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1.0 Corporate Health & Safety Policy Statement

Primary Guidance: What you need to know

It is the policy of M Moser Associates Ltd (M Moser Associates) to develop a positive health & safety culture throughout its organisation and as such, believes that health and safety standards are a pre-requisite in the pursuit of company efficiency and competitiveness. M Moser Associates therefore acknowledges its legal and moral responsibilities for the safety, health and welfare of its employees and all other persons whose health and safety may be affected by the company's activities.

M Moser Associates recognises that it has the ultimate legal responsibility for health and safety and clearly demonstrates this through effective policies and commitment to continued improvement. The Head of Office (H.O) accepts overall responsibility for policy formulation and implementation. In turn, all levels of management and all supervisory staff are responsible for carrying out health and safety duties placed upon them. The H.O will ensure that the corporate safety strategy includes sufficient resources for the successful implementation of the health and safety management policy. This is achieved through active monitoring and review as well as committing to the continuing improvement of health and safety performance.

Adequate financial, human and other resources will be made available to ensure the effective implementation of the policy and where identified, the provision of training or specific assessments for employees. The primary element of the policy is to prevent, as far as is reasonably practicable, injury or ill health, both to employees and other persons who may be affected by the actions of the Company. M Moser Associates will communicate the policy to employees, people engaged on a contractual basis and all others who may be using or visiting Company premises. All personnel will be directed to the policy detail to ensure their understanding of carrying out required work in a manner that does not expose themselves or others to risk.

The requirement to communicate all relevant safety matters will be facilitated by whatever means is deemed to be the most effective for particular situations and will include toolbox talks (site projects) the use of ICT systems (electronic communication), meetings/departmental briefings, notice boards or consultation with individual employees and will be supported by documented means where necessary/appropriate, e.g. memorandums, minutes of meetings. Equally the demonstration of good practice by senior management is considered essential in order to reinforce the safety culture of this organisation.

The Company actively encourages participation in all matters relating to health and safety by ensuring that the appropriate means for reporting of safety and welfare issues are provided and suitable arrangements for consultation.
Appropriate action will be taken should there be any breaches of established health and safety regulations or rules by any person(s).

Where appropriate, the monitoring and review of the Company’s health and safety management policy will be carried out under the direction of the appointed competent person(s) to determine performance against stated aims and objectives and will be amended where legislation, changes to working practices or new hazards necessitate this.

1.2 Occupational Health and Safety System

M Moser Associates recognise that in order to prevent injury and ill-health to persons affected by our practices then a robust Occupational Health and Safety (OHAS) System that has been embedded into the business is essential. Our OHSAS has been prepared to manage our Principal Contractor functions, as required, under the Construction (Design and Management) Regulations 2007 (CDM). The OHAS has been designed to consider OHSAS 18001:2008, Occupational Health and Safety Management Systems – Guidelines for the implementation of OHSAS 18001: 2007.

Under CDM we must:

- Satisfy ourselves that clients are aware of their duties, that a CDM co-ordinator has been appointed and the Health and Safety Executive notified before we commence work.
- Ensure that we are competent to address the health and safety issues likely to be involved in the management of the construction phase.
- Ensure that the construction phase is properly planned, managed and monitored, with adequately resourced, competent site management appropriate to the risk and activity.
- Ensure that every contractor working on a project is informed and clearly understands the minimum amount of time they will be allowed for planning and preparation before they commence on site;
- Ensure that contractors are provided with relevant information about the project in order for them to carry out their work safely and without risk to health. Requests from contractors for information will be met promptly;
- Ensure safe working and co-ordination and co-operation between contractors;
- Ensure that a suitable construction phase plan (‘the plan’) is:
  1. Prepared and implemented;
  2. Developed in discussion with, and communicated to, contractors affected by it;
  3. Implemented; and
4. Kept up-to-date as the project progresses.
   - Ensure that designers and contractors engaged are both competent and adequately resourced;
   - Provide suitable welfare facilities at the commencement of the construction phase;
   - Ensure all reasonable measures are taken to prevent unauthorised access to site;
   - Specify and enforce site safety rules;
   - Ensure that accurate information is provided to contractors and the self-employed, in sufficient time for them to plan their work;
   - Liaise with the CDM co-ordinator on design carried out during the construction phase, including design by specialist contractors, and its implications with the plan;
   - Provide the CDM-co-ordinator with all information relevant to the health and safety file;
   - Ensure that all workers are provided with suitable health and safety induction, information and training;
   - Ensure that the workforce is consulted on all relevant health and safety matters;
   - Clearly display the Project Notification.

1.3 Business Sector and Operations

M Moser Associates recognise that construction is one of the UK’s most dangerous industry sectors to work in and significant health and safety hazards and risks are associated with its business operations; these have been captured within the arrangements section of this policy, to include:

- Working at height;
- Manual Handling;
- Slips and Trips;
- Gas;
- Fire;
- Asbestos; and
- Electrical.

M Moser Associate’s legal register lists all the identified health and safety risks and the associated statutory requirements; these details can then be used to track, monitor and successfully manage the organisations activities. The health and safety legal standards to which our business operates to includes:

- Confined Spaces Regulations 1997
- Construction (Design and Management) Regulations 2007
- Control of Asbestos Regulations 2006
- Control of Noise at Work Regulations 2005
- Control of Substances Hazardous to Health Regulations 2002 (as amended 2003, 2004)
- Electricity at Work Regulations 1989
- Gas Safety (Installation and Use) Regulations 1998
- Health and Safety at Work etc Act 1974
- Health and Safety (Consultation with Employees) Regulations 1996
- Health and Safety (Display Screen Equipment) Regulations 1992 (as amended 2002)
- Health and Safety (First Aid) Regulations 1981
- Health and Safety (Signs and Signals) Regulations 1996
- Health and Safety Information for Employees Regulations 1989 (as amended 2009)
- Lifting Operations and Lifting Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999 (as amended 2003, 2006)
- Personal Protective Equipment Regulations 1992
- Pressure Equipment Regulations 1999
- Pressure Systems Regulations 2000
- Provision and Use of Work Equipment Regulations 1998
- Regulatory Reform (Fire Safety) Order 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Safety Representatives and Safety Committee Regulations 1977
- Work at Height Regulations 2005 (as amended 2007)
- Workplace (Health, Safety and Welfare) Regulations 1992
### 1.4 Policy Authorisation:

As the undersigned Director of M Moser Associates Ltd, London I accept full responsibility for the implementation of the Company's Health & Safety Policy and will ensure that operations throughout the Company comply and conform to the statement of intent.

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Charlie Millard

Director, Head of Office

Date

### 1.5 Non – Observance

It is the duty of all employees to comply with all systems put in place at work to protect their health and
safety. Employees found to be in repeated breach of this policy are liable to disciplinary action.
The Organisation

Company Overview
Primary Guidance: M Moser Associates Associates Ltd

M Moser Associates is a global firm specialising in the creation of workplace environments offering complete ‘turn-key’ and integrated solutions.

The Company acts as Principal Contractor and designer for internal office refurbishment and client fit-out projects. Client’s business objectives and needs are met through M Moser Associates’ integrated ‘turn-key’ solutions.

All projects are supported by a core team of talented and experienced professionals drawing upon interior architecture, interior designers, strategic planners, Mechanical and Electrical (M&E) engineers, technology specialists and construction expertise. Where professional expertise may not be immediately available in-house it will be mindfully engage the services of an external accredited, competent body or person from tried and tested collaborative partners.

Setting Objectives

M Moser continually assesses health and safety performance by setting measurable objectives on both a corporate and project specific level.

It is the aim for objectives to be SMART: Specific, Measurable, Achievable, and Realistic with a Timescale for implementation.

When formulating objectives management will consider:

- Compliance with M Moser Associates’s statutory duties,
- Health and safety hazards and risks
- Financial, technical, operational and business issues.
2.0 Roles and Responsibilities: Health and Safety Reporting Structure
Director, Head of Office

Primary Guidance: Directors Responsibility for Health and Safety

Responsibilities:

The Director, Head of Office has overall responsibility for implementing and achieving the objectives as detailed in the health and safety policy statement. This will be achieved by:

- Ensuring that health and safety is seen as the primary element of the Company’s operations.
- Ensuring that the health & safety aims and objectives are included in the Company’s business planning process.
- Ensuring that each member of the Company’s senior structure fully understands and accepts their group and individual role in providing health and safety leadership within the organisation.
- Implementing an effective reporting structure that ensures all relevant/significant health and safety information is received and responded to in a timely manner.
- Ensuring that health and safety performance is an agenda point at board meetings.
- Ensuring that appropriate resources are made available for implementation of the Company policy.
- Ensuring that the Company health and safety policy is effectively communicated to all personnel and any other parties affected by its operations.
- Periodically reviewing the policy (at least annually) to ensure its appropriateness.
- Promoting the Company commitment to health and safety at all times.

