



ITS Health and Safety Policy Manual

Version: 1.0

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Last Modified Date: 16/11/2017 15:17

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ITS Health and Safety Policy Manual

Section 1 : Policy Statement

1.1 Health and Safety Policy Statement

The scope of the Health and Safety Management System is detailed in the IMS Scope document on T100.

The scope of the Health and Safety Management System extends to ITS (Holdings) Ltd based in Reading, ITS (Guildford) Ltd, ITS (Croydon) Ltd, ITS (Bristol) Ltd, ITS (M&E) Ltd, ITS (Western) Ltd, ITS (Technical Recruitment) Ltd, ITS (Cymru) Ltd, ITS (Asbestos) Ltd, ITS (Chelmsford) Ltd, ITS (Midlands) Ltd, ITS (Cheltenham) Ltd, ITS (Exeter) Ltd, ITS (Plymouth) Ltd, ITS (Southampton) Ltd, ITS (Aylesbury) Ltd, ITS (Technical Recruitment Midlands) Ltd and Serrate Ltd.

The objective of this policy is to ensure the health, safety and welfare of ITS employees whilst they are at work; and to provide appropriate safeguards for others who may be affected by our business activities, so far as is reasonably practicable.

It is our Policy to ensure that:

The Board Members are committed to measuring and eliminating as far as is reasonably practicable the number of accidents and dangerous occurrences by controlling the Health and Safety risks arising from our work activities. This will be achieved by complying with all relevant legislation and associated codes of practice and to promote a safety culture by:

- Providing the necessary financial and human resource to ensure as far as is reasonably practicable the health, safety and welfare of all employees and visiting personnel;
- Undertaking risk assessments to identify and eliminate workplace hazards. This will include DSE, ergonomic desk layout, drivers of company vehicles and manual handling; however, this list is not exhaustive. Where possible maintained mechanical aids will be used by competent persons to avoid manual handling. Employees are trained in manual handling techniques and HSE guidelines are displayed in the relevant areas;
- Providing appropriate Personal Protective Equipment (PPE) where identified risks cannot be eliminated;
- Inspecting and maintaining safe plant and equipment. The selection of such equipment is taken by the managers of the area to ensure that it is fit for purpose and that information, instruction and training on such equipment is suitable and sufficient for employees to use. A procedure is in place to ensure the testing, inspection and maintenance of equipment is carried out in a timely manner.
- Control of Substances Hazardous to Health. Ensuring the safe handling and use of substances by providing the appropriate information, instruction and supervision of employees. Data sheets are provided with the substance and only trained personnel are authorised to use once a safe system of work is in place;
- Ensuring all employees are competent to undertake their tasks, and to provide adequate training. Branch Directors will be trained on supervising staff safely. Nominated persons will be trained in Fire procedures and act as fire wardens in the event of a fire and this will be refreshed on an annual basis. First Aiders will be fully trained and refresher course planned to avoid certification lapsing;
- Providing where necessary safe systems of work to prevent accidents, and cases of work related ill health;
- Undertaking workplace inspections to ensure we maintain a safe and healthy working environment. This will include the inspection of the welfare facilities such as bathrooms and rest facilities where an adequate drinks supply is available and to ensure staff can take reasonable breaks;
- Consulting and communicating with employees on matters relating to Health and Safety, on induction and via notice boards, on the intranet and meetings of local representatives;
- Appropriate training will be provided for all employees;
- Our Health & Safety Management System is maintained by a schedule of internal audits carried out by a competent internal auditor.

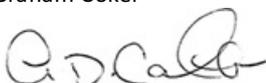
ITS will set, monitor, achieve and review measurable objectives for the maintenance and improvement of its Health & Safety Management System. The ultimate forum for this will be the Management Review.

By implementing the Health & Safety Management system into ITS we ensure compliance with the OHSAS 18001:2007 Health & Safety Management System.

The requirements of this standard are one part of our ISO Management System (**IMS**).

Approved By: Graham Coker

Signature:



Title: Director

Date: 14/11/2017

Section 2 : Policies

2.1 Modern Slavery Policy

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

As ITS do not meet the criteria as set out in the Modern Slavery Act 2015 to complete a slavery and human trafficking statement the detail set out in this policy acts as a confirmation for customers and suppliers who are required to ensure the integrity of their own supply chains.

Organisational Structure and Supply Chains

ITS is an accomplished recruitment consultancy agency with over 40 years of experience in supplying skilled, unskilled and professional personnel for temporary and permanent roles in the construction industry.

We operate out of 21 offices strategically located around Central and Southern England and South Wales. Having 21 offices means we can provide a bespoke local service tailored to our client and candidate's requirements.

At ITS we are proud to work with the biggest names in the industry in each of the Trades & Labour, Asbestos, Construction Professionals, Engineering, FM & Maintenance, Marine, M&E and Technical recruitment markets that we specialise in. Commitment to our core values of honesty and reliability has built strong relationships with our clients and candidates,

Our supply chain is essentially our management of Candidates, which is controlled via our Operational Control Processes.

Responsibility for Anti-Slavery Initiatives

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

To ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

All our policies and procedures have been implemented on our T100 portal in adherence with ISO9001: Quality Management System Standard and OHSAS18001: Health and Safety Management System Standard.

Due Diligence

As part of our initiative to identify and mitigate risk we:

- Maintain a work environment meeting the requirements of ISO9001:2015 and OHSAS18001:2007
- Where possible, longstanding relationships are built with local suppliers and customers clearly detailing expectations of business behaviour
- All staff are encouraged to report any concerns to the Branch Director
- All staff are aware of our sustainability and ethical ethos through T100 and at induction.
- Identify and assess potential risks as part of our ISO Risk Assessment Policy

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a Supplier Control Policy. Similarly, Candidates are managed as per our Candidate Registration Process.

Adherence to our policies and procedures is maintained via our Internal Audit Programme.

Any impacts that arise relating to this policy are recorded on the T100 portal.

2.2 Working at Height Policy

Introduction

The objective of this policy is to ensure that any work being undertaken 'at height' (if a person could be injured falling from it) is safely planned and executed to minimise the risk to all employees.

Applicable Legislation

1. The Work at Height Regulations 2005

Detail

The Branch Director must ensure that work is not carried out at height where it is reasonably practicable to carry out the work safely otherwise than at height.

Before any employee undertakes any work at height The Branch Director must ensure that a risk assessment is undertaken by a competent person to identify what measures are required to control the risks in accordance with current legislative requirements.

The Branch Director must ensure that work at height is properly planned, appropriately supervised and carried out in a manner which is so far as is reasonably practicable safe. In particular they must ensure that:

- all work at height takes account of weather conditions that could endanger health and safety;
- those involved in work at height are trained and competent;
- the place where work at height is done is safe;
- equipment for work at height is appropriately inspected;
- the risks from fragile surfaces are properly controlled;
- the risks from falling objects are properly controlled; and
- have at least 2 people working on the job.

Before any work is undertaken a risk assessment should be conducted of the area to include consideration of at least the following:

- The working conditions
- Access and egress
- Distance and consequences of a fall
- Duration and frequency of use / task
- Ease of rescue and evacuation
- Risk of use, installation and removal of equipment
- The effects of working at height upon the individual(s)

The recommendations of the risk assessment using the 'hierarchy of control' will be implemented and management made aware of any limitations placed on any individual's capabilities.

