

Certificate of Registration

OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM - ISO 45001:2018

This is to certify that:

Berry Systems
Springvale Business & Industrial Park
Bilston
WV14 0QL
United Kingdom

Holds Certificate Number:

OHS 691699

and operates an Occupational Health and Safety Management System which complies with the requirements of ISO 45001:2018 for the following scope:

The design, supply and installation of both pedestrian and vehicle restraint systems for off highway applications and facade systems for multi-storey car parks. The design, supply and installation of modular steel frame multi-storey car parks.



For and on behalf of BSI:

Matt Page, Managing Director Assurance - UK & Ireland

Original Registration Date: 2018-12-10

Latest Revision Date: 2021-11-23

Effective Date: 2021-12-10

Expiry Date: 2024-12-09



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HEALTH AND SAFETY POLICY AND CODE OF PRACTICE

Setting out our general approach and commitment together with the arrangements we have put in place for managing health and safety.



SOUTHALLS
STAY SAFE, STAY COMPLIANT

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REVIEW DATA

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Version	Date	Details of Change	Author/Company
0.5		First draft	ID
0.6	3 February 2017	Logo added. Mike Newland's comments addressed	ID
1.0	28 February 2017	Inserted organisation chart into document	ID
1.1	7 September 2017	Inserted new organisation chart into document. Date of policy unchanged to allow for full review in March 2018.	ID
2.0	6 April 2018	Included references to HS Solar. Inserted reference to ISO 45001:2018 into statement of intent. Inserted updated organisation chart into document. Incorporated Dust Policy into the arrangements. Removed Environmental section of arrangements. Alcohol and Drugs section - simplified so that user is referred to the company's separate policy in its entirety. Added sentence about PAT in office. Expanded section on fork lifts to consider those hired in for site work. Removed reference to mezzanine floors. Added arrangement for working with other trades. Various minor amendments. Added extra bullet point to disciplinary arrangements to consider the issuing of a prohibition notice. Added a section on Work Safe Policy.	ID
2.1	15 May 2018	Amendments made to Statement of Intent and arrangements for risk assessments. Following feedback from ISO auditor.	ID
2.2	20 June 2018	Inserted new organisation chart into document. Date of policy unchanged to allow for full review in April 2019.	ID
2.3	12 July 2018	Specific reference to "Contracts" manager included in Roles and Responsibilities. Fixed minor typo. Removed the word "Arrangements" from the subtitle "First Aid Arrangements": unnecessary. Appendix added that references the documents in the "fitters pack". Date of policy unchanged to allow for full review in April 2019.	ID
2.4	27 September 2018	Inserted new organisation chart into document. Date of policy unchanged to allow for full review in April 2019.	ID
2.5	14 November 2018	Added extra text regarding accepting subcontractors' RAMS. Added updated organisation chart. Date of policy unchanged to allow for full review in April 2019.	ID

Version	Date	Details of Change	Author/Company
3.0	11 June 2019	Routine review. Removed references to Solar. Updated organisation chart. Included new arrangements for emergency procedures on site, and welding.	ID
4.0	June 2021	Routine review. Incorporated overseas travel policy. Made reference to the Group's policy on Hybrid Working, and its DSE Checklist. New organisation chart included. Fixed some typos and formatting issues.	ID
4.1	October 2021	Review to reflect changes in senior management.	

HEALTH AND SAFETY POLICY

Statement of Intent

It is the firm policy of Hill and Smith Ltd t/a Berry Systems (herein after referred to as "the company") to take all reasonable steps to ensure the safety, health and welfare at work of all its employees and any others who may be affected by its undertaking, in accordance with current legislation. In order to ensure this policy is effectively pursued the company has implemented a management system to meet the requirements of the internationally recognised standard ISO 45001:2018.

The company will provide such information, instruction and training as is necessary to ensure that all its employees are aware of their own duties and responsibilities under relevant legislation and to ensure implementation of this policy.

Risk assessments will be undertaken/reviewed on a regular basis to ensure the identification of all significant hazards and corrective action required to reduce the risk to an acceptable level.

Sufficient resources will be provided to meet the requirements of health and safety legislation.

This document also sets out our general statements regarding equal opportunities and diversity.

The company also aims to comply with local laws when operating overseas.

Our general commitments are:

- To provide adequate control of the health and safety risks to employees and others arising from our work activities;
- To consult with our employees on matters affecting their health and safety;
- To provide and maintain safe premises, plant and work equipment;
- To ensure safe handling and use of substances;
- To provide adequate information, instruction, training and/or supervision for employees;
- To conduct regular safety audits to monitor performance and identify areas for continual improvement.

- To maintain safe and healthy working conditions for the prevention of work-related injury and ill-health; and
- To review this policy at regular intervals ensuring its continuing suitability and to implement revisions where deemed appropriate.

Dated October 2021

Signed



.....
Andre Van Heerden (Managing Director)

EQUALITIES AND DIVERSITY POLICY

General

To fulfil our Health and Safety Policy Statement of Intent it is necessary to consider the involvement of people, particularly when considering risk factors. This Equality and Diversity Policy has been written to enable the Health and Safety Policy to be followed whilst considering the wider issue of equal opportunities for all persons associated with the company and our undertakings.

The company is committed to ensuring that all of our staff and applicants for employment are protected from unlawful discrimination. This Equality and Diversity Policy is also intended to prevent unlawful victimisation and harassment.

The Company recognises that it has a moral obligation to ensure that a fair and objective policy of opportunities exists within the company and in any workplace for which the company undertakes its business. This includes all arrangements including recruitment, selection, development and training of employees.

The aim of this Equality and Diversity Policy is, therefore, to ensure that people are selected for vacancies within our organisation on ability to match a person specification, regardless of ethnic origin, nationality, sex, race, religion, creed, disability, sexual orientation, domestic situation or gender reassignment or any other diversity.

The Managing Director is ultimately responsible for the implementation of this policy and to fulfil this duty he will ensure arrangements are in place to;

- ensure that all persons within the company are aware of this policy and the spirit and letter of the policy is followed by all;
- ensure that all employees are aware that discriminatory behaviour and practices are unacceptable (including racist and sexist language) and of the disciplinary penalties of such behaviour;
- ensure that grievances are dealt with in a fair and consistent manner;
- maintain practices and procedures in the workplace which do not discriminate against individuals and are free from bias;
- ensure we have arrangements in place for the effective development and review of this policy to ensure that any

necessary changes are made in order to meet current legislation.

People with Disabilities

Wherever practicable, people with disabilities should work alongside other people. Some people with disabilities may need additional help to achieve this. To assist them, their line manager will employ specialist advice to ensure they can undertake the work in a safe manner. Where after employing all reasonable measures the risk to the individual is still unacceptable the company reserve the right to review their employment situation.

Men and Women

It is the company's policy that both men and women should have equal access to the full range of employment and training opportunities. To ensure that a particular type of work and working environment is suitable for all persons, their line manager will employ specialist advice to ensure they can undertake the work in a safe manner. Where after employing all reasonable measures the risk to the individual is still unacceptable the company reserve the right to review their employment situation.

Ethnic Minorities

The company recognises that some ethnic minorities may have additional needs, for example the use of PPE in relation to their religious beliefs and the fact that English may be their second language. To assist them, their line manager will employ specialist advice to ensure they can undertake the work in a safe manner.

This may include providing instruction, training and information in their native language and could include the use of a team member acting in a translator. Where after employing all reasonable measures the risk to the individual is still unacceptable the company reserve the right to review their employment situation.

Age

It is The Company policy that, except where required by eligibility criteria, people should not be denied access to training or employment opportunities on the grounds of age.

