

# HEALTH & SAFETY POLICY and ARRANGEMENTS

---

Hillside Contracts Ltd.

Compiled by WA MANAGEMENT

8<sup>th</sup> April 2016

## Contents

Health and Safety Policy Statement .....	1
Management Structure for Health & Safety.....	2
Director Responsibilities.....	2
Senior Management Responsibilities .....	4
Office Management & Administration Responsibilities .....	5
Management/Supervisors Responsibilities .....	6
Responsibilities of all Employees.....	7
Company Head Office and Site Offices.....	8
Company Van & Car Driving .....	9
Sub-Contractors.....	10
Arrangements for Safety Monitoring, Audit, Inspection & Review of Company Safety Policy and Arrangements .....	11
Inductions.....	12
Training.....	13
Incident and ill Health Reporting.....	14
Health Hazards.....	16
Health Surveillance .....	18
Welfare & First Aid .....	19
Workplace Housekeeping.....	21
Hired & Company Plant, tools & Machinery Maintenance .....	22
Use of Plant, Tools & Machinery .....	24
Compressed Air Power Tools.....	27
Protective Clothing & Equipment .....	28
Manual Handling .....	30
Working at Height.....	32
Fire Safety .....	33
Evacuations and Confined Spaces .....	34
Asbestos.....	36
Alcohol, Drugs, Smoking, SatNav and Mobile Phones.....	37
Construction (Design & Management) Regulations .....	38
Employee Consultation and Communication .....	41
Display Screen Equipment.....	43
Worksafe Policy .....	44
Permit to Work Procedure.....	45
Risk Assessment Process .....	47
Noise and Vibration .....	48
Electricity .....	49
Transport & Storage of Fuel .....	50
Security Policy for Permanent and Peripatic Sites.....	52
Adverse Weather Policy .....	53

## Health and Safety Policy Statement

It is the policy of Hillside Contracts Ltd approved by its board of directors that operations carried out by the company are in accordance with the requirements of the Health and Safety at Work Act 1974, both in the spirit of the act and its legal obligations. The company accepts its responsibilities towards its employees and any other person who may be affected by the work undertaken by the company. The company will ensure the work under its control is carried out in such a way to minimise the risk of injury or ill health to its employees and any other person who could be affected.

Mary Sillitoe has been nominated as the director responsible for implementing this policy and their duties, and that of other directors, senior managers and all employees are detailed in the company's Health and Safety Policy.

All managers shall familiarise themselves with their duties as detailed in the Health and Safety Policy, and all employees have a part to continuously improve the Occupational Health and Safety Management System and its performance.

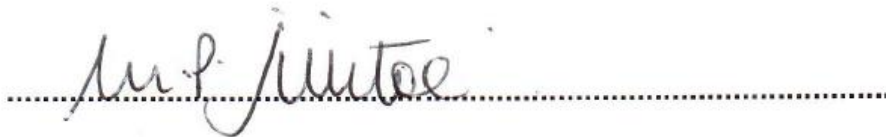
The company health & safety objectives, which will be reviewed annually, are:

- 1 The provision, maintenance and continual improvement of the safety of the working environment through regular reviews of the risk assessments.*
- 2 The provision, maintenance and continual improvement of equipment, which is as safe & without risk to health as is reasonably practicable.*
- 3 The provision of information, instruction and training to ensure the Health & Safety Policy of the company is adhered to & that safety is continually improved.*

This statement is to be displayed in a prominent position at all work locations and sites. A copy of the company's Health and Safety Policy with full details of the organisation and arrangements for implementing the policy will also be available at each work location and site, for reference by any employee.

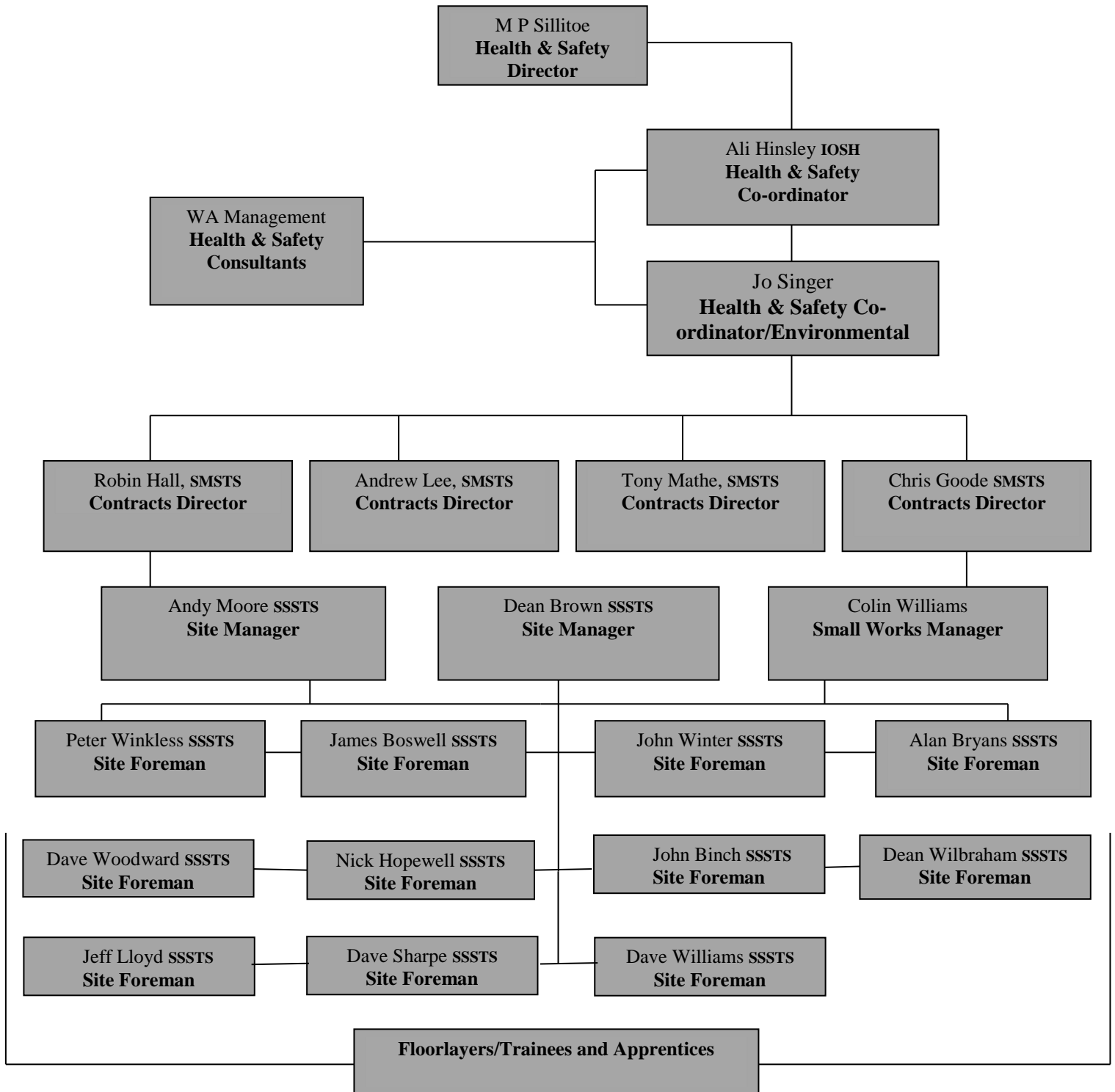
This policy statement and the Health and Safety Policy will be reviewed by Mary Sillitoe or their deputy on an annual basis and updated as either legislation changes or working practices change.

Signed



**Mary Sillitoe**  
**Managing Director**  
**Hillside Contracts Ltd**

## Management Structure for Health & Safety



All staff, particularly management, have a specific legal duty to ensure the safety of all persons' compliance with the general and specific duties listed within the Policy. Those appointed with specific duties will need the complete co-operation of all persons to fulfill them and as such are to be given every assistance.

## Director Responsibilities

The company Directors will undertake the following:

1. Prepare and keep up to date a Statement of the Company's Policy for Health and Safety and ensure that is brought to the notice of all employees.
2. Prepare instructions for the organisation and methods for carrying out the Company's Policy, to make sure each person is aware of their responsibilities and the means by which they carry them out.
3. Administer the Policy throughout the Company, by appointing an individual Manager responsible.
4. Know the appropriate statutory requirements affecting the Company's operations.
5. Ensure that all employees have the appropriate experience and training to undertake the tasks required of them.
6. Ensure that appropriate instruction, supervision and resources are provided at all times for the tasks being undertaken.
7. Insist that sound working practices are observed as lay down by Codes of Practice and that work is planned and carried out in accordance with the statutory provisions.
8. Ensure that tenders are adequate to allow for proper welfare facilities, safe working methods and equipment to avoid injury, damage and wastage and that Health and Safety factors are considered in the selection of sub-contractors.
9. Institute reporting, investigations and costing of injury, damage and loss, promote analysis of investigations to discover trends and eliminate hazards.
10. Reprimand any member of the staff failing to discharge satisfactorily their responsibilities for Health and Safety.
11. Arrange and provide for funds, resources and facilities to meet requirements of the Company Policy.
12. Set a personal example by wearing appropriate protective clothing.
13. Ensure a full fire risk assessment is drawn up, implemented, and regularly audited against & reviewed.
14. Ensure risk assessments for all operations undertaken are specific to the equipment/task & regularly audited against. The audit should be reviewed and actions undertaken in a timely manner.