Note: The Director, Head of Office may delegate responsibilities to other senior managers, however, it is recognised that when delegating responsibilities the Head of Office ultimately remains fully accountable and responsible for the policy and its application.
Associate Director

Responsibilities:

- Effectively supports the Director, Head of Office in implementing and achieving the objectives as detailed in the health and safety policy statement
- Assists the Director, Head of Office in policy reviews
- Identifies potential areas of non-conformity to policy and ensures that appropriate remedial responses are implemented
- Identifies training or assessment needs for direct reports
- Ensures design change implications are communicated to all relevant parties
- Reviews safety performance post project identifying learning points

Associates (Designers)

Designers have a duty wherever reasonably possible to eliminate/remove potential hazards and reduce/minimise associated risks at the planning stage of a design whilst always considering the client requirement;

- Adequate information to be provided where potential risks are identified within a design
- Design work must co-ordinate with that of others in order to manage and control risks
- Account to be taken of all relevant health and safety requirements when carrying out design work, e.g. upon completion of projects the structures/buildings that have been handed over will generally become a ‘workplace’ and as such the designer must take into account the provisions of the Workplace (Health, Safety and Welfare) Regulations 1992 which relate to the design of structures, or materials used in them.

Project Compliance Manager

- Maintain and control health and safety procedures and documents
- Monitor construction site set up arrangements
- Regularly liaise with health and safety advisors regarding compliance with in-house management system
- Coordinate meetings and information with site contract managers
- Coordinate information to be entered into the health and safety files and operational and maintenance manuals.
- CDM responsibilities
Project Manager

- Pre-construction information to be received in sufficient time from clients and/or CDM co-ordinators (where projects are notifiable under CDM 2007) to enable, prior to commencement, a Construction Phase Health & Safety Plan that reflects the size and complexity of the project to be developed
- Contractors to be sufficiently vetted for competency prior to engagement to work on projects
- First party (internal) auditing where projects are significant by duration or complexity
- Procedures to be in place for effective co-operation, co-ordination and communication between all parties
- Training needs to be identified, assessed and managed
- Accidents and incidents that are notifiable to be reported in line with the requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) (report to Project Compliance Manager who then forwards to Office Manager/Insurers)
- M Moser Associates’ commitment to health and safety to be promoted at all times when representing the Company

Site Managers (Contractors)

Site managers are responsible for managing general site safety and environmental matters throughout a project. General duties:

- Significant site incidents must be recorded and reported to senior management / Project Compliance Manager at the time of occurrence
- Minor accidents/incidents to be recorded and an appropriate level of investigation is to be carried out
- The project activities and working practices of direct and indirect reports are to be monitored using appropriate means of recording, i.e. checklist templates
- Welfare and first aid arrangements to be in place at the time of site set up
- Site rules to be established and an effective means of communicating them to be in place
- Contract workers to be provided with generic and project specific safety information prior to their commencing work
- Principal contractor risk assessments and other documents relating to safe working methods must be appropriate and suitable for the project and communicated to all affected parties
- Suitable and relevant safety and information signage to be clearly displayed
- An emergency plan to be developed and fire safety plans to be in place
- Relevant inductions to be provided and effectively managed for all site personnel
- A COSHH file of assessments and safety data sheets to be established
- Provision for effective dialogue through scheduled meetings and the provision of toolbox talks
- M Moser Associates’ commitment to health and safety to be promoted at all times when representing the Company

**Office Manager / HR**

- Responsible for interviewing appropriate candidates according to job role requirements and ensuring they are adequately trained and experienced.
- Ensuring Occupational Health of workers is considered and any improvements required implemented (for example workstation / chairs etc)
- Monitoring the sub contractors used for works within the Office to ensure they are competent.
- Reporting any issues with the office/building to the Building Manager for immediate rectification.
- Arranging appropriate training relevant to job role.

**Contractors/Operatives**

- Risk assessment procedures to be in place for developing and implementing the safe systems of work and method statements
- Site safety to be adhered to at all times and consideration given to those who may be affected/impacted by the actions of others
- Work to be carried out only by those competent and qualified to do so
- Advice, information and guidance on health and safety matters to be sought as and when required
- Instruction/information/guidance to be sought from the principal contractor and/or those contained within the arrangements section of this policy; to be complied and conformed with at all times
- Safety and welfare concerns to be reported at the time of occurrence
- ‘Near misses’ and incidents to be reported as well as accidents resulting in harm or damage in order to enable remedial actions to be established before further incidents occur

**External Health and Safety Support**

Third party health and safety advice is provided by Workplace Law Group Ltd to include;

- Electronic and telephone support and advice
- Assistance with accident investigation if required
3.0 Health and Safety Arrangements

3.1 Training

Primary Legislation: The Health & Safety at Work etc. Act 1974

It is a legal requirement for employers to train employees on processes, equipment and arrangements they will need in the course of their work.

M Moser Associates puts great store in maintaining a safe working environment and views the training of its employees, in the correct and safe way of doing their jobs, as a key contributing factor.

M Moser Associates identifies through skills and job role analysis, the training required for roles within the organisation. The factors that determine the scope and frequency of training are governed by:

- Risk Assessment;
- Legal Requirement;
- Individual job reviews and appraisals;
- Health and Safety audits;
- Accident investigations; and
- Individual training requests

The result of the analysis is documented within a training matrix which is accessible on the Company's internal intranet system.

As further evidence of M Moser Associates’ commitment to training and personal development the following arrangements shall be employed by the Company:

- Employees will receive training appropriate to the work they are engaged to carry out. Where a specific task requires refresher training it will be provided before any established expiry date.
- For activities requiring advanced skill sets specialised training may be considered appropriate. Where relevant the Company may consider engaging the services of an external accredited, competent body or person to provide appropriate training.
- Any reasonable request/instruction by others e.g. clients or landlords, to participate in specific training relating to work within their areas of control will be fully considered as M Moser Associates recognises it as contributing to a safer working environment.
- Contractor competencies: it is a requirement of the contractor selection process that company(s) or individuals have received training appropriate to the work to be undertaken and where applicable have obtained qualifications to substantiate.
A complete record of all training will be maintained within a health and safety training matrix; it is the responsibility of the Office Manager to maintain this document.
3.2 Construction, Design and Management

Primary Legislation: Construction (Design & Management) Regulations 2007 (CDM)

It is important that those who contribute to the health and safety of a construction project understand what they and others need to do to prevent injury and ill-health as well discharging their legal responsibilities. M Moser Associates recognises that as part of its normal operations they will undertake the roles of Designer and Principal Contractor as prescribed under the CDM operations.

The following general arrangements will be implemented in order to ensure that construction work is carried out without risks to health and safety, as far as reasonably practicable, and in accordance with statutory provisions.

Designer Duties

M Moser Associates acknowledges the responsibility of designers to eliminate and reduce health and safety hazards and potential risks within a construction project, and as such:

- Are committed to implementing the CDM regulations;
- Are committed to an ongoing learning process;
- Considers CDM as intrinsic to the design process.

These applied principles support the implementation of CDM and demonstrate the commitment of the Company in minimising risks to the health and safety of its employees and all others. CDM places specific duties on designers which can be summarised as follows:

- a) Commence work only once the client is fully aware of their duties and responsibilities;
- b) Remove potential risks, wherever possible to do so, focusing on hazard elimination;
- c) Consideration given to those carrying out construction work, affected by construction work, those cleaning windows roofs or other transparent surfaces, or using structures as a workplace;
- d) Take account of the workplace (Health, Safety and Welfare) Regulations 1992; and provide sufficient information to all members of the team to allow them to discharge their duties effectively

M Moser Associates recognises that those responsible for design must understand CDM and the main principles behind the regulations, which are, in order:

- to make the dangerous non-dangerous, i.e., eliminate hazards wherever possible to do so; or
- to make the dangerous less dangerous, i.e. reduce the chances of the hazard occurring; and then
provide sufficient information about residual hazards to enable the contractor to manage the hazards on site.

This can be summarised by applying the design hierarchy of control:

1. Eliminate;
2. Reduce;
3. Inform;
4. Control.

Most of the control activity will be the responsibility of the contractor or principal contractor.

A designer specifying a construction process may potentially create a hazard, with the specified process exposing workers to harmful side effects. For example:

- Cutting materials and fabric on site creates noise and vibration risks
- Solvent based paints may create harmful vapours

To prevent, as far as it is possible to do so, the creation of hazard guidance documents containing ‘good practice’ have been prepared and in addition procedures for demonstrating compliance with our legal responsibilities. These documents should be implemented across the whole practice.

Practice CDM policies, procedures and guidance documents are subject to continual review which should incorporate:

a) Feedback from site;
b) Project appraisals;
c) Changes in legislation, best practices, case studies and root cause accident/incident investigations.

**Principal Contractor Duties**

The Principal Contractor is responsible for all contractors, workers and others (e.g. visitors) on site and for planning, managing and monitoring the construction phase in a way that ensures, so far as is reasonably practicable, that it is managed without risks to health and safety.

In striving to achieve goals of minimising accidents, injuries and ill health to employees and others, M Moser Associates implements systems to facilitate and effectively plan, manage and coordinate all construction work.

M Moser considers it essential that as principal contractor, its employees are fully aware of its own and other CDM duty holders (client, designers, CDM Coordinator and contractors) responsibilities. M Moser Associates has developed systems, procedures and access to technical guidance to support employees in this process.
It is M Moser Associates’ intention that contract and site managers place health and safety at the forefront of meeting agendas and will review the health and safety implications of all decisions. This is of particular importance if changes arise during a project.

M Moser Associates recognise that time is a resource and having a properly managed period before commencing work on site will ensure that all parties are fully aware of their requirement in ensuring the smooth running of each and every project. Contractors will be informed in sufficient time to facilitate planning and preparation before commencement on site.

