

# **Health, Safety & Environmental Policy**



## Policy Review Record

Date	Comment / Amendment	Reviewed By
Oct 20	New Issue	

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## 1.0 Introduction

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Every year people are killed at work, are injured and/or suffer ill health. Many of these accidents occur because of lack of knowledge and understanding of good practice and safe working procedures.

Statutory health and safety requirements need to be met, but accidents also cost time and money through people being off work, material costs and damage to buildings, plant or products. These costs are often not covered by insurance and if they are of a serious enough nature can jeopardise the stability of a business and the future of all concerned.

Health and safety legislation varies from being very specific about what a business must do and others are general, requiring you to do what is “reasonably practicable”, such as the Health and Safety at Work etc Act 2015. A good deal of guidance is published by the Health and Safety Commission (HSC) and the Health and Safety Executive (HSE) to assist in you in complying with the legislation.

The Health and Safety at Work etc Act 2015, applies to all work activities and premises, with everyone at work having responsibilities under it, including those who are self employed.

All employers must have a written and up to date health and safety policy if they employ five or more people, carry out risk assessments for all foreseeable significant risks (and if they employ five or more people, record the findings and their arrangements for health and safety).

This policy has been written in conjunction with the HSE publication “Successful Safety Management – HSG65”. This book outlines a process that if adopted and implemented, will assist in providing a safe working environment for all.

Employers are also required to display a current certificate as required by the Employers’ Liability (Compulsory Insurance) Act 1969. The Health and Safety Law poster must also be on display, with the relevant details entered onto it.

## 2.0 Policy Statements

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### 2.1 Health, Safety & Welfare

KEE Projects Ltd recognises that high standards of health, safety and welfare are an integral element of a successful and efficient business. The management of this key performance indicator is therefore central to our strategy for the wellbeing of the Company.

We acknowledge that Health, Safety and Welfare is a management responsibility of equal importance to production (i.e. installation), quality and finance; to be actively pursued through the continuing development of employee competence and the provision of competent advice to achieve progressive improvements in Health, Safety and Welfare performance.

As a company we are committed to ensuring compliance with the requirements of The Health and Safety at Work Act 2015 and such other relevant Health and Safety legislation together with any new legislation that may be introduced. We will therefore ensure, so far as is reasonably practicable that:-

- All relevant statutory requirements are observed and are treated as the minimum standards to be applied to any work activities.
- Health, safety and welfare considerations are included in our business planning and decision making thus ensuring a safe and healthy working environment along with methods of work and conditions is provided, adopted and managed.
- Adequate information, instruction, training and supervision is provided so that through the use of formal risk assessment and the communication of the control measures to be adopted to eliminate or reduce risk, individuals are made aware of the potential hazards they face as a consequence of their work.
- Plant, equipment and materials provided for work that is to be undertaken is fit for purpose and adequately maintained so as to be free from unnecessary risk.
- Employees and Sub-Contractors are actively encouraged to participate in health and safety, raise safety concerns and submit ideas and suggestions for improving standards, thereby facilitating co-operation between individuals and groups.
- The immediate and underlying causes of work related injuries and near misses are identified and the necessary preventive action implemented to prevent a re- occurrence. This will include, as a last option, the provision and use of the correct personal protective equipment to ensure employees health and safety.

To assist in the promotion of a positive Health, Safety and Welfare culture the Company will establish objectives; develop, implement and maintain management controls; institute sound communication of information on safety and health; monitor; audit and review matters of Health and Safety & Welfare. In pursuance to that Health, Safety and Welfare will therefore be regularly reviewed at a senior level.

This Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.



Joseph Loftus

**Dated: 1st March 2021**

## 2.2 Environmental

KEE Projects Ltd recognises the need to ensure that we operate our business and carry out our activities in a way that acknowledges our responsibilities to and for the environment.

We accept and are committed to ensuring compliance with the requirements of The Environmental Protection Act and associated regulations. The company will therefore as a matter of policy work toward pursuing best environmental practices whenever and wherever practicable.

KEE Projects Ltd is therefore committed to working towards:

- Ensuring that adequate human and financial resources are made available within operating units to implement and maintain the Policy.
- Including environmental considerations in our business planning and decision making.
- Complying with all applicable regulations and statutory requirements as appropriate
- Training key employees in environmental matters appropriate for their role.
- Conserving resources by the efficient consumption of materials, energy and fuel by influencing design and specification wherever possible by utilising techniques that incorporate best practice not entailing excessive costs.
- Encouraging all suppliers and sub-contractors to develop or share environmental policies in line with our company Policy.
- Implementing a waste minimisation programme and encourage recycling where possible.
- Continuously monitor and improve the company's environmental performance by the use of management procedures.