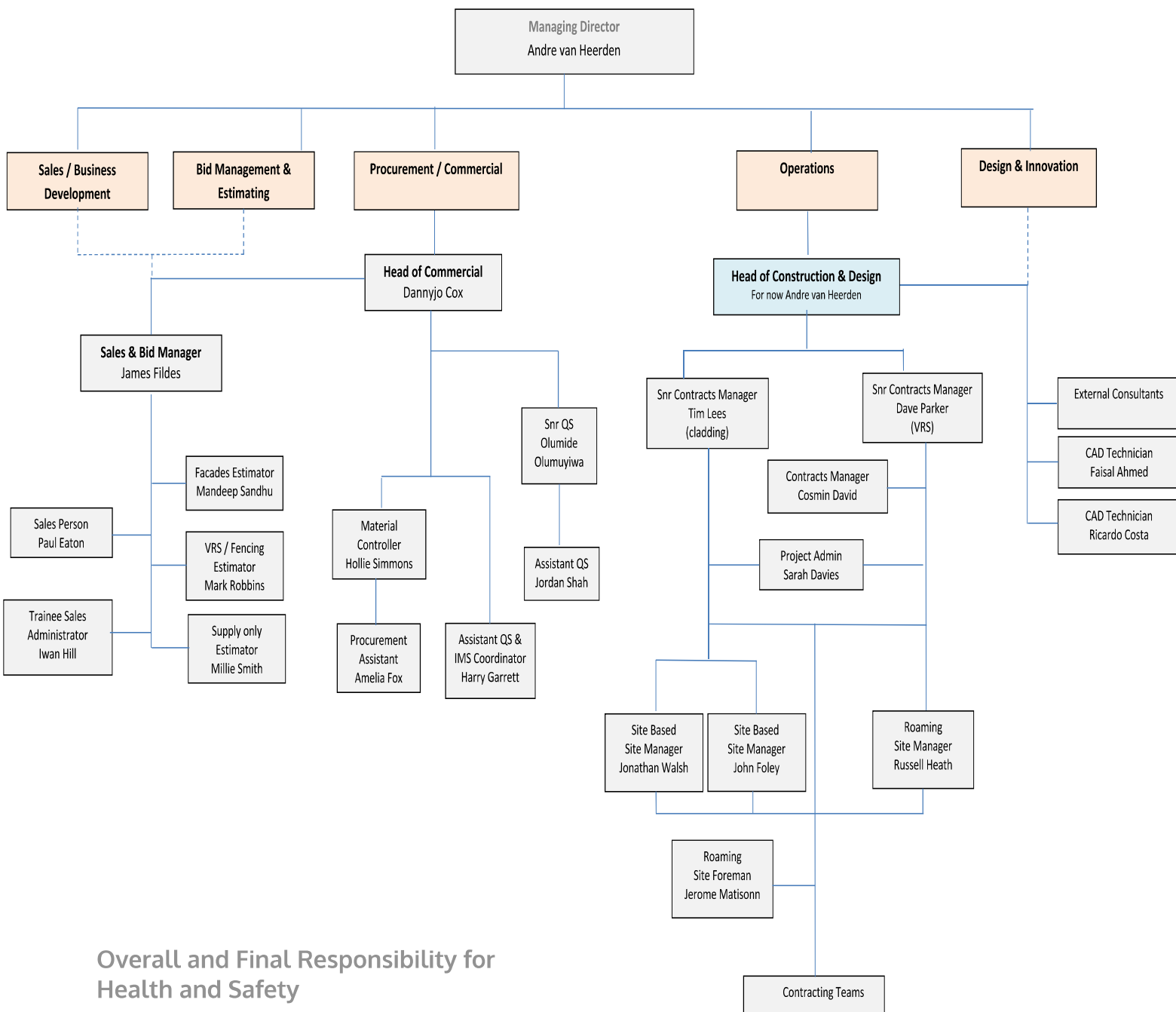
Other Matters

The Company will abide by current legislation on other related matters, such as Equal Pay, Statutory Sick Pay and Maternity and Paternity Rights and Payment.

ORGANISATIONAL/INDIVIDUAL RESPONSIBILITIES

Operating Structure

Organisational Structure Chart for 2022



Overall and Final Responsibility for Health and Safety

Andre Van Heerden (Managing Director)

Responsibilities of the Director(s)

- To ensure that this Health and Safety Policy is implemented across the business.
- To ensure adequate resources are provided to allow the organisation's safety policy and risk assessments to be effective.
- To ensure that the business has the necessary level of employer's liability insurance cover.
- To appoint competent persons to assist in enabling the Company to meet the requirements of health and safety law, as defined by the Management of Health and Safety at Work Regulations 1999.
- To appoint competent manager(s) who are responsible for the day-to-day management of health and safety at individual sites.
- To positively promote health and safety in all activities undertaken by the Company.
- To actively engage in the assessment of risk in the work activities being undertaken and to understand, initiate and monitor the effectiveness of the implementation of the control measures.
- To ensure that all proposed changes to plant, equipment or premises are fully assessed for health and safety impact prior to change or purchase.
- To make available to staff, health and safety information within the health and safety file.
- To monitor accidents and near misses, to investigate and implement appropriate and timely control measures and report outcomes of investigations to their management.
- Take appropriate action when statutory and/or Company standards are breached.

Responsibilities of the Contracts Managers and Site Managers

The managers and site managers are normally in charge of all on-site operations, working with contractors and sub-contractors and ensuring the building contracts run to schedule. They control all aspects of the site including the planning work, arranging delivery of materials to managing subcontractors.

- To ensure they lead and that they positively promote health and safety in their own undertaking and in all activities undertaken within the Company.
- To actively engage in the assessment of risk in the work activities being undertaken and ensure staff implement the control measures identified by risk assessments.
- To ensure that they maintain responsibility for health and safety and welfare of employees, customers and visitors on a day-to-day basis through supervision.
- To conduct routine site safety audits.
- To ensure that all employees receive adequate information, instruction,
- To ensure that all health and safety risks arising from the work activity or within the Company are investigated and actioned ensuring that appropriate action is taken to rectify unsafe systems or actions.
- To make health and safety information within the health and safety file available to staff and any information of risks to which they are exposed.
- To monitor incidents and near misses within their area of control, to investigate and implement appropriate and timely control measures and to report incidents to their line managers.
- To ensure the provision of suitable safety equipment and PPE.
- To ensure that suitable plant and equipment is provided and maintained and conforms to all relevant statutory provisions.
- To ensure that tools and equipment used are suitable for the purpose and comply with all relevant statutory provisions.
- To ensure first aid, fire fighting and any other relevant emergency equipment is provided and readily available and to ensure a sufficient number of suitable individuals are nominated and trained to deal with emergencies.
- To liaise with the nominated competent health and safety advisor as required and to ensure that any suggestions made to improve health and safety are considered and implemented or reported where appropriate.

Responsibilities of Employees and Labour-Only Contractors

To achieve and maintain high standards of health and safety within the Company, all employees shall, in accordance with sections 7 and 8 of the Health and Safety at Work etc Act 1974 and Regulation 14 of the Management of Health and Safety at Work 1999:

- Take reasonable care of their own health and safety and that of others and observe fully any safety rules and abide by the safety policy at all times.
- Neither intentionally, nor recklessly interfere with nor misuse anything provided to safeguard health and safety and will avoid any improvising that may lead to unnecessary risks.
- Not operate machinery that they are not competent or authorised to use and to ensure they use the correct tools and equipment for the job and use any safety equipment and protective clothing provided.
- Keep tools and equipment in good condition.
- Co-operate with management on matters of health and safety.
- Report all accidents, incidents or dangerous occurrences to their Manager whether injury sustained or not.
- Attend any training designed to further health and safety.
- Be aware of any fire or emergency procedures.
- Work to the highest possible standards of safety with regard to service users.
- Wear personal protective equipment whenever instructed to do so or in circumstances that require its use.
- Report to their supervisor immediately, any defects in plant or equipment, or any obvious health risks.

