

# GROUP POLICY

## Health, Safety and Wellbeing

August 2023

**McLaughlin  
& Harvey**

**BUILDING TOGETHER.  
UNLOCKING POTENTIAL.**  
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<b>Contents</b>	<b>3</b>
1. Group Policy Statement	<b>05</b>
2. Statement of Company Commitment and Objectives	<b>08</b>
3. Organisational Chart	<b>11</b>
4. Reporting Structure	<b>13</b>
5. Health and Safety Responsibilities	<b>15</b>
6. Management Arrangements	<b>30</b>
Policy Information	<b>48</b>

# Group Policy Statement

# 01

- 1.1** The health, safety and wellbeing of all our workforce and those affected by our activities is fundamental to the success of our business. We promote a health and safety ethos which is fully integrated into our management system and decision-making processes by: -
- Providing strong and active leadership;
  - Providing a safe and healthy working environment;
  - Identifying hazards, eliminating the risk where reasonably practicable and implementing robust management arrangements to control those risks which remain;
  - Providing information, instruction, training and supervision to enable the safe performance of all our operations and activities;
  - Maintaining effective systems to enable communication and consultation with our workforce, our suppliers, our sub-contractors and other interested parties.
- 1.2** Our workforce must be diligent in taking reasonable care for the health, safety and wellbeing of themselves and of others who may be adversely affected by their actions or neglect. Everyone has an individual responsibility to challenge unsafe practices, report unsafe conditions and comply with all health and safety requirements.
- 1.3** We regard compliance with health and safety legislation as the minimum standard to be achieved. We will promote best practice throughout our operations with the aim of continually improving our health and safety performance by the provision of adequate resources. This will ensure our management teams can deliver the highest standards of health and safety throughout our business.

**1.4** We are committed to preventing injuries and the protection of health and wellbeing by driving improvements, creating innovation and challenging conventional views and practices.

**1.5** We will bring this policy to the attention of our employees, all businesses within the group, our supply chain partners and other interested parties, as collectively their support and professionalism is essential in making it truly effective.



Director  
August 2023

# Statement of Company Commitment and Objectives

# 02

## 2.1 Commitment

**2.1.1** The Company is committed to ensuring a positive and proactive health and safety culture that will bring about safe working practices throughout all business activities. The Company is further committed to ensuring all Employees are aware of their statutory responsibilities to ensure their own safety, the safety of their colleagues and their responsibility to their Employer to work safely.

**2.1.2** The prevention of all accidents involving personal injury or incidents involving property damage is essential to the efficient operation of the Company.

**2.1.3** The Company operations are to be carried out, at all times, in a manner which ensures that accidents are prevented and the health of Employees is maintained. This commitment to the prevention of accidents and the maintenance of health also extends to members of the public and those who may be affected by Company operations.

## 2.2 Objectives

**2.2.1** The Company's objectives are to achieve continual improvement in both health and safety standards and performance by ensuring that: -

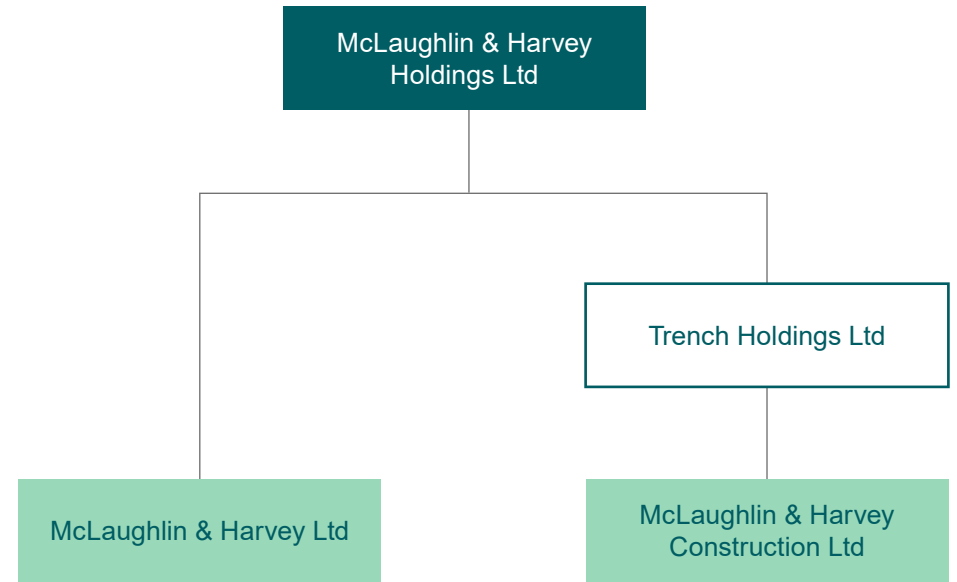
- Company procedures relating to compliance with relevant statutory provisions are set out within this document;
- Employees are advised of their duty to comply with the procedures derived from this policy statement;
- Directors, Senior and Workplace Management within the Company operate effective communication so that all Employees are made aware of any changes to the procedures;

- Personnel co-operate by exercising all reasonable care for their health and safety and that of others affected by their acts and omissions;
- Workplaces are maintained in a safe and healthy condition;
- The necessary resources in the form of finance, equipment, personnel and time are provided and that expert assistance will be sought where the necessary skills are not available within the Company;
- That accidents, incidents and dangerous occurrences are fully investigated and appropriate action is taken with a review of the control measures and records kept to reduce the likelihood of their reoccurrence;
- Procedures exist for the provision of safe equipment and plant for all Employees; and
- That policies are regularly reviewed and updated as necessary. Where new legislation comes into force steps shall be taken to implement new policies as soon as is reasonably practicable.

**2.2.2** The Health, Safety and Wellbeing Policy will be reviewed on a regular basis as part of the continual integrated management system review. Copies of the Policy and all subsequent revisions will be issued to all Company Employees and Sub-Contractors so that they are aware of all relevant changes which may affect work activities.