The Policy will be reviewed and developed periodically to ensure it remains effective and any necessary amendments will be communicated to all employees.



Joseph Loftus

**Dated:1st March 2021**

## 2.3 Industrial Relations

- KEE Projects Ltd recognises the right of all our employees to membership of a trade union.
- No job applicant or employee will be discriminated against or disadvantaged on the grounds of membership of a trade union.
- KEE Projects Ltd recognise that trade unions can be a useful source of information for health and safety matters, human resources, the construction industry, commercial and business development, best practice and benchmarking.
- In the absence of legal trade union recognition, pay and working conditions will be negotiated on an employee by employee basis.



Joseph Loftus

**Dated:** 1st March 2021



## 2.4 Equal Opportunities

As an equal opportunities employer we base our employment decisions solely on merit and suitability. No job applicant or employee will be discriminated against or disadvantaged on the grounds of race, colour, nationality, ethnic or national origins, sex, sexual orientation, marital status, age, disability or religion. Any behaviour by a member of staff resulting in unfair discrimination will be a matter for disciplinary action.

A flexible approach to working arrangements for disabled employees is taken where possible, including offering flexible hours and working arrangement.

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'Joseph Loftus' written in a cursive style.

Joseph Loftus

**Dated:** 1st March 2021

### 3 Organisational Chart

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## 4 Responsibilities

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### 4.1 Directors

1. Agree and ensure implementation the company safety, health and environmental policy.
2. On an 'as required' basis, review and update the company HS&E Policy and where necessary implement recommendations for any improvements identified.
3. Monitor the performance of the company safety, health and environmental policy.
4. Ensure that sufficient resources are available to enable the safe operation of the business and for all duties allocated.
5. Ensure that safe systems of work have been provided in the form of specific documentation, a risk assessment and/or a method statement.
6. Ensure that all accidents and incidents that are within the scope RIDDOR are reported as required.
7. Set a personal example to assist in the continued improvement of the safety, health and environmental performance of the company.

### 4.2 Contracts Managers

1. Provide positive leadership on HS&E issues within your area of operation.
2. Promote an enthusiastic HS&E culture that delivers positive commitment to and engages all employees in continuous improvement in HS&E performance.
3. Implement the HS&E Policy. In particular:
  - Identify HS&E training needs and have the necessary training arranged. When arranged, release those who require training.
  - Make arrangements for HS&E induction training for all new starters at the workplace under their control.
  - Implement operating procedures, including risk assessment procedures, for the planning and control of activities associated with identified risks.
  - Appoint appropriate personnel to undertake HS&E duties.
  - Ensure that suitable arrangements in place for the effective control of changes to planned methods of work.
4. Monitor and review the effectiveness of the HS&E Policy and report deficiencies.
5. Monitor that personnel under their control comply with their individual responsibilities in HS&E matters.
6. Give personnel under their control, including contractors, clear instructions as to their responsibilities to ensure correct working methods.

7. Make adequate provision for dealing with HS&E emergencies.
8. Promptly alert line and HS&E management to:
  - Significant injury to employees or those working under our control.
  - Reportable dangerous occurrences.
  - incidents that could lead to enforcement action
  - Enforcement notices served
  - Injury to a member of the public or a visitor.
  - Serious environmental incidents.
9. Where appropriate, be involved in the investigation and ensure that the findings are reported.
10. Act immediately on any breach of policy or procedures, unsafe situation or potential threat to the environment that comes to their attention and, where necessary, report such breaches.
11. Ensure that the disciplinary process to address breaches of the HS&E Policy or management system is applied where necessary.

#### **4.3 Site Supervisors**

1. Provide positive leadership on HS&E issues for the members of the work team for which they are responsible.
2. Promote a positive attitude in the workforce and encourage behaviours that protect both people and the environment.
3. Organise work to be carried out in accordance with relevant HS&E risk assessments/ method statements.
4. Monitor that personnel under their control comply with their individual responsibilities in HS&E matters.
5. Give personnel under their control, including contractors, clear instructions about the required methods of work.
6. Where appropriate assess and implement any additional HS&E controls required to address the needs of new employees, young persons, Non-English speaking workers, disabled persons, pregnant women, etc.
7. way communication and where appropriate deliver tool box talks to the work teams.
8. Identify any HS&E training requirements of personnel under their control and advise appropriate management accordingly.
9. See that accidents and incidents are reported immediately to the relevant manager.
10. Ensure that personal protective clothing and equipment is used where identified as required and is properly maintained and stored.
11. Ensure that the plant and equipment supplied is appropriate for the work and has any necessary certification. Ensure that plant and equipment is immediately put out of use if unsafe or presents a potential threat to the environment.
12. Ensure that only authorised persons operate plant and equipment.
13. Ensure that the disciplinary process for breaches of HS&E procedures and rules is applied where necessary.