Non-compliance with health and safety policy or procedures may result in disciplinary action, which if appropriate can lead to dismissal.

All Berry employees (who work on sites)

- Hold a valid CSCS competency card
- Relevant task-specific qualification, e.g. IPAF, PASMA, etc.

Responsibility of Contractors.

All contractors will be expected to comply with this Health and Safety Policy, and must submit their own Health and Safety Policy to the company for verification.

All contractors have a responsibility to:

- Ensure that work is carried out in accordance with relevant statutory provisions and take into account the safety of others.
- Ensure that plant and equipment brought into a work area is in a safe and good working condition, fitted with guards and safety devices with any certificated available for checking. All employees must be adequately trained in the use of such equipment and where appropriate have available certificates of competence.
- Ensure that any injury sustained or damage caused by contractors employees is reported immediately to the company's supervisor.
- Ensure that welfare facilities are provided at all sites as well as fire extinguishers and first aid personnel by the arrangements with Contractors. In many situations there will be co-operation and co-ordination of activities with the Principle Contractor who will make suitable provisions.
- Provide suitable fire extinguishers are in place when undertaking hot works.

Competent Person

To assist with the ongoing health and safety of employees and to ensure compliance with Regulation 7 of The Management of Health and Safety at Work Regulations 1999 the company engages the services of Southall Associates Ltd.

Southall Associates Ltd provide the following:

- Assist the company in formulating the policy and procedures required to comply with the Act
- Assist the company to identify the risks and hazards which are associated with the company's work activities.
- Assist the company to produce the appropriate risk assessments and safe systems of work required as a result of the company's work activities.
- Monitor the effectiveness of the company's health and safety management systems by:

- Site audits.
- Monitoring accident and incident statistics and advising on accident and incident investigations.

ARRANGEMENTS FOR IMPLEMENTATION

Employer's Liability Insurance

The Managing Director is responsible for insuring the activities of the organisation. The company will at all times, have a valid employer's liability insurance policy for at least £5 million.

Insurance certificates shall either be displayed at the office, and on projects where we act as the principal contractor, in an area where it can be read by employees, or, it may be made available electronically to employees through the Safety Cloud system. They may also be displayed, or available, at our installation sites.

There is no legal requirement to keep copies of out-of-date certificates, however, as far as is possible, a complete record of the company's employer's liability insurance will be kept.

Safety Cloud

Safety Cloud is a web-based system that provides a modern approach to health and safety. Safety Cloud is a well honed system, designed to record and store accident information and, to produce hold and manage, risk assessments, clear due diligence trails and policy documentation.

Safety Cloud monitors all work equipment and advises of impending checks.

All employee training can be managed through Safety Cloud including the provision of e-learning tutorials.

Risk Assessment

In line with the duty placed upon them by the Management of Health and Safety at Work Regulations 1999, the company will ensure that risk assessments are carried out for all work activities which pose a risk to employees and others. The principle 5 steps to risk assessment will be followed.

Risk assessments will be periodically reviewed to ensure that they remain effective and relevant to our work activities. All risk assessments relating to the company's activities are held on the Safety Cloud. We recognise that health and safety standards are moving targets and we aim to continually improve.

Risk Assessment and Method Statements (RAMS)

All projects will be subject to a specific risk assessment and method statement (RAMS) pack. The responsibility for producing RAMS depends on the relationship between Berry and our (sub)contractors:

- Contractors - Berry provide RAMS and contractors must work according to them.
- Subcontractors who provide labour and materials - work according to their own RAMS. These are provided to Berry before work commences. Berry's will check the RAMS for acceptance.
- Labour-only subcontractors - Berry provide RAMS and contractors must work according to them.

Where the assessor is unable to minimise the risk to an acceptable level, the findings of the risk assessment will be reported to the Commercial Manager.

Abrasive Wheels

Employees who use abrasive wheels should be aware of the possible hazards that are associated with such equipment including breakage or bursting of the wheel; flying particles; cuts and abrasions from contact with running wheels; entanglement of loose clothing; dust; noise; vibration and electric shock. As such, please:

- Ensure the disc or wheel is mounted correctly. This must only be done by a competent appointed person.
- Guards must be fitted to all abrasive wheels and kept in position.
- Eye protection must be worn when using abrasive wheels.
- Avoid wearing loose clothing, especially ties, sleeves, scarves etc.
- Hearing protection should be worn where necessary.
- All machines should be inspected regularly to ensure they are in good condition.
- Sparks from loose particles can cause fires or explosion if near to flammable materials. Ensure the work area is clear of such materials and also of people who may be affected by such sparks.

You must not work on abrasive wheels unless you have received the required training or are supervised by a trained person.

Accident and Injury Reporting Procedures

The company, through the implementation of this policy, is committed to preventing accidents and incidents of ill-health to all persons affected by its undertaking. Although every effort will be made to prevent accidents at work, procedures are in place for the recording, reporting and investigation of any such occurrences.

All accidents, incidents and near misses that occur as part of the company's activities will be reported/recorded on the Safety Cloud System by the relevant first aider or Manager, by completing the relevant accident or near miss form in the accidents and ill health module. This should be completed as soon as is reasonably practical after the incident.

The company is committed to investigating all accidents and incidents, and believes that this forms a fundamental part of improving safe working practices and raising awareness. Southalls will aid with major accident investigations and recommend remedial action where required.

Southalls report reportable accidents/occurrences on our behalf once we have notified them.

Alcohol and Drugs

Berry Systems have a separate Alcohol and Drugs Misuse policy. Employees must refer to this policy. This can be found, in its entirety on the company server "N" Drive at the below hyperlink:

N:\Y - IMS\5-Policies

Asbestos

No work should be carried out which is likely to expose employees to asbestos. To meet the requirements of the Control of Asbestos Regulations 2012 and manage the risk from asbestos the Company will:

- Find out, during the planning phase, if there is asbestos present in buildings or work area, the amount and condition it is in;

- Presume materials contain asbestos unless there is strong evidence that they do not;
- Assess the risk from the material;
- If it is suspected that a material being worked on, or found on site, is likely to be asbestos, work should stop and the supervisor informed immediately.
- If asbestos materials are discovered, the company will ensure that the work area is protected to prevent disturbance of the material and subsequently to prevent damage to any asbestos which may result in the release of fibres.
- The company will arrange (or pass to the principal contractor to arrange) a competent person/specialist analysis to assess the material to confirm if it is asbestos, confirming the material and condition and whether it requires removal or it can be left undisturbed.
- If the materials remain undisturbed, then there is a requirement of the management to introduce a system of management of the identified asbestos. A log will then be kept for the site of the type and location which is recorded and provided for contractors. This information should be communicated to all employees.

No installation, maintenance or repair work will be undertaken until it has been established that Asbestos materials are not present.

Supervisors working on other sites will:

- Ensure they have access to information about the location and condition of asbestos on sites;
- Ensure that no work is undertaken in the vicinity of damaged asbestos containing materials;

Furthermore, if an employee does identify any material which they believe has the potential to contain asbestos they will adopt the following procedure:

- Cease work immediately.
- Identify the material found to their manager.
- Under no circumstances attempt to remove the material.

Once the above procedures have been executed, management will seek professional advice as to whether the material may contain asbestos/consult the asbestos register. If further suspicion remains, work will not resume in the area until a survey has been conducted by a qualified asbestos surveyor and the area deemed safe to continue

work. Any removal of asbestos will always be undertaken following the relevant HSE guidance.

Confined Spaces

Employees may be required, from time to time, to work in confined spaces. For example, projects may require entry into basements. We will assess the risk of working in confined spaces (in line with the Confined Spaces Regulations 1997). We will, so far as is reasonably practicable, work without entering a confined space. If, however, this is not possible we will ensure that these are properly planned (and a record of this is placed in the RAMS pack), and that staff are competent to work in confined spaces. We will also ensure that the proper rescue arrangements are prepared and implemented.