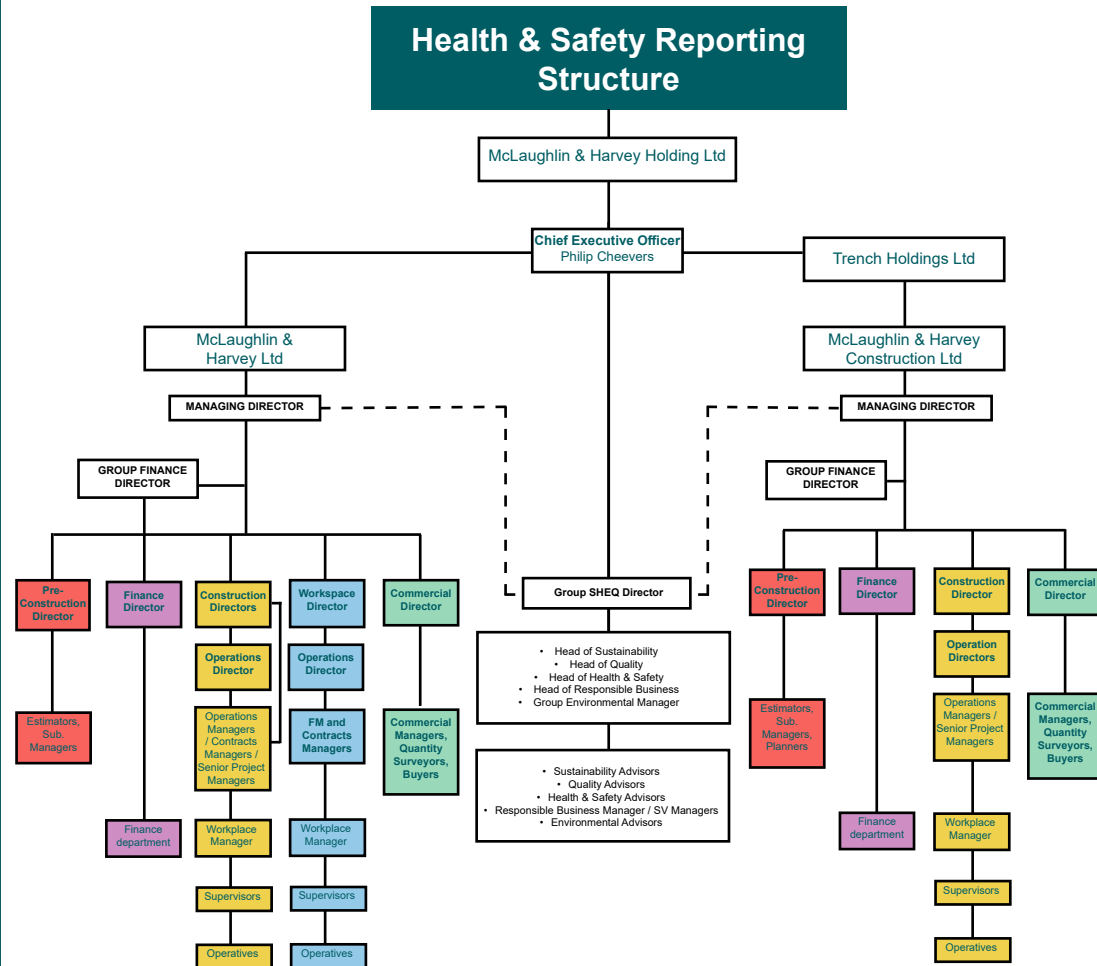
# Organisational Chart

03



# Reporting Structure

# 04



# Health and Safety Responsibilities

# 05

## 5.1 Board Directors

**5.1.1** The Company Board of Directors will individually ensure a commitment to both a leadership and directing role of all health, safety and welfare functions throughout the Company's activities. They assume executive responsibility on legislative and Company procedures in respect of health, safety and wellbeing.

**5.1.2** The Directors must have an understanding of the main requirements of current and applicable health and safety legislation and the requirements of this policy.

**5.1.3** The Company Board of Directors must ensure that: -

- The organisational Company structure and resources are appropriate to manage health, safety and wellbeing at every workplace;
- An equal importance is applied to health, safety and wellbeing safety as to other business functions;
- Set a positive health and safety example and prioritise risk management;
- The setting of standards of health, safety and wellbeing management is applied throughout the Company;
- The allocation of necessary resources for the management of health, safety and wellbeing training for Employees at all levels;
- Health, safety and wellbeing responsibilities are integrated into the management structure at all levels;
- Support and guidance is provided to workplace management in the implementation of the health, safety and wellbeing policy at every workplace;
- Standards applied to health, safety and wellbeing in the Company meet the standards of legislative requirements and codes of practice;
- That regular reviews and auditing procedures are conducted



at every workplace and that consolidated reports are incorporated into executive briefing documents; and

- A review on health, safety and wellbeing performance, inclusive of the business objectives, is undertaken on a regular basis.

## 5.2 Senior Managers (Senior Managers include Operations and Contract Directors, Heads of Department and Senior Commercial Managers)

**5.2.1** Senior Managers shall be committed to ensuring the defined Health, Safety and Wellbeing responsibilities outlined below are led within each of specific business units under their responsibility.

**5.2.2** As the policy highlights health, safety and wellbeing is an integral part of both leadership and management of every function within the business all designated Managers performance will be subject to monitoring by both the Directors and the Senior Management Team.

**5.2.3** Senior Managers must have an understanding of the main requirements of current and applicable health and safety legislation and the requirements of this policy.

**5.2.4** They shall also ensure that devolved line management responsibilities embrace the accountability for the health, safety and wellbeing of the workforce within their specific areas.