#### 4.4 Employees

1. Ensure that all company activities do not expose you or others to risk.
  2. Always ensure that you are fully aware of any risk assessment or other safe system of work and their requirements. For any task, make sure that you have the correct tools, equipment and PPE for the work involved and never deviate from the agreed safe system of work.
  3. Report any accident / injury, near miss, dangerous occurrence or occupational health disease to your line manager.
  4. Never operate any plant or equipment unless trained or authorised to do so. Report any defects to line management.
  5. Co-operate with the company and others in all matters that affect HS&E.
  6. Ensure good housekeeping in the workplace at all times.
  7. Set a personal example to others
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## 5.0 Arrangements

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### 5.1 Risk Assessment

All work activities and work areas that expose employees or others to foreseeable significant risks will be subject to a Risk Assessment (HS09). All personnel and others affected by the works must be informed of the findings of the risk assessment. Any such briefings or communication of the contents of a risk assessment must be recorded. All risk assessments must be periodically reviewed or when a change in circumstances occurs.

Should a risk assessment evaluation determine an activity and/or task to be a high risk, then a method statement must also be produced. The Method Statement will identify in detail the safe method in which the activity and/or task is to be undertaken. All assessments will be carried out by personnel who are trained and suitably competent in the activity and/or task area being risk assessed.

For works where a Site Health and Safety File has not been generated, activities must be risk assessed using either the Risk Assessment (HS09) or by completing a Small Works Risk Assessment and Briefing Record for minor and/or reactive works.

### 5.2 Personal Protective Equipment (PPE)

All personnel will be provided with suitable personal protective equipment where required to do so by risk assessment. All PPE issued on site will be recorded on the PPE Issue Register.

All equipment supplied will be to the relevant British or European standard and training given as to its proper and intended use.

It will be the employee's duty to co-operate in the wearing of the equipment when required, to not abuse the equipment and to ensure that any defects noted with any PPE issued are reported to their Supervisor. It will be the responsibility of the Supervisor to ensure that employees wear the PPE recommended for the specific activities or tasks being undertaken.

### 5.3 Manual Handling

Before deciding to conduct an operation that requires a load to be lifted, pushed, pulled or move any load, consideration must be given as to avoiding the need to use manual handling by using automated or mechanical equipment. Consideration to such operations can be recorded on the risk assessment (See 5.1) undertaken for the activity being undertaken.

For activities that require detailed information, a Manual Handling Assessment can be completed, where there is a foreseeable significant risk of injury due to manual handling. In conducting the assessment, the following factors must be taken into consideration;

- The task, i.e. what, where, when, how is the load to be moved?
- The capabilities of the individuals(s) who are to undertake the task
- The weight, shape and centre of gravity of the load
- The environment of where the task is to be performed.

All tasks involving the movement of loads will, where reasonably practicable to do so, are to be avoided, by the use of automation or mechanical aids. All personnel involved in manual handling operations will receive suitable information and training.

### 5.4 Accident Reporting

All accident, ill health, dangerous occurrence or near miss incidents must be reported as indicated on the Accident and Incident Reporting Flow Chart. The details of which will be recorded on an Accident and Incident Record Form. Any such accidents/incidents requiring the statutory reporting to the regulating authority under current legislation will be reported by the responsible person. All near misses and minor accidents will be investigated locally by site management. Any corrective actions that may have been identified during any investigation need to be recorded on the accident and incident report form and relevant action(s) taken to ensure that any corrective actions noted are implemented.

### **5.5 Plant and Equipment (including Electrical and Lifting Equipment)**

All plant and equipment will only be used by trained and qualified persons. The work equipment selected will be ergonomically suitable and fit for purpose. Work equipment inspections will be undertaken relevant to the plant and equipment in use. These inspections will be recorded using a Record of Work Equipment Inspection Form ([HS07](#)). Inspections by operatives using any plant or work equipment, must be carried out before use on a daily basis, however these inspections do not need to be formally recorded.

