents and Dangerous Occurrences)
- e. The Safety Officer/Adviser will be commissioned to investigate where in his opinion the circumstances warrant it.
- f. The Site Agent or Manager will make a report to Head Office of all 3 day accidents to the Contracts Manager on the internal accident report form, who in turn will forward a copy to the Safety Officer/Adviser

HEALTH & SAFETY ARRANGEMENTS

Monitoring, Audit & Review

To check the working conditions and ensure that the Company's safe systems of work are being complied with Managers and Supervisory Staff will undertake weekly site inspections. Records of these inspections will be maintained in the site files and copied to Head Office. They will also be copied to Senior Management.

At the minimum of a monthly basis the appointed Health and Safety Advisor or his designated deputy will undertake formal safety inspection of sites. Records of these inspections will be maintained in the site files and copied to Head Office

The Health and Safety Management Systems of the Company will be formally audited at least once a year by the Senior Management team with the assistance of the appointed Health and Safety Consultants.

The Health and Safety Management System will be reviewed annually as a minimum by Board and Senior Management team with the assistance of the appointed Health and Safety Consultants.

Further reviews will be triggered as the result of risk assessment, accident investigation, changes in regulations, the introduction of new machinery and changes in working practices.

Health Surveillance

Rowlinson have adopted the MCG Health & Safety Strategy occupational health guidelines which provide for implementing Health Surveillance.

We undertake health assessments for key, at risk groups of workers. Through these assessments we are able to identify and manage those individuals who are at greatest risk of occupational ill health on our construction sites.

In order to ensure that suitable and sufficient health surveillance is provided as and when required the Company will look to carry this out in house if an employee with the necessary level of competence is available. Where this cannot be achieved the work will be out sourced to an appropriate provider.

To ensure that suitable and sufficient health surveillance is provided as and when required. The procedures adopted to acquire the relevant information include:-

1. Employees are required to notify the company if they suffer from a medical condition that may affect, or be made worse by their work.

2. The need to conduct health surveillance shall be identified during the risk assessment and COSHH assessment processes.
3. If health surveillance is identified as a necessary control measure it will be the responsibility of the appropriate health and safety manager to make the arrangements.
4. Health surveillance will be carried out in house if an employee with the necessary level of competence is available. Where this cannot be achieved the work will be out sourced to an appropriate provider.
5. Employees that are the subject of health surveillance will be provided with the relevant information prior to the commencement of the surveillance.
6. Records of health surveillance will be kept in the appropriate personnel files at head office. Where appropriate individual employees will be provided with a copy of health surveillance findings.
7. Employees may be required to provide basic health surveillance information. This will normally be in the format of a self assessment questionnaire.
8. If the results of any health surveillance identify any failings in the existing control measures it will be the responsibility of the appropriate health and safety manager to arrange for new control measures to be implemented.
9. Employees who believe that they are suffering from ill health as a result of their work must report the matter to the Compliance department. The same requirement applies if a doctor diagnoses ill health caused by work activities.
10. If occupational ill health is diagnosed the company shall take steps to protect the employee from further harm whilst keeping them in their current job. Where this is not possible the company will try to find suitable alternative work.

Controls of Substances Hazardous to Health (COSHH)

The Company technical department provides all COSHH assessments. This is in addition to the substance suppliers Material Safety Data Sheet (MSDS). Copies of relevant COSHH assessments will be held in each workplace.

All efforts will be made to substitute hazardous substances to a less hazardous one eg. A high content VOC paint to a low content VOC or water-based paint. Where it is not possible to use a less harmful substance, the control measures as identified on the MSDS and the COSHH assessment must be implemented.

Disposal of substances must be in accordance with the manufacturer's instructions taking into account the Company's Duty of Care under the Environmental Protection Act.

Details of all COSHH assessments will be made known to all employees during their site specific health and safety induction. Employees using any substances identified as hazardous through the COSHH assessments will be made aware of the risks and in addition any first aiders in their area of work shall also be made aware.

Manual Handling

Where reasonably practicable all manual handling shall be avoided to reduce the risk of injury. Where this is not reasonably practicable, consideration will be given to the use of mechanical lifting aids. Manual handling must only be carried out by trained employees in accordance with the training provided, relevant risk assessments and method statements.

Fire

A fire risk assessment will be carried out for all the companies' premises and/or places where they conduct their business.

Training

General induction training will be provided for all new members of staff and all site operatives. Where applicable, site specific inductions will be undertaken as required by the Client and/ or the Construction Phase Health and Safety Plan. A record of all inductions will be kept.