Critical to the success (minimising accidents, incidents and ill health) of a construction project the development of a site specific Construction Phase Plan is essential. M Moser Associates requires that a plan, suitable to the size, scope and complexity of a project, is prepared, communicated and implemented at all times. A hard copy of this plan will be held on site and made easily accessible to employees and others to review its contents. In order to assess and maintain the effectiveness of this plan M Moser Associates will review and assess the adequacy of this document, achieved through:

- Periodic site inspections
- Periodic site audits
- Providing opportunities for operatives and sub-contractors to discuss and raise any health and safety issues during the construction phase.

**In House CDMC**

An In house CDMC service is offered to clients by M Moser. The CDMC for all notifiable projects when appointed is responsible for:

- Collating Pre construction information for the Project Team
- Explaining CDM Regs and Roles and Responsibilities to the client team.
- Submit the F10 Notification
- Ensure communication within the team is maintained
- Communication with the Project team including designers
- Reviewing the Construction Phase Plan and Risk Assessments
- Issuing the O&M Manuals and Health & Safety File at the end of a project.

**Contractor Competence and Safety Performance Monitoring:**

M Moser Associates as the employing company are ultimately responsible for the actions of contract labour on projects they manage.

The definition of a contractor (under CDM 2007) is “anyone who directly employs or engages construction workers or controls or manages construction work”
A significant element of M Moser Associates’ operational activity involves the use of contractors and sub-contractors, it is therefore vital that effective controls are instituted by the Company. These controls to include:-

- Contractors to have the correct procedures in place to carry out risk assessments and the development and implementation of safe systems of work or method statements; risk assessments and other documents relating to safe working to be appropriate and adequate.
- Ensuring contractors fully co-operate with the Company as the principal contractor and provide details of those they engage to work on their behalf; assisting in the development of construction phase health and safety plans.
- Ensure contractors co-operate and co-ordinate their scheduled works with others.
- Contractors to provide workers under their control with inductions (where not provided by the principal contractor) and appropriate information relevant to all other contractors’ work and site safety.
- The competence of contractor companies/contractors to be determined by the Company prior to engagement and to be supported by appropriate documentation/certification, copies to be retained.
- Contractors and other third parties (e.g. visitors) MUST receive a site induction (as a minimum) and to be provided with relevant information/training.

Although inductions are not intended to provide general health & safety training, the Company views them as an effective means of communicating site specific details including M Moser Associates’ commitment to safety.

In maintaining a current and valid ‘approved list’ M Moser Associates will continue to monitor the health and safety performance of its contractors through:

- Site meetings with the managers of the sub-contractors;
- The identification of areas of non-compliance through the project appraisal process;
- Site inspections
- Periodic reassessment through means of questionnaires and references.

**Client Duties**

Within the London office, M Moser Associates are tenants operating under a landlord agreement with the building owner. As such M Moser complies with the requirements of the landlords lease agreement whilst ensuring that the landlord maintains a safe working environment for its employees. It is therefore recognised that in this relationship M Moser Associates would not be responsible to act as a client for construction works carried on its premises under the CDM regulations.

These duties will be monitored and anticipated as part of the ongoing review of our policy should this situation change.
3.3 Communication & Consultation

Primary Legislation: The Information and Consultation of Employees Regulations 2004

The most common definition of communication is ‘the right information, to the right people at the right time to enable them to make appropriate decisions’ (on health and safety issues)

Company arrangements for communication will be tailored to match the size and nature of projects and the risks involved. The engagement of workers through communication of health and safety matters on projects is provided for by a combination of:

Site inductions, including:

- An outline of the project
- Individual responsibilities
- Site rules
- Emergency procedures
- Security
- Safe methods of working and control measures
- General arrangements for health and safety, e.g. welfare facilities; first aid arrangements emergency procedures, accident reporting, PPE

Toolbox talks (Information and training)

- Toolbox talks are short, informal site based talks relating to specific health and safety issues and are designed to improve awareness and understanding of health and safety issues amongst site operatives; they are an effective means of engaging workers in the two way dialogue that is important in developing communication.
- Information to be imparted should include particular risks associated with the project, including information received from designers relating to any residual risk, i.e. risk that cannot be designed out.
- Reviews of ‘live’ documents such as method statements are also used as topics for toolbox talks and are an effective way of gaining worker involvement in identifying the safest and most efficient ways of carrying out work.
- Where required, basic training in how to work safely in situations identified by specific risk assessments should be provided.

Other methods of site communication
• Notice boards as a visual way of providing information from a variety of sources, which may include minutes of meetings, accident/incident data and safety alerts.

• Posters for immediate visual impact.

• Suggestion boxes for workers who may have pertinent ideas but would prefer to remain anonymous.

• Individual consultation if requested or deemed to be beneficial.

• Senior management acting and leading by example.

Communicating with employees:

Health and safety matters will be communicated to staff within the business divisions of the Company by a combination of electronic communication, e.g. e-mails, workforce memorandums, notice boards, group meetings/departmental briefings or individual consultation.

When communicating with staff/workers, allowance may have to be made for those persons who have reading and writing difficulties and for those may not fully understand English. In such situations written instruction will be supported by images and symbols and where necessary the use of a translator may be considered.
3.4 Accident Reporting and Investigation

Primary Legislation: *The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013*

Accidents and incidents

Whilst the prevention of accidents, ill health and dangerous occurrences is the primary objective of this health and safety policy, it is recognised that they can still occur. In the event of an accident/incident or instance of ill health arising from a work related activity, the following will apply:

All accidents and significant incidents will be recorded by means of: The Company/premises accident book or a ‘field’ accident report book when carrying out contract work on site i.e. projects/contracts.

The details of any such record will be reported to the Site Manager within 24 hours of the occurrence.

The Director, H.O or other nominated person will be notified immediately of accidents that result in significant harm or damage.

Once the Director, H.O has been made fully aware of the circumstances the other nominated individual is responsible for informing the relevant authorities under the regulations of Reporting of Incidents,

**Dangerous Occurrences and Diseases Regulations;**

**Reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations:-**

- Accidents resulting in more than 7 days absence from work must be reported using form F2508
- In the event of an employee suffering a reportable work related disease, form F2508A to be used
- Dangerous occurrences may not necessarily result in harm or a reportable injury but nevertheless they must be reported immediately, e.g. by telephone and a report using form F2508 which shall be sent within ten days of the event.
- Accidents requiring ‘significant’ first aid treatment must be reported immediately to the client as with incidents resulting in significant damage to land or property.

**Accident Investigation**

Accidents or incidents resulting in injury or damage, or having the potential to cause harm, disease or damage will be investigated by the Company. The investigation and subsequent findings shall be appropriate to the scale and significance of the incident.

In the event of a serious incident, accident, near miss or dangerous occurrence M Moser Associates will liaise with its insurers and carry out where judged necessary, an investigation to make safe any equipment
or substances involved, prevent recurrence, obtain full details of the incident to enable a report to be compiled, or to assist the investigating inspector, or provide information for insurance purposes.
3.5 Risk assessments and Method Statements

Primary Legislation: The Management of Health and Safety at Work Regulations 1999

Risk assessments are not only a legal requirement but are a proactive means of mitigating health and safety hazards and risks and are fundamental in identifying risk control measures including safe systems of work, training requirements, engineering and management controls.

The concept of risk assessment is to focus on serious risks within the workplace with potential to potentially cause real harm.

In principle a risk assessment is simply a careful examination of what, in the workplace could cause harm to people; M Moser assesses whether sufficient precautions are in place or should more safety measures be considered.

It is M Moser policy that risk assessments are only carried out by competent personnel with staff kept informed and updated. The importance of keeping staff informed not only assists in the early identification of potential hazards but also provides assurance but averts new hazards arising. M Moser recognises that employees are more likely to embrace risk control strategies if they have been involved in the process.

In all cases, precautions and existing control measures should be compared with good practice and to assist a library of HSE ‘good practice’ guidance documents has been prepared and is available to all employees on our internal intranet.

When considering additional control measures M Moser Associates will support the application of the recognised health and safety control hierarchy, if possible in the following order:

1. Eliminate (can the hazard removed altogether);
2. Try a less risky option (e.g. switch to using a less hazardous chemical);
3. Prevent access to the hazard (e.g. by guarding);
4. Organise work to reduce exposure to the hazard (e.g. put adequate barriers between pedestrians and traffic);
5. Issue Personal Protective Equipment (e.g. clothing, footwear, goggles etc) and
6. Provide welfare facilities (e.g. first aid and washing facilities for the removal and contamination).

In certain circumstances and in accordance with specific legislation, it may be necessary to employ a competent person to undertake specialist risk assessment, to include but are not limited to:

Manual Handling, Pregnant workers, Fire, Display Screen Equipment, Hazardous Substances, Noise, Vibration, First Aid, Personal Protective Equipment, Work at Height, Confined Spaces and Asbestos
M Moser Associates will ensure that employees are consulted on the content of risk assessments and that they are easily accessible for review. Copies of risk assessments are retained and filed in a formalised, accessible manner on the organisation's internal intranet system.

Risk assessments will be reviewed where appropriate or in special circumstances, which may include:

- A change in legislation
- The introduction of a new process, equipment or new working practices;
- A change in personnel;
- As the result of an accident;
- In light of new technology or information.

**Method Statements**

Where a specific procedure (method statement) is required it will be drafted by a competent person with the assistance of one or more of those whose job involves carrying out the task concerned and with reference to specific risk assessments.