## Senior Management Responsibilities

All company Managers will undertake the following:

1. Read and understand the Company Policy for Health and Safety and ensure that it is brought to the notice of all employees under your control.
2. Ensure that the requirements of the Health and Safety at Work etc. Act 1974 and any other Acts and Regulations are complied with.
3. Ensure that all plant and machinery is safe, fitted with any necessary guards or safety devices and is serviced and maintained as recommended by the manufacturer and/or registered under the relevant legislation.
4. Ensure that staff using plant and machinery are experienced and trained in its use and are not permitted to carry out any repairs unless authorised to do so.
5. Ensure that the workplace is laid out and maintained to ensure safety of staff and visitors.
6. Arrange all necessary insurance and carry out any necessary reporting of incidents to Insurers.
7. Ensure risk assessments for all operations are undertaken & regularly audited against. The audit should be reviewed and actions undertaken in a timely manner.
8. Ensure that a Fire Risk Assessment is undertaken for all sites, and that all firefighting equipment is maintained, fire exits kept clear and emergency evacuation drills organised on a regular basis.
9. Ensure that First Aid cover is adequate and facilities are available.
10. Ensure that all accidents are reported in accordance with Company Policy.
11. Ensure that staff work safely and in accordance with company rules and safe methods of work.
12. Ensure all necessary welfare provisions are provided and maintained.
13. Set a personal example at all times.
14. Ensure that all employees have the appropriate experience and training to undertake the tasks required of them.
15. Ensure that appropriate instruction, supervision and resources are provided at all times for the tasks being undertaken.
16. Ensure all work, both regular and intermittent, is planned and undertaken only when all staff are trained with adequate contracts implemented

## Office Management & Administration Responsibilities

All Office Management and Administration personnel will undertake the following:

1. Read and understand the Company's Safety Policy and carry out your work in accordance with its requirements.
2. Ensure that the clothing and particularly, the footwear worn is suitable for the workplace.
3. Report any defects in office equipment or machinery immediately to Management. Do not try to use, repair or maintain any office equipment or machinery for which you have not received full instructions.
4. Ensure the First Aid Box in an obvious location and everyone knows where this is.
5. Ensure that you know the procedure in the event of a fire and/or emergency.
6. Report any accident, damage or unsafe act however minor, to Management.
7. Ensure that corridors, office floors, doorways, etc. are kept clear and free from obstruction and fire hazards.
8. Do not attempt to lift or move, on your own, articles or materials as heavy as likely to cause injury.
9. Do not attempt to reach items on high shelves unless using steps or a properly designated hop-up: do not improvise or climb.
10. Suggest ways of eliminating hazards and improving working methods.
11. Ensure that all equipment or materials purchased by the Company are to the Standards Required by Company Policy.
12. Ensure that all suppliers are asked to provide full information on any hazards associated with the equipment or materials supplied and any precautions required and that this information is passed to relevant supervision/Management.
13. Set a personal example by wearing appropriate personal protective clothing and adhering to all safe systems of work.
14. Ensure that suppliers are informed of safe working loads of plant used for handling materials on site so that materials are delivered in suitable size loads.
15. Ensure that sub-contractors have received lists of responsibilities and Company Policy Statement in accordance with this Policy.
16. Rates negotiated for work carried out by sub-contractors must include all necessary safety precautions and, where appropriate, separate rates should be included for Health and Safety measures.
17. Update training records as and when training is undertaken or new staff are recruited.

## Management/ Supervisors Responsibilities

All Management and supervisors will undertake the following:

1. Ensure all work is planned by identifying:
  - a) The most appropriate and safest order & method of working.
  - b) The allocation of responsibilities and communication between the Company and others.
  - c) All work involving high risk activities.
  - d) Welfare facilities and fire arrangements required.
  - e) The training, experience, supervision and information required.
  - f) The equipment suitable for the task.
2. Provide written instructions to establish working methods and sequences, outline potential hazards at each stage and indicate precautions to be adopted, usually in the form of risk assessments.
3. Ensure, so far as is reasonably practicable, that works once started is:-
  - a. Carried out as planned and that account is taken of changing or unforeseen conditions as work proceeds.
  - b. Carried out in accordance with the appropriate statutory requirements.
4. Reprimand any member of staff for failing to discharge safety responsibilities satisfactorily.
5. Set a personal example by wearing appropriate personal protective clothing and following the safe systems of work.
6. Carry out any necessary notifications to the HSE, the Environmental Agency, Local Authorities, Police, etc. as required by Company Policy or regulations.
7. Ensure that all plant owned or hired is safe, fully sufficient for the task required, and maintained.
8. Ensure that all plant operators are only employed on equipment that they are experienced and trained to operate.
9. Ensure that all maintenance, inspections, tests and thorough examinations of plant and equipment are carried out as required in accordance with regulations. All necessary records must be maintained and filled.
10. Give advice to employees on the suitability or otherwise of plant for specified operations and ensure that any necessary safety instructions are issued with power tools or equipment.
11. Arrange for regular servicing and maintenance of all Company owned or hired plant and ensures that defects are dealt with promptly.
12. Ensure that employees do not continue to use plant or equipment if defects which could affect its safety are reported.



## Responsibilities of all Employees

The main responsibility of matters to do with health and safety and of ensuring compliance with this policy lies with the Directors and Managers of the company. However, the individual employees also have responsibilities - in law, "Duty of Care".

In particular you are expected to: -

1. Co-operate and participate in the implementation of this Safety Policy and with any other procedure or instruction designed to help protect your health and safety. If you are unsure about the meaning of any such information, you should ask a Supervisor for guidance.
2. Ensure your work is carried out in a safe manner. For example, where necessary you should use any safety equipment provided (blade guards, goggles, masks etc)
3. Report all accidents, dangerous occurrences or situations that have the potential to cause injury (to you or anyone else) to a Manager or Supervisor, if no personnel are available, report to main contractor or client.
4. Read and understand the Company's Health & Safety Policy.
5. Do not damage or misuse any equipment, such action may have safety implications.
6. To advise in good time of any expiry dates / due service details on plant and equipment.

The principle law concerned with health and safety at work (in general terms) is called the Health and Safety at Work Act 1974. Within this law is the duty imposed on you to: -

1. Take reasonable care for the health and safety of yourself and of other persons who may be affected by your acts or omissions at work; and
2. With regard to any duty or requirement imposed on your employer or any other persons by or under any of the relevant statutory provisions, to co-operate with him so far as is necessary to enable that duty or requirement to be performed or complied with.
3. Not intentionally or recklessly interfere with, or misuse anything provided in the interests of your health, safety or welfare.

# Company Head Office & Site Offices

## Standards Required

Workplace (Health, Safety and Welfare) Regulations 1992

Management of Health and Safety at Work Regulations 1999

Health and Safety (Display and Screen equipment) Regulations 1992

## Planning, Supervision and Safe Systems of Work

1. The Directors will ensure that a procedure is drawn up to be followed in the event of an emergency and that key personnel are given training in the procedures and use of firefighting equipment. Fire drills will be organised at 12 monthly intervals, date of drill and comments to be recorded.
2. All fire extinguishers will be provided in accordance with the latest British Standard and will be serviced and maintained at regular intervals as recommended by the manufacturer.
3. The Director will ensure that all office equipment is sited and maintained correctly and is serviced in accordance with the manufacturer's recommendations.
4. All staff required to use office equipment will be given training and instruction in its use.
5. All accesses, stairways, fire exits, etc. will be kept clear of all materials and well lit.
6. Equipment will be provided for office staff required to access items at height.
7. Offices will be planned to avoid trailing cables on floors to office equipment.
8. All fire alarms will be checked weekly and test recorded.
9. All fire exits will be checked at the start of each day by the Directors or nominated person.
10. Welfare facilities provided will be adequate and maintained to the required level.
11. All first aid requirements will be identified within a risk assessment and implemented
12. The Health and Safety at Work poster will be displayed in a prominent location.

# Company Van & Car Driving

## Standards Required

Provision and Use of Work Equipment Regulations 1998

Management of Health and Safety at Work Regulations 1999

The Transport and Works Act 1992

Road Vehicles (Construction and Use) Regulations 2003

## Planning, Supervision and Safe Systems of Work

1. Make regular inspections of your vehicle for obvious defects and ensure any defects noticed are rectified without delay. This is to be recorded.
2. Drive in a safe manner at all times and be particularly careful when driving on sites to consider the conditions of temporary access roads or roads that are under construction and being used for access purposes.
3. Ensure before reversing that there are no obstructions or people behind the vehicle.
4. Report all accidents or damage, however minor, to the Directors.
5. Ensure any traffic violations you are involved in which result in yourself being prosecuted are reported to the Directors.
6. Ensure your vehicle is serviced in accordance with the manufacturer's requirements.
7. Check lights, tyres, oil, water, windscreen wipers and washer reservoir, etc. at least every week.
8. Do not drink alcohol or take medication which could affect driving ability before driving a vehicle.
9. Do not operate a mobile phone or SatNav whilst driving. Only use mobile phones and pre-set SatNav when stationary with the engine switched off.
10. All company vans or lorries should contain a first aid kit and fire extinguisher.
11. Where fuel or gas cylinders is transported by company vehicles, the load must be secured, adequate ventilation must be provided and the appropriate signage must be displayed.

# Sub-Contractors

## Standards Required

Management of Health and Safety at Work Regulations 1999

The Construction (Design & Management) Regulations 2015

## Planning, Supervision and Safe Systems of Work

1. All sub-contractors will be expected to comply with the Company Policy for Health, Safety and Welfare and must ensure their own Company Policy, Method Statements & Risk Assessments are made available on site whilst work is carried out.
2. All sub-contractors will be assessed for competency prior to undertaking any work on behalf of Hillside Contracts Ltd. The Directors and/or Managers are responsible for undertaking this competency assessment.
3. All work must be carried out in accordance with the relevant statutory provisions and taking into account the safety of others on the site and the general public.
4. All plant or equipment brought onto site by sub-contractors must be safe and in good working condition, fitted with any necessary guards and safety devices and with any necessary certificates available for checking.
5. No power tools or electrical equipment of greater voltage than 110 volts may be brought onto site without the permission of Manager. All transformers, generators, extension leads, plugs and sockets must be to latest British Standard for industrial use, and in good condition.
6. Any injury sustained or damage caused by sub-contractor's employees must be reported immediately to this Company's Site Representative.
7. Sub-contractor's employees must comply with any safety instructions given by this Company's Site Representative.
8. Any material or substance brought on site which has health, fire or explosion risks must be used and stored in accordance with regulations and current recommendations and that information must be provided to any other person who may be affected on site.
9. Sub-contractors are particularly asked to note that workplaces must be kept tidy and all debris, waste materials etc. cleared as work proceeds.
10. The Method Statement and risk assessments must be agreed with Management before work begins and copies made available on site so that compliance with the agreed Method Statement can be maintained.
11. All subcontractors must undertake an induction prior to commencing work.
12. All subcontractors must abide by the site rules.