**5.2.5** In addition to the above Senior Managers have specific duties to ensure: -

- That health, safety and wellbeing responsibilities are correctly assigned within the workplace;
- They demonstrate commitment, provide visible leadership and set a positive example in relation to health, safety and welfare;
- Set a positive health and safety example and prioritise risk management;

- The development of health, safety and wellbeing strategies with action plans encompassing the Company's objectives;
- The Company's Policy and direction on safety matters are distributed to all personnel within their area of responsibility;
- That all third party personnel and contractors and their Employees are made aware of the health, safety and wellbeing policy and action plans which have been put in place;
- That resources are made available to execute, review and monitor the Company objectives, strategy and action plans;
- That a monitoring system is put in place to check the implementation by all personnel and third party contractors of all safety strategies and action plans;
- That all Managers and other personnel within their area of responsibility are competent and adequately trained;
- That the records of all training received and other continuing professional development activities are compiled and issued to Human Resources;
- That all workplaces, including the management teams, are reviewed as to their safety performance in respect of the responsibilities assigned to them;
- That proactive reviews and audits of all objectives and action plans are carried out within their area of responsibility and that appropriate documented feedback is issued to the Board of Directors;
- That all incidents, dangerous occurrences and injury events are investigated and written reports compiled as soon as possible after the incident;
- That in respect of construction sites a specific plan is developed and approved in writing along with associated workplace specific hazard identification, risk assessments and control measures prior to works commencing;
- That appropriate action to deal with the findings of any health and safety monitoring reports, accident / incident investigations, performance reviews or similar reports;

- That appropriate safety equipment and PPE are available for all projects;
- That all personnel within their respective Divisions/ Departments are adequately trained and instructed in relation to their duties in order that these can be performed safely.

### **5.3 Operations Managers / Contracts Managers / Senior Project Managers / Commercial Managers / Quantity Surveyors**

**5.3.1** The Operations Managers, Contracts Managers, Senior Project Managers, Commercial Managers and Quantity Surveyors shall display effective leadership in ensuring the defined health, safety and wellbeing responsibilities below are led within each specific business unit.

**5.3.2** It is the duty of the Operations Managers, Contracts Managers, Senior Project Managers, Commercial Managers and Quantity Surveyors to allocate specific duties to the appropriate Workplace Manager and / or where appropriate to the nominated safety representative / advisor.

**5.3.3** As the policy highlights health, safety and wellbeing is an integral part of both leadership and management for every part of the business and all Operations Managers, Contracts Managers, Senior Project Managers, Commercial Managers and Quantity Surveyors performance will be subject to monitoring by both the Board of Directors and Senior Managers.

**5.3.4** The Operations, Contracts, Commercial Managers and Quantity Surveyors must have an understanding of the main requirements of current and applicable health and safety legislation and the requirements of this policy. They shall also ensure that devolved line management responsibilities embrace the accountability for the health, safety and wellbeing of the workforce.

**5.3.5** In addition to the above the Operations Managers, Contracts Managers and Senior Project Managers have specific duties to ensure: -

- That health, safety and wellbeing responsibilities are correctly assigned within the workplace;
- They demonstrate commitment, provide visible leadership and set a positive example in relation to health, safety and welfare;
- The development of health, safety and wellbeing strategies and action plans encompassing both Client and Company objectives;
- The Company's Policy and relevant direction on health, safety and wellbeing matters are distributed to all personnel within his area of responsibility;
- That all third party personnel and contractors and their Employees are made aware of the policy and action plans which have been put in place;
- That resources are made available to execute, review and monitor the Company objectives, strategy and action plans;
- That a monitoring system is put in place to check the implementation by all personnel and third party contractors of all safety strategies and action plans;
- That all managers and other personnel within their area of responsibility are competent, receive specific training and instruction in relation to their duties in order that these can be performed safely;
- That the records of all training received and other continuing professional development activities are compiled and issued to Human Resources for inclusion in personnel files;
- That Workplace Management are reviewed as to their safety performance in respect of the responsibilities assigned to them;
- That proactive inspections, reviews and audits of all strategies and action plans are carried out within their area of responsibility and that appropriate documented feedback is issued to the Senior Managers;

- That all incidents, dangerous occurrences and injury events are investigated by Workplace Management and written reports compiled as soon as possible after the incident;
- That in respect of construction projects a specific plan is developed and approved in writing along with associated workplace specific hazard identification and risk assessments prior to works commencing;
- That appropriate action to deal with the findings of any health and safety monitoring reports, accident / incident investigations, performance reviews or similar reports;
- That in respect of construction projects, during the project the management teams collate all the relevant documented information and specifications for inclusion in the Clients Health and Safety File and / or Operation and Maintenance Manuals;
- That appropriate safety equipment and PPE is available for all personnel;
- Specific risk assessments are completed and communicated in respect of all activities considered as presenting a significant hazard or as required to comply with specific legislation, e.g. COSHH, DSE;
- That all necessary welfare facilities are provided and maintained.

**5.4 Safety, Health, Environmental and Quality Staff**  
(Safety, Health, Environmental and Quality Staff include Group SHEQ Director, Group Heads of SH and Q, E Manager Senior Advisors and Advisors)

**5.4.1** The designated individuals for Safety, Health, Environmental and Quality (SHEQ) including safety supervisors (whether agency or not) appointed by the Company are responsible for co-ordinating health, safety and wellbeing.

**5.4.2** They will at all times demonstrate leadership and commitment in the Company ethos of health, safety and wellbeing being at the forefront of all work operations. They will comply with

the relevant legislative requirements, Company Integrated Management System (IMS) and liaise / assist with all workplace management in relation to Health, Safety and Wellbeing matters.

**5.4.3** In particular the designated individual for SHEQ will ensure that procedures exist whereby: -

- Personnel working within their respective Divisions/ Departments are made aware of the policies, guidance, hazard, associated risk assessments and safe systems of work relating to their specific work activity;
- Personnel are familiar with the requirement to report proactive interventions i.e. near misses, incidents, dangerous occurrences and injury events;
- Written reports of such proactive interventions (near misses), incidents, dangerous occurrences and accidents occurring within the business environment, are collated in order to identify trends and where practicable take remedial action;
- Regular consultation with all levels of management on health, safety and wellbeing matters and that where practicable, any health, safety and wellbeing problems, which may arise are resolved;
- Regular Workplace proactive visits are conducted and recorded accompanied by the designated Workplace Management;
- Contractors and their Employees working on Company sites and premises are made aware of policies to ensure the safety of other who may be affected by their work;
- A legal duty of care is exercised in respect of third parties who may be affected by work. This is particularly important in relation to persons who visit a Company location;
- A procedure is in place to ensure that adequate fire controls are in place and that these are accurately documented within a Fire Plan which remains under review and is updated when required. The Fire Plan must include clear instruction on emergency evacuation procedure and arrangements to ensure that fire-fighting equipment is regularly inspected and

maintained in good working order.