Construction Design and Management

It is the overarching aim, of the company, to comply with the requirements of the Construction (Design and Management) Regulations 2015. Depending on the role, that we play, we will have various duties. Sometimes we fulfil more than one role during a project.

CDM Contractor Duties

When acting as a contractor, the company will:

- Check that the clients are aware of their duties (e.g. submitting F10, providing welfare facilities, etc.)
- Satisfy that all employees and anyone who works under our control are competent (e.g. through CSCS cards) and adequately resourced.
- Plan manage and monitor our own work to make sure that workers under our control are working safely.
- Provide workers, under our control (whether employed or self employed), with any necessary information, including information about other contractors work, site inductions (where not prepared by a principal contractor), information on working safely, where to report in the event of an emergency.
- Co-operate with others and co-ordinate our work with others working on the project.
- Obtain specialist advice (for example from a structural engineer or occupational hygienist) where necessary when planning high risk work.

CDM Principal Contractor Duties

Where the company has been appointed as principal contractor we will:

- Satisfy ourselves that our clients are aware of their duties (e.g. submitting F10, providing welfare facilities, etc.)
- Prepare the construction phase plan.
- Ensure competence to address health and safety issues likely to be involved in the management of the construction phase.
- Ensure the construction phase is properly planned, managed and monitored with adequately resourced competent site management appropriate to the risk and activity.
- Ensure all contractors are provided with the information about the project they need to enable them to carry out their work safely and without risk to health. This includes site indications, site information board, and continual communication throughout the project.
- Ensure safe working, coordination, and cooperation between contractors.
- Ensure that a suitable construction phase plan is prepared before construction work begins, developed in discussion with and communicated to Contractors affected by it. We will ensure that it is implemented and kept up to date as the project progresses.

CDM Designer/Principal Designer

When acting as CDM Designer we will:

- take into account any pre-construction information that we are provided
- eliminate (where possible) foreseeable health and safety risks to anybody involved with the project
- where risks cannot be eliminated, reduce or control them
- provide information to any principal designer, client and (principle) contractor to help them comply with their duties.
- communicate, cooperate, and coordinate with any other designers and all contractors.

When acting as a Principal Designer we will:

- plan, manage, monitor and coordinate health and safety during the pre-construction phase. We will consult any existing, relevant, information.
- provide information to any other designer(s), client and (principal) contractor to help them comply with their duties.
- work with other designers to eliminate, or if this is not possible, reduce or control the risks to anybody involved with the project.
- liaise with the principal contractor to keep them informed of any risks that will need to be managed during construction.

Complaints Procedure

Work undertaken on construction sites has, by its nature, an impact on the surrounding environment. The company will work pro-actively with the allocated CDM Principal Contractor, the client and Local Authority to ensure that any site nuisances are restricted as far as is reasonably practicable.

Any complaints of a work nature should be directed to a supervisor who will forward this to the directors.

Compressed Air Equipment

Compressed air lines are used to power a range of tools. These tools are subject to daily visual examination by operatives and routine maintenance. The system is thoroughly examined in accordance with its written scheme and serviced periodically.

Construction Dust

There are three main types of "construction dust":

1. Silica dust (respirable crystalline silica (RCS))
2. Wood dust
3. Other dusts (e.g. from plaster)

Only the first, silica dust, is relevant to the company's work.

Health Risk

Construction dust can lead to serious health defects:

- COPD
- Lung cancer
- Silicosis (inflammation and scarring of the lungs caused by long-term inhalation of RCS)
- Asthma

Most of these conditions can take a long time to develop.

In order to reduce the risk from RCS the company will:

- Carry out risk assessments that consider RCS. These will be both generic (e.g. a COSHH assessments, workplace risk assessments) and specific (considered in project-specific RAMS).
- Communicate the findings of risk assessments to all relevant staff. COSHH and workplace risk assessments are available to all staff on Safety Cloud. RAMS will be communicated to all staff working on a project.
- Staff will be trained in the risks that RCS presents. The risk from RCS will also be made available as a toolbox talk.
- We will implement the controls identified in risk assessments. These may include the use of local exhaust ventilation (LEV) and respiratory protective equipment (RPE).
- We will monitor the use of control measures (by site supervisors or external auditors). This will include use of the LEV, checking that persons who are wearing RPE are clean shaven, etc.
- If, when on site, other trades are creating excessive dust (which is causing a risk to our staff and contractors) the site supervisor will remove our personnel from the area. They will then raise the issue with the other trade and/or principal contractor. Berry's work will not recommence until the situation has been resolved.
- We will seek to make improvements as and when new technologies and/or techniques become available.

Consultation with Employees

In accordance with the Safety Representative and Safety Committee Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996 it is the intention of the company to promote a culture whereby employees are encouraged to bring to the attention of their

manager and ultimately the Director(s) any issues relating to safety. Should employees wish to form a safety committee this would be facilitated.

We acknowledge that employee involvement is a vital element in ensuring that all hazards are identified and concerns addressed. All staff will have access to read this and other policy's via the Safety Cloud website and can raise concerns at any time with their Manager.

Dangerous Substances and Explosive Atmospheres

The company will undertake a risk assessment where a dangerous substance is present in the workplace. The risk assessment will take into account the hazardous properties of the substance from information on the supplier's safety data sheet.

The company will provide employees with information, instruction and training on precautions required to use the substance safely as well as the significant findings of the risk assessment and what to do in the event of an accident, incident or emergency.

Data Protection and Record Keeping

It is the company's policy to maintain a record keeping system, regardless of description that provides protection for the privacy of all employees, where personal data is stored.

Disciplinary Procedure

Where there are issues of non-compliance of health and safety rules or unsafe practice, the company will investigate them. The directors will collate any information. This will be reviewed and the appropriate corrective action taken to ensure that there are controls implemented and the employees are made aware of any situations which are causing concern. If the problems persist, the company will apply further measures to ensure the health, safety and welfare of employees and others who may be affected by the actions of those who are not complying with the health and safety rules.

The employee's attention will be drawn to a situation, which is causing concern in order to give an employee the opportunity to explain and to improve a position. If

subsequently, the problems persists then further, more stringent, measures may be necessary.

Where the company is dissatisfied with an employee or contractors performance on health and safety grounds they will arrange a formal interview, where the employee can be accompanied by a fellow employee or trade representative. After considering the details, an appropriate action, (verbal warning, written warning, suspension or dismissal) will be taken. Records of disciplinary actions will be maintained by the company and made available for any appeals or legal actions arising from the issues of non compliance with health and safety legislation.

The following contraventions will result in the offending individual being suspended from work pending an inquiry, which will be overseen by the Directors

- Failure by supervisors to notify and explain to operatives over whom they have charge, the controls in force for projects and associated risks and the procedures established for their protection and safety.
- Working in a manner where safety management controls and requirements are disregarded, to such an extent that the activity or action is considered life threatening to the individual, colleagues or third parties.
- Malicious misuse of or damage to any items which have been provided to assist in maintaining health, safety or welfare standards including personal protective equipment, first aid provisions and facilities; welfare facilities; safety notices, instruction or signs; consumption of or being under the influence of, alcohol or other substance during the course of employment.
- Project, or element of work, is stopped by Health and Safety Executive or local authority representative, and a formal prohibition notice is issued to the business.

Display of Statutory Information

All statutory notices, provided by the company, will be displayed in a proper manner in places that are appropriate and easily accessible to all employees concerned.

Display Screen Equipment

The Company will assess and control health risks from exposure to display screen equipment in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992.

A suitable and sufficient analysis of workstations and environment will be undertaken for all employees defined as users, with provision of training/instruction regarding ergonomics and safe working practices provided on Safety Cloud.

Employees classified as habitual display screen equipment users are entitled to free eye tests, and vision correction appliances where these are needed for work with display screen equipment.