# Arrangements for Safety Monitoring, Audit, Inspection & Review of Company Safety Policy and Arrangements

## Standards Required

Management of Health and Safety at Work Regulations 1999

## Planning, Supervision and Safe Systems of Work

1. All employees will be expected to bring to the notice of the Directors, any areas where the Company Policy on Health, Safety and Welfare appears to be inadequate. The suggestions will be passed to the Manager responsible for safety for consideration.
2. The company will review the Health and Safety Policy on an annual basis or whenever there is change to the business.
3. The company will review any generic risk assessments on an annual basis or whenever there is change to the business or areas for change are highlighted from audits or accidents.
4. Through monitoring of the health and safety system the company hopes to achieve continuous improvement. This requires constant development of the company policy, approaches to implementation and techniques of risk control.
5. The Directors will ensure regular audits of the company safety arrangements are carried out.
6. Company Director and Supervisors will ensure that places of work are inspected regularly and these inspections are recorded.
7. Two audits a year are undertaken by the Health and Safety Advisor.
8. More regular site audits are undertaken as and when the client demands, or Identified in a site specific Risk Assessment.
9. All records of safety inspections and audits will be kept at head office to enable the Directors to monitor the performance of the company on an ongoing basis.

# Inductions

## Standards Required

Management of Health and Safety at Work Regulations 1999

The Construction (Design & Management) Regulations 2015

## Planning, Supervision and Safe Systems of Work

This procedure is to be carried out by a Director or Manager of the company where the new employee will be required to work.

1. Explain to the new employee what he/she will be required to do and to whom he/she will be directly responsible.
2. Show the new employee the Company Safety Policy, manual, including, statement, procedures, risk assessments and method statements. Explain its purpose and ensure that the employee is aware of his/her responsibility and obtain a signature in acknowledgement of this.
3. Ascertain if the new employee has any disability or illness which could prevent him/her carrying out certain operations safely or require additional protective measures.
4. Warn new employee of any potentially dangerous areas of operations on site or in the workplace.
5. Warn the new employee of any prohibited actions on site or in the workplace, e.g. entering specific areas without a safety helmet, operating plant unless authorised etc.
6. If there is any training or instruction required, inform management, e.g. abrasive wheels, cartridge tools, scaffold inspection, plant or machinery etc.
7. Issue to the new employee any protective clothing or equipment necessary, e.g. safety helmet, goggles, ear defenders, wet weather clothing etc.
8. Show the new employee the location of the company First Aid Box and explain the procedure in the event of an accident, in particular, the necessity to record all accidents, however trivial it may appear at the time.
9. Show the new employee the emergency procedure and exits.

## Additional Procedures for New Employees Under 18 Years Old

1. Inform employees that they must not operate any plant, give signals to any driver, and use any power tools or equipment unless being trained under the direct supervision of a competent person.
2. Ensure a suitable risk assessment is carried out & adequate supervision & training are provided.

# Training

## Standards Required

Management of Health and Safety at Work Regulations 1999

### Planning, Supervision and Safe Systems of Work

1. The Company is required to provide whatever information, instruction and training are needed to ensure, so far as is reasonably practicable, the Health and Safety of all employees. Therefore the company will ensure all employees receive Health and Safety training to enable them to undertake their work activities safely and efficiently.
2. The organisation should take into account the capabilities, training, knowledge and experience of workers and ensure that the demands of the job do not exceed their ability to carry out their work without risk to themselves and others.
3. Individual employees will have particular training needs, for example:
  - a. New recruits need induction training into how to work safely, including arrangements for First Aid, Emergency Procedures, PPE, Welfare etc...
  - b. When changing jobs or taking on extra responsibilities they need to know about any new Health, Safety and Environmental implications / responsibilities.
  - c. Employees who are particularly vulnerable to accidents and require particular attention to their needs, must be assessed to identify their training needs. It is also important that new, inexperienced or young employees are adequately supervised.
  - d. Skills may require updating by refresher training where the skill hasn't been used for a period of time.
4. Risk Assessments undertaken for specific tasks, projects or for company operations may also identify any further specific training needs for employees and or subcontractors.
5. All employees and contractors shall complete the relevant Induction which will be recorded prior to starting work.
6. All staff will be provided with the training necessary to ensure they have the experience, training and instruction for the task they are asked to do e.g. plant licences.
7. Directors and Management will regularly review to identify for any employee training needs. The company will continually assess the competence level of its Managers and Employees through the completion of annual appraisals to ensure experience, training and to continuously improve the safety mind-set of the company.
8. A Training Matrix will be completed and maintained for all company staff and where applicable sub-contractors. Copies of training certificate will be held at head office.
9. Where changes in legislation may require the organisation to carry out specific training e.g. First-Aid training then this will be undertaken after the completion of a risk assessment to identify the company requirements.

# Incident & Ill Health Reporting

## Standards Required:

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

## Planning, Supervision and Safe Systems of Work

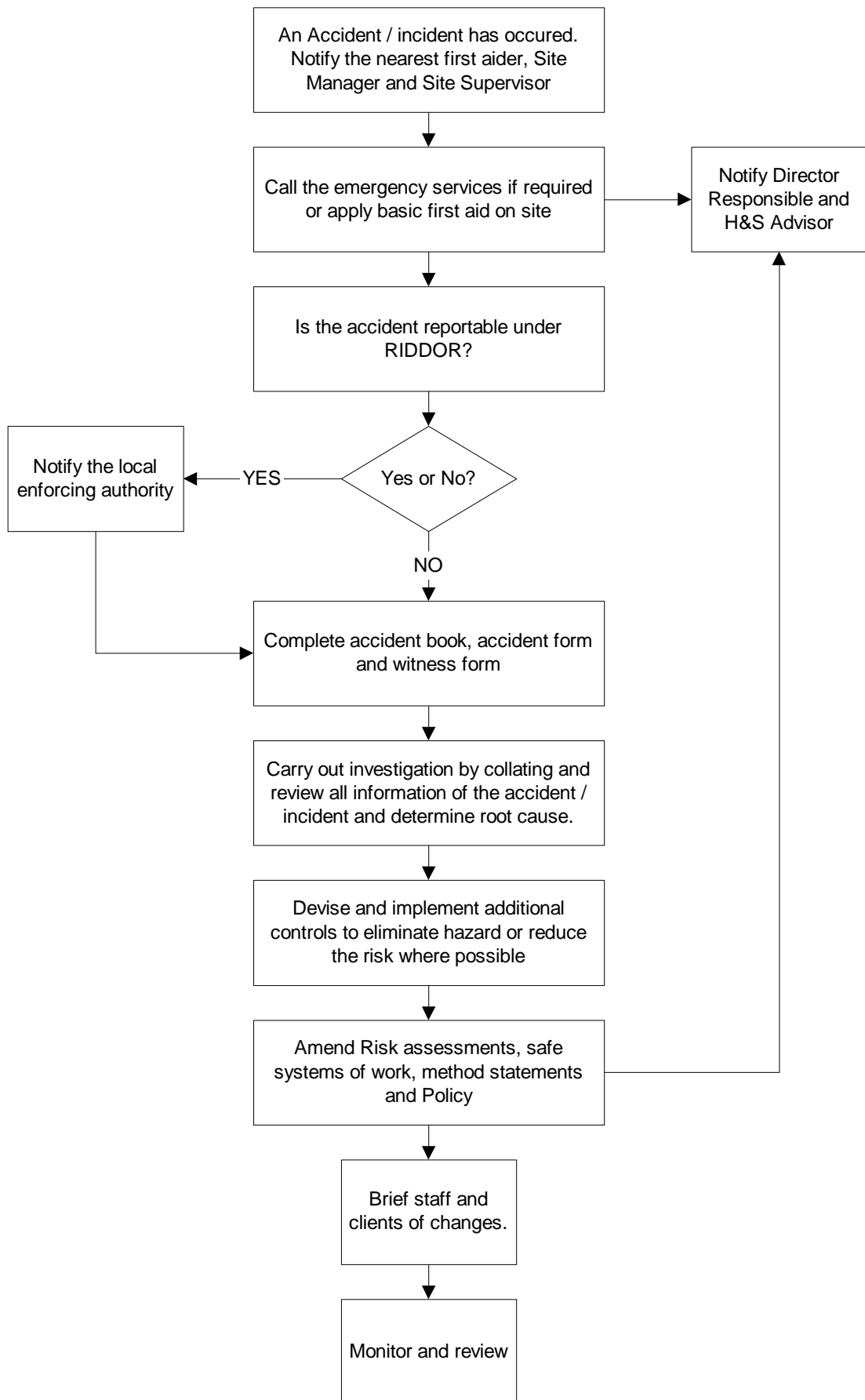
1. All injuries or damage resulting from incidents on site or in other workplaces, however minor, will be reported to a Site Manager. This applies to injuries received by sub-contractors, members of the public, visitors, etc. as well as Company employees.
2. In the event of an employee suffering any of the following:
  - a. Fatal Injury
  - b. Major Injury
  - c. An Injury resulting in the employee being absent from work for more than seven days
  - d. Occupational Illness or disease
  - e. Dangerous occurrences which could have resulted in a major injury

These types of accidents must follow the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations. The incident must be immediately reported to the Supervisor/ Senior Operator who in turn will inform Company Directors. A full investigation will then be undertaken by senior management and the Health and Safety Advisor to establish the root cause of the accident and then the local office of the Health and Safety Executive (HSE) must be informed via either email or through the HSE website in the correct time scales. In the case of an employee of another company being killed or injured, this duty is placed on his/her employer. However, in order to ensure that this Company has fully complied with legal requirement, the Manager or Supervisor may also notify the HSE.

Where any injury to any employee, self-employed operative or person undergoing training (other than those reported as in Paragraph 2 above), results in the injured person being absent from work for more than 7 days, a notification will be sent to the Health and Safety Executive within 15 days of the incident if details have been received from site/workplaces in accordance with Paragraph 1 above.

3. An Accident Book that complies with current legislation & guidelines will be available at the office, to ensure any injured employee will have recorded details of his accident.
4. If a medical certificate or other written diagnosis from a doctor has been received in respect of an employee who is absent from work and the disease diagnosed is one of those listed in the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, and if the disease is reportable, notify the Health and Safety Executive.
5. The records of any fatalities, major injuries, reportable diseases, dangerous occurrences and other notifiable injuries will be kept by the Director who is responsible for ensuring that all details are entered and that records are kept for at least 3 years from the date of the last entry.





# Health Hazards

## Standards Required

The Control of Asbestos Regulations 2012

The Control of Lead at Work Regulations 2002

The Construction (Design & Management) Regulations 2015

Control of Substances Hazardous to Health Regulations 2002 as amended

The Control of Noise at Work Regulations 2005

The Control of Vibration at Work Regulations 2005

Personal Protective Equipment at Work Regulations 1992

## Supervision

The Supervisor will ensure that all procedures planned to handle or use any hazardous substances are carried out fully and that any protective clothing, equipment or hygiene measures are provided and maintained as required.