In consultation with the relevant managers, job specific training needs will be established and developed. It is the responsibility of the relevant senior managers to ensure that their staff receives the agreed training. In line with the Company's QMS procedures the effectiveness of the training will be reviewed.

Training needs identified by the Company's appraisal process will be authorised in the same way.

The Company will maintain a centralised training database including both hard copy and electronic records.

First Aid

It is the responsibility of the Manager of each site and/ or contract to ensure that adequate First Aid facilities and equipment are available and that sufficient certified First Aiders are available at all times for the numbers of personnel on site. The names of first aiders will be displayed on the office/ site notice boards. Training will be given by HSE approved training bodies.

All injuries, however slight, must be reported to a supervisor and first aider.

The supervisor will then follow the Company's Accident/ Near Miss Reporting Procedure. The first aider giving treatment will be responsible for replenishing the contents of the first aid kit.

There will be an Accident Book held in all places where the Company conducts its business and the format and type of book will comply with the requirements of the Data Protection Act. It will be updated upon receipt of completed Incident Report Forms. It is the responsibility of the Contracts Manager assigned to the applicable business stream to contact the HSE to comply with the Company's duties under the "Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995"-RIDDOR.

Personal Protective Equipment (PPE)

PPE will be issued where either a risk assessment or COSHH assessment has identified its need. Such PPE will be issued free of charge to those employees identified at risk.

Issued PPE should be recorded and signed for by the recipient. Personnel are to ensure that they maintain PPE in a clean and serviceable condition and obtain a prompt replacement when it becomes damaged or unserviceable and this is communicated to the workforce through the safety induction procedures.

Employees will be trained in the correct use of PPE.

Please note that it is the express instruction of the Managing Director that all sites are designated as hard hat areas and must be worn at all times. Hard hats should be replaced when damaged or in line with manufacturer's instructions.

Mobile Phones

Mobile phones will be issued to employees only where there is a justifiable recognised need, which the Company will assess.

The use of hand-held phones whilst driving is illegal. The Company will not accept such behaviour. Any person observed using a hand-held phone whilst driving will be subject to the Company's disciplinary procedures. This also applies to staff using their own phones whilst driving company vehicles and operating plant.

Maintenance of Plant and Equipment

Plant and equipment will be maintained in accordance with the Company's appropriate Quality Management Procedures. The Company terms any item of plant which is not fixed permanently to a structure to be a 'portable appliance' and this will be subject to the required regular (daily) inspections.

Where required electrical plant will be PAT tested to ensure it is in safe working order. Records of all PAT testing will be maintained at head office.

Operatives will be made aware at their site safety induction of their duties as an employee to follow the required protocol when using items of plant with specific reference being made to the need to carry regular condition checks on all plant before it is used.

Plant shall only be operated by trained personnel in possession of a current CITB or equivalent card issued by an approved body or trainees under the close supervision of a competent person. At all times the control measures identified in risk assessments and method statements must be implemented.

The Company shall only source items of plant equipment from approved suppliers in accordance with its quality procedures. Their performance will be monitored particularly hire companies to ensure that plant equipment supplied is fit for purpose, has been maintained where necessary and any documentation required is supplied.

Sub-contractors working for the Company will be monitored to ensure their plant equipment meets statutory requirements. Site management will ensure that any shortfalls are addressed without delay.

Where plant equipment is being delivered to site the supplier whether it is the plant department or outside supplier must be informed of any hazards that may affect delivery to the site.

No employee shall operate plant equipment without first checks being made to ensure they are competent.

Personnel accepting deliveries of plant equipment must satisfy themselves that it is fit for the intended purpose and safe to use so far as is reasonably practicable.

Plant should not be put to use unless the relevant documentation and, where appropriate, valid certification has been checked and approved.

Operatives shall carry out daily visual checks before use. If there are any defects they are to be reported and the item of equipment not used? Where required, operators shall record the results of their inspections.

Where required, weekly inspections shall be carried out and formally recorded.

Plant equipment shall be maintained in accordance with the manufacturers' instructions.

With regards to mobile plant, in addition to the above statement

- a. Speed limits must be obeyed and designated vehicle routes used.
- b. Seat belts must be worn.
- c. Reversing should be avoided wherever possible. If it is unavoidable a banksman must be employed.
- d. Dumpers must be dismounted when being loaded.
- e. Parking brakes shall be applied before tipping loads.
- f. No passengers shall be carried unless a passenger seat is provided.
- g. When left unattended attachments must be lowered to the ground, the parking brake applied and the keys removed.
- h. Beacons must be used when plant is in use.
- i. Where necessary mirrors must be fitted to provide all round 360 degrees vision 1 metre from the plant.
- j. When carrying loads the drivers' vision must not be obscured.
- k. Refuelling must only take place in designated areas. Where necessary drip trays must be used.