The 'hierarchy of control' places a duty to ensure that all reasonably practicable measures are in place to prevent anyone falling by:

- Avoiding work at height where possible
- Providing and using suitable work equipment or other measures to prevent falls where working at height cannot be avoided
- Where the risk of a fall cannot be eliminated, use of work equipment or other measures to minimise the distance and consequences of a fall should one occur
- Ensuring a "spotter" is used to hold the climbing equipment.

Safe systems of work shall be developed to ensure that:

- All work at height is properly planned and organised
- Weather conditions that could endanger health and safety are taken account of
- Those involved in work at height are trained and competent
- The places where work at height is carried out are safe
- Equipment for work at height is appropriately inspected
- The risks from fragile surfaces are properly controlled
- The risks from falling objects are properly controlled
- The work is appropriately supervised

The Branch Director must ensure that no person engages in any activity for the company, including organisation, planning and supervision, in relation to work at height or work equipment for use in such work unless they are competent to do so.

The work equipment used (e.g. Ladders) must be owned by ITS, the use of customer work equipment is prohibited.

The Branch Director must ensure (as far as it is reasonably practicable to do so) that each individual place at which work is to be done at height is checked on every occasion before that place is used and by providing the necessary instruction and training to employees. The Branch Director must ensure that scaffolding, mobile towers and other similar work equipment are inspected by a competent person:

- after they have been assembled or installed (or after it has been assembled and installed if both are required), if ITS safety depends on how it is assembled or installed;
- as often as is necessary to ensure safety, and in particular to make sure that any deterioration can be detected and remedied in good time.

In the instance that equipment is hired in order to complete the job, the requisite insurance shall be purchased for the appropriate length of time.

Any incidents that arise relating to this policy are recorded on an improvement form

All Staff must report any and all hazards immediately to the Branch Director.

2.3 Work Environment Policy

Introduction

The objective of this policy is to relay information regarding housekeeping and employee and building security.

Applicable Legislation

1. Workplace (Health, Safety and Welfare) Regulations 1992
2. Management of Health and Safety at Work Regulations 1999
3. [Employment Rights Act 1996](#)

Detail

The physical conditions in the workplace are maintained by the Management Representative, this covers but is not restricted to:

- maintenance of buildings and equipment
- lighting
- provision of drinking water
- temperature
- rest facilities
- ventilation
- toilet facilities
- first aid

These physical conditions are required to be maintained to a minimum standard in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992.

All areas are to be kept clean and tidy at all times. All employees have a duty to ensure that hazardous working conditions are not allowed to develop.

All employees must ensure that all offices, work spaces, toilets and kitchens are kept clean.

All employees have a duty to ensure that all passageways and escape routes are kept tidy and clear of obstacles.

All employees have a duty to ensure that all fire escape exits are kept clear and unlocked whenever the building is occupied.

ITS actively promotes all employees to keep their workstations and their general working environment in a clean and tidy state, both to minimise accidents (such as employees tripping over boxes etc.), and also to reduce the risk of electrical fires (for example, resulting from paper falling down the back of desks near computer cables etc.).

The general tidiness of the office is the responsibility of all employees, and if the situation were to arise where the state of the office environment became unacceptable, this would be addressed by the Branch Director.

Employee and Building Security

All security aspects for employees and building security are documented within the Infrastructure Details document within Supplementary Documents.

Delivery Handling

All deliveries come through the front entrance to ITS. Designated personnel are responsible for managing all deliveries and the location of the items being delivered. If necessary Manual Handling training will be given to any employees assisting in moving oversized or heavy items being delivered.

Delivered items will be taken to final destination and not "left" in the entrance way upon delivery.

Care shall be taken when delivery vehicles arrive on site. All employees have a duty of care to ensure they do not remain in the vicinity of a reversing vehicle.

Any incidents that arise relating to this policy are recorded on an improvement form.

All Staff must report any and all hazards immediately to the Branch Director.

2.4 Risk Assessment Policy

Introduction

The purpose of this process is to describe how the risk assessment is managed. This includes the severity of the risk and how it is reported; including the identification of key assets and their associated risk.

The risk assessment and treatment actions is reviewed regularly by the Branch Director. The status of risks and, where appropriate, treatment activities will be maintained by the Branch Director.

Detail

The tool utilised for conducting the Risk Assessment is the cloud-based RA-Matrix. This is utilised for identifying and recording all assets and activities within the organisation. The following information is collated for each identified activity/asset:

- The specific category of the activity/asset.
- Specific threats that can affect the activity/asset.
- Specific impacts of the assigned threats.
- Existing documentation in place to protect or set the "Rules of Engagement" for the use of the asset or whilst conducting the activity.
- Existing precautions in place to protect the activity/asset. This could be documentation or physical controls.
- The ISO controls are a list of the applicable domains or controls of the standard that pertain to the activity or the asset.
- The appropriate legislation is listed for each activity/asset.
- The person responsible for the management of the activity/ asset.
- The location of the activity/asset is the department or office area.
- Recommendations are the recommended actions to be taken in order to protect the activity/asset.
- The treatment plan is identified as to how the risk of compromise of the activity/asset is to be implemented.
- The risk to the activity/asset is then assigned a score and calculated.

Scoring the Risk Assessment

How we calculate the risk associated with an activity or an asset:

- **Risk Score** = (Probability x Severity) + (Confidentiality + Integrity + Availability)
- **Maturity level** = a score of 4 -1 of what controls are in place to mitigate the risk. 4 = all possible precautions have been implemented, 1 = no precautions are in place
- **Risk Indicator** = Risk Indicator places a value of between 1 and 10 indicating a comparable level of risk. 1 = very low risk activity, 10 = high risk activity

Therefore the Risk Value = ((**Risk Score**) x **Risk Indicator Score**) / **Maturity Level**

Each activity or asset is given a rating of **Very High, High, Medium** or **Low** risk level.

A Risk Value of less than 70 is considered an acceptable risk. A Risk Value above this level requires action to be taken in order to mitigate the risk.

Risk Value Risk Level

| | |
|-----------|-----------|
| 1 - 70 | Low |
| 71 - 140 | Medium |
| 141 - 210 | High |
| 211 - 280 | Very High |

Responsibilities

| Role | Description |
|--|--|
| Management Representative (Branch Director) | Review all services/assets/activities on an annual basis Verify within the Management Review Process Scoring all risks |
| ISF | Review all Risk Assessment Reports |

| | |
|--------------------------|---|
| | Assign responsibilities to enact the Treatment Plan |
| Designated Owners | Enact Treatment Plan |
| | Inform Management Representative of actions taken |

Risk Assessment Report

The Risk Assessment report is detailed within RA-Matrix. This includes the detailed treatment plan along with the Business Impact Analysis for identified assets and activities.

For each identified treatment the risk decision of Accept or Reduce is identified.

Acceptance of these risks does not preclude risk treatment activities being carried out.

2.5 Prevention of Violence at Work Policy

Introduction

Most people accept that physical force against an individual is an example of violence, but violence can take other forms, including verbal abuse and threats (with or without a weapon).