Any necessary air sampling, medical examinations, testing, etc. will be carried out as required and records will be kept on site during the operations.

All measures necessary to protect other workers and the general public from any substance hazardous to health, will be provided and maintained.

## Planning Procedures

All work will be tendered for or negotiated, taking into account the above standards.

The Directors will ensure that before work starts on site, information is obtained on any material or substances to be used or likely to be encountered, which could be a hazard to the health of operatives and that this information is included in the risk assessment.

If possible, arrangements should be made for an alternative, less hazardous material to be specified.

Any necessary protective clothing, equipment, enclosures, extraction equipment, hygiene facilities, medical examinations, etc. must be planned before work commences.

All operatives engaged in any process involving the use of handling of any hazardous substance, must be given full instructions and any necessary training in the health hazards and precautions, use of protective clothing, equipment, hygiene measures, etc. as required, as well as a copy of the risk assessment.

## Safe Systems of Work

Health hazards from substances can be divided into the following categories.

1. External contact - corrosive, skin absorption, dermatitis, etc., e.g. cement, acids, epoxy resins, etc.
2. Inhalation - gases, fumes, dusts, vapours.
3. Ingestion - swallowing.

The precautions that apply to the handling, transporting and use of specific substances are set out in the COSHH risk assessments completed for each product.

Almost all chemical materials are potentially dangerous. Although they may find their way into day to day use, it is usually a very diluted or otherwise modified form. The following general rules should always apply in conjunction with the COSHH risk assessment:

1. No chemical should be used before referring to the COSHH risk assessment. A COSHH risk assessment is produced from the information provided in the material data safety sheet (MSDS) by a competent person.
2. Chemical products must never be allowed to come into eye contact. Contact with skin and mucous membrane must likewise be avoided. Wear protective equipment and clothing supplied. Always observe good industrial hygiene practice.
3. Do not swallow materials or use in areas where food is being consumed. Smoking is also prohibited during application and curing.
4. Inhalation of chemical vapours or dust should be avoided. Adequate ventilation must be provided. Suitable respiratory protection will be provided if appropriate.
5. Facilities for the washing and cleansing of the skin must be made available with the necessary cleansers and barrier creams.
6. Store all products in ventilated areas, away from extremes of temperatures and environment.
7. Clean all spillages instantly and dispose of waste and used containers properly.
8. Except for transport in closed packages, materials must be handled only by authorised personnel.
9. Ensure the correct equipment for handling the products is available.
10. If any person handling the materials shows the symptoms which may possibly have been caused by exposure to chemical products, they should be removed from the area and medical advice sought, without delay.

The completed COSHH risk assessment should be issued to all supervisory personnel and brought to the notice of all operatives, sub-contractors, etc. who may be affected by the use of the material, products, etc. before they use the product.

# Health Surveillance

## Standards Required

The management of Health and Safety at Work Regulations 1999

Control of Substances Hazardous to Health Regulations 2002

The Control of Noise at Work Regulations 2005

The Control of Vibration at Work Regulations 2005

The Control of Asbestos Regulations 2012

## Planning, Supervision and Safe Systems of Work

1. Annual Health Surveillance will be undertaken, where identified in a risk assessment, for workers exposed to hand arm vibration (HAV), whole body vibration (WBV), Manual Handling, lead, asbestos, noise, gases, fumes and dust.
2. Annual surveillance will be undertaken with the support of the Health and Safety Advisor.
3. Health Surveillance will be undertaken using the relevant HSE approved questionnaire for all employees and new starters.
4. If the need arises the assistance of an occupational nurse or doctor they will be sought.
5. All records will be kept by the Directors, will be treated as confidential and kept securely under the Data Protection Act.

# Welfare & First Aid

## Standards Required

The Construction (Design & Management) Regulations 2015

The Workplace (Health, Safety and Welfare) Regulations 1992

Management of Health and Safety at Work Regulations 1999

Provision and Use of work equipment Regulations 1998

The Health and Safety (First Aid) Regulations 1981

## Planning Procedures

All work will be planned taking into account the requirements of the above regulations.

The Manager will establish the Welfare and First Aid requirements before work starts, taking into account sub-contractors requirements if applicable.

*Or*

The Supervisor will arrange with the main contractor before Company employees are sent to site that all necessary Welfare and First Aid arrangements are provided.

*Or*

All sub-contractors will be expected to provide facilities in accordance with the regulations for their employees. These will be provided and maintained to the satisfaction of our Management.

## Supervision

Staff are provided with first aid facilities at the company's head offices & first aid kits are carried in their vehicles.

The Workplace Supervisor will ensure that all planned Welfare and First Aid facilities are provided and that they are maintained to the required standards.

*Or*

The Supervisor will report to management any deficiencies in facilities provided by main contractor.

## Special Welfare Arrangements

Where short term work is to be carried out on a site where the provision of huts or mobile units is not reasonably practicable, the minimum of equipment to be carried in vehicles is:

- a. Drinking water container.
- b. Hand cleanser in dispenser.
- c. Paper towels or other suitable means of drying hands.
- d. Storage facilities for protective clothing.
- e. Adequate First Aid equipment.

Before work commences, the Manager/Supervisor must make arrangements for the use by operatives of convenient sanitary facilities throughout the duration of the work.

The location of the nearest hospital with a 24 hour A&E provision will also be notified.

# Workplace Housekeeping

## Standards Required

Management of Health and Safety at Work Regulations 1999

Construction (Design and Management) Regulations 2015

The Health and Safety at Work etc. Act 1974

The Work at Height Regulations 2005

## Planning Procedures

All work will be tendered for or negotiated taking into account the labour requirement and plant required to comply with the above standards.

The Directors will ensure that access routes are planned, deliveries are programmed to ensure that excess materials are not stored on site, storage areas are defined, compounds are planned and sub-contractors are made aware of the Company requirements with regard to storage, clearing up, tidiness, etc.

The Directors will ensure that before Company employees are sent to site under the overall control of another contractor, arrangements are made for storage and that safe accesses and places of work will be available for employees to carry out their work safely.

## Supervision

The Supervisor will ensure that all sub-contractors and operatives are made aware of the need to maintain the site in a tidy condition throughout the contract.

The Supervisor will ensure that stacking areas are prepared and that materials are called off in quantities which will not create difficulties on site.

When working as a sub-contractor, the Supervisor will ensure that working areas and accesses on site where employees are required to work are safe. Where difficulties are experienced, the Director must be informed, to discuss improvements with the main contractor.

The Supervisor will ensure that all waste materials are cleared and disposed of safely, and in accordance with environmental legislation and site disposal plans, as work proceeds. All materials delivered to site for use by this Company will be stored safely ensuring that accesses are not obstructed.

All openings in roofs must be securely covered or be clearly marked, to show that there is an opening below.

Debris and materials must not be thrown or dropped from scaffolds or buildings unless a chute is provided or other suitable safe method used.

The Supervisor will arrange for sufficient labour and plant to enable clearing up and maintenance of safe accesses, cleaning of Welfare facilities etc. to be carried out in accordance with these standards.

# Hired & Company Plant, Tools & Machinery Maintenance

## Standards Required

Lifting Operations and Lifting Equipment Regulations 1998

Construction (Design and Management) Regulations 2015

Provision and Use of Work Equipment Regulations 1998

The Electricity Regulations 1989

The Health and Safety at Work etc. Act 1974

The Control of Noise at Work Regulations 2005

The Control of Vibration at Work Regulations 2005

Management of Health and Safety at Work 1999

Manual Handling Regulations 2002

Personal Protective Equipment at Work Regulations 1992

Supply of Machinery (Safety) Regulations 2011

Various Codes of Practice and British Standards apply to specific items of plant and will be referred to as necessary.

## Planning Procedures

The Manager will ensure that plant to be supplied is suitable for the work intended. If required, a visit or meeting will be arranged, to discuss provision of plant and conditions they will be used in.

The Directors will ensure that all Company owned plant is in good order and has been fitted with all necessary safety devices, noise measures and guards and that any necessary portable appliance testing and thorough examination is carried out at the prescribed intervals.

The Directors will arrange a schedule of maintenance and servicing for all plant in accordance with manufacturer's recommendations.

The Directors will ensure that any plant operator has received sufficient training and experience to competently operate the item of plant hired out and to carry out any appropriate inspections and routine maintenance. Where appropriate, the operator should possess an accredited Operator's Certificate.

When purchasing any new Plant or Equipment, consideration must be given to items that produce the lowest noise, vibration and Co2 emissions along with suitability and ease of maintenance.



## **Supervision**

The Directors will ensure that any defect reported or noted at regular servicing or maintenance, is attended to as soon as possible. Where a defect could affect safe use of plant, instructions will be issued for use of plant to stop immediately.

## **Safe System of Work**

Where any machine is supplied with an operator, arrangements must be made with the hirer for the provision of Welfare facilities and First Aid equipment for the use by the operator.

All equipment will be inspected for defects prior to use.

When machine is not being used keys will be received by the operator and the plant secured.

# Use of Plant, Tools & Machinery

## Standards Required

Construction (Design and Management) Regulations 2015

Provision and use of Work Equipment Regulations 1998

Lifting Operations & Lifting Equipment Regulations 1998

Electricity at Work Regulations 1989

The Control of Noise at Work Regulations 2005

The Control of Vibration at Work Regulations 2005

The Control of Substances Hazardous to Health 2002

Management of Health and Safety at Work 1999

Personal Protective Equipment at Work Regulations 1992

Supply of Machinery (Safety) Regulations 2011

## Planning Procedures

All work will be planned in accordance with the above regulations.

Prior to using any plants, tools or equipment a risk assessment will be undertaken and documented. The risk assessments will take into account all the significant hazards.

The Directors will ensure that competent operators and banksmen are provided or that, where necessary, full training and instruction is arranged. Where appropriate, only operators holding a current Operator's Certificate will be permitted to operate plant.

The Directors will ensure that a planned maintenance and servicing schedule is prepared for all Company plant and machinery including transport vehicles and fuel bowsers.

Where necessary, discussions will take place between the Manager and the Local Highway Authority, Police, etc. on road crossings, traffic management etc. to produce a site traffic plan. This will include the need for temporary access roads, safe fuel storage locations, maintenance facilities, etc. for transport on site will be planned.

## Supervision

The Supervisor will ensure that plant is in good order and fitted with any necessary safety devices and guards.