Where petrol, diesel or other mechanical plant is required to be used and where there is the potential for fumes to be generated consideration shall be given to reducing the potential for harm by the use of:

- a. The use of local exhaust systems (LEV).
- b. Forced ventilation and dilution.
- c. As a last resort Respiratory Protective Equipment

Noise

All employees subjected to noise exceeding 85 dB(A) but less than 90 dB(A) will be supplied with and encouraged to use appropriate hearing protection. At noise levels of 90 dB(A) and above, hearing protection must be provided and worn. Where employees are subjected to noise levels below the statutory intervention levels that may be deemed a nuisance then attempts will be made to design or engineer out the problem. If this is not possible then hearing protection will be offered.

Safe Systems of Work

Procedures have been produced which form the basis of the required standards for health and safety. It should be used to structure any risk assessments, method statements and site rules.

The Management of Health and Safety at Work Regulations reinforces the requirement for risk assessments to be undertaken. The Company's approach is to provide a suite of generic risk assessments of work activities which can then be utilised to adapt or be referred to for specific scenarios.

The Company's Senior Management are responsible for updating and producing the Company's generic risk assessments. Contracts Managers, Project Managers, Site Supervisors or Foremen are responsible for producing specific site risk assessments.

Information, Instruction and Supervision.

The Health & Safety law poster, Employers Liability Insurance Certificate, Health and Safety, Quality and Environmental Policy Statements will be displayed at all site offices and on site notice boards.

Health & Safety advice can be obtained from the appointed Health & Safety Auditors. Their contact details are displayed on the Health & Safety law poster in all premises and sites where the Company conduct their business.

Consultation with Employees

The Company has a formal consultation forum. The forum consists of a representative from the Board and duly elected representatives from the workforce or separate departments. Regular meetings are held.

Minutes of the meetings are circulated and displayed on the Company notice boards.

In addition the Company through its Senior Managers and Technical Manager conducts team meetings, tool box talks and circulates regular memos in order to ensure the workforce is well informed about Company developments and future plans.

Lone Working

The Company has specific guidelines for management and employees when working alone is unavoidable.

If an employee is required to work alone then the following protocol will be adopted.

1. An appropriate risk assessment will be carried out prior to any works commencing
2. There will be a means of communication in place before any lone working takes place.
3. No lone working must take place outside normal office hours without prior risk assessment taking place.
4. Regular contact will be made at set pre-determined intervals agreed before the work commences.
5. No work will be carried out if the lone worker feels unsafe or threatened in any way.
6. The management will consider task suitability when allocating work to lone workers. This will be highlighted through the relevant risk assessment.

Working at Height

No work at height shall take place unless suitable and sufficient risk assessments have been undertaken. When carrying out such risk assessments the hierarchy of control detailed within the Work at Height Regulations 2005 shall be applied. All persons involved in the work shall be made aware of the risk assessment/method statement findings and requirements.

Asbestos

The Company will ensure that they fulfil their obligation under the current Control of Asbestos Regulations and ensure they uphold the safe management of asbestos in the workplace, thereby avoiding the uncontrolled exposure of employees and others to asbestos containing materials. This will be carried out by ensuring the following protocol is duly followed:-

1. The possible presence of asbestos containing materials must be considered during a risk assessment process. If it is believed that Asbestos Containing Materials may be present it will be necessary to have an asbestos survey undertaken.
2. Asbestos cement materials e.g. pipes, roofing sheets etc, may be dealt with safely by company employees providing that the work is carried out in accordance with the requirements of the Control of Asbestos Regulations and suitable risk assessments and method statements.
3. Asbestos surveys will only be carried out by competent persons appointed by the Company or their clients.
4. The findings of any asbestos surveys conducted on behalf of the Company will be used to formulate a site specific asbestos method statement for the relevant workplace.
5. Asbestos containing materials must be managed in accordance with the requirements of the appropriate site specific asbestos method statement.
6. Asbestos method statements must be made available to all those who have a need for the information contained within, e.g. building maintenance workers.
7. Asbestos method statements must be kept up to date and reviewed annually as a minimum or as the specific work in progress dictates.

SIGNED

DATE

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STEVE WEIR
CONSTRUCTION DIRECTOR

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