The Health and Safety Executive (HSE) defines work-related violence as:

“Any incident in which a person is abused, threatened or assaulted in circumstances relating to their work”

Applicable Legislation

1. The Health and Safety at Work, etc. Act 1974
2. Workplace (Health, Safety and Welfare) Regulations 1992

Detail

Even where there is no physical injury, there can still be considerable emotional stress. Threats may indicate a risk of actual injury, while malicious damage to an employee's property can cause distress and fear of future physical attack. People have different perceptions about behaviour they find threatening or offensive. Something which causes distress to one person may simply annoy another; and what one finds threatening may be shrugged off by others. It is important that you treat each reported incident seriously to ensure that everyone is aware of your commitment.

Violence to employees can include:

- Verbal abuse
- Swearing
- Spitting
- Posturing
- Making threats (race, religion, gender, physical make-up, etc)
- Use of a weapon (anything from a pen to a knife or gun)
- Actual physical attack (being scratched, punched, kicked, hit, hair being pulled, etc)

Violence or the threat to the personal safety of individuals whilst at work, can lead to low morale, high absenteeism, and high employees turnover, creating anxiety, stress, low self esteem and poor performance for the individuals concerned.

Employees also have a responsibility to take all reasonable steps to ensure that they do not place themselves, or others at risk of harm. Employees must co-operate fully in complying with systems and procedures introduced into the workplace for safety purposes. Thus the employees have an important role to play in ensuring their own personal safety whilst at work.

The aims of this Policy are:

- To enable ITS to create and maintain a safer working environment for all employees, which is so far as is reasonably practicable, free from the threat of violence.
- To provide support to employees involved in violent incidents
- To ensure that all incidents of violence/aggression are recorded and reported.

Statement of Policy

ITS recognise that there is always the potential for the personal safety of, ITS employees to be placed at risk.

Whilst evidence suggests that the risk to employees from acts of violence or the threat of violence is very low, ITS are committed to minimising that risk, so far as is reasonably practicable, in accordance with its' legislative obligations and its common law 'duty of care'.

ITS recognise that the creation and maintenance of a working environment, which presents a minimum risk to the personal safety of all

employees, is mutually beneficial and conducive to the efficient and effective delivery of services. ITS undertake to take all reasonable steps to establish a safe working environment, which protects and provides support for all employees, ensuring their dignity and treating them with respect.

The underlying principle is that violence, in all its forms, is unacceptable to the company, irrespective of the reasons for that violence. This includes the physical act of violence, threats of violence, aggressive or abusive behaviour, harassment, bullying or other persistent antisocial behaviour.

ITS are committed to the continued development and implementation of a range of measures and procedures, to protect and support the individual whilst engaged in ITS business, including: -

- Robust security systems and procedures which have the capacity to prevent and control situations which may lead to the threat of violence
- Provision of adequate and relevant information and training to employees
- Reporting and recording systems for incidents, near misses and suspicious activity
- The provision of all necessary medical and professional support to employees who are victims of violence whilst at work
- Periodic monitoring and review of performance and provision

The measures undertaken to provide a safe and secure environment will be determined by a risk assessment, undertaken by appropriate persons, which considers: -

- The individual
- The location
- The activities
- The existing controls
- The identification of additional measures which further minimise the risk

2.6 Out-of-Hours, Off-Site and Lone Working Policy

Introduction

Lone working is defined as working with no other person within visual or normal audible range. The availability within range need not be on a continuous basis, but the adequacy of non-continuous coverage must be assessed in relation to the hazards of the work concerned, in determining if the work will be considered as 'lone-working'.

When the work to be undertaken consists solely of work such as office administration, no special action is required, but if outside normal working hours the notifications relating to such work must be given.

A risk assessment will be made of the work environment and task to be completed. This may conclude that one person cannot control the risks involved.

In addition, when the work is to be undertaken outside normal working hours, the manager will ensure that arrangements have been made for checking at agreed intervals appropriate to the nature of the hazards.

Applicable Legislation

1. The Health and Safety at Work, etc. Act 1974
2. Workplace (Health, Safety and Welfare) Regulations 1992

Detail

Out of Hours Working

All out of hours working (including evenings and weekends) on ITS' premises must be authorised in advance by your line manager, particularly if you will be in the office on your own.

All employees should follow normal health & safety procedures and policies whilst working out of hours and in addition should also comply with the following:

- you should make sure that someone (family member, friend or colleague) knows where you are going to be, and what time you are expected to start and finish;
- you should ensure that both you and your family member, friend or colleague has an emergency contact number for your line manager in the event of emergency;
- you should take special care when leaving the office after dark.

Lone Working

All employees who are going out of the office should ensure that either their line manager, receptionist or office manager knows where they are going and the time they are expected to arrive at and leave their destination.

When lone working you should contact the office (or if out of hours your line manager) to notify them that you have arrived at your destination, and again when you leave.

If you are travelling to a known trouble area then:

- Consider with your Branch Director whether you should be accompanied by a colleague;
- If you feel threatened then you should walk away and leave the area immediately. You should contact the office when you believe you are in a safer area.

Off-site Working Policy

Under the Health and Safety at Work etc. Act 1974 employees have a legal duty to take reasonable care for their own safety and for the safety of others who may foreseeably be affected by their actions at work. To comply with legislation and for your own safety, it is essential that the following actions are adhered to:

- Prior to visiting a customer's premises, if applicable ensure you have read, understood and have a copy of any relevant risk assessments and method statements.
- Employees working away from the office must carry a mobile phone and it must be left switched on (if allowed on the location where they are working).
- Ensure that your line manager has the details of the address, telephone number and contact name of the person you are visiting

and approximate duration of the visit.

- It is good practise to phone the office when you arrive at the client's premises and again when you have left and are on route to your next destination.
- All client's Safe Systems of Work, Isolation and Permit to Work systems must be followed.
- Employees who are not satisfied with working practices at client's premises will not expose themselves to risks to their health and safety.
- Health and safety concerns on client's premises must be reported immediately to the Branch Director
- If PPE is required at client's premises, then employees will make appropriate use of the equipment.
- Upon signing in at Reception, ensure you fully understand the evacuation procedure, the nearest escape routes and fire assembly point.
- Obey the site safety procedures and instructions at all times.
- Work safely at all times.
- If you suffer an injury inform your host immediately for first aid attention and/or record the injury in the Accident Book.
- If the company you are visiting has internal Accident, Incident or Near Miss forms, complete the form and obtain a copy for the Company's use.
- If no Accident Forms are in use, complete the Company's Accident and Incident Report and send to the Branch Director immediately.
- If an accident occurs away from the customer's premises complete the Accident and Incident Report and send to the Branch Director immediately.
- Do not delay in reporting any of the above as this may lead to legal implications.

2.7 No Smoking Policy

Introduction

This policy has been developed to protect all employees, service users, customers and visitors from exposure to passive smoking and to assist compliance with the Health Act 2006 and other legislation. The Company recognises that health, safety and welfare of employees and anyone else directly affected by the Company's operations are of prime importance.