Once the specific task method statement is agreed, it will be signed and dated by both the competent person and those who assisted in putting it together. As from that date, no person may undertake the task concerned other than by following the documented procedure and no individual is permitted to follow the procedure unless they have been trained to do so. They will be considered to have been trained when a copy of the method statement has been signed and dated, both by the trainee and by the trainer, and then placed on the individual’s personnel file.

Deviation from a method statement is only permissible following an appropriate level of assessment on the safety implications of any such change, and with authorisation by a senior person on the site.
3.6 First Aid Provision

Primary Legislation: *The Health and Safety (First Aid) Regulations 1981*.

Each year some 1.5 million people are injured at work and many others fall ill during working hours. Whilst many of these injuries and illnesses will be minor, each case will require some sort of attention. The presence on site of an individual, or group of individuals, capable of either administering help or taking charge of a situation, especially in an emergency, must be of benefit to us all.

Under the terms of the Health and Safety (First Aid) Regulations 1981 and their corresponding approved code of practice and guidance, there is a requirement to provide equipment, facilities and people adequate and appropriate for treating individuals (at least in the first instance) who are injured or who may fall ill whilst at work. What is adequate and appropriate is defined as being related to circumstances, and recommendations to consider are as follows:

1. the outcome of workplace risk assessments (in particular, details relating to any specific hazards that cannot be eliminated or adequately reduced by engineering controls)
2. recorded incidents relating to previous accidents and/or ill health
3. employees with disabilities and identified health problems
4. numbers of trainees on site
5. layout of premises
6. ease of emergency services to attend site
7. pattern of hours (late night working/shifts).
Arrangements to apply:

Details of trained First Aiders

<table>
<thead>
<tr>
<th>Name</th>
<th>Job Title</th>
<th>Location (site / office)</th>
<th>Contact #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lorna Killick (from 17th Dec)</td>
<td>Office Manager</td>
<td>Office</td>
<td>Ex: 5400</td>
</tr>
<tr>
<td>Stuart Curd</td>
<td>Site based Project Manager</td>
<td>Site</td>
<td>07595 206 905</td>
</tr>
<tr>
<td>Andy Weller</td>
<td>Site Manager</td>
<td>Site</td>
<td>07709 090 152</td>
</tr>
<tr>
<td>Kevin Cheung (from 17th Dec)</td>
<td>IT</td>
<td>Office</td>
<td>Ex: 5400</td>
</tr>
</tbody>
</table>

Named First Aiders are responsible for checking and replenishing first aid boxes; names will be displayed on both the site and office notice boards.

First aid and medical assistance must only be given by qualified persons; if given by someone unqualified the person giving the assistance may be considered liable. Unless an employee is in possession of a valid first aid certificate (or he or she is a qualified and practising doctor or nurse), first aid and medical assistance must not be given.

It is the responsibility of the appointed person (or deputy) to call for an ambulance, or request that someone does this on their behalf, should they feel a situation requires the immediate presence of a paramedic team.
Record Keeping Arrangements

It is policy of M Moser Associates that only those trained in First Aid at Work and/or Emergency First Aiders, by a HSE approved supplier, enter details of all incidents in to the Accident book. Details to be recorded as follows:

- Date and time at which an incident occurred
- Location
- Name of injured or sick person(s)
- Nature of injury or illness
- Nature of the first aid assistance provided (if provided)
- Immediate outcome following first aid provision (if provided) (e.g. the person was taken to hospital and by whom)
- Name and signature of the person completing the record and the date on which the entry was made.
3.7 Fire Precautions

Primary Legislation: The Regulatory Reform (Fire Safety) Order 2005

In addition to having the potential to cause personal tragedy, most workplace fires also damage or destroy premises and equipment. Damaged or destroyed premises or equipment cannot be used. Lay-offs, redundancies and even closures may be the outcome, depending on the extent of the damage or destruction that occurs.

Most fires start in a small way, but any other combustible materials nearby could soon catch light as well. As these materials burn, hot gases and smoke rise up and collect at the top of the workspace in question. Highly charged with energy, these gases and smoke radiate heat down onto what is beneath them. As the fire continues to ignite more material in its immediate vicinity, more hot smoke and gases will rise to the ceiling. As they do so, they push existing gases and smoke lower. As this heat source gets nearer to the materials below it, these materials are heated to higher and higher temperatures. When their ignition point is reached, flashover occurs as items away from the original fire ignite.

All of this can happen very quickly if the initial fire is not brought under control at an early stage. Whilst people do suffer burns as a consequence, by far the greatest danger comes from inhaling hot and acrid smoke.

Under the terms of the Regulatory Reform (Fire Safety) Order 2005, M Moser Associates are required to undertake a fire risk assessment to determine all potential fire hazards related to our premises, our type of work and the way in which this work is performed. M Moser Associates are then required to take action to reduce all risks to a reasonable minimum and to ensure that all employees are protected from remaining hazards and the dangers associated with fire should one break out for some other reason. We are required to do this by providing:

- an appropriate fire detection and warning system
- safe means of escape
- appropriate fire-fighting equipment.

We are also required to devise a means for testing and maintaining the above arrangements.

A plan of action is required and will incorporate relevant details concerning the above points (for example, how the fire warning (alarm) system is activated, the location of emergency exits and what type of fire-fighting equipment is to be used for which types of fire). In addition, employees must receive training in respect of this plan, which must include a fire evacuation procedure to be practised at regular intervals (at the very least, once each year).
As construction sites are also classified as a 'workplace' each site would therefore also require its own FRA and the relevant control measures implemented as necessary.

**Arrangements to apply**

**Names of Fire Wardens:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Job Title</th>
<th>Location (site / office)</th>
<th>Contact #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stuart Curd</td>
<td>Site Manager</td>
<td>Site</td>
<td></td>
</tr>
<tr>
<td>Lorna Killick</td>
<td>Office Manager</td>
<td>Office</td>
<td>Ex:8586</td>
</tr>
<tr>
<td>Kevin Cheung</td>
<td>IT</td>
<td>Office</td>
<td></td>
</tr>
</tbody>
</table>

Fire Wardens are responsible for ensuring that evacuation arrangements are in place and tested at Company premises.
3.8 Electrical Safety

Primary Legislation: *The Electricity at Work Regulations 1989*

The Electricity at Work Regulations requires certain precautions to be taken against the risk of death or personal injury from electricity (in any work activity). The regulations place duties on employers, employees and self-employed persons to comply with such requirements within their control. Persons holding such responsibilities are the ‘Duty Holders’. Employees and workers have an additional duty to co-operate with the employer.

**Construction work**

- All project work of an electrical nature will be strictly carried out in accordance with the requirements of the Electricity at Work Regulations and other relevant and current regulations.

- Temporary site supplies and permanent installations shall be installed in accordance with BS 7671 *Requirements for electrical installations* (The IEE Wiring Regulations).

- The design and installation of any electrical power systems on sites shall be carried out by persons with specialist skills required for this work.

- Suitable consideration will be given to the size and locations of electrical loads and the manner in which they may vary with time during projects.

- Live working will only occur where absolutely unavoidable and will be under ‘live-working’ permit conditions and will not be carried out in lone working situations.

- Electrical hand tools or other electrical equipment will be used at the lowest voltage practicable, with a preferred safe option of being battery powered/cordless.

- All necessary precautions will be taken in relation to the conditions being worked in, with particular care taken in damp or potentially explosive atmospheres - additional control measures will be employed where necessary in such circumstances.

**Business premises**

Where a tenancy agreement provides for such an arrangement, M Moser Associates may engage the services of electrical contractors to carry out work such as new installations, upgrades or repairs. On those occasions the following conditions will apply:-
• The contracted company shall fully understand that the primary objective of the above regulations is the avoidance of danger to persons by prohibiting live working, unless it can be technically justified and will ensure compliance with this requirement.

• The contracted company will ensure that only trained and competent persons will be authorised to work on electrical equipment and distribution systems, i.e. as duty holders they will have sufficient knowledge of the Electricity at Work Regulations and other relevant and current regulations e.g. the 17th Edition IEE Wiring Regulations.

• Portable appliances within the offices/premises will be integrity tested (PAT) annually.
3.9 Personal Protective Equipment

Primary Legislation: *The Personal Protective Equipment at Work Regulations 1992*

A construction workplace is a highly dangerous place, with the potential to injure, maim or even kill. Under current legislation, we are required to carry out an assessment of all processes undertaken to determine which, if any, put employees at risk of injury or of developing ill health. Where risks are identified we must, in the first instance, try to eliminate these. This may involve for example, changing the way a job is performed, introducing new equipment or automation, or isolating hazards with some form of engineering control, for instance surrounding particularly noisy machinery with noise-proof screening.

In certain cases it may not prove practicable to reduce risks in this way. For instance, although it may be desirable to reduce risks by installing new equipment, it may not be feasible to do this. In other situations, risks may remain even where all reasonable changes in a process, as well as engineering controls, have been introduced. As a last resort in these cases, Personal protective equipment (PPE) will be required that is both suitable and appropriate to defend against the risks that remain.

It should be noted, however, that although providing PPE is essential when relevant, this should be done as an aid to safety not as a substitute for changing the way things are done.
The law requires that PPE considered necessary as a result of a risk assessment must be provided free of charge. Where the PPE is protective overalls, safety eyewear or safety footwear, one or more sets will be issued to those employees required to undertake the processes concerned.