Driving on Company Business

Driving is restricted to employees with a valid current driving licence for the category of vehicle to be driven. Validity of employee driving licences will be checked by the company on a periodic basis.

Drivers complete health questionnaires prior to driving vehicles on company business to ascertain medical fitness.

Drivers are responsible for conducting daily vehicle pre-use safety checks and ensuring maximum safe working or permitted loads are not exceeded and that loads are adequately secured.

Drivers are responsible for ensuring that any vehicle that is used for work purposes is taxed, appropriately insured, serviced and maintained in a road worthy conditions.

Electrical Safety

The Company will comply with the Electricity at Work Regulations 1989, with regard to electric shock, socket outlets and plug tops, switches, conduits and cables etc.

Electrical equipment used on site will be 110V centre tapped to earth. This equipment will be portable appliance tested at three-monthly intervals (as recommended by HSE guidance).

240V equipment is not permitted, on site, unless a risk assessment has been produced for its usage, residual circuit devices are fitted and portable appliance testing is undertaken on a monthly basis.

Electrical equipment, in our offices, will be portable appliance tested on an annual basis.

All employees must complete a visual inspection of electrical equipment before use. Employees shall not attempt to repair or modify any electrical item except with prior written approval. Where faults occur they shall be reported for action to be taken.

Company management will ensure that there is adequate supervision of the requirements of the electrical equipment and will keep records of maintenance and testing results.

Only trained or qualified staff are permitted to work with electrical equipment. Work on electrical equipment will not be allowed before the equipment has been properly isolated and disconnected from the source of supply.

Employees at Special Risk

The company recognises that some workers may from time to time be at increased risk of injury or ill-health resulting from work activities. All employees must advise their manager if they become aware of any change in their personal circumstances which could result in them being at increased risk. This could include medical conditions, permanent or temporary disability, taking medication and pregnancy.

As an equal opportunities employer the company will ensure that they make reasonable adjustments of their employment arrangements or premises, in order not to place disabled people at a substantial disadvantage compared with non-disabled people.

Excavations

Works in connection with excavations must be carried out in accordance with the Construction (Design and Management) Regulations 2015. Excavations can impose risks not only to persons working in the excavation but also to other site workers, plant operators, site traffic, general public road traffic.

All excavations require barriers erected at a safe distance from the excavation edges and signage highlighting there is an excavation should be displayed where there could be a risk to the general public.

All excavations will (subject to a variety of exclusions¹) be covered by a **permit**. This permit will have considered, and identified through plans, scanning, etc, any buried services.

General Public Safety

Excavation works should be planned whenever possible so that the least amount of excavation is left open when the sites are unattended. Whenever possible excavations should be back filled, and where this is not possible, safely guarded off or securely covered in line with the risk assessment and safe system of work.

Fencing and Barriers

During construction works, where the company is principal contractor, we will provide a suitable fence or barrier to a minimum of two meters to prevent unauthorised access and protect the public.

When other works are left incomplete and from a hazard, e.g. trench works are left open, a safety barrier of a type and size suitable for the area shall be installed: level steel bridging plates (of adequate strength) covering the entire area shall be put in place or a combination of both will be provided.

Where any site is left unattended, even for short periods, the area will be left in a safe condition with plant and equipment isolated.

Fire Safety

The Company will assess and control the risks from fire in accordance with the Regulatory Reform (Fire Safety) Order 2005.

Premises, and sites, are equipped with appropriate fire fighting equipment, fire detection and fire warning systems that are suitable and sufficient for the features of the premises, the activity carried out and the hazards present. Emergency routes and exits are maintained in good working order and unobstructed.

The Company will ensure that arrangements are in place to ensure that all fire fighting equipment is regularly maintained. Suitable records of such maintenance should be kept.

Managers are responsible for checking fire safety hardware during monthly site safety audits.

The Company has an emergency plan to follow in the event of fire or sounding of the alarm.

Managers are responsible for giving new employees a basic fire safety induction, covering the risk of fire, control measures in place to protect them and location of the fire assembly point. Further training on fire awareness will be provided for employees via the fire awareness e-learning module on Safety Cloud.

Fire and Emergency Evacuation Procedure

In the event of fire, sounding of the alarm, or in any other emergency situation (such as a bomb threat), all employees should stop what they are doing and walk to the nearest safe exit leaving all personal belongings behind. All employees should then assemble at the designated assembly point.

Practice fire drills will be conducted on a frequent basis to ensure employee familiarity with emergency evacuation procedures.

On Sites

Where we are working on a site, our staff will comply with all of the fire (and other emergency) arrangements put in place by the client and/or principal contractor.

We will, where we act as principal contractor, consider the risk from fire (and other emergencies) during the pre-construction phase. Control measures will be included in the construction phase plan, and they will be implemented, communicated and monitored throughout the duration of the project.

First Aid

The company acknowledges that first aid can save lives and prevent minor injuries becoming major ones. First aid provision will be assessed during the planning phase. As a minimum all sites will have the provision of a suitable stocked first aid container, there will be an appointed person to take charge of first aid arrangements and information will be provided for employees on the first aid arrangements at their location.

¹ Exclusions include: Tarmacked roads up to a depth of 200mm, cultivated gardens to a depth of 0.5m (not including lawns), and any surface disturbance less than 200mm in depth.

Where a risk assessment determines it as necessary, the above minimum provisions will be supplemented by additional provisions.

Managers are responsible for informing employees about accident reporting procedures, introducing them to first aiders and advising them on the location of first aid kits, and eye wash stations, during their initial induction.

In the event of an accident a nominated trained first aider will be contacted to administer treatment. If it is deemed necessary an ambulance will be called.

Fork Lift Trucks

All fork lift trucks, used at Bilston, will be maintained in accordance with manufacturers' recommendations. This is arranged by Hill & Smith Ltd (Barrier Division). All records relating to these trucks can be found on their Safety Cloud site. Any enquiries, about a forklift truck, or any defects that need to be reported, will be done through Martin Peach (Hill and Smith Bilston).

Any fork lift trucks that are used on site will be hired in. We will only use reputable hire companies. We will ensure that all forklifts are in good, visual, condition. We will also insist that any forklift, hired in, has been thoroughly examined within the last twelve months (or 6 months if they are to be used to lift persons).

Hand Tools

The safe use of hand tools is the responsibility of both the employer, for the supply of the safe tools and the employee for the safe use and maintenance. All tools should be inspected before use on each occasion to check for faults and damage. Any damaged tools should not be used and will be replaced.

Health Surveillance

Personnel exposed to known hazardous activities will be subjected to suitable health surveillance in accordance with the associated risk assessments.

Where health surveillance uncovers issues, we will refer any affected staff to occupational health specialists. We will act on any findings, or recommendations from such specialists.

we will, also, use the findings of health surveillance when reviewing our risk assessments, safe systems of work, etc.

Hot Works

Hot works refers to work which involved or produced a naked flame, sparks or similar, and which could be a source of ignition if hydrocarbon vapours or flammable substances are present. It includes (but is not restricted to):

- the use of abrasive cutting discs when used on either metal or concrete (consideration should be given to the cutting off any natural stone that may contain ferrous metals.
- burning or grinding
- blow lamps
- hot air guns
- propane torches

While hot works are being undertaken in a hazardous area, a fire extinguisher and fire watch may be posted. A fire extinguisher will be directly to hand throughout the operation as a minimum requirement. A hot works permit should be used where required

Housekeeping

The Company will ensure that standards of cleanliness are maintained in all areas of its premises, and all sites. All floors and traffic routes will be maintained in good repair so as to reduce the health and safety risk to staff, customers and visitors. Traffic routes and fire escapes will be kept clear of obstructions. It is the responsibility of all staff to ensure the following:

- materials and equipment must be stored safely and tidily at all times
- walkways and walking areas and exits must be kept clear and free from obstructions at all times
- if water is spilt on the floor it should be wiped immediately to avoid slipping
- trailing cables should not be left in any walking area
- where objects are stored in or around a walking area, care must be taken to ensure that no long or sharp edges jut out into the walking area

Any concerns regarding cleanliness and hygiene should be reported to the manager.