All relevant plant and work equipment will be the subject of statutory or periodic inspections. Electrical equipment will be the subject of regular Portable Appliance Testing (See [HS02](#)). Results of portable appliance testing are to be recorded on a Portable Appliance Test Record ([HS03](#)).

Employees must not use and report faulty or defective equipment. Repairs will only be carried out, by competent and authorised persons.

### **5.6 Welfare**

Suitable and sufficient welfare facilities will be provided for all employees, these will include; toilets, washing facility, rest accommodation and where appropriate drying rooms. With regard to site work, where these are not provided by the Principal Contractor or Client as shared welfare, KEE Projects Ltd must provide.

### **5.7 Chemicals and Substances**

The Control of Substances Hazardous to Health Regulations requires the employers assess the adverse health affects of employees and others from exposure to substances in the workplace. Once an assessment has been carried out to quantify the risk, it is necessary to either eliminate or control to an acceptable level the exposure of the individual to that substance. All hazardous substances used by KEE Projects Ltd will be subject to a COSHH Assessment for both its hazard to health along with damage to the environment. All tasks involving employee exposure (or others) where a COSHH assessment has been undertaken, all employees and others affected will be informed of the results and any controls required for its safe use and to limit exposure.

### **5.8 Procurement**

Persons responsible for the process of the procurement of items must ensure that:-

- Any item of plant, equipment or goods whether purchased or hired complies with the relevant legislation, standards and safety instructions on the correct use of plant etc accompanies the goods purchased.
- Each manufacturer's safety, health and environmental information are supplied with any product purchased. Relevant information shall include the materials safety data sheets that are applicable under the Control of Substances Hazardous to Health Regulations.

### **5.9 Monitoring & Reviewing Performance**

Regular reviews of health and safety performance based upon information from risk assessments, accident records, ill-health records, safety inspections and training allow a constant development and improvement in health and safety management.

An annual review of health and safety performance will take place to ensure that a range of key performance indicators are set and achieved.

KEE Projects Ltd is committed to a proactive way of measuring its health and safety performance to ensure continuing improvement. This will include:

- Site inspections, undertaken weekly by the Site Manager or Site Supervisor and monthly by the Health and Safety Advisor.

The inspections carried out by KEE Projects Ltd personnel will be recorded using a Safety Inspection Report. It is important that any issues identified during inspections are recorded in sufficient detail, the persons responsible for rectifying the issues must also be noted. When the issues noted during the inspection have been completed, the date of completion must also be entered.

### **5.10 Health, Safety and Welfare Grievances including Consultation**

Joint consultation will be held between management and employees including any appointed safety representatives, to resolve any problems which may arise.

Information will be provided to employees on subjects relevant to any consultation that they will be involved with such as the planning of health and safety training; and risk and hazards involved during the course of their work.

To resolve problems both parties, if necessary, will jointly seek expert impartial advice.

Employees who feel that problems are not being satisfactorily resolved by line management should highlight such concerns to a through the normal lines of communications however this does not affect employees rights to contact the Health and Safety Executive independently.

Consultation will be undertaken if a decision is to be made involving work equipment, processes or organisation that could affect the health and safety of employees. Information will be provided and a chance will be given to the employees to express their views on the subject. These will all be taken into account before a decision is reached.

### **5.11 Temporary Workers and Sub Contractors**

KEE Projects Ltd recognises its duties to persons other than employees under the requirements of Sections 3 and 4 of the Health and Safety at Work etc. Act 2015 and its obligations to fixed term contractors and temporary workers under the Management of Health and Safety at Work Regulations 1999.

All contractors and temporary workers will therefore be provided with all necessary information regarding risks to their health and safety whilst on KEE Projects Ltd's premises or sites.

Suitability of contractors in terms of health and safety will be a prime consideration prior to the awarding of contracts. This will involve an assessment of contractor competency in safety



management as far as can be reasonably ascertained from information submitted by the contractor using a Sub Contractor Evaluation.

When evaluating Risk Assessments and Method Statements submitted by Sub Contractors to see whether they are sufficient, the Risk Assessment & Method Statement Evaluation Record should be used.

Sub-Contractors are subject to the same conditions as the company and will comply with all relevant statutory requirements, codes of practice and guidance notes.

All contractors will be expected to manage risks to the health and safety of KEE Projects Ltd's employees, other contractors and members of the public exposed to working activities carried out for the company by the contractor.