Where the PPE is of a specialist type, for example breathing apparatus, the kit will be retained at a central source.

Training will be provided to relevant employees as to how to wear and/or operate each item of PPE that they are required to use. Also provided will be an explanation as to why the particular kit concerned is essential and what its limitations are. This training will be provided by persons competent in the use of the PPE concerned. A training record will be kept and, when the training is complete, the record will be signed by both the trainer and the trainee. The signed record will be placed on the employee's personal file.

Further risk assessments, in full or in part as relevant, will be undertaken on the introduction of new or second-hand machinery and equipment; where the layout of the workplace, or any process, has altered and no later than 12 months after a previous assessment.

**Points to Note:**

For PPE to be effective it must used as intended. Consideration must be given to:

1. Where an employee sports a beard certain types of respirator have potential to let in contaminated air where an effective seal around the face cannot be made.

2. Those required to wear two or more pieces of kit at the same time that may not be compatible; examples include certain types of safety helmet and ear defender (where the ear defenders cannot cup the ear completely), and respirator and safety eyewear (where the eyewear dislodges the seal between the respirator and the face).

3. PPE has to be selected and/or adjusted to fit height, size and weight.

4. Rubber-based protective materials can be penetrated by most solvents within a fairly short period of time.

Although it may seem burdensome to use PPE for a relatively quick task, if PPE is specified for that task then it must be used. It is the responsibility of the individual to use PPE as trained to do so and to take good care whilst in their possession, bringing any faults and/or damage to the attention of their supervisor.
3.10 Work Equipment

Primary Legislation: *Provision and Use of Work Equipment Regulations 1998*

Definition: Work equipment is generally *any equipment used by a person at work*, i.e. any machinery, appliance, apparatus, tool or installation for use at work (whether exclusively or not). The definition is equally applicable to site working, e.g. using hand tools, or in an office environment using office equipment, e.g. photocopiers, computers, printers and lighting e.g. for workstations.

- Work equipment will be purchased based on suitability, safety and effectiveness, not on a cost only basis.

- All tools/equipment will be visually inspected each working day *prior to use* to determine they are fit for purpose. Any item found to be faulty will not be used until either repaired by a competent person or replaced.

- Powered Hand tools will be cable free/battery powered or 110 volt only. Where hand tools are used at a higher voltage, then they shall be fed via armoured cable and the supply protected by a 30mA circuit protection device.

- Where specialised equipment is used for project work, only sufficiently trained competent people shall operate such equipment.

- Only hire equipment with current and appropriate documentation relating to testing/maintenance supplied by the hire company, will be used. Instructions for safe use of the item(s) appropriate to the complexity of the equipment and/or associated risk must also be supplied.

**Arrangements to Apply**

Instructions about the use of following work equipment must be provided before they are used:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Location (site / office)</th>
<th>Person responsible for ensuring workers are trained</th>
</tr>
</thead>
<tbody>
<tr>
<td>Printer</td>
<td>Office</td>
<td>Lorna Killick</td>
</tr>
<tr>
<td>Photocopiers</td>
<td>Office</td>
<td>Lorna Killick</td>
</tr>
<tr>
<td>Abrasive Wheels</td>
<td>Site</td>
<td>Trade Contractors</td>
</tr>
<tr>
<td>Reciprocating saw</td>
<td>Site</td>
<td>Trade Contractors</td>
</tr>
</tbody>
</table>
3.11 Manual Handling Operations


Many thousands of working people suffer injuries each year as a direct result of poor manual handling. Common problems include: sprained and strained muscles and joints, torn tendons and ligaments, slipped discs, hernias, cuts, abrasions and splinters, crushed fingers, hands and feet.

Moreover, manual handling injuries have been found to build up slowly over time and can result in permanent damage later on in life to our backs, necks, shoulders, hands and arms.

Under the Manual Handling Operations Regulations 1992, we, the Company, are required to assess our workplace and identify where manual handling takes place (or could take place) in the course of what we do.

The Regulations require us to ensure, where reasonably practicable, that manual handling is avoided for example by changing work processes or by the introduction of mechanical aids. Where it is not reasonably practicable to make such changes, we are required to identify the risks associated with a manual handling task and make arrangements to reduce these. We are also required to provide our employees with instruction in the correct techniques to use when manually handling an object to ensure that, as far as possible, injuries are not sustained.

M Moser Associates will ensure that training in correct procedures is provided; that is, how to use new mechanical aids and/or how to lift carry and move objects correctly.

This training will be provided to relevant employees by competent persons. A training record will be kept and, when the training is complete, the record will be signed by both the trainer and the trainee. The signed record will be placed on the employee’s personal file.

Further risk assessments, in full or in part as relevant, will be undertaken:

- on the introduction of new or second-hand machinery and equipment (whether introduced to aid lifting or not), where the layout of the workplace, or any process, is altered and no later than 12 months after a previous assessment.

Where it is not possible to avoid handling a weight manually, the following points are to be adhered to:

1. What can be handled by a particular individual will depend on his or her build, age, sex and physical condition.

2. Suitable protective clothing to be worn.
3. Ensure that the lifting route is clear of obstructions and trip hazards.

4. Loads to more manageable with smaller and lighter ones wherever possible.

5. Ensure that no one person is tasked with all of the lifting.

6. Help to be sought where an individual doubts their capacity to carry a load, especially where awkward in shape. When team handling, ensure good vision, good handholds for all, and that team members do not obstruct each other.

The significant tasks identified as part of our activities include:

- Loading / unloading materials / equipment and travelling across roadways
- Handling plasterboard, glass etc up staircases
- Carrying tools / equipment up a staircase.
3.12 Working at Height

Primary Legislation: Work at Height Regulations 2005

Working at height is deemed to be any work related activity carried out above ground level. A place is ‘at height’ if a person could be injured falling from it, even if it is at or below ground level.

This Policy reflects M Moser Associates’ commitment to meeting the requirements of the Work at Height Regulations 2005. It provides guidance to those charged on their behalf with taking action necessary to ensure compliance.

The Work at Height Regulations 2005 apply to all work undertaken at height wherever there is the potential for a fall to occur which may cause personal injury. No height limits are specified in the Regulations in recognition that all work undertaken at height has the ability to result in injury.

Work at height will range from the routine use of a stepladder to retrieve files on shelving which is an activity which may be undertaken in an office, to potentially higher risk activities undertaken by, or under the control of construction operatives such as on the roofs of buildings which could present unusual and difficult access issues. This Policy will, therefore, need to be read in conjunction with all activities involving work at height in order to minimise any risk of injury occurring.

Requirements of this Policy

The Work at Height Regulations and this Policy requires managers to do all that is reasonably practicable to prevent accidents by considering avoiding work at height wherever possible; utilising equipment or other measures to prevent falls where working at height cannot be avoided; and where the risk of a fall cannot be eliminated, use work equipment or other measures to minimise the distance and consequences of a fall should one occur.

These duties require that:

- work at height is efficiently planned and organised and where applicable takes account of weather conditions that could endanger health and safety;
- those involved in work at height are trained and competent to do so;
- the place where work at height is undertaken is safe with equipment used being appropriately selected, used, inspected and maintained;
- the risks from fragile surfaces are properly controlled; and the risks from falling objects are properly controlled.

The above requires risks to be assessed and control measures commensurate to be implemented.

**Staff Training**

Managers must ensure that everyone involved in work at height is competent to do so, having received suitable and sufficient information, instruction and training and is supervised by a competent person.

Training in conjunction with work at height will be provided and/or approved by the M Moser Associates Head of Office.

**Place Where Work is undertaken**

Consideration must be give to safety of the task and preventions to avert risk of a fall. Detailed safety requirements are set out in the Schedule to the Regulations and should be consulted where further information is required.

Where there is a requirement for work at height the conditions, risks and equipment must be considered: appropriate equipment used and protection measures (e.g. guard rails and safety harnesses) supplied.
3.13 Hazardous Substances

Primary Legislation: Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Nobody wants to take their work home with them, let alone have it dominate their very existence, yet this is the risk that many people take as a result of the way they carry out their tasks at work.

Under the Control of Substances Hazardous to Health Regulations 2002, the company is required to assess all substances kept at work to determine what risks there are to employees from their use. This assessment must be carried out before the substance is used.

Where possible substances must be substituted for less harmful ones or, if this is not practicable, consider changing the working practise to avoid using the substance concerned.

Where it is not possible to do either of the above, we are required to consider such things as:

- isolating the substance and process away from general work areas
- reducing the amount of the substance used and the number of people exposed to it, as well as the length of time the exposure occurs.

Where use of a substance cannot be avoided, exposure must be controlled by way of ventilation to extract fumes and dust. The point of extraction should be as close to the source of the process as practicable (possibly by using a localised exhaust ventilation (LEV) system). Personal protective clothing and equipment must be provided where relevant, but never as a substitute for the controls described above. No employee shall undertake a procedure involving use of a substance unless trained. Further assessments, in full or in part as relevant, will be undertaken if any process or substance is changed and no later than 12 months after a previous assessment.

When dealing with a substance, particularly a harmful one, the following general points are relevant.

1. Never decant it into food or drink containers and never store it in open containers.
2. Always store rags used in conjunction with chemicals in covered containers.
3. After handling substances, always remove protective clothing worn (including overalls, polo shirts, etc.) and clean your hands, face and forearms in line with instructions on the substance container before consuming food or drink.
4. Solvents, such as turpentine, bleach or white spirit must not substitute appropriate cleaning agents.
5. Never eat or drink in a substance-handling area.
6. Never siphon substances by mouth.