Hybrid Working

The Group has recognised the benefits of being flexible (with regards to working arrangements in the office and being remote). The company, and its employees, will abide by the Group's Hybrid Working Policy. Part of this policy involves the completion of a workplace self-assessment form. This is available for all relevant employees.

Infection Control

Berry employees will follow the Group's policy, risk assessments, working instructions, etc. that concern the risk (and management thereof) of COVID-19.

Information, Instruction, Training and Supervision

The Company will provide employees with adequate information, instruction, training and/or supervision to enable them to undertake their duties safely. A staff health and safety handbook will contain important information for employees regarding any workplace hazards they may be exposed to, and the safe working procedures and control measures they should follow in order to remain safe.

Written records of training will be maintained (on Safety Cloud), with all new starters given induction training relevant to their duties. Training will include instruction on the safe use of any equipment provided and other information that is relevant to their specific role and responsibilities. Specific training sessions will be arranged if there is a change to health and safety procedures, if it is agreed as part of a member of staff's training and development plan or to inform staff of a specific health and safety concern. Any training and development needs should be reported to the relevant Manager.

All staff, who are involved in construction, will receive site inductions.

Staff members have personal logins to Safety Cloud which enables them to view risk assessments relevant to their work and are instructed on any reviews that are relevant to their work area.

Note to employees - If you are required to undertake a task which you feel you are not competent and where your health and safety might be put at undue risk you are required to stop work and report this immediately so that appropriate remedial steps can be taken.

Isocyanates

The predominant use of isocyanates is in the resins and buffers that we use. Hazards associated with these include irritation of the respiratory tract asthma, chemical conjunctivitis and dermatitis.

All work, that might give risk to the production of isocyanates, will be assessed at tender stage or prior to the commencement of work. The necessary control measures identified and the safe method of work documented.

Lifting Operations and Lifting Equipment

Lifting operations will be undertaken under the control of a competent person.

All lifting equipment which is hired by the company must be up to date with all thorough examinations and certification.

Staff are only permitted to use the lifting equipment where they have been trained and authorised to use it by the company. Refresher training is provided if deemed necessary after observation of poor practices.

Lone Working

Lone working should only be undertaken if absolutely necessary. Prior to working alone it is the company's policy that a third party be informed of the fact that you are working alone. Monitoring of the individual is to be established through effective form of communication.

If employees are working alone on site after normal working hours they must:

- Inform someone where they are and what time they intend to leave.
- Ensure that entrances are securely shut and ensure that they can get out of another door in case of an emergency without using a key.
- Always be alert when leaving the building and ensure that the door through which they leave is securely locked behind them.
- Phone the police if they are suspicious about someone attempting to enter the building.

Persons working alone must not enter any confined space or undertake hazardous tasks.

Managing Contractors

This section refers to contractors who might be appointed to carry out works in Bilston. For details about contractors, sub-contractors, etc. on site please see the section on Construction Design and Management.

The competency of contractors is checked before services engaged. This includes qualifications, insurance, membership of professional bodies, and previous experience.

Prior to appointment, contractors undertaking high risk works (e.g. work at height, steel erection, demolition) will be requested to provide a method statement for any work they intend to undertake at the premises. This should include information on:

- hazards involved in the work.
- assessment of the risks arising from the hazards identified.
- how the risks will be controlled.

It is the supervisor's responsibility to ensure that work is carried out in accordance with the method statement.

Employees and contractors will be advised of risks they may be exposed to (e.g. asbestos, live electrics etc) and all site rules they must follow prior to commencing work.

The Company will undertake regular checks on the contractors mode of operation and stop any work suspected to pose a risk to either our staff or the contractor.

Manual Handling and Lifting

The Company will take all reasonable steps to reduce and avoid hazardous manual handling activities where this is practical and reasonable. If this is not possible we are committed to undertaking a suitable risk assessment to identify practical controls that will reduce the risk of injury.

Where employees are required to undertake manual handling duties, training will be provided to cover:

- the principles of good lifting and handling.
- understanding of how to assess the risks posed by manual handling.
- how to use any mechanical aids provided.

Precautions:

Lifting and moving of objects should always be done by mechanical devices rather than manual handling wherever reasonably practicable. The equipment used should be appropriate for the task at hand.

The load to be lifted or moved must be inspected for sharp edges, splinters and wet or greasy patches.

When lifting or moving a load with sharp or splintered edges gloves must be worn. Gloves should be free from oil, grease or other agents which might impair grip.

The route over which the load is to be lifted or moved should be inspected to ensure that it is free of obstructions or spillage which could cause persons to trip or slip.

Employees should not attempt to lift or move a load which is too heavy to manage comfortably.

Where team lifting or moving is necessary one person should act as co-coordinator, giving commands to lift, lower etc.

When lifting an object off the ground employees should assume a squatting position, keeping the back straight. The load should be lifted by straightening the knees, not the back. These steps should be reversed for lowering an object to the ground.

Migrant Workers

The company ensures compliance with the requirements of the UK's Immigration laws, and is committed to providing a safe working environment for employees and contractors whose first language is not English.

In order to comply with its legal duties the company will check relevant identification documents, including the following;

- passport and cross check photographs.
- expiry dates of limited leave to enter or remain in the UK have not passed.
- be satisfied that the documents are genuine and have not been tampered with.

Photocopies of the above documentation will be taken and stored on the individual's personnel file.

The company will ensure the health and safety of migrant workers under their responsibilities by:

- providing information, instruction, training and supervision and making sure workers can understand it.
- ensuring workers have the necessary knowledge and skills to do the work for which they have been employed.
- ensuring that workers understand that the company has responsibilities for their health and safety.

Mobile Phones

The company considers the use of mobile phones a health and safety issue. Unless a mobile phone is necessary, employees are not permitted to use a mobile phone, other than at recognised break times. If anyone needs to get an urgent message to employees they should do this through the main office in Bilston. Anyone needing to make an urgent call should speak to their manager.

Monitoring and Inspection

We will undertake regular inspections and checks to monitor health and safety standards and ensure a healthy and safe workplace. Southalls will undertake quarterly site safety audits.

A "fitter's pack" is prepared for each project. This contains a variety of documents that managers and site managers can use to monitor our health and safety performance during the works. A full list of the documents, and the frequency for completion, can be found at Appendix One. If the site manager finds any issues, during monitoring, these will be escalated to the relevant contracts manager.

Responsibility for carrying out monthly health and safety inspections will be delegated to the designated manager at each site. The Manager will conduct this check on the Safety Cloud system and should report findings of the inspections to the Contracts Manager as required. The manager or other senior members of the management team will also do occasional health and safety spot checks.

This policy will be reviewed to reflect changes in best practice guidance, techniques and legislation as required and as a minimum once every two years.

Noise

Where it is suspected that the noise level emitted from machinery, averaged over the course of the working day or working week, exceeds the lower or higher action value

levels (80dBA or 85dBA) a noise assessment will be undertaken and any necessary protective measures put in place to reduce the risk of hearing damage.

Hearing protection is issued and provided for those at risk and is subjective dependant on working practice i.e. machinery tools or defined by mandatory hearing protection zones defined with signage.

Workers will be instructed in the risks of noise exposure, the controls in place, hearing protection provided and safe working practices.

Health surveillance (hearing checks) is provided for those at risk with results used to review controls and further protect individuals.

These arrangements will be reviewed whenever there is a substantial change in work practice, equipment or exposure e.g. purchase of new machinery, increased use of machinery etc.