Exposure to passive smoking increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

Applicable Legislation

1. The Health Act 2006
2. The Smoke-free (Premises and Enforcement) Regulations 2006
3. The Smoke-free (Exemptions and Vehicles) Regulations 2007
4. The Smoke-free (Signs) Regulations 2012

Detail

General Statement

This policy seeks to guarantee a healthy working environment and protect the current and future health of employees, service users, customers and visitors. This policy complies with current law and guarantees the right of non-smokers to breathe in air free from tobacco smoke. It also raises awareness of the dangers associated with exposure to tobacco smoke and takes into account of the needs of those who smoke and aims to support those who wish to stop.

Restrictions on smoking

Smoking is not permitted in any parts of the Company's premises, [*including the entrance and grounds*] at any time by any person regardless of their status or business with the Company. This includes areas that are outside but form part of the Company's premises.

Visitors

All visitors, contractors, work-seekers and deliverers are required to abide by the no-smoking policy. Staff members are expected to inform customers and visitors of the no-smoking policy politely but firmly to ensure that such visitors comply with the smoking ban. No members of staff are expected to enter into any confrontation which may put their personal safety at risk.

Vehicles

Smoking is not permitted by any person in any Company vehicle (including pool vehicles) or any other vehicles being used on Company business where the user does not have exclusive, unrestricted use of that vehicle. If an employee uses his or her own vehicle for Company purposes, this vehicle is exempt from the scope of this policy under the legislation.

Support for smokers:

The Company understands that some of its employees may feel unwilling or unable to give up smoking. Such people may request permission from their immediate manager/supervisor to step outside the building/grounds during coffee/tea breaks to smoke a cigarette. However they must return to their workplace at the due time.

It is recognised that all smokers will need to adjust to this policy and some may welcome some support.

Help to stop smoking

The NHS offers a range of free services to help smokers give up. Visit <http://smokefree.nhs.uk/> or call the NHS Smoking Helpline on 0800 0224 332 for further details.

Disciplinary Action

Any employee who ignores the smoking ban will be treated in accordance with the Company's disciplinary procedure and in the case of repeated offences, may be dismissed from the Company's employ.

Employees are also reminded that it is a criminal offence for employees to smoke in smoke-free areas, with a fixed penalty of £50 or prosecution and a fine of up to £200.

Signage

The Company displays signs that make it clear that smoking is prohibited on its premises. These signs are located at *[list where signs are displayed.]* The Company also requires that no-smoking signs are displayed in those of its vehicles that are subject to the ban.

Maintaining this policy

The Company will monitor the effectiveness of this policy and its general compliance within the organisation. This policy will be kept up to date and amend accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the top management of the Company. In support of this intent, the policy will be reviewed *annually*. The Company will ensure that the necessary resources are given for the full implementation of this policy.

2.8 Model Equal Opportunities and Diversity Policy

Introduction

The Company embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

The Company is committed to diversity and will promote diversity for all employees, workers and applicants. We will continuously review all aspects of recruitment to avoid unlawful discrimination. The Company will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 (the Act) which are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We will not discriminate on the grounds of an individual's membership or non-membership of a Trade Union. All staff have an obligation to respect and comply with this policy. The Company is committed to providing training for its entire staff in equal opportunities and diversity. The Company will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people and will not prescribe discriminatory requirements for a role.

The Company will not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. The Company will ensure that each candidate is assessed in accordance with the candidate's merits, qualifications and ability to perform the relevant duties for the role.

Detail

DISCRIMINATION

Under the Act unlawful discrimination occurs in the following circumstances:

-Direct discrimination

Direct discrimination occurs when an individual is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them badly in comparison to others that do not have that protected characteristic.

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of a protected characteristic:

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or deliberately omitting to provide any of its services;
- in the way it provides any of its services.

Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favourably because it is assumed he or she has the protected characteristic or is associated with someone that has the protected characteristic.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon instructions from an employer which states that certain persons are unacceptable due to a protected characteristic, unless an exception applies. The Act contains provisions that permit specifying a requirement that an individual must have a particular protected characteristic in order to undertake a job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then the client must show that applying the requirement is a proportionate means of achieving a legitimate aim, i.e. the employer must be able to objectively justify applying the requirement. An occupational requirement does not allow an employer to employ someone on less favourable terms or to subject a person to any other detriment. Neither does an occupational requirement provide an excuse against harassment or victimisation of someone who does not have the occupational requirement.

-Indirect discrimination

Indirect discrimination occurs when a provision, criterion or practice (PCP) is applied but this results in people who share a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. If the PCP can be objectively justified it will not amount to discrimination.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to an occupational requirement or the instruction is discriminatory but there is an objective justification, the Company will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

The Company will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

-Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature.

The Company is committed to providing a work environment free from unlawful harassment.

The Company will ensure that the consultants do not harass any individual.

Examples of prohibited harassment are:

- verbal or written conduct containing derogatory jokes or comments;
- slurs or unwanted sexual advances;
- visual conduct such as derogatory or sexually orientated posters;
- photographs, cartoons, drawings or gestures which some may find offensive;
- physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected characteristic basis;
- threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
- retaliation for having reported or threatened to report harassment.

If an individual believes that they have been unlawfully harassed, they should make an immediate report to a Director followed by a written complaint as soon as possible after the incident. The details of the complaint should include:

- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

The Company will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.

All employees and workers will be expected to comply with the Company's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary action.

Any individual who the Company finds to be responsible for harassment will be subject to the disciplinary procedure and the sanction may include termination.

-Victimisation

Under the Act victimisation occurs when an individual is treated unfavourably because he/she has done a 'protected act' which is bringing a claim for unlawful discrimination or raising a grievance about discrimination or giving evidence in respect of a complaint about discrimination.

The Company will ensure that the consultants do not victimise any individual.

-DISABLED PERSONS

Discrimination occurs when a person is treated unfavourably as a result of their disability.

In direct discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

Reasonable adjustments in recruiting could include:

- modifying testing and assessment procedures;

- meeting the candidate at alternative premises which are more easily accessible;
- having flexibility in the timing of interviews;
- modifying application procedures and application forms;
- providing a reader or interpreter.

Wherever possible the Company will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

The Company will not discriminate against a disabled person:

- in the arrangements i.e. application form, interview or arrangements for selection for determining whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- by subjecting the individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

The Company will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

-AGE DISCRIMINATION

Under the Act, it is unlawful to directly or indirectly discriminate against or to harass or victimise a person because of age. Age discrimination does not just provide protection for people who are older or younger. People of all ages are protected.

A reference to age is a reference to a person's age group. People who share the protected characteristic of age are people who are in the same age group.

Age group can have various references:

Under 21s

People in their 40s

Adults

The Company will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to encourage clients to recruit on the basis of competence and skills and not age.

The Company is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the company.

If the Company requests age as part of its recruitment process such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process. In addition if under age 22 to adhere to Conduct of Employment Agencies and Employment Business Regulations 2003 and other relevant legislation applicable to children or young candidates.

Where a client requests age or date of birth, this will have to be under an occupational requirement or with an objective justification which should be confirmed in writing.

-PART-TIME WORKERS

This policy also covers the treatment of those employees and workers who work on a part-time basis, the Company recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. The Company also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

-GENDER REASSIGNMENT POLICY

The Company recognises that any employee or worker may wish to change their gender during the course of their employment with the

Company.