- First aid requirements as laid down in the Company's Health, Safety and Wellbeing Policy is adhered to;
- All Reportable events are investigated by the appointed SHEQ Advisor and any reports/findings are forwarded to the relevant Heads of Departments;
- Other injury/incident events are reviewed by the SHEQ Department and any reports/findings are forwarded to the relevant Heads of Departments;
- Matters arising in relation to health and safety are resolved in line with Company Policy and the legal duties imposed by health and safety legislation;
- All collated reports and trends arising from internal and external audits, proactive visits, consultations, incident and injury event investigations and general compliance as set down in this policy are reported to the appropriate Director and reported monthly to the Board of Directors.

## 5.5 Workplace Managers

(Workplace Managers include any Employee who has been appointed to manage a specific business function e.g. Project / Site Manager, Plant Manager, FM Manager etc.)

### 5.5.1

At all office and transient operational workplaces it is the duty of the appointed Workplace Manager to ensure that the Health, Safety and Wellbeing responsibilities as defined below are carried out. The appointed Workplace Manager will allocate the duties to the appropriate supervisor(s) or foreman and / or where appropriate to the nominated safety representative and will ensure that a workplace specific statement of the nominated manager's responsibilities is produced and issued.

### 5.5.2

Health, Safety and Wellbeing is an integral part of the management function for every workplace and all designated Managers performance in this respect will be subject to monitoring by a Board Director, Operations Director or Operations Manager.

### 5.5.3

The designated Workplace Manager must have an understanding of the main requirements of current and applicable health and safety legislation and the requirements of this policy. They must ensure that devolved line management responsibilities embrace the accountability for the Health, Safety and Wellbeing of the workforce.

### 5.5.4

In addition the Workplace Management has a duty to ensure: -

- That all health, safety and wellbeing responsibilities are correctly assigned within the workplace;
- All work is carried out within the health and safety strategies and associated Company objectives and action plans;
- Risk assessments are carried out for all tasks and ensure the necessary risk controls and safe systems of work are implemented, monitored and reviewed;
- The Company's Policy and relevant direction on safety matters are distributed to all personnel within their areas of responsibility;
- That all third party personnel and contractors and their Employees are made aware of the health, safety and wellbeing policy and action plans which have been put in place;
- That resources are made available to execute, review and monitor the Company objectives and action plans;
- That the review system is management led with regards the approval of safe systems of work and the implementation by all personnel and third party contractors of all safety strategies and action plans;
- That managers and other personnel within their area of responsibility are competent and adequately trained and instructed in relation to their duties in order that these duties can be performed safely;
- That the records of all training received and other training development activities are compiled and issued to Human Resources;
- That Supervisors and Foremen are reviewed as to their

safety performance in respect of the responsibilities assigned to them;

- That inspections, reviews and audits of all strategies and action plans are carried out within their areas of responsibility and that appropriate documented feedback are passed to the Board of Directors, Senior Managers and Operations Managers;
- That all incidents, dangerous occurrences and injury events are investigated and reports compiled as soon as possible after the incident;
- That in respect of construction sites a specific Plan is produced and managed along with associated workplace specific hazard identification and risk assessments throughout the tenure of the project;
- That all necessary inductions are carried out and documented;
- That appropriate safety equipment including PPE is available to all Employees and site visitors;
- That sufficient numbers of First Aiders/Fire Wardens are trained and adequate cover is provided;
- That all plant and equipment is maintained in a safe condition and used correctly within the manufacturers' guidelines;
- That all necessary welfare facilities are provided and maintained.

## 5.6

### Design and Technical Services Staff

(Design and Technical Services Staff include Architects, Estimators, Planners, Engineers, in essence any person undertaking or involved in any design activity)

#### 5.6.1

Design and Technical Services Staff have, in addition to their relevant management status, the responsibility to carry out their respective tasks in compliance with current professional standards and Codes of Practice relative to their professional discipline and within the legislative requirements.

#### 5.6.2

Design and Technical Services Staff must have an understanding of the main requirements of current and applicable health and safety legislation, the requirements of this policy and must recognise their individual responsibility for risk management of projects to which they have been assigned. They must: -

- Identify and consider, at the concept stage the hazards and associated risks that could arise during the manufacture, construction, production, operation, use, maintenance and decommissioning phases;
- Prepare, as appropriate, a site specific hazard, associated risk control document and temporary works information for the workplace management team;
- Advise the workplace management teams as to any change to the design or construction methods, which may affect health, safety and wellbeing;
- Liaise with all relevant parties in the production of pre-construction information;
- Ensure compliance with the CDM regulations for construction work; and
- Ensure compliance with specific Work Equipment Regulations;
- In relation to temporary works the preparation of the design and specifications are undertaken as required by the procedures applied to the design of permanent works and provide adequate information about any significant risk associated with the design.

**5.7 Supervisors**

(Supervisors include the role of Foremen, Chargehand and anybody who is appointed to supervise others in the workplace)

**5.7.1** Supervisors are responsible to their specific Line Manager and are to be familiar with the main aspects of health and safety legislation for work activities and codes of practice relative to their designated areas of responsibilities. They will take a “hands on” approach to the management of health, safety and wellbeing by providing a suitable level of work supervision.

**5.7.2** They require being the ‘eyes and ears’ of general operatives’ performance and demonstrate commitment by setting a positive personal example of health and safety standards and leadership.