Overhead Cables

Hazards associated with overhead cables include severe electric shock, fire, burns and possible death from contact by plant or vehicles, operatives handling long objects e.g scaffold tube, sheeting etc. Electrical energy can also arc from cables onto plant, vehicles and scaffolding poles.

Overhead cables will be identified on site, during the pre-construction phase, and suitable allowance made when planning contract operations. Risk assessments will be undertaken by management and suitable safe working practices devised in accordance with all applicable standards.

in good time, prior to the commencement of works on site, management will arrange for all necessary diversions, safe distance barriers, precautions etc to be installed in consultation with the electricity provider and the appropriate authorities.

Permits to Work

The company may be required to undertake operations of a hazardous nature. On these occasions it is a requisite that they be undertaken in accordance with a permit to work system. The company will highlight during the tendering process to these preparing and considering health and safety requirements, that a permit will be required to undertake the works. Should a permit be required it will be

issued by a person nominated as being competent by a director. This person is to ensure that all requisites of the permit have been considered and controls implemented before work commence before the permit is authorised. Once works are complete the nominated person is to 'sign off' the permit as a confirmation that the area is safe.

Pressure Systems

All pressure systems shall be regularly maintained.

A periodic inspection and test shall be undertaken of all pressure systems in accordance with the insurance schedule and relevant regulations. Written schemes of examination and records of inspection shall be maintained on Safety Cloud.

The company will provide sufficient information, instruction and training to all those involved in the operation of pressure systems.

Personal Protective Equipment (PPE)

PPE includes safety equipment such as protective footwear, gloves, high visibility vests/jackets and hard hats. The company acknowledges that PPE forms the last level of protection within the hierarchy of controls, and will ensure all other practicable controls are in place. It is however recognised that PPE is often required to bolster other controls. As such the company will:

- assess the risks and the PPE to be issued to ensure it is suitable.
- maintain, clean and replace PPE as required.
- provide storage for PPE when it is not being used.
- give training and instruction to personnel on its use and how to look after it.
- monitor use and condition of PPE.

Employees will be consulted at the selection stage to ensure equipment is suitable for their needs and to encourage usage. All employees sign a record of issue upon receipt of their PPE. All PPE is provided free of charge.

Provision and Use of Work Equipment

It is the company's policy to comply with the law as set out in the Provision and Use of Work Equipment Regulations

1998. We will endeavour to ensure that all equipment and plant is used in the workplace is safe and suitable for the purpose for which it is used. New or second-hand equipment must be checked, before it is purchased, to ensure that it meets health and safety standards.

All workers will be provided with adequate information and training to enable them to safely use work equipment specific to their job role. The use of any work equipment which could pose a risk to the well being of persons in or around the workplace will be restricted to authorised persons.

It is the responsibility of all employees to ensure that any device or equipment they use is in a good and safe condition. Any device or equipment that is defective must be reported to the Manager.

No device or equipment should be used outside of the manufacturer's guidance. Employees are prohibited from using any device or piece of equipment for any purpose other than its intended purpose.

All workers will be provided with such protection as is adequate to protect them from dangers occasioned by the use of work equipment. All work equipment will be clearly marked with health and safety warnings where appropriate.

All devices and equipment must be properly and safely stored when not in use.

The Contracts Manager shall be the point of reference for queries regarding equipment maintenance and testing. They will also identify all equipment that requires testing and to ensure that appropriate servicing/maintenance of equipment is carried out, to record the maintenance checks.

Safety Signs

Where required, suitable and sufficient safety signs shall be posted in accordance with the Health and Safety (Safety Signs and Signals) Regulations 1996. Signs will be positioned to provide a suitable warning of the work activity being undertaken.

All safety signs shall be maintained in a clean and clearly visibly condition.

Safety signs shall be removed when they are no longer required.

Site Traffic Management

One of the most common causes of fatalities and serious injuries at work involve the operation of vehicles, including lorries and fork lift trucks.

The company will attend sites which are sometimes unfamiliar to its staff (e.g. when coming onto an existing site to start our work). To this end, the company will take all reasonable steps to speak to site supervisor to determine site traffic routes, authorised contractor area such as parking, loading/unloading and consciously segregate the risk of vehicle – pedestrian collision.

Drivers are aware of pedestrian presence on shared sites and this is reinforced through the staff health and safety handbook.

Smoking, Vaping and E-Cigarettes

Smoking is not permitted anywhere inside company's premises or vehicles. Employees, who smoke, should check where smoking is permitted. This information will usually be provided during site inductions.

Smoking is expressly prohibited in confined spaces and near their access points (regardless of whether they are in open air).

The above also applies to vaping and the use of e-cigarettes.

Use of Safety Knives

Wherever possible employees use a safety knife instead of an open blade knife. The use of knives is controlled through the risk assessment process.

Vibration

The use of certain tools, and plant, poses a risk of hand-arm vibration (HAV), or whole-body vibration (WBV) related diseases. The risk is reduced by using vibrating tools, or plant, for a limited period of time, wearing warm clothing to increase circulation and completing annual health surveillance questionnaires to detect early signs of vibration related diseases (e.g- vibration white finger).

Hand Arm Vibration

The company recognises that a common cause of hand arm vibration is the prolonged use of rotating hand tools,

together with progressive hand tools used for riveting, grinding, hammering and drilling. The company shall ensure that the tools and equipment are selected or allocated is suitable for tasks. The information provided by the manufacturers on vibration values for some types of work equipment will be used where possible to calculate the hand-arm vibration exposure. A hand-arm vibration calculation will be completed for employees and risk assessed against the tasks they perform. Where it has been confirmed that the employees are being exposed to excessive hand-arm vibration, the company will ensure that affected employees are placed on health surveillance.

Whole Body Vibration

Exposure to whole-body vibration (WBV) particularly to large shocks and jolts, and risk of back pain for Company employees who drive mobile machines over poor surfaces as the main part of their job. The Control of Vibration Regulations 2005 requires the health risks from exposure to WBV to be controlled and sets out the maximum daily exposure limits an employee should be exposed to on a single day and the daily action value being the level of exposure to vibration above which the company is required to take actions to reduce exposure. The company will endeavour to reduce exposure as low as possible, reducing the time and frequency in which employees spend on specific machinery each day, spreading particular tasks over more days or between more employees where necessary.

Violence and Aggression

Any employee who feels that they may be at risk from verbal abuse, threats or actual violence should report this to their manager immediately.

In the event of a member of public/visitor/contractor becoming aggressive, they will be asked to leave the site in a calm and non-threatening way. If the person refuses to leave the police would be called. Staff should not try to physically remove the person or engage in arguments.

Basic skills in identifying the warning signs of violence and aggression and conflict resolution training are provided in the Health and Safety handbook, which, are of particular importance to those who work off site. Employees are not to engage in situations which made risk their own or someone else's safety.

Welding

The HSE have updated their official guidance on protecting employees, and other people in the area, from welding fumes. Local exhaust ventilation and/or air-fed masks are required (independent of the duration of welding).

The Company will now outsource all welding. As with any other work that we subcontract - reasonable checks will be made to ensure that welding is completed in accordance with the HSE's guidance.

Working at Height

The Work at Height Regulations 2005 require:

- work at height to be avoided as far as reasonably practicable.
- where work at height cannot be avoided, provide suitable and sufficient measures to prevent persons falling a distance liable to cause injury.
- where a risk of falls remains, use work equipment and other measures to minimise the distance and consequences of a fall.

Employees are responsible for using work equipment provided for working at height in the correct manner and to report any safety hazard, fault or deficiency in the equipment promptly to their supervisor.

Ladders and Step Ladders

All work at height is risk assessed. This includes routine use of ladders. Safety rules for use of ladders are provided for staff to follow within the staff handbook. Aeroplane style steps with upper guard rails and hand rails or A-frame ladders are always used in preference to single section ladders.