Daily visual inspections by the plant operator and weekly recorded inspections by the Supervisor will be undertaken to ensure all plant and machinery equipment is free of any defect. Any defects noted will be reported to Directors or hire company immediately.

The Supervisor will ensure that only authorised and, where appropriate, certificated operators are permitted to operate any item of plant. Where any doubt of the competency of an operator exists, the Supervisor will report to the Directors or hire company immediately.

No young person (under 18 years old) is permitted to operate any item of plant or act as banksman, unless being trained and under direct supervision.

All plant will be properly secured and immobilised when not in use and at the end of each day.

All necessary testing and thorough examination certificates will be requested and checked by the Supervisor and all items of plant requiring weekly inspections by operator or other competent person will have the inspection recorded in the site register, regardless of any register kept by the operator or plant hire company.

The Supervisor will ensure that any necessary preparatory work required to enable plant to be installed or used correctly, is carried out in accordance with specific requirements.

The Supervisor will ensure that any defect notified by the plant operator during operations on the site is reported immediately for repair and that where defects could affect safety on site, the item of plant is not used until the repairs are carried out.

The site supervision will not ask or permit the plant operator to carry out work with the machine for which it was not intended, unless specific advice has been obtained from the manufacturers of the machine on the proposed use.

Preventative maintenance of electrical equipment will be undertaken through regular portable appliance testing.

Specific risk assessment will be undertaken to ensure the controls for all reasonably foreseeable hazards are addressed.

All electrical equipment used by company employees will be where possible battery powered. Any mains operated equipment is 110v and PAT tested regularly as per the maintenance schedule unless less than 6 months old.

## **Safe System of Work**

1. Read and understand the Company Safety Policy and risk assessments and carry out your work in accordance with its requirements
2. Only operators who are trained and competent can use plant and machinery
3. Know and understand the legal requirements affecting the use of plant and machinery and ensure that it is used in accordance with those requirements.

4. Visual inspections of all equipment will be undertaken by the operator prior to use at the start of each shift to ensure that the machine is defect free. Any defect with the machine is to be reported immediately to the Supervisor. Do not continue to operate the machine if the defect affects its safe use.
5. Undertake visual inspections before using plant, tools and machinery each time.
6. Carry out and record weekly inspections of plant and machinery for defects.
7. Ask for, and use, ear protection to ensure that you do not suffer from gradual loss of hearing due to prolonged exposure of noise.
8. Never try to use the machine for work for which it was not designed. If in doubt, ask the Contracts Manager for advice.
9. Suitable safety footwear and protective clothing must be worn by those exposed to the same hazards as the operator of your machine.
10. All banksmen, required to enter areas where machinery is operating will be provided with high visibility jackets.
11. Suggest ways to eliminate hazards or improve working methods.
12. Ensure when operating your machine that other persons are well clear, especially if reversing.
13. Ensure, if necessary, that you work with a Banksman and, if so, you are both sure before starting work of the meaning of signals which may be used.
14. Report all accidents or damage, however minor, to your Manager.
15. Prior to starting work, check with the Supervisor the location of any relevant services. Avoid working close to overhead power lines.
16. Plant operators must not drink alcohol or take drugs, during the working day or shift.
17. All personnel required to enter areas where lifting appliances are in use, (e.g. cranes, excavators, piling frames, etc.) will be provided with safety helmets and will be required to wear them as directed by site supervision.
18. Children must not be permitted to enter working areas, whilst plant is in use and all necessary measures required to avoid hazards to children on site outside working hours must be taken, particularly if it is not possible to fully fence the site.
19. Drip trays, spill kits and fire extinguishers are to be provided around refuelling areas.

# Compressed Air Power Tools

## Standards Required

Provision and Use of Work Equipment Regulations 1998

Construction (Design & Management) Regulations 2015

Personal Protective Equipment at Work Regulations 1992

## Planning Procedures

At tender or negotiations stage, the above regulations will be taken into account.

The Directors will ensure that any compressor and compressed air tools which are purchased or hired for use on site or in the workplace, are in accordance with the above standards and are selected in accordance with the Company Policy on noise.

## Supervision

The Supervisor will ensure that any compressor or compressed air tools provided for use are fitted with all necessary guards and safety devices (jockey wheel, brake, engine cover stays, etc.) and noise control measures and that instructions are given to operatives in the correct use of the equipment to reduce noise, injuries, damage etc.

The Supervisor will ensure that all necessary safety equipment, e.g. eye protection, hearing protection, is available and provided for use, as required.

The Site/Workplace Supervisor will ensure that any defects in the compressor, hoses or tools is reported immediately to the Director or hire company.

The Company will encourage all operatives to wear suitable protective footwear when using compressed air equipment, breakers, rammers etc.

Compressed air will not be used to blow down clothing etc. and disciplinary action will be taken against any operative seen directing a live compressed air hose at any other person.

## Safe Systems of Work

When moving compressors on site, care must be taken to ensure that the jockey wheel or towing arm stand is not damaged.

When changing tools connected to compressed air lines, not fitted with automatic cut-off valves, air must be turned off at source (lines must not just be folded and held or tied).

# Protective Clothing & Equipment

## Standards Required

The Construction (Design & Management) Regulations 2015

The Control of Asbestos at Work Regulations 2012

Personal Protective Equipment at Work Regulations 1992

The Control of Noise at Work Regulations 2005

The working at Height Regulations 2005

Control of Lead at Work Regulations 2002

Personal Protective Equipment at work Regulations 1992

All safety equipment purchased for use on Company sites/workplaces will be in accordance with the appropriate British Standard and CE marked.

## Planning Procedures

All work will be tendered for or negotiated in accordance with the above standards.

Before work starts, the Directors will ensure that any special protective clothing or equipment required is ordered and available for use on site and that sub-contractors are made aware of the Company Policy on the wearing of safety helmets.

All PPE identified through risk assessments must be provided free of charge to all personnel.

## Supervision

The Supervisor will ensure that adequate supplies of all necessary protective clothing or equipment are available free of charge on site/workplace for issue as required and that when issued to employees, a record is kept.

The Supervisor will ensure that before employees are set to work, that any necessary protective clothing is provided.

Any person on site/workplace observed carrying out any process which requires the use of protective clothing or equipment, will be informed of statutory Company Policy requirements and instructed not to continue working until protective clothing or equipment is obtained. This applies to any sub-contractors as well as direct employees.

The Supervisor will ensure that the protective clothing or equipment is suitable for the specific process for which it is provided.

All supervisory and management staff will set a good example in the wearing of safety helmets, protective footwear, etc. and will use all necessary protective clothing and equipment where required.

### **Safe Systems of Work**

All operatives are required to wear suitable footwear whilst at work.

It is the policy of this Company, that all management, supervisory staff, visitors, sub-contractors and employees shall wear safety helmets whilst on Customer sites, unless otherwise specified. Normal disciplinary proceedings will be used against employees not complying with this requirement.

All plant operators employed by the Company will be issued with appropriate hearing protection and instructed in its maintenance and use.

All persons issued with protective clothing or equipment must immediately report to supervision any loss or defect in the equipment.

All staff are trained for working at height, and are provided with up to date protective equipment. All harnesses and associated equipment are inspected prior to each occasion of use by operator and by an independent competent person at 6 monthly intervals.

# Manual Handling

## Standards Required

Lifting Operations & Lifting Equipment Regulations 1998

Construction (Design & Management) Regulations 2015

Manual Handling Operations Regulations 1992

Provision and Use Of Work Equipment Regulations 1998

The Workplace (Health, Safety and Welfare) Regulations 1992

Management of Health and Safety at Work Regulations 1999

Health and Safety (Display Screen Equipment) Regulations 1992

## Planning Procedures

All work will be tendered for or negotiated, taking into account the above standards.

The Directors and management will ensure that where possible that materials are handled by mechanical handling equipment. Where the use of mechanical handling equipment is impracticable, then a suitable risk assessment will be undertaken to identify the most suitable way to handle any loads. Instructions must be issued to site on the handling of these loads.

All supervisory staff will be given training in the correct methods of handling and lifting loads as part of their normal site safety training.

## Supervision

Supervisory staff will instruct any operative in the correct handling and lifting of loads as required.

Supervisory staff will ensure that a supply of suitable gloves are available as required, for the handling of materials which could cause injuries to the hands.

The Company encourage the wearing of safety footwear and supervisory staff will caution any employee or sub-contractor wearing unsuitable footwear.

The supervision will not require any operative, particularly a young person, to lift without assistance a load which is likely to cause injury.



## Safe Systems of Work

The main injuries associated with manual handling and lifting are:

1. Back strain, slipped disc.
2. Hernias.
3. Lacerations, crushing of hands or fingers.
4. Tenosynovitis,
5. Bruised or broken toes or feet.
6. Various sprains, strains etc.

The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physical build etc.

Where loads have to be manually handled, the need to ensure that accesses are safe is especially important.

The training provided should be based on the physical structure of the body and the effect of attempting to handle loads in various positions.

# Working at Height

## Standards Required

Working at height is controlled by the Work at Height Regulations 2005

The Construction (Design & Management) Regulations 2015

Management of Health and Safety at Work Regulations 1999

## Planning Procedures

All work will be tendered for or negotiated, taking into account the above legislation.

The Directors and management will ensure that where possible working at height will be avoided at all where reasonably practical. If this is not possible then a suitable risk assessment will be undertaken to identify the correct work at height equipment to be used.

## Supervision

The Supervisor will ensure that all work at height is planned in such a way as to ensure the safety of all those working at height, and protect other persons below.

All equipment used for working at height is regularly inspected, and old or faulty equipment disposed of.

All persons working at height will be trained for the work they do & the equipment they use. All work at height is supported by a suitable risk assessment.

It is not a normal requirement for site staff to use ladders for anything other than the access provided by the site management. Should ladders be erected and/ or used by site staff, they would be used for access only, and would be tied off or footed in accordance with best practice. A suitable risk assessment would be drawn up.

## Safe Systems of Work

- 1 A work at height risk assessment will be undertaken and documented.
- 2 All inspection work is carried out in accordance with training. All scaffolding is inspected daily and formally weekly.
- 3 All personnel are trained to work at height and to work with equipment provided.
- 4 External work at height is only carried out if weather conditions permit.
- 5 Where identified, personnel working at height wear restraining systems appropriate to the task, attached to fixed strong points.
- 6 Where there is risk of deploying a harness in freefall, adequate rescue plans shall be identified and put into effect.