All plant and equipment, substances and materials, personnel and working practices utilised by contractors shall be safe and used in a manner which meets the requirements of all current legislation and best practice.

All contractors and temporary workers will be familiarised with local fire and emergency procedures by persons responsible for the contractor or temporary worker.

### **5.12 Young Persons**

No persons between 16 and 18 years of age will be permitted onto any KEE Projects Ltd office or work site without the following;

- a) Written permission from the person's parent or guardian.
- b) Written permission from KEE Projects Ltd.
- c) Written permission from the client (for site work).
- d) Completion of a specific risk assessment for the activities that are to be undertaken by the young person.
- e) All of the above are only for activities which have no statutory restrictions based on age.

### **5.13 Construction, Design and Management**

KEE Projects Ltd recognises that they may be involved in the commissioning and design of works which fall within the scope of the Construction, Design and Management Regulations (CDM) and that failure to meet the requirements of these Regulations may result in injury to persons involved with the construction project. This recognition however is not an acceptance, and it is the expressed intention of KEE Projects Ltd to take all reasonably practicable steps to ensure that each member of staff and others affected by its undertakings are not exposed to risks that may lead to incidents that may result in injury or ill health. KEE Projects Ltd is committed to working towards ensuring a safe, healthy and welfare-oriented environment. KEE Projects Ltd will therefore take all steps necessary to meet this responsibility. In achieving this, KEE Projects Ltd will ensure that:

- Appropriate financial resources are allocated, to meet the health and safety standards necessary within the areas of a project that they manage, so that KEE Projects Ltd may comply with its overall statutory responsibilities:
- The Managing Director understands and accepts responsibilities for the implementation of the CDM Regulations (where relevant).
- The Managing Director will ensure that all necessary measures are taken to ensure the Health, Safety and Welfare of employees in the workplace:

- The Managing Director will ensure that any necessary written policies and arrangement/ instructions are produced, and issued to the staff that they manage: and
- The Managing Director will ensure that employees receive appropriate training to enable them to carry out their responsibilities.

#### **5.14 Working at Height**

KEE Projects Ltd will;

- Avoid work at height where it is possible to do so
- Use work equipment or other measures to prevent falls where work at height cannot be avoided
- Where risk of fall cannot be eliminated, work equipment or other measures will be implemented to minimise the distance and consequences of a fall should one occur

Working at height shall be undertaken through the use of safe systems of work developed specifically for the working activity via a risk assessment. Hazards associated with working at height shall be assessed, with control measures developed and implemented to eliminate or minimise any risk. Stepladders (class 1) must only be used as the last resort and upon a site specific risk assessment being conducted. Evidence must also be available that illustrates that alternative methods of working at height have been considered.

All employees who undertake work at height, must have had training to ensure that they have a satisfactory level of awareness in relation the hazards of working at height, in particular the requirements of the Working at Height Regulations and the type of control measures needed to eliminated or sufficiently reduce the hazards posed by working at height.

#### **5.15 Mobile Phones and Driving**

KEE Projects Ltd is committed to reducing the risks our employees face and create when driving for work. We expect that all employees play their part, whether they use a company vehicle, their own or a hire vehicle.

Directors must ensure:

- They lead by personal example
  - They do not expect staff to answer calls whilst driving
  - That employees understand their responsibilities not to use hand-held mobile phone while driving
  - That employees switch phones to voicemail, or switch them off, while driving, or ask a passenger to use the phone
  - That employees plan their journeys to include rest stops which will also provide the opportunity to check messages and return calls
  - That work practices do not pressurise staff to use a mobile phone while driving
- Employees who drive for work must:
- Never use a hand-held mobile phone while driving
  - Plan journeys so they include rest stops when messages can be checked and calls returned
  - Ensure their phone is switched off and can take messages while they are driving, or allow a passenger to use the phone

### 5.16 Display Screen Equipment (DSE)

Users of DSE shall review their workstation against parameters detailed on a Display Screen Equipment User Assessment ([HS21](#)) to achieve an ideal working situation, and report any non-conformity to their line manager for corrective actions where possible. This document will also judge habitual users. The Health and Safety Advisor will then complete the Display Screen Equipment and Workplace Assessment Action Sheet ([HS22](#)). The combined completion of these two documents will then establish the necessary remedial action for each workstation, if required.

DSE assessments shall be periodically reviewed, usually within a 12 month period, however there are circumstances, where an assessment may needed to be reviewed earlier, i.e. employee moves to another workstation, receives new DSE equipment or workstation furniture. A review will also be required should the employees personal characteristics change in any way.