**5.7.3** They have specific responsibility for ensuring: -

- That Employees under their supervision are adequately trained, instructed and informed;
- That specific induction training is provided to all direct and subcontract Employees;
- That all work is allocated in accordance with the Employees’ ability and level of training;
- Employees are encouraged to report a proactive intervention (near miss), any defects and suggest improvements;
- That operational processes and practices are correctly defined and adhered to and that specific risk assessment and method statements are implemented for all tasks;
- That defective equipment is reported and taken out of use;
- That injury events and proactive interventions (near misses) are reported and with the project team investigated as soon as practicable after the incident;
- That regular inspections are carried out of the workplace;
- That toolbox talks are carried out regularly to rectify or familiarise unsafe or new practices;

- They set a good example personally to Employees under their control by strict adherence to safety procedures and by the wearing of appropriate PPE.

**5.8 General Operatives**

(General Operatives include Plant, Agency and Sub-Contractor Operatives, i.e. those involved in non-managerial or supervisory roles)

**5.8.1** All Operatives must be fully aware and committed to the Company ethos and principles for Health, Safety and Wellbeing. They are to be capable of carrying out the work task to which they have been assigned without taking any unnecessary risks. If they do not understand or are not competent to carry out the task they must inform their supervisor and seek additional training.

**5.8.2** Individually they have responsibility to set an example, co-operate with the project team and ensure that they: -

- Exercise reasonable care at all times in the work area towards themselves and others;
- Wear, use and maintain correctly any required personal protective or safety equipment that has been issued to conduct the specific task in accordance with the specific risk assessment;
- Work in accordance with Company procedures;
- Avoid horseplay or any negligent action which could result in injury to themselves or others;
- Comply with management requests and instructions on health and safety matters;
- Do not use defective equipment;
- Do not damage or misuse equipment;
- Report any defective equipment or product to the supervisors; and

- Report any injury events, incidents or proactive interventions (near misses) as soon as possible after the incident to the foreman/immediate supervisor.

## 5.9 Office Based Staff

**5.9.1** It is the responsibility of all Employees irrespective of their grading, to work in accordance with this policy and to take reasonable care of themselves and other persons who may be affected by their acts or omissions.

**5.9.2** The duty of care extends to third parties and is particularly important in relation to persons who visit or carry out work on Company premises. Office based staff have a responsibility to: -

- Report any fault or shortcoming in the health and safety arrangements in their office / location;
- Report any unsafe conditions or defects;
- Report incidents where the circumstances have the potential to lead to an injury event or dangerous occurrence;
- Familiarise themselves with all risk assessments and safe systems of work and apply all necessary measures to prevent an impact on their specific work task;
- Ensure they only carry out tasks for which they have been authorised and / or trained; and
- To not take short cuts, interfere with or otherwise misuse anything which has been provided in the interest of their or other's health, safety and wellbeing.

# Management Arrangements



**6.1 Introduction**

- 6.1.1** The Board of the Company is responsible for implementing the provisions of this policy and all health, safety and wellbeing matters throughout the Company's operations.
- 6.1.2** The Company's Board of Directors will be subject to regular external audits to ensure that this duty is being complied with.
- 6.1.3** The Health, Safety and Wellbeing Policy (the "Policy") and associated procedures will be brought to the attention of all personnel in a suitable form that can be readily understood. The Company shall provide where necessary policies and procedures translated into other languages.
- 6.1.4** Employees and Sub-Contractors must recognise that they have a legal obligation under current legislation to co-operate with the Company in implementing the provisions of the Policy.

**6.2 Planning and Arrangements for Health, Safety and Wellbeing**

- 6.2.1** At every workplace where Company personnel are employed, the responsible Workplace Manager will establish clear divisions of responsibility for all aspects of health, safety and wellbeing.
- 6.2.2** Safe systems of work will be site specific and produced with effective control measures which have been approved by Workplace Management. These will be in place for all operational workplaces in accordance with these safety planning procedures and other site-specific procedural documentation.
- 6.2.3** Arrangements for health, safety and wellbeing shall be implemented at all times, including holiday periods, at every workplace in accordance with current legislation and site specific procedures.
- 6.2.4** For construction activities, where appropriate, a project specific risk assessment shall be prepared prior to the

commencement of any works, and a safe system of work in the form of a method statement.

- 6.2.5** Safe systems of work shall be communicated to the workforce and adhered to at all times for each operation in the workplace.
- 6.2.6** The Workplace Manager will consult, as appropriate, with the SHEQ department in respect of the approval of all key safe systems of work as identified within the site specific hazard and associated risk control documents.
- 6.2.7** Location specific contingency plans shall be prepared for any emergency situation (e.g. fire, explosion, emissions of gas or other serious incident) and will be made known to the workforce and available to them at all times.
- 6.2.8** Contractors and non-Company personnel will be made aware of the Policy and associated safety measures at Site Induction, prior to commencement of their works.
- 6.2.9** Company management will oversee ongoing activities of contractors and non-Company personnel to ensure that they are complying with current legislation and Codes of Practice affecting their particular operations.
- 6.2.10** Workplaces must be left in a safe condition to eliminate, as far as is reasonably practicable, all risks to workers, children and other members of the public that may be affected by the works.
- 6.2.11** The Company will make suitable arrangements to ensure adequate preparedness to deal with the likely effects, including any health and safety effects, of an influenza pandemic. This will include a risk assessed review of working arrangements based in the most up to date information provided by the Public Health advisory bodies during the pandemic.



**6.3 Safe Systems of Work and Risk Assessments**

**6.3.1** Risk assessments undertaken by the Company and sub-contractors must identify particular risks specific to the project and task, the required management processes and other control measures. Significant findings from risk assessments are to be conveyed to the appropriate supervisors / operatives.

**6.3.2** In addition, the Workplace Manager will complete additional risk assessments and co-ordinate with those of the other contractors involved, to identify standards and procedures to be followed in carrying out the tasks to which the risk relates. These shall be communicated during ‘daily briefings’ prior to work commencing.

**6.3.3** Project-specific Risk Assessments and Method Statements including those of Sub-Contractors are to be reviewed by the designated Workplace Manager as a check on adequacy of coverage and consistency of approach prior to any works commencing.