The Company will support any employee or worker through the reassignment.

The Company will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems the Company will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's grievance procedure.

-RECRUITMENT OF EX-OFFENDERS

Where the Company has registered with the Disclosure and Barring Service (DBS) and has the authority to apply for criminal records checks on individual because they are working with children or vulnerable adults or both, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-offenders.

COMPLAINTS AND MONITORING PROCEDURES

The Company has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from a Director and will be made available immediately upon request. Any discrimination complaint will be investigated fully.

2.9 First Aid and Accidents Policy

Introduction

The objective of this policy is to provide First Aid support for all employees and visitors on site; this policy details information regarding First Aiders on-site, Incident Reporting, RIDDOR and Incident Investigation.

Applicable Legislation

1. Health and Safety (First Aid) Regulations 1981
2. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

Detail

ITS is responsible for the provision of First Aid support and aims to ensure that all employees and visitors are aware of the availability of First Aid in accordance to the Health and Safety (First Aid) Regulations 1981.

The Branch Director will appoint the appropriate number of first aid personnel for their area of responsibility using the table below. This will include Appointed Persons and First Aid Personnel, details of First Aid personnel at ITS locations will be available on your company notice-board.

| Risk Category | Number Of Employees at Location | Minimum Number Of Appointed Persons Required | Minimum Number Of First Aid Personnel Required |
|---------------------------------------|--|---|---|
| Low Risk -Office Environments | Less Than 30 Employees | 1 | 0 |
| Low Risk - Office Environments | More Than 30 Employees | 1 | 1 |
| Low Risk - Office Environments | More Than 60 Employees | 1 | 2 |
| Low Risk - Office Environments | More Than 100 Employees | 1 | 3 |

Nominated First Aid personnel will be responsible for ensuring suitable and sufficient First Aid kits are available in order for them to administer care appropriately. All First Aid kits will be checked by first aiders ensure supplies are maintained.

It is best practice for First Aid Boxes to contain:

- one guidance card
- twenty individually wrapped sterile adhesive dressings (assorted sizes) appropriate to the work environment
- two sterile eye pads, with attachments
- six individually wrapped triangular bandages
- six safety pins
- six medium sized individually wrapped un-medicated wound dressings (approx. 10cm x 8cm)
- two large sterile individually wrapped un-medicated wound dressings (approx. 13cm x 9 cm)
- three extra-large sterile individually wrapped un-medicated wound dressings (approx. 28cm x17.5cm)

Nominated First Aid personnel will have primary responsibility for monitoring individuals after giving care and to notify the Branch Director should any concerns arise of the employees continued fitness for work.

The nominated First Aid personnel will all hold in-date First Aid Certificates which are held with personnel files and displayed on the company noticeboard; when they require to be renewed ITS will arrange this training in conjunction with the First Aid personnel.

Accident Reporting

In the event of an employee or visitor being involved in an accident, one of the first aiders should be notified immediately. All

accidents must be recorded in the accident book which is held at reception or with the designated First Aider on site with the following detail:

- full name and address of the injured person;
- occupation of the injured person;
- date of entry;
- date and time of accident;
- accident details - the location and circumstances, work, process etc.;
- injury details and treatment given;
- Signature of the person making entry.

All employees have an individual responsibility to report and record all accidents they incur or witness. All accidents will be reported to the Branch Director.

Should an employee incur an accident whilst working for ITS on a customer's site, the employee will have an individual responsibility to report and record this accident, both at the customer site and to the Branch Director.

The nominated Health & Safety Representative will be responsible for ensuring all accidents are recorded in the locations accident book and to inform the Group Health and Safety Manager of all accidents in a timely manner.

The maintenance of a safe working environment is essential to ITS, therefore employees who purposely do not report incidents of accidents will be subject to disciplinary action which could result in dismissal in cases of gross misconduct.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) places a legal duty on ITS to notify, report and record accidents to the HSE's Incident Contact Centre where death or major injury has occurred as a result of an accident at work or, where an employee is absent from the workplace for longer than seven consecutive days following the date of accident at work.

It will be the responsibility of the Branch Director to inform the appropriate member of management immediately of any accident that is RIDDOR reportable. All RIDDOR reportable accidents will be reported to the HSE by the Branch Director.

The Branch Director must be notified as soon as practicable after incidents causing the following injuries:

- Any work related injury that leads to an employee being absent from work for more than 7 working days;
- Fracture other than to fingers, thumbs or toes;
- Amputation;
- Dislocation of the shoulder, hip, knee or spine;
- Loss of sight (temporary or permanent);
- Chemical or hot metal burn to the eye or any penetrating injury to the eye;
- Loss of consciousness arising from the intake of any substance by inhalation, ingestion or absorption; and/or acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent, ITS toxins or infected material;
- Injury resulting from an electric shock or electrical burn leading to; Unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours;
- Any other injury leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation, or requiring admittance to hospital for more than 24 hours.

Accident Investigation

All RIDDOR accidents will be investigated by the Branch Director who will be responsible for producing the appropriate report to the HSE and Board Members.

All accidents will be investigated at local level, in all cases a report of the accident must be entered in the accident log book.

Investigations of Incidents and accidents will be collated from all ITS locations and the frequency and trends of accidents will be analysed to establish policies and procedures aimed at eliminating accident frequency.

All Staff must report any and all hazards immediately to the Branch Director.

2.10 Fire Safety Policy

Introduction

The objective of this policy is to detail the Fire/Site Evacuation Procedure including the chain of responsibility in the event of a fire, the on-going integrity of the fire safety equipment and all employees role in the event of a fire.

Applicable Legislation

1. Regulatory Reform (Fire Safety) Order 2005

Detail

Fire hazards pose a particular threat to office environments and the company aims to ensure that appropriate preventative practices are implemented and adhered to. This includes having fire detection equipment, promoting a clean and tidy office environment, providing sufficient training for employees to help reduce the risk of fire, and also providing sufficient training for employees in the response to fire. Training for employees to help reduce the risk of fire is carried out for every permanent employee of the company, and is revisited on an annual basis.

The Branch Director is responsible for ensuring fire extinguishers are maintained by an approved company and checked annually and that the appropriate signage is located with each appliance.

Branch Director's are responsible for nominating Fire Wardens for their area of responsibility and for ensuring fire risk assessments are undertaken and appropriate actions are implemented. Fire Wardens for each ITS location will have responsibility for ensuring escape routes are checked for evacuation of the building in both drill and fire situations.

Tests of the fire alarm system are carried out by the designated personnel on a weekly basis. A record of the tests will be maintained at local level with either reception or the Fire Warden. Fire evacuation procedure will be tested on a regular basis but will be at least once per year to ensure all employees are aware of and comfortable with the evacuation process in the event of a fire. The drill directs people to the fire assembly point outside the front of the company's premises, and a Fire Warden checks that everybody is accounted for.

All fire detection systems will be placed in test mode and where a system exists that is not externally monitored it will be the responsibility of the Director organising the test to inform the Local Authorities of their intentions.

An up to date list of each site's Fire Warden's is displayed on each site's notice board, at main reception and at various other locations throughout each premises.

In the event of an actual fire, the fire brigade are notified by one of the Fire Warden's, and nobody should re-enter the building until instructed to do so by one of the Fire Warden's.