Adequate health and safety training is to be provided. The objective of the training will be to reduce the risk of physical (musculoskeletal) problems, visual fatigue and mental stress. The training should include;

- A simple explanation of the causes and risks of harm whilst using DSE equipment and workstations.
- The desirability of comfortable posture.
- Correct use of the adjustment mechanisms on equipment, particularly furniture.
- Arrangement of workstation components to facilitate good posture.
- The need for regular cleaning of screens and other equipment, and inspections to identify defects.
- The need to take advantage of breaks and changes of activity.  
All employees should be issued with or have access to a “You and Your Workstation” Guide ([HS23](#)).

### 5.17 Health Surveillance

The purpose of health surveillance is to provide appropriate health surveillance for employees, based on assessment of the potential risk of harm through work activity and to provide employees with general advice on work related health matters.

These briefings will undertaken in confidence and be between the individual employee and his/her line manager. They can be undertaken during a performance appraisal or as a standalone meeting

All employees will be encouraged to attend and co-operate with health surveillance briefings as requested by KEE Projects Ltd and to inform KEE Projects Ltd of any medical condition that may affect his or her potential to complete work safely. Or of any condition which they suspect may have been caused by work activities.

As health surveillance has been designed to meet relevant statutory requirements, co-operation with this policy is required. Refusals to attend the briefings previously noted by an employee will be investigated sensitively, however, unreasonable refusal to co-operate may result in disciplinary action. Individual employee’s reasons for not attending e.g. religious or other personal factors will be fully taken into account.

Records of health surveillance meetings will be recorded on a Health Surveillance Register ([HS24](#)).

### 5.18 Noise

Personal exposure to noise levels should not exceed 80dB(A) for excess of 8 hours per day, this is a legal requirement. Steps should be taken to reduce the noise or sound pressure level to the lowest level reasonably practicable. Wherever there is a noisy environment, where employees need to shout to communicate with a person 2 meters away this is an indicator that noise levels are being exceeded.

Where employees are exposed to noise levels exceeding 80dB(A), employees are provided with hearing protection such as ear muffs or ear plugs.

The employee has a responsibility to wear the hearing protection and the Supervisor is responsible to ensure it is worn.

KEE Projects Ltd are to provide employees with information about the noise levels, the harm this could have on the employee should the protection not be worn and the disciplinary action that will be taken should the PPE not be worn.

Signage shall be posted where the noise level exceeds 80dB(A), the sign is a mandatory sign, which has a blue background with a white pictogram showing a head of a person wearing ear protection.

Ear protectors must be maintained and stored as the manufacturer's instructions, any defects are to be reported to the manager.

Ear defenders and/or ear plugs are to be provided to the employee free of charge by the employer.

KEE Projects Ltd will monitor that employees are wearing their hearing protection as identified in the risk assessment.

The Health and Safety Advisor will audit noise and/or risk assessments to check noise has been suitably considered, controlled and check that relevant control measures have been identified and implemented.

Noise assessments undertaken by a competent person will be recorded on document ([HS13](#)).

### 5.19 Vibration

The Control of Vibration at Work Regulations 2005 are in place to protect staff against risks to their health while working with equipment.

There are 2 areas of concern, which are:-

- Hand Arm Vibration (HAV); and
- Whole Body Vibration.

Most people who drive road-going vehicles at work are not likely to experience high levels of whole-body vibration. It is, therefore, unlikely that any action will be required with regard to whole body vibration. Whilst KEE Projects Ltd realises that exposure to vibration does occur, it should be considered as a significant risk to its employees. Therefore, this policy outlines the steps to be taken by KEE Projects Ltd to ensure that the risk of suffering ill health from using hand held power tools, or hand guided machines is eliminated or minimised. Risk control will be effected by giving careful consideration to the selection and use of new equipment and by ensuring that any use of new or existing equipment does not exceed the daily exposure limit (ELV) value of 5 m/s<sup>2</sup> A(8).

In addition, where an individual's daily exposure exceeds the exposure action value (EAV) of 2.5 m/s<sup>2</sup> A(8) steps are taken to minimise exposure.

#### Assessing the risk and developing an action plan for control

- All foreseeable hazards and risks must be considered in advance, in order to determine whether an assessment is necessary, the following questions need to be considered:-
- Use impact or percussive (e.g. hammer action) tools for more than about 15 minutes per day?
- Use rotary action machines (e.g. grinders or sanders) for more than about an hour a day?
- Are there vibration warnings from tool/equipment manufacturers or suppliers for the tools being used?
- Have any employees been affected by vibration?