**6.3.4** Method statements will be the subject of ongoing review as work progresses.

**6.3.5** The workplace of expectant mothers shall be evaluated and risk assessed specific to the role they undertake.

**6.4 Performance Monitoring and Auditing of Health and Safety Arrangements**

**6.4.1** There are a number of procedures that will be implemented throughout the Company locations to ensure the monitoring of compliance with legislative requirements and procedures including the Company’s health and safety management system:

Activity	Responsibility
Routine / Workplace Inspections	Workplace Management
Health and Safety Audits	SHEQ Department
Leadership Engagement Visits	Directors and Senior Management
Integrated Management Audits	SHEQ Department

**6.4.2** Workplace Inspections shall be carried out regularly. All projects shall be subject to a regular safety inspection conducted by Workplace Managers reporting on their observations and the required corrective actions.

**6.4.3** The SHEQ Department shall carry out regular and systematic audits and support visits on current live contracts and premises. Audit reports will be issued to a nominated person(s) for immediate action, with copies sent to appropriate Directors(s). The nominated person(s) is required to close put actions from the audit report on the internal system within two working days of receipt (unless more immediate action is required) with full details of all actions taken.

**6.4.4** The outcome of any significant audit findings will be reported to the Board and to all Employees specific to the location.

## 6.5 Communication and Consultation

- 6.5.1** Safe and healthy working practices cannot be achieved without the direct and committed involvement of all Employees. Employees will be consulted about health and safety matters that affect them directly or indirectly, and all Employees are encouraged to make suggestions about possible improvements to our current health and safety arrangements.
- 6.5.2** Communication and consultation will take place directly with the Employees via Department meetings, Management meetings, regular health and safety meetings, tool-box talks, e-mails, newsletters and information posted on the workplace notice boards.
- 6.5.3** Any matter relating to health, safety and wellbeing shall be brought to the attention of the Board Members and Senior Management in the form of specific monthly reports or direct reporting as required; this will ensure specific continual improvement is developed in line with the Company ethos.
- 6.5.4** There is a requirement for all personnel who work at any of the Company locations to receive a site-specific induction prior to commencing any work.

## 6.6 Training and Development

- 6.6.1** The Company recognises that the training, education and professional development of its Employees is critical in maintaining an innovative and dynamic organisation in order to deliver a high quality service to the clients. The Company recognises that the ability of Employees to learn and develop is vital to the effective management of change.
- 6.6.2** The Company is therefore committed to providing a wide range of opportunities to enable its Employees to acquire the skills,

knowledge and qualifications necessary to perform efficiently and effectively in their jobs and deliver the services required. Further details can be found in the Company's "Training and Development Policy".

- 6.6.3** Managers and Employees will undertake a general Programme of Safety Training (such as toolbox talks) relative to their position. Managers will undertake workplace training for supervisory staff and operatives relative to site specific hazards and associated risk control. Training needs shall be continually monitored by the Human Resources and through the Personal Development Reviews (PDR's) and updated as required.

## 6.7 Selection and Control of Sub-Contractors

- 6.7.1** Sub-Contractors used at any Company location must be pre-qualified and listed on the approved Contractors database.
- 6.7.2** The competency of Sub-Contractors is to be established through SSIP and Constructionline assessment, or through the company competence questionnaire. Once the Sub-Contractors competence has been suitably assessed they will be entered onto the Company Sub-Contractors data base with their Health and Safety status highlighted by the traffic light system (Red, Amber, Green).
- 6.7.3** Prior to an order being placed a pre-award meeting will be held with the sub-contractor attended by appropriate members of the project team with minutes issued alongside the Sub-Contractor order.
- 6.7.4** Each Sub-Contractor is to be issued with a 'Sub-Contractor Health and Safety Requirements Document' prior to appointment, which must be signed and the confirmation of receipt returned to the Workplace Manager.

**6.7.5** The workplace management team will regularly monitor the performance of sub-contractors and information on the performance will be recorded and signed by the workplace management team and should be countersigned by the Sub-Contractor or foreman representative. **Where a red rating is noted immediate action will be taken by the relevant Senior Manager** and reported through to the SHEQ Department.

**6.7.6** Sub-Contractors are also subject to ongoing review with the feedback monitored on the Approved Sub-Contractor database.

**6.7.7** At post contract completion the Sub-Contractor's performance is subject to an additional review and analysis to determine suitability for future contracts.

## **6.8 First Aid and Injury Event Arrangements**

**6.8.1** First Aid arrangements will be in compliance with the Health and Safety (First Aid) Regulations 1981 (as amended) where adequate provision will be made at each place of work occupied by the Company.

**6.8.2** A qualified First Aider or nominated individual shall be appointed at project level who will be the initial point of contact in the unlikely scenario an injury event occurs.

**6.8.3** First Aiders are to be identified through their specific induction and their contact details displayed on the Project Health, Safety and Environmental Notice Board or within the Reception of Company fixed locations as required.

**6.8.4** First aid boxes at each location shall be suitably marked and be easily accessible to all Employees at all times when they are at work. The location of first aid boxes are to be known to all workers.

**6.8.5** The above requirements shall be derived from the specific First Aid Risk Assessment.

**6.8.6** Where medical circumstances change following induction it is the individual's duty to ensure that appropriate notification of any such change is made to the Workplace Manager to allow the induction record to be updated accordingly.

## **6.9 Injury Event and Incident Reporting and Investigations**

**6.9.1** All reportable accidents and dangerous occurrences will be reported to the relevant authority by the SHEQ Department. Where appropriate accidents involving members of the general public arising from our work activities will be reported in the same manner as those involving our own Employees .

### **6.9.2 Immediate Reporting of all Incidents to Line Managers in All Areas and Operations**

**6.9.2.1** The Workplace/Project Manager(s) when informed of any injury/ incident events is to report them to the SHEQ Department at the earliest opportunity, no longer than 24hrs.

**6.9.2.2** Reports to the SHEQ Department require completion as per the current documented management system. It is the Workplace Manager's duty to ensure that such a report includes all necessary supporting information.

**6.9.3 Company Arrangements**

**6.9.3.1** Reportable events - The Workplace Manager or Designated Person is required to report the event immediately to the SHEQ Department who will conduct an investigation identifying possible causation and producing a prevention action plan. The Company will ensure that the statutory authority is notified by the relevant methods.