It is the fire Wardens responsibility to assign personnel to be within safe "Line of sight" to all external entrances to the building during an evacuation.

To ensure the safety of all visitors to the company, they are required to sign in using the book held on the reception desk. This book will be taken and used by a Warden upon evacuation of the building.

Any incidents that arise relating to this policy are recorded in the Fire Folder.

Each site will have the following Fire/Emergency Evacuation Procedure displayed prominently throughout the building with the highlighted information completed detailing information relevant to that site.

All Staff must report any and all hazards immediately to the Branch Director.

2.11 Equipment Safety Policy

Introduction

The objective of this policy is to ensure that all staff employed by ITS are aware of the safeguards in place for the responsible use of the following equipment; this includes but is not limited to:

- Portable Appliance Testing
- Company Vehicles
- Mobile Phones and Driving
- Personal Protective Equipment (PPE)
- Display Screen Equipment (DSE)

All employees who are required to use equipment are responsible for ensuring that it is maintained to appropriate Health and Safety standards.

Applicable Legislation

1. Electricity at Works Regulations 1989
2. Provision and Use of Work Equipment Regulations (PUWER) 1998
3. Personal Protective Equipment at Work Regulations 1992
4. Display Screen Equipment Regulations 1992

Detail

Work place equipment is maintained in accordance to the Provision and Use of Work Equipment Regulations 1998 (PUWER). All equipment provided by the company for use at work is safe to use and records of any maintenance are kept. Before new equipment is introduced into the working environment, an assessment will be made by the Branch Director in order to ascertain that the equipment is suitable for ITS intended use.

No employee will use work equipment for which they have not received specific training in ITS use.

All employees have a responsibility to familiarise themselves with any specific ITS guidelines or work instructions relating to equipment safety, as issued by their Branch Director.

Any and all electrical equipment portable or otherwise must be visually checked prior to operation to ensure there are no apparent physical defects, and that the equipment has an appropriate current test certificate.

Portable Appliance Testing

Maintenance will be responsible for ensuring all portable appliances are tested and certified. A schedule of equipment and inspections will be maintained to ensure ITS adheres to the electricity at work regulations 1989 as far as is reasonably practicable.

Company Vehicles

All employees who are required to operate a company vehicle shall provide ITS with a copy of the appropriate license that entitles them to legally operate such a vehicle. This condition also applies to lifting equipment such as forklift trucks. A copy of this license must be given annually and at the point of induction for new employees and will be retained in local personnel files.

All employees who are required to operate a company vehicle must inform their Branch Director of any and all penalty points attracted to their license.

All employees who are required to operate a company vehicle must regularly check the condition and roadworthiness of the vehicle.

Employees who take payment in lieu of a company vehicle shall provide ITS with a copy of the appropriate license that entitles them to legally operate such a vehicle and must inform their immediate Manager of any and all penalty points attracted to their license.

In addition it will be essential for those employees to provide a current copy of their vehicle insurance certificate with full business use cover before embarking on business on behalf of ITS. Records of these will be kept at local level.

Employees will be required to complete a monthly mileage claim which also contains statements relating to the safety and roadworthiness of their vehicle.

It is the responsibility of all vehicle users to:

- Drive in an appropriate safe manner with due regard to the health, safety and welfare of themselves and other road users including pedestrians.
- Ensure the car has MOT annually.
- Ensure they have the appropriate insurance.
- Ensure they have the appropriate tax.
- Ensure they are fit to operate a company vehicle e.g. overtiredness, physical injury impairing safe driving.
- Must not operate a vehicle whilst under the influence of alcohol or drugs.
- Regularly check the legal condition of the vehicles tyres and to ensure that the vehicle is safe to drive.
- Immediately inform their Branch Director should their license be revoked.
- Immediately inform their Branch Director of any and all vehicle accidents.
- Ensure the vehicle is maintained in accordance with the manufacturer’s specifications.

Mobile Phones and Driving

All employees who are issued with a hand held mobile phone, or use a personal mobile phone for business calls:

- Must ensure they are maintained in good condition
- Must not use the phone whilst driving unless the vehicle is fitted with a hands free car kit with fixed cradle.
- Under new legislation you MUST NOT send or read text messages.
- Wherever possible only make calls when the vehicle is stopped in a place where it is safe for them and other road users to do so e.g. layby or car park.

ITS’ policy is that whilst driving, (and only by using a hands free car kit) calls are only answered, using the auto answer option, to establish the detail or urgency of the call, making an assessment as to the safety of themselves and other road users before engaging in reciprocal conversation.

IT IS AGAINST THE LAW TO USE A HAND HELD DEVICE WHIST DRIVING.

Personal Protective Equipment (PPE)

Where PPE is required all employees have a responsibility to wear PPE provided and maintain in such a condition that it remains suitable for ITS intended purpose. All employees are required to inspect PPE before use and report any defects or any out of date equipment, to their immediate Manager who must organise ITS repair or replacement.

Where a supplied item of PPE would not provide suitable and sufficient protection to ensure the employees safety, due to age or deterioration it will be the responsibility of the employee to notify their immediate Manager before commencing any unprotected work activity.

The hazards and types of PPE suggested:

| Area of Concern | Hazard | Option |
|---------------------|--|--|
| Eyes | Chemical or metal splash, dust, projectiles, gas and vapour, radiation | Safety Spectacles, Goggles, Faceshields, Visors |
| Head | Impact from falling or flying objects, risk of head bumping, hair entanglement | A range of helmets and bump caps |
| Breathing | Dust, vapour, gas, oxygen-deficient atmospheres | Disposable filtering facepiece or respirator, half or full face respirator, air-fed helmets, breathing apparatus |
| Protecting the body | Temperature extremes, adverse weather, chemical or metal splash, spray from pressure leaks or spray guns, impact or penetration, contaminated dust, excessive wear or entanglement of own clothing | Conventional or disposable overalls, boiler suits, specialist protective clothing e.g. chain mail aprons, high-visibility clothing |
| Hand and Arms | Abrasion, temperature extremes, cuts and punctures, impact, chemicals, electric shock, skin infection, disease or contamination | Gloves, gauntlets, mitts, wristcuffs, armlets |
| Feet and Legs | Wet, electrostatic build-up, slipping, cuts and punctures, falling objects, metal and chemical splash, abrasion | Safety boots and shoes with protective toe caps and penetration –resistant mid-sole, gaiters, leggings, spats |

Display Screen Equipment (DSE)

ITS is committed to adhering to the Health and Safety (Display Screen Equipment) Regulations 1992 and the welfare of all of ITS employees and recognises the problems that can be associated with working with DSE. The basic health problems associated with DSE work are as follows:

- Upper limb disorders
- Eye problems
- Stress and fatigue

The legal requirements with regards to DSE work specify obligations on both the users of the equipment and the employer. The company has therefore adopted a number of procedures to ensure compliance with the relevant regulations:

- Every employee undertakes their own DSE Assessment every two years to ensure that there are no health and safety issues that could affect or be affected by DSE work;
- Taking the appropriate actions if any issues or concerns are raised by an employee as a result of the DSE assessment (e.g. sun light shining on screen etc.);
- Providing guidance on posture for DSE users and positioning of the DSE within the work area;
- Providing any equipment required by an employee using a DSE due to issues relating to posture (e.g. the provision of foot rests, wrist support etc.);
- Encouraging users to adopt good practices on DSE screen usage;
- Ensuring that DSE users take regular breaks from their screen; e.g. All employees that habitually use display screen equipment as a significant part of their normal work shall plan their activities to ensure that their work on display screen equipment is periodically interrupted by changes of activity to reduce their workload at the equipment.
- Providing free eye tests for all employees who work with a DSE;
- Keeping DSE assessment records;
- Raising awareness of the wide range of IT related health and safety risks associated with using DSE;

DSE assessments are carried out by the employee upon commencement of their employment and every two years. DSE assessments will be revisited for each employee if they move work stations or if there are any similar changes to their working environment.