7. Always check that personal protective equipment and substance control arrangements (such as local exhaust ventilation systems) are in good working order, and report all defects when found.

8. Never store gloves used to handle substances inside respirator or breathing apparatus helmets.

9. Even though trained in the use of a substance, re-read the label regularly to remind you of its hazards.

10. Seek first aid treatment for all cuts and abrasions.

11. Monitor your skin regularly and consult your GP should any rash appear, inform the company at once should this happen.

12. Apply a moisturising cream to your hands and forearms both before coming on shift and after cleaning up when it is over.
3.14 Lifting Operations and Lifting Equipment


The Lifting Operations and Lifting Equipment Regulations (LOLER) came into force in 1998 and replaced all previous legislation that was in place relating to the use of lifting equipment. These regulations cover all operations and equipment whether lifting people or goods. They cover equipment such as cranes, lifts, hoists, chains, slings, hooks, shackles, eyebolts, rope and pulley systems, mobile elevating platforms, forklift trucks etc. The regulations also cover second hand and leased equipment and apply to all workplaces from hospitals to building sites.

These regulations are also linked to the Provision and Use of Work Equipment Regulations (PUWER) which requires all work equipment to be serviced and maintained on a regular basis.

To comply with the regulations M Moser Associates will compile (or request from sub-contractors) a dedicated risk assessment for all lifting equipment and a lifting plan outlining how, when and where it is to be used. This assessment will determine the correct equipment to be purchased or where there may be limitations as specified by the manufacturers.
3.15 Asbestos

Primary Legislation: Control of Asbestos Regulations 2012

Many buildings contain asbestos in various forms for purposes of heat or acoustic insulation, for fire protection and much of this still remains.

Asbestos is a generic term name given to a number of crystalline metallic silicates which occur naturally in fibrous form. There are 3 types:

- Chrysotile (White)
- Crocidolite (Blue)
- Amosite (Sometimes called brown)

Anthophyllite (Amphibole minerals) Chrysotile and Crocidolite are fine and flexible and can therefore be spun and woven into textile products. Amosite is too brittle but is commonly used as a heat insulator.

M Moser Associates will implement preventative and protective measures relating to health risks associated with occupational exposure to asbestos fibres with the objective of reducing the exposure to airborne respirable fibres of employees, contractors working on its behalf and any person who may be affected by any of our activities.

Hazard identification and risk assessment are the basis for introducing practical preventive policies and control measures in the workplace. Information on the risks, systems of work and the precautions to be taken will be communicated to employees and others who may, in the course of their work for or on behalf of M Moser Associates Ltd., be exposed to asbestos.

Guidance notes and procedures provide more detailed information on the hazards, risks and appropriate preventive control measures in order to fulfil M Moser Associate’s obligations under the Control of Asbestos Regulations 2012.

Adequate information, instruction and training will be given to employees and other persons affected by M Moser Associate’s activities to ensure that they are aware of:

- the health risks associated with asbestos
- the reasons for and the nature of the precautions to be observed to protect themselves and other people who may be affected
- how to make use of the protective equipment and other safeguards

Effective steps will be taken to ensure that all persons entering a property where asbestos removal work is being undertaken are made aware as soon as is reasonably practicable of the nature of the operation and any matters likely to affect their health and safety.

To control the risks to employees, building users, contractors and other persons, the following measures will be adopted:
- No new asbestos-containing material shall be used in M Moser Associates properties
- M Moser Associates shall ensure that, as a minimum a Demolition & Refurbishment survey will be requested or carried out on all properties which, due to their age or nature of construction, are likely to contain asbestos. This will be requested and reviewed prior to undertaking works.
- M Moser Associates shall ensure that an Asbestos Management Plan is developed, maintained and reviewed annually for all property where it is has obligation to maintain and repair as landlord, lessee or tenant. M Moser Associates shall co-operate with other duty holders under any tenancy arrangement to achieve this objective.
- Where existing properties contain asbestos which is sound, in good condition and has not been, or is not likely to be subject to abrasion or deterioration, M Moser Associates will take all necessary measures to avoid disturbance.
- Where existing installations or parts of property contain damaged, deteriorating or inadequately sealed asbestos containing material, the material shall be enclosed, sealed or encapsulated; removed and replaced by suitable material not containing asbestos; in the case vacant or unoccupied property, the property or the affected parts of the property, will be secured to prevent access.

**Construction Work**

Where building or engineering works are to be undertaken in a property, the Asbestos Survey Information and Asbestos Management Plan for the building will be the first point of reference. Additional site inspections, test results, remedial work or removal of asbestos materials, must be recorded and presented to the client and included as part of the health and safety file.

The location of asbestos containing materials will be brought to the attention of any person who is likely to disturb the fabric of the property in the course of their work.

M Moser Associates will only appoint laboratories and analysts (referred to as ‘Asbestos Consultant’ in this policy) to undertake air sampling and surveying work who meet the following key criteria:

- For surveying premises only - UKAS accreditation to ISO/IEC 17020.
- For the analysis of bulk samples - UKAS accreditation to ISO/IEC 17025. The Asbestos Consultant must participate in AIMS and maintain a standard of ‘satisfactory’.
- For air sampling and subsequent analysis of air samples - UKAS accreditation to IEC/ISO 17025. The Asbestos Consultant must participate in the RICE scheme and be classified as a Category A or Category B Laboratory.
- For the supervision of asbestos removal works - hold a supervisory licence granted by the Health and Safety Executive (HSE) under the Control of Asbestos Regulations 2006.
- Analysts and surveyors must be experienced and qualified to BEBOH P.Cert 13 or BIOH Specialist Module S301, or hold the appropriate proficiency module (P401 - 405) for the element of work they are required to undertake.

All licensable asbestos work will be supervised by the Asbestos Consultant. This will include the provision of background and leak monitoring during the asbestos related works and subsequent clearance and reassurance air monitoring where necessary.

Asbestos Consultants will be appointed independently of the licensed contractor either directly by M Moser Associates Ltd. or by its agents. Only contractors licensed by the Health and Safety Executive (HSE), registered with CHAS (Contractors Health and Safety Assessment Scheme) and members of ARCA (Asbestos Removal Contractors Association) will be appointed to undertake work with asbestos falling under the scope of the Control of Asbestos Regulations 2012.
3.16 Confined Spaces

Primary Legislation: The Confined Spaces Regulations 1997

A confined space, has a fairly broad definition. While a closed tank with restricted access may be the obvious example of a 'confined space', it also includes enclosed rooms such as basements, pits, open manholes, trenches, pipes, flues, ducts, ceiling voids, and other places where there is inadequate natural ventilation.

Dangers can arise in confined spaces through:

- Lack of oxygen, poisonous gas, fumes or vapour
- Liquids and solids suddenly filling the confined space, or releasing gases into it when disturbed
- Fire and Explosions
- Residues left behind which can give off gas, fume or vapour
- Dust
- Hot working conditions

At some point almost any place on a construction site/project may become a confined space. Accordingly M Moser Associates will ensure that its employees are provided with sufficient information relating to, and appropriate training for, working within confined spaces.

Work will only be carried out within a confined space when absolutely necessary or where it cannot be undertaken from outside of the chamber, vessel etc. By planning tasks adequately and utilising the correct tools and equipment, the need for confined space working should be eliminated.

Where working in a confined space cannot be avoided it will only proceed following the undertaking of a risk assessment and a safe system of work having been put into place. Dependent on the level of risk associated with the task, a permit to work and permit to enter system may be required. Any assessment will include consideration of: the task, working environment, cleaning and purging processes, working materials and tools, the suitability of those carrying out the task and arrangements for emergency rescue.

The Company strictly prohibits lone working in confined spaces.

**Oxygen deficient atmospheres:**

No person may enter or remain in a confined space in which the atmosphere is liable to be deficient in oxygen unless either he is wearing approved breathing apparatus, or the space has been and remains adequately ventilated and a responsible person has tested and certified it as safe for entry without breathing apparatus.
3.17 Welfare Arrangements

Primary Legislation: Workplace (Health, safety & Welfare) Regulations 1992

Construction site workers need adequate toilet and washing facilities, a place to warm up and eat their food and somewhere to store clothing. Good facilities can have a positive benefit on health and well-being and can help prevent dermatitis. If a large number of people are working on site or the work being carried out is particularly dirty or involves a health risk (eg pouring concrete) additional washing facilities (which may include showers), toilets, etc may need to be provided.

With most re-fit projects existing toilet and washing facilities will be available for our operatives, however this cannot be assumed. It is the Project Contracts Manager responsibility when appraising a site to determine the requirements and facilities.

General requirements:

- All welfare facilities must be readily accessible with adequate heating, lighting and ventilation.
- Arrangements must be made to ensure that welfare facilities are kept clean and tidy.

Toilets:

- An adequate number of toilets to be provided at all times and should be sufficient in number to ensure that facilities are available without causing undue delay.
- Water flushing toilets should be used whenever possible. Chemical toilets may be used as a short term measure.
- Men and women may use the same toilet provided it is a lockable room and partitioned from any urinal.