Ladders and stepladders should be regularly inspected to ensure they are in good repair and safe condition. This check will be recorded and the ladder marked to indicate the next date after which the ladders should not be used. Defective ladders are labelled and removed from use.

Scaffolds and Platforms

Fixed scaffolding (where applicable) must not be altered by anyone other than a competent site scaffolder. If alterations are required the Project Manager / Site Agent or Supervisor must be notified and a new scaffold safety certificate issued if necessary.

Trestles and Batten, Tower or mobile platforms (where applicable) must be erected by a competent person with suitable guardrails and stability bracings fitted to all tower scaffolds. No operative shall be permitted to stay on any mobile or tower scaffold whilst it is being moved.

Working Alongside Other Contractors

We often work on busy sites. These may have other contractors (e.g. electricians, painters, etc.) on site when we are.

Where we are the principal contractor we will plan the works to minimise the impact that one contractor might have on another. Where we are a contractor, we will liaise with the principal contractor, to ensure that our work is done to minimise disruption to other contractors (and vice versa).

If, whilst out on site, our site superiors are concerned that another contractor is putting our staff at risk (e.g. from dust, noise, slipping hazards, workplace transport, etc.) they will:

1. stop our work
2. try and resolve the situation with the other contractor
3. speak to the site manager (if necessary).

Our site supervisor will not recommence work until the situation is resolved.

Working Hours

The Company complies with the EU Working Time Directive by keeping a record of hours worked by our employees.

Workplace Facilities and Welfare

In line with the Workplace (Health, Safety and Welfare) Regulations 1992 the company is committed to providing a suitable workplace conducive to productivity and the wellbeing of employees.

It is the client's responsibility to provide welfare facilities. We will, where we act as principal contractor, or contractor, help the client to meet their duties. The Construction Phase Plan will detail welfare facilities for each specific site. Toilets and washing facilities will be maintained in good repair, suitable for the number of employees on site, along with access to a rest room with a potable water supply.

Workplace Stress

The Health and Safety Executive define stress as the adverse reaction people have to excessive pressure or other types of demand placed on them. The Company recognises that workplace stress may at times be a health and safety issue and acknowledges the importance of identifying and reducing workplace stressors.

The hazard of workplace stress has been included within the company's risk assessments. This risk assessment has identified key workplace stressors and controls to eliminate stress or control the risks from stress.

The Company ensures that employees are sufficiently trained to discharge their duties. Workloads and work hours are monitored to ensure that employees are not overloaded. Bullying and harassment is not tolerated in the workplace and the Company can, where necessary, provide confidential counselling for employees affected by stress caused by either work or external factors.

Worksafe Policy

Any person, working on one of our sites (either an employee or a sub-contractor) will have the opportunity to stop working should they consider the working environment or the process/practice to be unsafe, having the potential to endanger themselves or others. In such cases the following steps will be taken:

- Consultation between the individual raising the concern and the site management will be undertaken, in order to where ever possible, take immediate and appropriate action to resolve the situation.
- If the individual raising the concern is satisfied once the works are deemed safe or suitably amended, then work may recommence, on the basis the site management have assessed that no change is necessary to the existing method statement(s) or risk assessment(s) for the issue identified.
- If the situation cannot be resolved then works should cease and the site management should contact the appropriate business Contracts Manager and the client informed where necessary. A formal review of the site process or practice will be undertaken by the Contracts Manager, including consultation with an independent 3rd party Health and Safety support professional where required.

- Once the formal assessment has been completed a consultation meeting will be convened to ensure the necessary actions have been taken and a safe system of work has been established.
- When concluded, any changes to the appropriate RAMs will be initiated and reissued. Additional levels of training and competence may be required for individuals or further briefings introduced where appropriate.

Any employee, initiating this process for a genuine Health and Safety issue, will not face disciplinary action. However, in cases where a safe environment, process or practice is established and the person continues to refuse to work, disciplinary action may be considered.

Suitable records will be maintained throughout this process (e.g. the issue, the person involved, key decisions, etc.) Where changes to work environments, processes, or practices have been agreed by all parties and appropriate amendments made to the respective RAMS, then further consultation will be undertaken; on cases where a refusal to work remains, Human Resources Department will be engaged.

Young Workers

Persons under the age of 18 years may be employed (or placed on work experience) but only after a risk assessment has been carried out to identify any potential risk to the young person in the place of work. Factors considered within the assessment are physical strength, possible smaller size, any health issues and any physical and learning difficulties. The assessment also takes into account their inexperience and lack of awareness.

Induction training is provided, and clear instructions on the tasks young people should not be involved in. At all times a young person will be adequately supervised and will be given the appropriate training before being asked to undertake any given task.

COMPLYING WITH LOCAL LAWS WHEN WORKING ABROAD

The Company will conduct all works, outside of the UK, in accordance with the legal regulations, ordinances, etc. of the Country where the work is taking place. All reasonably practicable measures will be taken, in order to undertake the work safely to protect employees and others affected by our undertakings.

Management and supervisory staff are responsible for ensuring that the regulations, ordinances, etc. are followed as advised by the host company (e.g. principal contractor). They must ensure that health and safety considerations are always a priority as far as the design work, and the daily supervision of work, are concerned.

We will liaise with local health and safety experts, associated with the host, on site to be confident that local regulations are understood and followed. Due to the fact the key UK's key health and safety legislation (e.g. the Provision and Use of Work Equipment Regulations 1998, the Management of Health and Safety at Work Regulations 1999, the Control of Noise at Work Regulations 2005, etc.) have been derived from EU Directives, the company has a good understanding of the key principles that will apply in each country. We are also confident, therefore, that we will be compliant with local laws. Should there be any uncertainty we will liaise with the local site managers to seek clarification.

We would also expect that any critical health and safety legislation to the work being undertaken is raised on induction to the work once our team has arrived in the country. This will assist the company with compliance.

Applicability

The company is confident that it can operate in most regions. In the immediate future we are looking to operate in Germany and the Netherlands. We have identified some key pieces of legislation that will apply to our work:

Germany

- The Construction Site Ordinance
- Rules on occupational health and safety at construction sites

- The Ordinance on Equipment and Machinery Noise Protection
- The Ordinance on the Handling of Loads
- The Ordinance on the Use of Personal Protective Equipment

The Netherlands

- The Working Conditions Act
- Working Conditions Decree
- Working Conditions Regulation

Accidents and Near Misses

Where any Berry employee is involved in an accident, or near miss, we will liaise with the host company to ensure that we are making any report in accordance with local laws. The same is true if our work activities cause another person to be injured, or be involved in a near miss.

Monitoring and Review

This part of our policy will be monitored in a variety of ways. These will include:

- Seeking feedback from the host company and considering points raised.
- Regular, and frequent, site tours by our site supervisors.
- Monitoring of accident, and near miss reports.
- Acting on feedback, recommendations, made by any local health and safety inspectors.

APPENDIX 1. LIST OF DOCUMENTS IN FITTER'S PACK AND FREQUENCY FOR COMPLETION

Document	Frequency for completion
BSF070 Fitter Instruction sheet	Completed for all new projects
Material take off	N/A
Drawings	Issued for every project
Drawing register	Issued with every project
BSD008 Anchor bolt spec	Issued in every pack
BSF080 Method statement	Issued for every project
BSF079 Risk Assessment	Issued for every project
BSF059 VRS inspection test plan	Completed on a weekly basis while a project is ongoing or at the completion of installation if this is less than a week.
BSF065 daily site diary	Completed daily and sent to contracts manager at the end of the week or at the completion of installation if this is less than a week.
Manual handling assessment	Issued in every pack
BSF069 toolbox talk	Completed fortnightly and additional if requested for projects
BSF068 workplace equipment inspection record	
BSF067 handover acceptance	On completion of project
BSF072 HAV exposure sheet	Completed daily
BSF066 forklift check list	Completed daily if forklift on site
BSF071 plant checklist	Completed daily if plant on site