If an employee at any point has concerns over their own health and safety with regards to DSE work, it is their responsibility to notify their Branch Director as soon as possible.

Employees are entitled to appropriate eyesight testing by competent persons at the employers cost.

Any incidents that arise relating to this policy are recorded on an F01 - Improvement Form on TMS-Orion.

All Staff must report any and all hazards immediately to the Branch Director.

2.12 Employee Welfare Policy

Introduction

The objective of this policy is to relay information regarding the welfare of all staff and new and expecting mothers; also covered is ITS' Policy in regards to Sporting and Special Events.

Applicable Legislation

1. Workplace (Health, Safety and Welfare) Regulations 1992
2. Management of Health and Safety at Work Regulations 1999
3. Employment Rights Act 1996

Detail

A health and safety risk assessment of all ITS Locations has been conducted and all of the relevant risks have been identified and mitigated to promote a safer working environment for all ITS employees.

Should an employee feel that their welfare is at risk they should contact the Branch Director who will address the matter appropriately.

New and Expectant Mothers

The Branch Director should be notified that one of their female staff is pregnant; it is recognised that the circumstances of any pregnancy is personal to that staff member and that they may not immediately wish it to be known that they are pregnant.

ITS would therefore encourage ITS female staff to report their pregnancy at the earliest opportunity they feel able in order for a risk assessment to be conducted and exposure to possible hazards controlled.

The Director must:

- ensure that a risk assessment including COSHH is conducted for that staff member to determine whether the work the employee is expected to do is of a kind which could involve risk, by reason of her condition, to the health and safety of the expectant or new mother or to that of her baby, from any substances, processes or working conditions;
- take steps to avoid or minimise the risks;
- monitor the implementation of measures taken to protect the staff member concerned;
- ensure records are kept of such risk assessments.

If any risks are identified then the company must take action to remove, reduce or control the risk. If the risk cannot be removed employers must:

- **Action 1**
temporarily adjust her working conditions and/or hours of work; or if that is not possible;
- **Action 2**
offer her suitable alternative work (at the same rate of pay) if available; or if that is not feasible;
- **Action 3**
suspend her from work on paid leave for as long as necessary to protect her health and safety and that of her child.

The Management of Health and Safety at Work Regulations 1999 also state that where a new or expectant mother works nights and provides a medical certificate from her GP or Midwife which says that working nights will affect the health of the woman, then the company must suspend her from work, on full pay, for as long as necessary. However, the Employment Rights Act 1996 provides that where appropriate, suitable alternative work should be offered, on the same terms and conditions, before any suspension from work.

Any incidents that arise relating to this policy should be recorded on within Personnel Files.

All Staff must report any and all hazards immediately to the Branch Director.

Sporting and Special Events

The aim of this policy is to set out rules and guidance for all staff on what is expected and what concessions may be granted when a sporting or other special event is taking place, for example the Olympic Games, the football or rugby World Cup, or a wedding or funeral of national significance.

The Company recognises that employees may wish to take time off at or around the time of major events (such as the football World Cup) and that this may be very important to some individuals.

Any concessions granted to employees and/or flexibility in working hours implemented for the duration of a sporting or other special event will be temporary measures, and are a privilege, rather than a right, for staff.

This policy is non-contractual and management reserves the right to amend or withdraw it at any time.

Time off work

Employees who wish to take time off work around the time of a sporting or other special event should book annual leave in the normal way, as set out in the Company's holiday policy. Employees should apply for such annual leave well in advance of the event. However, in the case of sporting or other special events, the Company may, at ITS discretion, also consider late requests for time off work, including half days.

The Company will, whenever possible, seek to grant the time off that employees request and will grant holiday leave on a first-come, first-served basis. However, employees should note that the Company must maintain a minimum level of staffing at all times for both operational and safety reasons. It follows that if the organisation (or a particular department or section) receives a large number of requests for annual leave at the same time, some of them may have to be refused. In these circumstances, the Branch Director will endeavour to be as fair as possible to all staff.

Flexibility in working time

During special events, the Company will, if it is possible to do so without creating operational difficulties, permit flexibility in start and finish times for employees who wish it for the duration of a designated special event. For events that begin around midday, employees may request to take a longer lunch-break with working time being made up as appropriate. Similarly, if an event is scheduled to begin in the late afternoon/early evening, management may permit employees who request it to leave work up to an hour earlier than their normal finishing time to enable them to watch the event at home or elsewhere.

This will be on the basis that an employee who seeks such flexibility must:

- obtain his/her Line Manager's permission in advance for any and all variations to his/her working hours; and
- agree to make up any lost time within [one/two weeks] at a time designated or approved by his/her Line Manager.

Employees may also request a shift swap. They can, with the Branch Director's permission, swap one or more shifts with a colleague, subject always to health and safety provisions.

Although flexibility in working time will be granted whenever possible, employees must understand that there may be business-based reasons why it cannot be granted. If that is the case, employees will be notified of this and required to continue to work normally.

Employees should note that any variations to working time, however minor, require the prior approval of the Branch Director.

Unauthorised absence

Levels of attendance at work will be monitored, and any employee who is absent from work without permission on the day of a major sporting or other important event, and who does not subsequently provide medical evidence or some other acceptable explanation for his/her absence, will be subject to formal disciplinary action. Unauthorised or unjustified absences or lateness will not be tolerated and disciplinary action will be taken against any employee who takes time off work without permission, without providing proper notification or without good reason.

Disciplinary action may also be taken against any employee who, following an authorised day's holiday on the date of a special event, fails to turn up for work at the proper time the following day.

Facilities for watching the event at work

The Company may, at ITS discretion, provide access to a television in a designated communal area in the event that a major sporting match or other important event is being televised during working hours. Employees are not permitted to watch such events on their PC/Laptop, and must always obtain permission from their Line Manager before leaving their work station to watch the event at work. Time off to watch the event will be granted only where it does not cause any disruption to the employee's work, or inconvenience to customers or other employees. Where employees are permitted to watch the event on television, they may, at the Company's discretion, be required to make up the lost work time.

Drinking or being under the influence of alcohol at work

Where the Company has provided access for employees to a television in a communal area at the time of a major sporting tournament or other special event, employees will not under any circumstances be permitted to bring any alcoholic beverages with them to drink while watching the event.

In line with the Company's disciplinary rules, if (during the time of a special event) an employee should turn up to work under the influence of alcohol, or be caught drinking alcohol during working hours [including during a lunch break], this will be regarded as gross misconduct potentially leading to summary dismissal from the Company.