**6.9.3.2** The Workplace Manager will ensure that the relevant Sub-Contractor reports any reportable injuries and diseases to the relevant statutory authority. Any dangerous occurrence on site will be reported to the reporting authority directly by the SHEQ Department.

**6.9.4 Arrangements for Others to the Company**

**6.9.4.1** Contractors are required to inform the Workplace Manager of any injuries or incidents immediately.

**6.9.4.2** The employing Sub-Contractor will report to the statutory authority any reportable event and must also provide an investigation report to the SHEQ department.

**6.10 Work Equipment**

**6.10.1** Given the diverse nature of the work conducted by the Company there will be a vast array of equipment both mechanical and electrical present on site, which requires to comply with The Provision and Use of Work Equipment Regulations 1998 (PUWER) and Electricity at Work Regulations (1989).

**6.10.2** Equipment (Including electrical) which is brought onto any location which is the responsibility of the Company, be it contractor owned or hired, requires to be suitable for the intended task and be complete with any specific in date service certification to ensure compliance. Only Company approved tools and equipment, maintained in compliance with current statutory legislation, shall be used in the workplace.

**6.10.3** The operation of such equipment is only to be conducted by trained and competent personnel, whose certification has been confirmed at the specific site induction. Any personnel found to be operating equipment they are not trained for will be removed from the location.

**6.10.4** No Employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

**6.10.5** Plant Equipment will be inspected prior to use, this is to include daily checks as per the manufacturer's guidance and industry best practice; these checks are to be recorded and signed off by the relevant operator. If any faults are found during both the daily inspections or whilst operating they are to be recorded and reported to the supervisor to allow for immediate repairs.

**6.10.6** Where machines / equipment are not being used they will be securely parked or stored as appropriate. All mobile plant requires being parked in the specific areas as identified by the traffic management plan. They shall be immobilised by way of lock off system or isolator and keys securely stored when not in use to prevent unauthorised access and use.

- 6.10.7** All Vehicles brought to site must have all round visibility and hazard beacons.
- 6.10.8** All lifting appliances and accessories, whether owned by the company or not, must have appropriate thorough examination certification supplied with same and are subject to plant operative daily / weekly checks. This applies to all Sub-Contractor plant being operated on the company sites or premises.
- 6.11 Work On / Near Railway Networks**
- 6.11.1** No person is permitted to work on or near railway lines (including but not limited to platforms, bridges and culverts) unless working to a site / task specific risk assessment / method statement which incorporates current railway specific rules and procedures.
- 6.11.2** Employees who are required to work on the railway networks will have the appropriate knowledge, training and experience including Personal Track Safety (PTS) to deal with each individual task which is required on or near a railway network from Person in Charge of Possession (PICOP).
- 6.11.3** Employees required to work on or near railway lines must also attend a relevant role specific medical assessment as per Rail Operator guidelines. Regular on-line audits are carried out by both the Company and Rail Operator staff.
- 6.11.4** All visitors to such sites must be in possession of a relevant 'Visitor's Pass'.
- 6.12 Work On / Near Watercourses**
- 6.12.1** The correct personal floatation devices (PFDs) or buoyancy aids must be worn by all Employees and Sub-Contractor Employees including all plant operatives when working within 2m of watercourses or unprotected quay edges.

- 6.12.2** Plant operatives may be required to wear manually operated PFDs as per the specific risk assessment on a site. Employees must comply with the provisions of the Company's 'Personal Flotation Device Policy' and the 'Safety and Workboat Policy'.
- 6.12.3** Automatically inflating PFDs and buoyancy aids are classed as PPE and as such must be maintained as per manufacturers' guidelines.
- 6.13 Hazardous Substances - COSHH**
- 6.13.1** The risks associated with hazardous substances require consideration for all work activities both on projects and fixed locations. Alternative less harmful substances are to be used wherever possible.
- 6.13.2** Before any hazardous substances are used during any work process, a material safety data sheet (MSDS) shall be requested from the supplier and an appropriate assessment made of the risks from that substance undertaken by Workplace Manager. Prior to the use of hazardous substance an alternative means requires being assessed where no other means is available, PPE shall be provided by the Company and is to be used by all Employees engaged in any such work activities and health surveillance undertaken where necessary as identified by the specific COSHH Assessments.
- 6.13.3** Inventory of all substances and materials hazardous to health requires being held at both fixed and project locations.
- 6.13.4** Precautions must be taken to ensure the safe storage, use or movement of substances that are flammable, explosive or hazardous to health.
- 6.14 Manual Handling Operations**
- 6.14.1** The need for manual handling of loads will be avoided wherever possible without introducing additional and more serious risks from mechanical handling equipment. Where it is not reasonably

practicable to remove particular manual handling operations, the activity in question will be suitably assessed. All Employees are required to undertake manual handling training as requested.

**6.14.2** Avoid all manual handling so far as is reasonably practicable by:

- Redesigning the task;
- Automating the process;
- Where it cannot be avoided making a suitable and sufficient assessment;
- Reducing the risk of injury from those operations by use of mechanical means.

**6.14.3** Manual Handling operations require a specific training and task related risk assessment developed taking cognisance of the above.

## **6.15 Asbestos**

**6.15.1** All supervisory personnel are required to attend asbestos awareness training courses and refresher training sessions.

**6.15.2** Prior to works commencing on site / premises, all available information from clients or their representatives will be sought and reviewed, such as asbestos registers, associated management plans and current survey reports. A Pre-Demolition Refurbishment survey must be completed and reviewed prior to any demolition or refurbishment works commencing.

**6.15.3** When it is suspected that asbestos has been encountered during the course of work, such areas will be immediately sealed off from site personnel / other third parties who may be affected. No further work will continue until the nature of the materials has been suitably and thoroughly identified by competent persons.

**6.15.4** When asbestos is required to be removed or is in such a condition that it poses a risk to personnel on site and / or members of the public, specialist licensed asbestos contractors

will remove the asbestos. Asbestos removal work will not be allowed to proceed until the method of working, cleaning and isolation has been agreed with the licensed asbestos contractor and all statutory notifications to the relevant enforcing authorities have been made.