If any of these can be answered positively then an assessment is necessary.

Risk assessment will be conducted by:-

- Identification of individuals at risk;
- Observation of specific work practices;
- Referring to relevant information on the probable level of vibration likely to be encountered when the equipment is used in particular working conditions;
- Where necessary, by measuring the level of vibration individuals are liable to be exposed to.

Consideration shall also be given to:-

- Duration of exposure, including any exposure to intermittent vibration or repeated shocks;
- Effect of vibration on the workplace or work equipment, including the proper handling of controls, the reading of indicators, the stability of structures and the security of joints;
- Information provided by the manufacturers of work equipment;
- Availability of replacement equipment designed to reduce exposure to vibration;
- Specific working conditions such as low temperatures;
- Appropriate information obtained from health surveillance including, where possible, published information.

Using the probable level of vibration for the equipment and the duration of exposure, a calculation can be made by using the online exposure calculator at <http://www.hse.gov.uk/vibration/hav/hav.xls>.

This will assist in determining the daily exposure limit value associated with the equipment and ensure use of the equipment will be kept below this value.

Exposure to vibration is also monitored through the HAVS Operative Weekly Assessment (HS17) , by the HAVS Supervisor Weekly Check (HS18) and Health Surveillance (See 5.17).

## **5.20 Alcohol and Drugs**

KEE Projects Ltd is committed to providing a safe and healthy working environment for all employees, contractors and visitors. The use of illegal drugs, misuse of legal drugs or other



substances and the abuse of alcohol present serious risks to the workplace in that they are known to impair performance and increase the likelihood of accidents.

For the purpose of this policy, unlawful drugs are those substances detailed in the Misuse of Drugs Act 1971 for which no prescription has been obtained.

The consumption of alcoholic beverages prior to commencing work (so that the employee can be reasonably regarded to be under the influence of alcohol) or during working hours (including on-site work) is prohibited. The Company regards any breach of this rule to be a disciplinary matter that may result in formal disciplinary action, including summary dismissal for acts of Gross Misconduct.

Any employee who is medically prescribed drugs, which may affect their safety and efficiency, should seek advice from their GP regarding their fitness to carry out normal duties. The Company prohibits the unlawful use, possession, sale, manufacture and distribution of controlled substances as detailed in the Misuse of Drugs Act. Any employee who is convicted of an alcohol or drug related crime should report this, along with written details, to KEE Projects Ltd at the earliest opportunity. KEE Projects Ltd regards any breach of this rule to be a disciplinary matter that may result in formal disciplinary action, including summary dismissal for acts of Gross Misconduct.

### **5.21 Induction**

Persons entering into employment with KEE Projects Ltd shall undergo induction training given by his/her line manager. During the induction process, the following topics shall be covered;

- KEE Projects Ltd commitment to health and safety
- An outline of the company
- Key personnel
- Access and egress
- Demarcation and safe working areas
- Site hazards and risks
- Fire and emergency procedures
- No smoking policy
- Alcohol and drugs policy
- Accident and incident reporting
- First aid facilities
- Company Safety, Health and Environmental Policy
- Safety procedures
- Disciplinary procedures
- Health surveillance

Inductions will be recorded and records kept using Employee Induction Record ([HS15a](#)).

### **5.22 Fire**

The Managing Director will ensure that a suitable and sufficient Fire Risk Assessment is carried out at any site under the control of KEE Projects Ltd and that any control measures identified are implemented and that the fire risk assessment is reviewed at desirable intervals.

### **5.23 First Aid**

KEE Projects Ltd will ensure that the requirements of the Health and Safety (First Aid) Regulations are met as a minimum. The arrangements made for summoning first aid will be clearly displayed throughout any premises under the control of KEE Projects Ltd they will also be communicated to new employees as part of the induction process. Any changes in the arrangements will be clearly communicated and made available for all.

### **5.24 Asbestos**

Under the Control of Asbestos Regulations 2006, KEE Projects Ltd recognises and accepts its duty to manage asbestos in non-domestic premises.

KEE Projects Ltd has an explicit duty to assess and manage the risks from asbestos. The Managing Director is ultimately responsible for the production and implementation of an asbestos management plan within its own business premises (should one be required).

The KEE Projects Ltd Asbestos Management Plan shall be controlled by the Managing Director, who will ensure that the management of asbestos is compliant with current legislation.