# Fire Safety

## Standards Required

Fire Safety is controlled by the Regulatory Reform (Fire Safety) order 2005

## Planning, Supervision and Safe Systems of Work

### Offices

The Directors will ensure that a procedure is drawn up to be followed in the event of fire and that key personnel are given training in the procedures and use of firefighting equipment. Fire drills will be organised at 12 monthly intervals, date of drill and comments to be recorded.

All fire extinguishers will be provided in accordance with the latest British Standard and will be serviced and maintained at regular intervals as recommended by the manufacturer.

All fire alarms will be checked weekly and test recorded.

Emergency lighting will be tested monthly and recorded.

All fire exits will be checked at the start of each day by the Directors or nominated person to ensure they are clear at all times.

The fire risk assessment will be reviewed regularly.

### Site

No hot work is carried out in the vicinity of flammable materials, or where it is likely to cause a hazard.

When hot works are undertaken then brazing should stop a minimum of thirty minutes before leaving site to ensure no hot residues cause a fire on site.

All hot works should be undertaken with a fire extinguisher at hand in case a fire breaks out.

A site fire risk assessment will be undertaken identifying all controls in place and actions required. All fire safety instructions and preventive measures issued by the Supervisor will be followed by Hillside Contracts Ltd's Staff.

When a permit to work is identified as a control measure for hot work to be undertaken, then the controls outlined in the document will be complied with, to ensure fire risks are minimised.

# Excavations & Confined Spaces

## Standards Required

Confined Spaces Regulations 1997

Management of Health and Safety at Work Regulations 1999

The Construction (Design & Management) Regulations 2015

Working at height is controlled by the Work at Height Regulations 2005

## Supervision

The Supervisor will ensure that all excavations and confined spaces are planned in such a way as to ensure the safety of all those working.

All equipment used for excavations and confined spaces are regularly inspected, and old or faulty equipment disposed of.

All persons working in excavations and confined spaces will be trained for the work they do & the equipment they use. All work in excavations and confined spaces is supported by a suitable risk assessment.

Access to excavations and confined spaces is normally by ladder.

All work undertaken in excavations and confined spaces will be supported by a permit to dig or work and emergency plan.

Weekly recorded inspections of all equipment, trenches, trench boxes & other safety arrangements are undertaken.

All surveys of the dig site for services are undertaken by the principle contractor. Survey drawings are provided to assist the process. Work will not commence until these have been read & preventive measures agreed.

Permits to work should be issued where identified in a specific risk assessment.

## Safe Systems of Work

1. All new work is carried out in accordance with surveys provided by the principle contractor
2. All inspection work is carried out in accordance with training.
3. All personnel are trained to work in excavations and confined spaces and to work with equipment provided.
4. At all times, personnel working in confined spaces must wear harnesses that will allow them to be hoisted to safety.

5. Where there is risk of the operator being trapped, adequate rescue plans shall be identified and put into effect.
6. Where there is a risk of oxygen depletion or the presence of other gases, personal gas monitoring devices will be carried, and suitable evacuation equipment provided, which the operator will be trained to use.
7. No work will be carried out within an excavation until suitable safety measures are in place, including a trained presence on the surface and a permit to work.

# Asbestos

## Standards Required

Control of Asbestos Regulations 2012

Management of Health and Safety at Work Regulations 1999

## Planning and Supervision

The Supervisor will ensure that all staff under their control are trained in asbestos awareness to a level appropriate to their area of work.

The Supervisor will ensure relevant policy and procedures documentation are complied with and reviewed as necessary.

The principle contractor will maintain a register of all identified asbestos based products on site. The register will be updated to reflect changes in the risk, after removal or encapsulation works, or general deterioration.

All high-risk asbestos identified in surveys shall be removed or treated as appropriate to eliminate the risk or reduce the risk to an acceptable level by a competent & licensed operator.

The Supervisor will ensure that all persons who might come into contact with asbestos are trained to such a level as to be deemed as competent persons for the purposes of the Control Of Asbestos Regulations 2012 approved codes of practice e.g. regular asbestos awareness training.

## Safe Systems of Work

1. All work areas/offices will hold an asbestos survey and register unless the building is newer than 2000.
2. This will be provided to any employees/ Sub-Contractors who might be undertaking work where asbestos might be.
3. No new asbestos-containing material shall be used in any work undertaken.
4. Where no work is to be undertaken a refurbishment survey will be carried out on all properties which, due to their age or nature of construction, are likely to contain asbestos. An Asbestos Management Plan will then be developed, maintained and reviewed regularly where appropriate.
5. For any construction work and or maintenance on properties which, due to their age or nature of construction, are likely to contain asbestos a demolition survey must be undertaken prior to commencing any work.
6. All persons must be suitably trained where they are likely to come into contact with asbestos.
7. Where asbestos is found in an unidentified location then work must stop immediately and the Supervisor informed.

# Alcohol, Drugs, Smoking, Satnav & Mobile Phones

## Standards Required

The Transport and Works Act 1992

Smoke-free (Premises and Enforcement) Regulations 2006

Road Vehicles (Construction and Use) Regulations 2003

Management of Health and Safety at Work Regulations 1999

## Planning, Supervision and Safe Systems of Work

Smoking, including E-Cigarettes, is not permitted on company premises or within confined spaces and company vehicles.

No worker must undertake work under the influence of any recreational drugs and alcohol.

Managers can undertake random drug and alcohol testing.

The use of hand held mobile telephones while driving the vehicle is not permitted under any circumstances. The use of mobile phones whilst driving is only permitted when in conjunction with a suitable hand free kit and must only be used when it is safe to do so.

The use of a Satellite Navigation System can be provided or used to ensure the driver finds the destination efficiently. However the system must only be set up or modified when the vehicle is parked up in a safe location and the engine switched off.

# Construction (Design & Management) Regulations

## Standards Required

The Construction (Design & Management) Regulations 2015

Management of Health and Safety at Work Regulations 1999

Workplace (Health, Safety and Welfare) Regulations 1992

## Planning, Supervision and Safe Systems of Work

Under the CDM Regulations 2015, all sections apply to Hillside Contracts Ltd at all times on all construction work, including work for domestic clients as well as non-notifiable jobs.

Therefore the following actions must be taken to ensure compliance at all times:

## Roles & Responsibilities

Identify roles and responsibilities of all parties prior to commencing work on the project, the following roles need to be appointed formally by the client and arrangements communicated.

If it's not clear who the client is under the CDM regulation, any uncertainty should be resolved as early as possible by considering who;

- a) Ultimately decides what is to be constructed, where, when and by whom.
- b) Commissions the design and construction work.
- c) Initiates the work.
- d) Is at the head of the procurement chain.
- e) Appoints principal contractors and principal designers.

## 1. Client

- a) Assemble project team – appointing a principal contractor and principal designer and ensure they comply with their separate duties.
- b) Ensuring the roles, functions and responsibilities of the project team are clear.
- c) Ensuring sufficient resources and time are allocated for each stage of the project.
- d) Ensuring effective arrangements are in place for members of the project team to communicate and cooperate with each other. This can be in the form of a client brief.
- e) Ensure that the health and safety performance of designers and contractors is maintained throughout and reported back to the client.
- f) Ensuring that workers are provided with suitable welfare facilities for the duration of construction work.
- g) Ensure the Principal Designer compiles the health and safety pre construction information and health and safety file.



Domestic clients are responsible under CDM regulations 2015 however their duties as a client are transferred to; the designer or the principal contractor.

## **2. Designer**

- a) When preparing, or modifying designs, to eliminate, reduce or control foreseeable risks that may arise during: construction and maintenance/use of a building.
- b) Provide information to other members of the project team to help them fulfil their duties
- c) Eliminate, reduce or control foreseeable risks through design.

## **3. Principal Designer**

- a) Plan, manage, monitor and coordinate health and safety in the pre-construction phase of a project. This includes; identifying, eliminating or controlling foreseeable risks and ensuring designers carry out their duties.
- b) Prepare and provide relevant information to other duty holders.
- c) Liaise with the principal contractor to help in the planning, management, monitoring and coordination of the construction phase.
- d) Plan, produce and monitor health and safety file.
- e) Produce pre construction information.
- f) Plan, manage and undertake design reviews.

## **4. Principal Contractor**

- a) Plan, manage, monitor and coordinate the construction phase of the project. This includes: liaising with the client and principal designer, preparing the construction phase plan, organising cooperation between contractors and coordinating their work.
- b) Ensure: suitable inductions are provided, reasonable steps are taken to prevent unauthorised access, workers are consulted and engaged in securing their health and safety and welfare facilities are provided.

## **5. Contractor**

- a) Plan, manage, and monitor construction work under their control so that it is carried out without risks to health and safety.
- b) For projects involving more than one contractor, coordinate their activities with others in the project team – in particular, comply with directions given to them by the principal designer or principal contractor.
- c) For single-contractor projects, prepare a construction phase plan.

## **Planning & Operations**

- 1. At tendering, negotiating and planning stages, the requirements of current CDM and other H&S and Environmental regulations must be taken into account.
- 2. Any aspects of work not covered by this Policy must be planned by management and written procedures and policy defined.

3. Pre-contract meetings and design reviews will be held with clients, designers, principal designers and principal contractors to ensure Health and Safety matters discussed and processes are in place to plan, manage and monitor work processes so that risks to health and safety are minimized through each project.
4. To produce or to have input into the pre-construction and construction phase plan, which takes account of any hazards and controls highlighted by the principal designer or designer.
5. To take all reasonable steps to ensure that work is carried out in accordance with the construction phase plan, and to notify the relevant duty holder of anything which may require the plan to be amended.
6. To co-operate with all other duty holders.
7. To inform any contractor appointed of the amount of time allowed for planning and preparation prior to construction work commencing.
8. To promptly provide details of any reportable accidents or incidents to the relevant duty holder.
9. To provide the relevant duty holder with the current employers' and public liability insurance certificate, health and safety policy, site specific risk assessments and method statements.
10. To produce the relevant documents required for the health and safety file to the duty holder.

## **Notifications**

1. Where a construction project must be notified, the client must notify the relevant authorities as required for the relevant projects.
2. A project is notifiable if the construction work on a construction site is scheduled to last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project or exceeds 500 person days.