Washing facilities:

- Must be provided next to both toilets and changing facilities; basins must be large enough for people to be able to wash their face, hands and forearms.
- There must be a supply of clean, hot and cold water with soap and towels (or a dryer) provided.
- Where work is particularly dirty or where workers are exposed to hazardous substances, showers may need to be provided

Storing and changing clothes:

- There must be a provision for storing clothing not worn on site.
• There must be a provision for storing Protective clothing needed for site working.

• Where there is a risk of the clean clothing being contaminated by work clothing, they must be stored separately.

• The facilities should provide for wet clothing to be dried.

• Men and women must have separate changing facilities.

**Rest facilities:**

• There must be facilities for taking breaks and they must provide shelter from the weather and be adequately heated.

• Rest facilities should have: tables and chairs, a kettle or urn for boiling water, provision for preparing food e.g. a microwave (gas rings are not suitable due to the risk of fire).

**Drinking water:**

• There must be an adequate supply of wholesome drinking water provided. This can be from bottles or tanks if there is no mains water available.

• Drinking water must be conspicuously marked as drinking water and cups should be made available unless it is a drinking fountain

Welfare arrangements are to be agreed and adopted on a construction project prior to works commencing. Arrangements will be made to ensure that all provisions are well maintained and kept in a clean and tidy condition. The specific arrangements will be documented in the project specific construction phase plan and communicated to site operatives and visitors.
3.18 Display Screen Equipment

Primary Legislation: The Health and Safety (Display Screen Equipment) Regulations 2002

Sitting and watching screens of one sort or another is, today, an almost indispensable part of daily life, yet staring for lengthy periods at a single object can cause fatigue and eye strain.

In recognition of this fact, and of the importance of display screens in business life, the Health and Safety (Display Screen Equipment) Regulations were enacted in 2002 to govern the way in which workplace display screens are used.

Under the Regulations, display screens are defined to include any screen that provides information in a numbers, words or images format. Workplace display screens, therefore, include not only VDUs but also microfiche readers and machine control screens as well.

According to the Regulations, we are required to assess all workstations that include DSE, with the aim of reducing any health risks found.

In general these health risks will fall into two categories.

The first category concerns those risks associated with the posture of an employee when using the equipment in question. For instance, does he or she have to remain still for lengthy periods, and, are the controls of the equipment (for example a keyboard) in an awkward position in relation to where the employee sits and to his or her hands? These kinds of risk can give rise to work-related upper limb disorders and are dealt with under that policy.

The second category of risks relates to eye strain itself. In this respect any habitual user of DSE may request to have his or her eyes tested. Habitual users are considered to be those who use display screens for more than three-and-a-half hours each day. The company must arrange for such a test to take place. The cost of each test (to be undertaken by a suitably qualified person) will be met by the company, and a contribution towards the cost of any glasses considered necessary for undertaking the display screen work.
3.19 Noise

Primary Legislation: The Control of Noise at Work Regulations 2005

As well as giving us headaches and stress, loud and continuous noise can cause physical damage to the delicate mechanisms in our ears.

When sounds are made, they make disturbances in the air similar to the ripples that are made when we throw pebbles into a pond. These disturbances are picked up by the delicate skin which stretches across the end of the passageway inside our ears – otherwise known as our eardrum.

In accordance with the The Control of Noise at Work Regulations 2005, the government has determined the action that employers must take to protect their employees from particularly noisy work areas or work processes.

Under the Regulations M Moser Associates are required to take action to protect those who, throughout any eight-hour period of work, are likely to be exposed to noise averaging 80 or more decibels; those affected can be provided with hearing protection if requested.

Throughout any eight-hour period of work, where you are likely to be exposed to noise averaging 85 or more decibels, M Moser is required to reduce either the level of this noise or the time you are exposed to it by any of the following means.

1. rotating jobs to ensure to avoid exposure throughout an eight-hour period
2. constructing noise refuges around machine control areas
3. boxing in noisy machines using sound insulation material
4. changing machines and methods of work
5. grouping particularly noisy machines together in a single, sound-controlled area
6. fitting silencers to all exhausts.

Where not practical or possible to reduce noise level to below 85 decibels, the area concerned will be identified with recognised signs to ensure that no one enters unless wearing hearing protection.

Under the Noise at Work Regulations a person properly trained in noise assessment techniques will be appointed to measure noise levels within our workplace. This individual may be someone we train to undertake this work or someone from a company specialising in this kind of activity. M Moser Associates
provides the following type[s] of hearing protection.

**Ear muffs:** To be worn at all times in noisy areas and cups of each muff to enclose ears completely.

**Ear plugs:** To be effective roll one end of the plug between your thumb and first finger until it forms a cone shape and screw gently into each ear. To provide protection, ear plugs must be worn at all times in relevant noisy areas. Ear plugs are available, clearly marked, in a box at each of the entrances to the red and blue areas shown on a site plan.

Further noise assessments, in full or in part as relevant, will be undertaken once the company has tried to reduce noise levels in the red areas of the plan by one or more of the means listed in points 1 to 6 above and/or on the introduction of new or second-hand machinery and equipment.
3.20 Hand-Arm Vibration

Primary Legislation: *The Control of vibration at Work Regulations 2005*

Vibration white finger is one of a range of diseases that can affect the hands and forearms of employees as a result of using vibrating machinery at work. Collectively they are known as hand-arm vibration syndrome (HAVS).

In addition to causing numb fingers, HAVS can result in damage to the muscles, ligaments, bones and joints of all areas of the forearm and hands, making it painful to move these parts of the body.

Under the Management of Health and Safety at Work Regulations 1992, we are required to undertake a risk assessment of all processes that result in operators experiencing hand-arm vibration and we are required to take action to help protect those undertaking these tasks from developing HAVS.

A range of recommended protective actions has been drawn up by the HSE, including the following:

1. change the way work is carried out to ensure that operators do not come into contact with high-level vibrating equipment in the first place
2. replace older tools with tools of a more modern design
3. ensure that equipment is properly maintained and always in good working order
4. only use equipment that gives off high levels of vibration for relatively short periods of time
5. encourage employees to exercise their fingers and forearms during these breaks to improve blood supply, and rotate work to ensure that no one person is continually exposed to a vibrating process.

Training in all courses of action specified will be provided to relevant employees by competent persons. A training record will be kept, and when the training is complete, the record will be signed by both the trainer and the trainee. The signed record will be placed on the employee's personal file.
### 3.21 Sun Damage to Skin

Primary Legislation: *Management of Health and Safety at Work 1999*

All cancers start from one or more of the billions of cells in our bodies becoming abnormal and then multiplying out of control to form a lump or tumour. It is now well known that most of these cell abnormalities are caused by parts of our bodies being exposed to something harmful over a long period of time. For example, most lung cancer is caused by repeated exposure to the substances in tobacco smoke, whereas many cancers of the stomach and intestines are caused by what we choose to eat.

**Employees Working Outdoors**

Where a task is being carried out that requires the wearing of recognised protective clothing, then this type of clothing must be worn at all times while this task is taking place.

Where a task does not require recognised protective clothing to be worn, employees should ensure that they wear clothing that covers their bodies, arms and legs when working in direct sunlight particularly during the hours around midday, when the sun's rays are harshest.

M Moser Associates recognises that to undertake work (in particular, physical work) in the sun when clothed can be uncomfortable. It is therefore recommended, in line with advice from the Health Education Authority, that loose-fitting clothing should be worn (as opposed to tight-fitting garments). Loose-fitting clothing must *not* be worn, however, when machinery is being used, because of the danger of entanglement and possible injury.

*Note: You are still in danger from the sun on a cloudless day, but even on a cloudy one in summer there is potential for skin damage.*
3.22 Alcohol and Drugs

Primary Legislation: Management of Health and Safety at Work Regulations 1999

Whilst alcohol and drugs are specific to the framework of the company’s personnel management system i.e. terms and conditions of employment, work standards etc. there is an obvious connection to health, safety and welfare of employees and others who may be affected by their actions.

- Under health and safety legislation employers have a duty of care to protect staff. Equally important is the need for employees to take reasonable care for the health and safety of themselves and other persons. This duty requires an employee to arrive for work in a fit state. Employees are a risk both to themselves and others if they are over the legal alcohol limit or impaired through the use of drugs (for recreational or therapeutic reasons) while at work.

- Due to the obvious and well documented risks associated with working under the influence of alcohol or drugs M Moser Associates applies a zero tolerance policy towards a person attending work whilst their capability to work safely is potentially impaired by the effects drink or drugs.

Note: alcohol can impair a person’s ability to work safely even when under the legal limit (for driving). Drinks and drugs can remain in the bloodstream for a considerable amount of time after the initial consumption/taking and therefore retains an ability to adversely impact on a person’s ability to work safely – this would include the ‘morning after effect’.

- The company’s zero tolerance policy strictly prohibits staff from drinking, buying, selling or even being in possession of alcohol while at work.

- In addition to illegal drugs, certain prescription drugs and over-the-counter medicines (e.g. some hay fever medication) can affect a person’s ability to work safely. Therefore, it is vital that the company is informed immediately where a person has been prescribed medicines or is using medicines purchased over the counter so that any possible risks arising from use can be identified e.g. may cause drowsiness.

- Should any person feel that they have a mental and or physical problem relating to alcohol or drugs then they should request a confidential meeting with the company’s HR manager in the first instance as it is the policy of the company to provide help wherever possible.
3.23 Lone Working

Primary Legislation: *The Management of Health and Safety at Work Regulations 1999*

Lone workers are people who work alone with little or no supervision. Thus in the event of an emergency there is no one to give assistance, or summon help. There is no time limit attached to working alone. It may be for the whole work period, or only for several minutes.