In order to manage the risk from asbestos, the Duty Holder shall ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or isn't liable to be present within its own premises. Where works are to be undertaken in premises under the control of other persons, information needs to be obtained as to the known location(s) of Asbestos Containing Materials (ACM's) within the premises and/or areas of work must be made available by the clients representative to KEE Projects Ltd of the premises where the activities are to be undertaken.

In the absence of any information (such as asbestos registers, survey reports, etc.) relating to ACM's within any of KEE Projects Ltd clients premises, it shall be assumed that asbestos is present and therefore appropriate controls, dependent upon the activity shall be identified and implemented.

Where, during works associated with any site or project, it is considered that other asbestos containing materials may exist, the KEE Projects Ltd office shall be informed immediately and the work(s) suspended until the Client has been informed and remedial action has been agreed.

The Control of Asbestos Regulations 2006 (Regulation 10) states that every employer must provide adequate instruction, information and training who are, or maybe exposed to asbestos. In accordance with this Regulation, KEE Projects Ltd shall ensure that all staff who may come into contact with asbestos shall attend an Asbestos Awareness course that covers the following:-

- The properties of asbestos, its health effects and the interaction of asbestos and smoking
- The type of materials likely to contain asbestos
- What work could cause asbestos exposure and the importance of preventing exposure
- How work can be done safely and what equipment is needed
- Emergency procedures
- Hygiene facilities and decontamination.

Such training shall be undertaken at regular intervals to ensure staff that regularly has the risk of becoming exposed to asbestos have the most up to date training and knowledge.

## **5.25 Smoking**

Smoking is not allowed within the KEE Projects Ltd building, signage as required by current legislation will be erected accordingly. Areas where smoking is permitted will be communicated to employees at their induction.



## 5.26 Related Documentation

This is a table of supporting documentation that is used to assist implementation of the Health, Safety and Environmental Policy requirements.

Title	Reference	Site H & S File
Site Health & Safety File Contents Page	HS01	✓
Portable Appliance Flow Chart	HS02	✓
Portable Appliance Test Record	HS03	✓
COSHH Assessment Record	HS04	✓
Accident & Incident Record	HS05	✓
Accident & Incident Reporting Flow Chart	HS05a	✓
Manual Handling Operations Record	HS06	✓
Record of Work Equipment Inspection	HS07	✓
Method Statement & Risk Assessment Briefing Register	HS08	✓
Risk Assessment Template	HS09	✓
Method Statement Template	HS10	✓
Method Statement & Risk Assessment Register	HS11	✓
Site Safety Inspection Report	HS12	✓
Noise Assessment Template	HS13	✓
Toolbox Talk Register	HS14	✓
Induction Register	HS15	✓
Employee Induction Record	HS15a	
Sub Contractor Evaluation	HS16	✓
HAVS Operative Weekly Assessment	HS17	✓
HAVS Supervisor Weekly Check	HS18	✓
Plant & Equipment Register	HS19	✓
Site Health & Safety - Prompts and Reminders	HS20	✓

Display Screen User Assessment Checklist	HS21	
Display Screen User Assessment Checklist	HS21	
DSE & Workplace Assessment Actions Sheet	HS22	
You and Your Workstation Guide	HS23	
Health Surveillance Register	HS24	✓
Small Works Risk Assessment and Briefing Record	HS25	
HAV Identification Questionnaire	HS26	✓
Hot Work Permit	HS27	✓
Electrical Work Permit	HS28	✓
Access Permit	HS36	✓
Risk Assessment & Method Statement Evaluation Record	HS37	
Visual Inspection of Electrical Equipment	HS47	✓
PPE Issue Register	HS51	✓
Toolbox Talks		✓
Training Certificates		✓
PASMA Mobile Tower Checklist		✓
A Brief Guide to the COSHH Regulations		✓
Working with VDU's		
A Simple Guide to the PUWER Regulations		✓
Vibration - Advice for Employers		✓
Hand Arm Vibration - Advice for Employees		✓



Health, Safety and Environmental Policy Organisation and Arrangements Issue 1st March 2021

I..... (Please print name and initials) have received, read and understood the Policy, Organisation and Arrangements outlined in this document

<b>Signed:</b>	
<b>Title:</b>	
<b>Company (if not KEE Projects Ltd):</b>	
<b>Date:</b>	

Please detach this page from document and return completed to KEE Projects Ltd.

KEE Projects Ltd / HS&E Policy Issue 1st March 2021