# Employee Consultation and Communication

## Standards Required

Safety Representatives and Safety Committees Regulations 1977

Health and Safety (Consultation with Employees) Regulations 1996

Immigration, Asylum and Nationality Act 2006

## Consultation

### Planning, Supervision and Safe Systems of Work

It is the company's policy to seek the full co-operation and support from our employees on health and safety matters. Therefore consultation with employees is undertaken within the company in accordance with the relevant legislation.

Where the company recognises a trade unions in any part of the business then the Safety Representatives and Safety Committees Regulations 1977 will apply if that trade union has appointed, or is about to appoint, safety representatives. The employer will consult the union-appointed health and safety representatives on health and safety matters affecting the employees they represent through a formal safety committee.

Where the Safety Representatives and Safety Committee Regulations 1977, do not apply for example if:

- a. the employer does not recognise trade unions;
- b. the employer does recognise trade unions but representatives have not been appointed or are not about to be appointed; or
- c. There are any employees who do not belong to a trade union and recognised trade unions have not agreed to represent them.

The Health and Safety (Consultation with Employees) Regulations 1996 will apply. Where this is the consultation with employees this will be done directly as individuals on an ongoing basis, or through elected health and safety representatives or a combination of the two.

It is good practice to consult with the workforce above and beyond your legal requirements. Therefore Hillside Contracts Ltd have identified the following additional arrangements for communication and consultation with employees and sub-contractors:

- a) Informally through line managers on a daily basis.
- b) Formal staff briefings/toolbox talks monthly.
- c) Formal communication of risk assessments and method statements.
- d) Formal team day training on an annual basis.
- e) Where more regular consultation is required the company will set up safety committee meetings on a regular basis.

# Communication

## Planning, Supervision and Safe Systems of Work

The internal and external telephone system is available to all personnel, as are mobile phones.

All internal communication is done through notice boards, memos in the form of emails, management review meetings, internal audits and formal and informal internal meetings. Communication is done to ensure the transfer of information required by all parties within the business to undertake the work. It is the responsibility of all employees to communicate effectively internally using the means available.

The company shall not communicate externally about the organisations external and internal issues, aspects and impacts, requirements of relevant interested parties, products and services unless it specifically needs to when asked by a client, potential client or government agency for the purposes of a specific contract, service or investigation. All external communication on such matters is undertaken through senior management and if necessarily through the company solicitor, accountant or consultant.

Where any employee whose first language is not English and/or they do not hold a valid UK passport/birth certificate, the company must follow the safe system of work set out below:

1. Consult with the Health and Safety Advisor.
2. Ensure that the non-English speaking worker was documented and legally allowed to work in the UK
3. The new employee would have an induction into the company with the aid of a translator; this would also include pictorial advice and films, if necessary.
4. Ensure that a translator would be present at all times and other employees both offices based and site based were made aware that a non-English speaking person was present.
5. The non-English speaking worker would be allocated only low risk work and the use of internationally recognised pictorial warning signs would be implemented. If one or more non speaking English worker were employed, they would work together in a group with a designated supervisor/translator.
6. Training would be provided using an external translator on a regular basis.
7. English language courses would be considered for long term workers.
8. Regular checks and audits would be carried out to monitor the situation and any amendments required would be carried out accordingly.

# Display Screen Equipment

## Standards Required

Health and Safety (Display Screen Equipment) Regulations 1992

## Planning, Supervision and Safe Systems of Work

### User definition

HSE Guidance states: It will generally be appropriate to classify the person concerned as a “user” or “operator” if they:

- a. Normally use DSE for continuous or near-continuous spells of an hour or more at a time; and
- b. Use DSE in this way more or less daily; and
- c. Have to transfer information quickly to or from the DSE;

Also need to apply high levels of attention and concentration; or are highly dependent on DSE or have little choice about using it; or need special training or skills to use the DSE.

[Source – HSE, Work with display screen equipment, Health and Safety (Display Screen Equipment) Regulations 1992 as amended by the Health and Safety (Miscellaneous Amendments) Regulations 2002 s15, 2003]

The company will fulfil its obligations to its DSE users through:

1. The provision of suitable work equipment.
2. The provision of information and awareness training for Workstation Operators.
3. The assessment of workstations and the task(s) being undertaken using DSE Assessment documentation.
4. Trained DSE Assessors who will review the DSE self assessment undertaken by each Workstation Operator.
5. Arrangements to ensure Workstation Operators take regular breaks from DSE activities.
6. The provision of eye and eyesight tests for users, and the provision of spectacles where these are required specifically for DSE work.

# Worksafe Policy

## Standards Required

Health and Safety at Work Act 1974

Management of Health and Safety at Work Regulations 1999

## Policy

Hillside Contracts Ltd operates a worksafe policy (Or Refusal to Work Policy) for its staff working on all their sites.

No employee of Hillside Contracts Ltd, or anyone working on behalf of Hillside Contracts Ltd, is expected to carry out any task where the risk to themselves or any other person is considered to be unacceptable.

Under the Worksafe Policy, each member of staff has the absolute right to refuse to carry out work if they feel it is not safe to do so. Refusal to work on the grounds of Health and Safety will result in no disciplinary action and will not affect, in any way, their future prospects within the company.

All refusals to work will be responded to positively & promptly and the employee raising the Worksafe procedure will be informed of decisions throughout the process.

All managers and staff are also encouraged to report any unsafe acts or conditions, which they have witnessed.

## Planning, Supervision and Safe Systems of Work

Any situation arising which leads to an individual refusing to work for Health and Safety reasons must be reported, in the first instance, to the senior person on site as soon as possible, explaining that the Worksafe Policy has been invoked and why you have stopped work.

The person in charge shall, in discussion with the employee, make an investigation of the situation and determine the course of action required. An agreement should be reached and documented so that there is a suitable and sufficient risk assessment of the task, the system of work is safe and that the work can be restarted. Lessons learnt from each case will be briefed to relevant personnel.

If a safe method of work cannot be agreed, the work will not be restarted and the person in charge shall report to senior management for further instruction.

No work should be recommenced until the issue causing concern has been addressed.

Details of all refusals to work must be passed to the Managing Director.

# Permit to Work Procedure

## Standards Required

Health and Safety at Work Act etc. 1974

Management of Health and Safety at Work Regulations 1999

Work at Height Regulations 2005

Confined Spaces Regulations 1997

Electricity at Work Regulations 1989

Provision and Use of Work Equipment Regulations 1998

Construction (Design and Management) Regulations 2015

## Supervision

This procedure applies to all staff and contractors who undertake activities for or on behalf of the Company:

1. Each employee or contractor must ensure that no work is undertaken that is deemed as requiring a Permit to Work Certificate, and that such work has received a suitable and sufficient Risk Assessment. By the very nature of the work it will also require a Method Statement or working procedure based upon the Risk Assessment.
2. Work requiring a Permit to Work includes but it not limited to:-
  - a. Working at height.
  - b. Working in confined spaces.
  - c. Working on live electrical equipment (lamp changing).
  - d. Hot Works.
3. Permits to Work are an essential procedure for managing the risk to safety or health where work cannot be performed in a safer way. Without a Permit to Work certain designated tasks (2.2) cannot go ahead. The need for a Permit to Work will be identified in the risk assessment that must be made before any work can commence.

## Safe Systems of Work

### Planning the work

1. **First Phase:**  
Requires a thorough plan of the work to be undertaken, identifying the need for the work and also who will be required to undertake the task, noting required competencies.
2. **Second Phase:**  
A Risk Assessment must be completed by the competent persons. Either the Company Health & Safety coordinator or approved Contractors hired to undertake the work. In the latter case all Risk

Assessments and other documents must be submitted to the Health and Safety coordinator for approval.

3. **Third Phase:**  
Planning the work including Method Statements based upon the Risk Assessments.
4. **Fourth Phase:**  
Application for a Permit to Work should be made no less than one day prior to proposed work. All applications should be made to the Supervisor.
5. **Certification:**
  - a. Permits to Work will be provided by the Supervisor.
  - b. A duplicate Permit to Work Certificate will be issued.
  - c. One copy to be retained by the issuing approved person, and should the need arise be passed on in person at the end of their working hours to another approved person.
  - d. One copy will be retained for the duration of the work by the task supervisor who will have acknowledged the fact that the Certificate stipulates certain working requirements by their signature.
  - e. On completion of the work, once the equipment or area has been made safe, and is returned to its normal working condition the Permit to Work Certificate will be cancelled.
  - f. Where hot works is undertaken a cooling period (usually 1 hour) will usually apply before the process can be cancelled.
6. **The Cancellation Process:**
  - a. The supervisor checks that the work is completed and the area or equipment has been made safe and returned to normal working conditions and then signs the Clearance Statement on the Permit to Work.
  - b. All copies of the Permit to Work will be returned to the authorised person who issued the Certificate.
  - c. Once satisfied that the work has been completed the authorised person will cancel the Certificate.
  - d. Where scheduled work has not been completed the Permit to Work will be denoted as such. Should further time be requested the authorised person will need to satisfy themselves that further work is essential and can be undertaken safely.
  - e. All cancelled Certificates must be returned to the Contract Manager.



# Risk Assessment Process

## Standards Required

Health and Safety at Work Act etc. 1974

Management of Health and Safety at Work Regulations 1999

## Planning, Supervision and Safe Systems of Work

Before commencing any work Directors and/or Managers are required to assess the potential risks from workplace hazards and activities that they are responsible for. Where there is a potential to cause harm then managers must ensure a suitable and sufficient risk assessment is conducted by a competent person. The following process is followed:

1. Identify and describe the process or activity that is the subject of the Risk Assessment.
2. Identify the hazards which could reasonably be expected to result in harm in the workplace e.g. Slips and Trips; Working at height; Use of chemicals and substances; Manual handling etc.
3. Identify who may be harmed by these hazards e.g. Employees; Contractors; Members of the public / Visitors etc.
4. Evaluate the risk. Having identified all of the hazards, an evaluation of the level of risk is required. During the evaluation consider existing controls and using the risk matrix in the risk assessment form, evaluate the likelihood and consequence, multiplying both values to give a risk potential score.
5. Additional controls. If the risk score is unacceptable, then there is a need to improve or increase control measures reduce the risk to an acceptable level. Record any additional controls on the form and re-evaluate the likelihood and consequence, multiplying both values again to give a final risk potential score. If in doubt as to additional controls seek assistance from the Health and Safety Advisor.
6. Management confirmation. Manager responsible for the activity or process to:
  - a. Agree additional controls
  - b. Agree target dates
7. The responsible manager is to sign off the assessment agreeing to take appropriate steps to ensure that all actions raised are completed satisfactorily.
8. Completed RAs are to be located in Site / Office files and electronic Contract folders. Method Statements may be produced using the template, to detail sequence of works highlighting Risks and any designated Controls to reduce them.
9. Communicate the findings. The Director and/or Manager will ensure that all groups who may be at risk of harm are made aware of the Risk Assessment and necessary controls, typically at Site Inductions or new starter Induction.
10. Assessment review. The Risk Assessment will be reviewed when there is any change, new equipment or operations etc... or at least once per year.