**6.15.5** In all instances works will not commence in areas where asbestos has been identified unless it is in a safe condition and that we can conduct our works without the possibility of disturbing the asbestos.

## **6.16 Welfare Facilities**

**6.16.1** All welfare arrangements at the Company locations are to be in compliance with the relevant statutory regulations.

**6.16.2** A specific assessment must be carried out to determine the welfare requirements and arrangements, as a minimum to include:

- Toilet facilities (Male, female and disabled);
- Canteen and kitchen facilities;
- Drying facilities;
- A storage area with lockers (as required);
- Shower Facilities (as required).

**6.16.3** For transient projects this will be in place prior to any works commencing on site.

**6.16.4** Directors will ensure that appropriate welfare facilities are provided throughout the business and maintained according to the size of the workforce and nature of the work.

## **6.17 Fire and Emergency Procedures**

**6.17.1** To ensure compliance all transient projects and fixed locations are to develop specific fire and emergency plans, coupled with specific risk assessments.

- 6.17.2** These plans require being maintained and developed / updated to ensure compliance at all times and require being displayed on the Health, Safety and Environmental Notice Board.
- 6.17.3** Each location requires having trained fire wardens. The number required will be established through specific assessment.
- 6.17.4** The wardens are to be aware of their specific duties. Their names, location and contact details are to be known to all Employees and workers and highlighted in the specific induction.
- 6.17.5** On Retail Projects there is a mandatory requirement for all fire wardens to also be trained in the Hot Works Passport Scheme.
- 6.17.6** In the event of a fire evacuate the working area to the designated assembly point.
- 6.18 Personal Protective Equipment (PPE)**
- 6.18.1** Appropriate PPE will be issued to Employees when necessary for work activities. All PPE requests are to be submitted by the Workplace Manager to Procurement.
- 6.18.2** Employees shall in accordance with current safety standards use only PPE which is supplied and made available for their benefit.
- 6.18.3** Training will be provided for Employees on the safe use, storage and maintenance of relevant equipment before issue and a written record detailing what PPE has been issued will be signed by the Employees on receipt of the equipment and the hard copy kept on file.
- 6.18.4** Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements and ensure the PPE is maintained correctly.
- 6.18.5** Any defects or malfunction of PPE must be reported to the specific Workplace Manager or SHEQ Department.

- 6.19 Electricity**
- 6.19.1** Electrical equipment used and owned by the Company should comply with the requirements of the Electricity at Work Regulations and the current edition of the IET Wiring Regulations.
- 6.19.2** Where portable equipment is supplied for use on site, it will be of as low voltage as is reasonably practicable, e.g. 110 volts and will be suitable for the environment in which it is to be used. All Employees and Sub-Contractors using Company equipment must report defects immediately to their Line Manager / the Company Supervisor.
- 6.19.3** Electrical equipment on Company premises must be adequately maintained and serviced at appropriate intervals by suitably trained and experienced electricians and as per the IET Code of Practice for In-service Inspection and Testing of Electrical Equipment. If any item is found to be faulty it shall be taken out of service immediately until it can be suitably repaired.
- 6.19.4** Where work is in the vicinity of overhead or underground services, specific risk assessments and method statements will be compiled for such activities. Current best practice Health and Safety Executive and appropriate trade association guidelines should be consulted.
- 6.19.5** When maintenance work is required to be carried out on large fixed items of electrical equipment and / or electrical supply units, a safe method of working will be employed that will ensure that this equipment is de-energised where possible and is suitably isolated and locked off to prevent it from being accidentally operated.
- 6.20 Lone Working**
- 6.20.1** Any Employee who carries out lone working as a 'normal' part of their work activities, must be instructed in best practice lone working procedures and adhere to them at all times.

**6.20.2** Where lone working is not a `normal' part of work duties, individuals must report such lone working to their line manager before such work commences. No manager should permit lone working on construction sites or Company premises before a risk assessment for the activity has been completed, and the Employee is fully appraised of the safe method of working. In all instances the need for lone working will be avoided so far as is reasonably practicable.

## **6.21 Health Surveillance**

**6.21.1** The Management of Health and Safety at Work Regulations 1999 as amended require an employer to “ensure that Employees are provided with such health surveillance as is appropriate” following a risk assessment process.

**6.21.2** The requirement to ensure that Employees are placed under health surveillance in relation to noise, dust, vibration and symptoms of dermatitis which goes beyond simply making a system of health surveillance available to an Employee. It requires an employer to take steps in offering an Employee the opportunity to attend appointments.

**6.21.3** Within the Company each Employee will receive a communication in advance of the appointment detailing the date, time, venue and a leaflet explaining health surveillance at work including a confidential medical questionnaire.

**6.21.4** For the Company, Health Surveillance is about managing and identifying the early signs of work related ill health in Employees who may be exposed to certain health risks and as such the Company recognises that it has a duty of care to assess and identify measures to eliminate or reduce risks from exposure to workplace hazards.

**6.21.5** To ensure compliance the Company uses an external occupational health provider to enhance the wellbeing and safety of Employees at work.

**6.21.6** The external occupational health provider provides the following:

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- Pre-employment assessments;
- Provision of the Company’s Health Surveillance Programme;
- Provision of the Company’s Life Style Health Checks; and
- ‘Random’ and ‘For Cause’ Drug and Alcohol testing.

## **6.22 Drugs and Alcohol Testing**

**6.22.1** The Company continues to forbid the use of illegal substances and alcohol during working hours. Abuse of controlled substances (illegal, prescribed and some over-the-counter drugs) and alcohol can create serious risks to the safety of Employees, Sub-Contractors and members of the public.

**6.22.2** To monitor this the company shall conduct unannounced ‘Random’ and ‘For Cause’ drug and alcohol testing of any persons under its control or who are on site or premises which are under its control.

**2.22.3** Any disciplinary proceedings which arise out of a breach of the Company’s Drug and Alcohol Policy will be dealt with under the Company’s Disciplinary Policy.



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Document Title:	Group Policy: Health, Safety and Wellbeing
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Process Owner:	Group SHEQ Director

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