There is no law which says that people cannot work on their own however the Health and Safety at Work places a duty on the employer to ensure that all work activities are carried out safely.

M Moser Associates are required to prepare a risk assessment under the Management of Health and Safety at Work Regulation 1999, which will look closely at how the job is done and identify the work hazards, assess the risks involved and ensure that adequate measures are put in place to avoid the person carrying out the work being harmed. Once risks have been addressed, a safe working procedure should be developed. This should contain as much relevant information as possible, both for the worker and their supervisors.

It is the policy of M Moser Associates to avoid lone working situations wherever practicable.

Factors to be considered in assessing lone working situations will include:

- The health of the individual concerned
- Who would be contacted in an emergency situation and how?
- Provision in the event of an accident or illness - Note: is the person medically fit and suitable for carrying out the work?
- Actions in the event of fire
- Workplace conditions e.g. access and egress excesses of temperature
- Manual handling
- Hazardous substances
- Is there a risk of violence?

M Moser Associates will ensure that the individual concerned will be briefed on the findings of this assessment.
3.24 Lead Exposure

Primary Legislation: Control of lead of work Regulations 2002

Lead is a heavy-metal element well known to be hazardous to both human health and the environment.

Exposure Sources

It is recognised that there is the potential for M Moser Associates employees to become exposed to lead through the following processes which create lead dust, fume or vapour. These include:

- blast removal and burning of old lead paint;
- stripping of old lead paint from doors, windows etc;
- hot cutting in demolition and dismantling operations and recovering lead from scrap and waste.

If the level of lead in your body gets too high, it can cause headaches, tiredness; irritability; constipation; nausea; stomach pains; anaemia and loss of weight.

Continued uncontrolled exposure could cause far more serious symptoms such as kidney damage, nerve and brain damage.

These symptoms can also have causes other than lead exposure so they do not necessarily mean that lead poisoning has occurred.

Where employees are exposed to lead, lead compound, dust, fume or vapour at work M Moser will:

- assess the risks to health;
- decide whether exposure is/has been ‘significant’ and what further precautions may be needed;
- put in place systems of work and controls such as extraction ventilation equipment;
- provide washing and changing facilities and places free from lead contamination;
- inform staff on the risks to health from working with lead and the required precautions;
- train staff on control measures and protective equipment.
3.25 Management of Road Risk

Primary Legislation: *The Management of Health and Safety at Work Regulations 1999*

*(Please also see Driving at Work Regulations 1997 & list of approved driving qualifications as dated 22nd October 2012)*

Whilst M Moser Associates does not retain company vehicles a small proportion of M Moser Associates’ business activity involves driving. Accordingly the company will strive to prevent road related incidents by:

- Ensuring drivers on company business are aware of their actions with regards to the safety of themselves and others and comply with road transport legislation and other relevant safety legislation.
- Ensuring vehicles used are properly maintained
- Requiring drivers to report faults immediately
- Informing employees of the potentially hazardous effects of driving in extreme weather conditions
- Informing drivers of the dangers of driving under the influence of alcohol or drugs
- Emphasising the importance of taking rest periods as prescribed when undertaking long journeys
- Reiterating the importance of not driving when physically and mentally tired
- Investigating road related accidents and recording in line with existing accident procedures. Interviews will be carried out in a manner that is positive and helpful, rather than punitive however, disciplinary action may be instituted in cases of repeat offending, or where gross negligence is proved
- Reiterating the need to not use hand held telephones or other means of mobile communication requiring hand contact at any time whilst in charge of a moving vehicle or a stationery vehicle with the engine running.
3.26 Stress

Primary Legislation: *The Management of Health and Safety at Work Regulations 1999*

The Health and Safety Executive (HSE) define stress as “an adverse reaction people have to excessive pressures or other types of demands placed on them”.

Life places demands and pressures on all of us, but if these stressors become too great or exist for a prolonged period of time they can affect our health. Stressors can originate from within the workplace or from our lives outside the office, e.g. bereavement; break up of a relationship; financial situation

Stress is not the same as ‘pressure’. Pressure can be motivating and challenging and can actually improve performance and whilst each of us has a different ability to cope with pressure this can fluctuate according to our personal situations. Additionally each role carries with it a performance level which the employee is expected to meet. However, if the individual’s ability to cope decreases and/or the expectations upon him or her are too high, potential health risks can result.

M Moser Associates recognises that stress, especially chronic stress, can be a considerable risk to both physical and mental health. M Moser Associates is committed to promoting a healthy environment and a supportive climate with a culture of openness where stress is not seen as a personal weakness and where employees experiencing stress or mental health problems can access appropriate support.

M Moser Associates is committed to providing services that support staff with stress-related issues.

**Risk Assessment**

The assessment of hazards associated with work stress aims to identify factors at work that are likely to cause stress, those employees who are at risk of stress and the action that is required to eliminate or reduce the risk.

To understand and measure stress indicators, M Moser Associates will draw upon information from health and performance indicators such as sickness absence and decrease in productivity, attitude, behaviour, excessive working hours, organisational change and physical conditions. The information gained from assessments will be recorded and a potential action plan discussed on how to tackle the sources of stress. The assessment will be subsequently reviewed at an agreed date and time to confirm that remedial actions are effective.
3.28 Permit to Work

Primary Legislation: The Management of Health and Safety at Work Regulations 1999

Each year some 500 people are killed in the workplace. Often these fatalities occur where training has been poor, where work procedures are non-existent and where employees take short cuts.

A Permit to Work is a way of formally documenting work to be done to minimise the risk of an accident occurring and forms an essential part of safe systems of work for high risk or complex activities.

The importance of such a system can never be under stated, and should only be administered by a competent person. The contract managers are the competent persons responsible for maintaining, implementing and monitoring the system and are the authorised persons designated by M Moser Associates to issue the permits. It is not sufficient to rely upon third parties to issue permits such as contractors on M Moser Associates’ behalf.

Before a Permit can be issued, M Moser Associates must be satisfied as to the completeness and validity of the information provided. Contractors and consultants requiring permits must supply various supporting information including a risk assessment and method statement, which must be checked to ensure they are site specific and address the hazards and associated risks.

When to Use a Permit to Work

Permits-to-work are used for activities which are particularly hazardous i.e. where a failure to implement the safety measures would have serious and immediate consequences.

A Permit to Work is normally only required for areas under the control of M Moser Associates.

A Permit to Work is not required within an Occupier’s demise unless the work consists of hot works, or will affect any part of the base build systems e.g. Fire alarms, main electrical distribution or water isolations or isolations of any base build life safety systems.

It is the policy of M Moser Associates to ensure that:

- Employees are given the appropriate training on the permit to work management system;
- Permit to work procedure and forms are available to each site manager;
- A competent supervisor will oversee all works where a permit is required.
1.29 Housekeeping

Primary Legislation: *Workplace Health, Safety and Welfare Regulations 1992*

At work, slips and trips are the cause of many accidents each year. At the heart of the problem is poor housekeeping, with the following making a more than average contribution:

- trailing leads and cables
- wet and muddy surfaces
- tools, materials, refuse and waste left lying around
- partially obstructed entrances, exits, walkways and stairs

M Moser Associates policy requires that good practice is observed at all times and that employees are informed on the general principles of good housekeeping:

- Refuse, waste and spillages to be cleared up as they occur.
- All walkways, entrances, exits and stairs to be kept clear of leads, cables, tools, materials, refuse and all other waste.
- Cleaned floors must not be left too wet; barriers and warning signs to be erected around them until dry.
- Tools and materials to be stored in boxes, bags, compounds and other areas provided for this purpose.
- Objects, tools and materials to be stacked properly and with care; heavy objects at floor level.
- Never destack by pulling from the bottom of a pile or by throwing down from the top.

Finally, many slips and trips are caused as a consequence of people in a hurry so take care and avoid running when at work.
4.0 Performance Monitoring and Measuring

Key Guidance: OHSAS 18001

Monitoring:

The content of this Policy and its effectiveness in terms of health and safety performance is the subject of an annual review by the Director, Head of Office with input from the senior management team, as identified in the organisation section of the policy.

Health and safety performance will be monitored at senior levels and on a scheduled basis as an agenda point at management meetings. Accident/incident data and other relevant statistical analysis, results from safety initiatives with specific objectives, or the findings of management inspections will be reviewed at the meetings.

Senior personnel shall monitor and record whether health and safety responsibilities in their areas are being identified and discharged correctly and failings addressed accordingly. Areas to include:-

- Staff awareness of health and safety rules; duties complied with and executed as a primary objective
- Appropriate health and safety training for relevant staff
- Statutory requirements

Measuring:

M Moser Associates endeavours to make sound business decisions based on the knowledge and understanding of all factors. KPI’s will be developed to measure compliance with legislation as well significant hazards and associated risks.

In setting KPI’s, M Moser Associates ensure that they manage out potential risk. PSPI’s are reviewed (at least annually) to ensure that they remain SMART and manageable. Periodic inspections of workplace activities and internal auditing (at least annually) of the 18001 safety management system, policy objectives and the commitment to continued improvement will take place thereby identifying any further requirement for corrective actions or opportunities for improvement; results to be discussed at management level.