# Noise and Vibration

## Standards Required

The Control of Noise at Work Regulations 2005

The Control of Vibration at Work Regulations 2005

## Planning, Supervision and Safe Systems of Work

It is the responsibility of the Directors to seek to reduce as far as reasonably practical, the levels to which it's employees are exposed noise and vibration.

Specific machinery or task risk Assessments will be undertaken to ensure that all possible steps are taken to reduce exposure to known and published safe limits. These safe limits are:

## Noise

The Noise at Work Regs currently apply two action levels and a exposure limit. The level at which employers must provide hearing protection and hearing protection zones is 85 decibels (daily or weekly average exposure) and the level at which employers must assess the risk to workers' health and provide them with information and training is now 80 decibels. There is also an exposure limit value of 87 decibels, taking account of any reduction in exposure provided by hearing protection, above which workers must not be exposed.

## Vibration

The Control of Vibration Regs sets out the daily limits for employees exposed to Vibration

Hand Arm Vibration action levels are:

Exposure action value of 2.5 m/s<sup>2</sup> A(8) at which level employers should introduce technical and organisational measures to reduce exposure.

Exposure limit value of 5.0 m/s<sup>2</sup> A(8) which should not be exceeded.

Whole-body vibration

The regulations introduce an:

Exposure action value of 0.5 m/s<sup>2</sup> A(8) at which level employers should introduce technical and organisational measures to reduce exposure.

Exposure limit value of 1.15 m/s<sup>2</sup> A(8) which should not be exceeded.

Noise and Vibration are considered as a hazard when conducting risk assessments and the relevant controls put in place to ensure these regulations are complied with where necessary.

When purchasing any new Plant or Equipment, consideration must be given to items that produce the lowest noise, vibration and Co2 emissions along with suitability and ease of maintenance.

Typical controls for noise and vibration are PPE, distance from noise, job rotation, exposure monitoring and health surveillance.

# Electricity

## Standards Required

The Electricity at Work Regulations 1989

Provision and Use of Work Equipment Regulations 1998

## Planning, Supervision and Safe Systems of Work

### Portable Appliances

A portable or movable electric appliance is any item that can be moved, either connected or disconnected from an electrical supply. Portable or movable items generally have a lead (cable) and a plug. Portable and movable equipment are items that can be easily moved around, such as kettles, vacuum cleaners, portable heaters, fans, desk lamps and PC projectors. Larger items that could be moved (but only rarely), e.g. water chillers, fridges, microwaves, photocopiers, vending machines and desktop computers. In addition to this mobile phone and other battery-charging equipment that is plugged into the mains (but the phones themselves and any other battery-operated equipment would not be included); and extension leads, multi-way adaptors and connection leads.

Portable Appliances used on company premises and on-site will all be subject to a periodic formal visual inspection by a Competent Person. This inspection will take the form of a visual condition inspection checking for:

Damage and wear to the insulation, flex and plug. Where possible the plug will be opened to check for correct fuse rating, good contact with no signs of burning. The item is then tested using a Portable Appliance Test device (PAT testing). This however is only necessary for earthed (class 1) equipment whose frequency is identified in a company electricity risk assessment. Where electrical equipment is double insulated (class 11) then no formal PAT test is required.

Any item failing the above criteria will be clearly marked and the plug removed to make it unusable. Items that are ok will be labeled with identity number, date tested and due retest date. Testing will be undertaken annually and records will be held of all items. It is the responsibility of any person buying new appliances to ensure they are added to the inspection schedule held by maintenance. This also applies to items used on company premises but belonging to individuals.

Any item found to be damaged must be highlighted to the H&S Manager for the above checks when discovered.

### Site Electrical Equipment

All electrical equipment used on site must only of 110 volt supply and with RCD protection. Care must be taken to protect from damage and wet conditions.

It is the responsibility of all users to ensure they inspect all appliances before use and remove any damaged items from service and report to Supervisor or Contract Manager, who will arrange repair and inspection before re-use.

Particular care must be taken with the flex to prevent it from getting damaged by the correct selection of armored cables and flex covers when crossing routes.

The regularity of PAT testing for all site electrical equipment is identified in the risk assessment.

# Transport & Storage of Fuel

## Standards Required

Provision and Use of Work Equipment Regulations 1998

The Road Traffic Acts and associated legislation will also apply when transport is required to be used on public roads

Control of Substances Hazardous to Health Regulations 2002

The Petroleum (Consolidation) Regulations 2014

The Dangerous Substances and Explosive Atmospheres Regulations 2002

## Planning Procedures

All work will be tendered for or negotiated in accordance with the above standards.

The Directors will arrange for suitable transport to be provided, taking into account the work to be carried out and the above standards.

Petrol is only used in small quantities and no more than one 10 litre or two 5 litre containers are used for storage and transportation. The correct containers for these are to be provided.

Diesel is stored and dispensed with the use of bowsers, both fixed and mobile, depending on the requirements of the operation being undertaken. The bowsers are required to be double skinned and at all times meet the relevant regulations.

Where necessary, discussions will take place between the Construction Manager and the Local Highway Authority, Police, etc. on road crossings, traffic management etc. to produce a site traffic plan. This will include the need for temporary access roads, safe fuel storage locations, maintenance facilities, etc. for transport on site will be planned.

A planned maintenance schedule will be prepared by the Directors, for all transport vehicles and fuel bowsers.

Training will be arranged for all plant operators. Only operators who possess a certificate of competence will be permitted to use the plant and undertake the refuelling of them.

## Supervision

The Supervisor will ensure that all plant and equipment, when delivered to site is in good order and fitted with all necessary safety devices, notices and guards. Any defect must be reported to the Directors or Hire Company and the machine must not be used until the defect is rectified.

The Supervisor will ensure that only authorised licensed drivers are permitted to operate any site

transport. Where any doubt of competency of any operator exists, the Site Supervisor will report to the Directors or hire company, immediately.

No young person (under 18 years old), is permitted to operate any transport or act as banksman, unless being trained under direct supervision.

Any necessary preparatory work required to ensure transport is used safely on site, e.g. access road, traffic control measures, etc. will be carried out in accordance with planned requirements.

The Site Supervisor must ensure that any defect notified to him by the transport driver during operations on site, is reported immediately for repair and that where the defect could affect safety on site, the item of transport must not be used until repairs are carried out.

## **Safe System of Work**

Hazard with use of transport on site arises out of:

- a. Incorrect use.
- b. Speeding.
- c. Poor maintenance (i.e. lack of checking water, oil, fuel, lights, tyres and brakes daily).
- d. Reversing unsupervised.
- e. Carrying of passengers where no proper seat is provided.
- f. Undue care when refuelling.
- g. Overloading or insecure loads.
- h. Incorrect or improper towing.
- i. Incorrect storage of fuel, e.g. inappropriate/unbundled containers.

All banksmen, supervisory staff and operatives required to enter certain areas as designated by management, will be provided with high visibility jackets.

Transport drivers must not consume any intoxicating liquids or drugs, during the working day or shift.

Drip trays, spill kits and fire extinguishers are to be provided around refuelling areas.

# Security Policy for Permanent and Peripatetic Sites

## Standards Required

Workplace (Health, Safety and Welfare) Regulations 1992

The Management of Health and Safety at Work Regulations 1999

The Construction (Design and Management) Regulations 2015

## Planning, Supervision and Safe Systems of Work

Hillside Contracts Ltd is dedicated to ensuring the security for permanent and peripatetic sites. Hillside Contracts Ltd is responsible for the permanent site at the office premises which currently is used for office accommodation and storage.

Hillside Contracts is not responsible for arranging and maintaining security when acting as a Contractor to the Principal Contractor, however when Hillside Contracts Ltd is acting as the Principal Contractor they are responsible for the security of the sites.

A risk management approach shall be adopted on all site security related issues. Risk assessments are expected to identify legal, proportionate and necessary security measures to protect Hillside Contracts Ltd sites from unauthorised access to the land and buildings.

All physical site security precautions shall be legal, proportionate and necessary. All recommendations for physical site security requirements shall come from internal and external sources as appropriate for the requirements of any part of the site and building.

The office premises are fenced off with a gate open during the day. The premises are closed to the public in the evenings.

The Operations Manager will complete the risk assessment for the site security if Hillside Contracts Ltd is appointed as Principal Contractor. In addition the Director will formally appoint any security firms as required.

The Office Manager is responsible for making appropriate arrangements for the upkeep of this office premises site.

This policy will be reviewed every three years or earlier should there be security lessons learned from the occurrence of incidents.

# Adverse Weather Policy

## Policy statement

The Hillside Contracts Ltd recognises that there are occasions when employees may have difficulty in travelling to work due to severe weather conditions and disruptions to public transport.

While the Company expects employees to make every effort to come to work, employees should under no circumstances travel if it is dangerous to do so and should have due regard for their health and safety.

## Planning, Supervision and Safe Systems of Work

- Severe weather or disruptions to public transport may make travelling to work slower or more difficult. If employees find that their journey to work is delayed they should, where possible, contact their manager at the earliest opportunity.
- Employees are expected to make every effort to arrive to work on time. Where poor weather conditions or disruptions to public transport result in employees arriving to work late, they are expected to make up the time lost.
- On occasions, for example in the event of road closures due to severe weather or the total shut down of public transport, it may be impossible for employees to attend work. On such occasions employees will normally be required to take annual leave in respect on that day. Where employees have exhausted their annual leave entitlement, the time away from work will be unpaid.
- If unexpected weather conditions which will make travel difficult occur during the working day, employees will, at management discretion, be allowed to leave work early in order to travel home.
- Certain employees may be able to work from home in such circumstances. Employees may only work from home if authorised to do so by their manager.

Employees who abuse the above procedure may be subject to disciplinary action.

The above policy is non-contractual and the company reserves the right to amend or withdraw it at any time.

This policy will be applied in a spirit of common sense and fairness, balancing the needs of the business, our customers, and the safety of employees.