Criminal conduct outside work

Where an employee commits a criminal offence in the course of his/her time off work to attend a sporting or other special event, for example being drunk and disorderly at a public event or being involved in football hooliganism, the Company reserves the right to take disciplinary action (up to and including summary dismissal) against the employee, even though the conduct will have occurred outside of work and in the employee's own time. In these circumstances, the Company will listen to the employee's explanations regarding the offence and follow fair procedures before taking a decision as to what (if any) action to take.

Young Persons

Managers must ensure that no young person will be employed for work for which they are responsible which:

- is beyond their physical and/or psychological capacity;
- involves harmful exposure to agents which are toxic, carcinogenic, cause heritable genetic damage or harm to the unborn child or which, in any other way, may chronically affect human health;
- involves harmful exposure to radiation;
- involves the risk of accidents which it may reasonably be assumed cannot be avoided by young persons owing to their insufficient attention to safety or lack of experience or training;
- exposes the young person to a risk to health from extreme heat or cold, noise or vibration;
- exposes the young person to risks arising from the use or handling of explosives or objects containing explosives;
- involves high voltage electrical hazards.
- Ensure a young person's risk assessment has been conducted.

However, it may still be appropriate to employ young persons in some of the above capacities where:

- it is necessary for their training;
- they are supervised by a competent person;
- any risk will be reduced to the lowest level that is reasonably practicable.

Children may not be employed:

- before 7am or after 7pm on any day;
- for more than two hours on any Company day or Sunday;
- for more than 4 hours without a rest break of 1 hour.

2.13 Annex - Additional Definitions used in this policy

"Candidate" means an applicant for permanent employment, temporary or contract work who has at any time during the Relevant Period been registered with the Company or any Group Company and with whom the Employee was materially involved or had personal dealings during the Relevant Period;

"Client" means any person, firm, company or entity which has at any time during the Relevant Period been a client of the Company or any Group Company and with whom the Employee was materially involved or had personal dealings during the Relevant Period;

"Group Company" and **"Group"** means the Company, and its holding company and any subsidiaries (s defined in om time to time, a time, abdtious diseases policy

circumstances.hese employment businesses.as respectively defined in Section 736 of the Companies Act 1985 as amended from time to time, and any associated companies (if any) as defined in section 416 of the Income and Corporation Taxes Act 1988 as amended from time to time

"Introducer" means any person, firm, company or entity which has at any time during the Relevant Period been an introducer or supplier of Candidates or Clients to the Company or any Group Company and with whom the Employee was materially involved or had personal dealings during the Relevant Period;

"Key Employee" means any person who immediately prior to the Termination Date was a recruitment consultant, manager, Director of the Company or any Group Company with whom the Employee had personal dealings during the Relevant Period

"Prospective Candidate" means any person, firm, company or entity who has at any time during the period of six months prior to the Termination Date been in negotiations with the Company or any Group Company about their availability for placement in permanent employment, temporary or contract work and with whom during such period the Employee was materially involved or had personal dealings;

"Prospective Client" means any person, firm, company or entity which has at any time during the period of six months prior to the Termination Date been in negotiations with the Company or any Group Company for the supply of services and with whom during such period the Employee was materially involved or had personal dealings;

"Relevant Area" means within 2 miles of any branch of the Company or any Group Company at which the Employee worked in the Relevant Period;

"Relevant Period" means the period of 12 months ending on the Termination Date;

"Services" means services identical or similar to those being supplied by the Company or any Group Company at the Termination Date and with which the Employee was materially involved during the Relevant Period;

2.14 Email Telephone Computer Facilities Social Media Policy

Introduction

This policy sets out the Company's policy for use of its Facilities and Networking Sites and covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, home workers, part-time and fixed-term employees, casual and agency staff, temps, and volunteers. ("You"). "Your" and "Yourself" shall be construed accordingly and where there are references to "employee" and/or "your employment" throughout this document, these should be read as referring to the terms upon which you are either employed or engaged by the Company (as applicable). Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy. This policy shall apply during the course of your employment including any period of garden leave (and where stated, also after your employment has ended).

Definitions

"Confidential Information" means:

- information relating to the Company's business plans, finances, new or maturing business opportunities, and research and development projects;
- marketing information relating to the Company's marketing or sales of any past, present or future service including without limitation sales targets and statistics, market share and pricing statistics, marketing surveys and plans, market research reports, sales techniques and price lists;
- details of Professional Contacts including names, addresses, contact details, terms of business or proposed terms of business with them, their business requirements, pricing structures, lists of employees and their terms of employment; and
- any other information of a confidential nature belonging to employees, candidates, clients, and employees of clients of the Company or in respect of which the Company owes any other obligation of confidence.

"Facilities" means telephone and computer facilities, including email and the internet, and hardware including mobile media such as laptops, mobile phones, BlackBerries™, smartphones, personal digital assistants, iPads™, tablets or notebooks, or similar equipment.

"Networking Sites" includes (but is not limited to) professional networking sites such as LinkedIn, Xing, Viadeo ((Professional Networking Sites) and social networking sites such as Facebook, Twitter, SecondLife, Google+, Wikipedia, (Social Networking Sites). Your access to and use of Networking Sites, whilst employed by the Company is set out in this policy.

"Personal Contacts" means any of Your friends (not including Professional Contacts).

"Professional Contacts" means any Candidate, Client, Introducer, Key Employee, Prospective Candidate or Prospective Client (all as defined in Annex 1), together with any contacts made through a professional body trade or association of which You or the Company is a member.

Use of the Facilities:

Work use of the Facilities

The Facilities are made available to You during the course of your employment with the Company to assist You in carrying out and promoting the Company's business and interests.

Personal use of the Facilities

The Facilities may be used, within reason, for personal communications or to send and retrieve personal messages and to browse external web-sites for personal use although this should be done outside office hours and be kept to a reasonable limit. It must not interfere with business commitments. If there is any evidence that this privilege is being abused then the privilege will be withdrawn. The content of personal e-mails must also comply with the restrictions set out in section 3.3 of this policy. **If using the Facilities for personal communications You should be aware that the Company may monitor your use of the Facilities in accordance with section 6 of this policy and any breaches of this policy may result in disciplinary action up to and including dismissal.**

Prohibited use of the Facilities

The following uses of the Facilities are expressly prohibited:

- viewing internet sites which contain pornographic, obscene, abusive, slanderous or otherwise offensive material or downloading or forwarding such material within or outside the Company;
- sending, receiving or forwarding communications that are in violation of company policy including, but not limited to, the transmission of obscene, offensive or harassing messages;

- sending receiving or forwarding communications which make unsubstantiated and potentially defamatory comments about colleagues, clients, candidates or any other person via the Facilities or any Networking Site. **You are reminded that communications via social media constitutes publication just as printing in hard copy or via email is publication. You personally, and/ or the Company could face a defamation action should you publish unsubstantiated and potentially defamatory material;**
- sending, receiving or forwarding communications that disclose Confidential Information without the prior authorisation of a Director;
- bullying or harassing colleagues, clients, candidates or any other person via the Facilities or any Networking Sites
- discriminating or making offensive or derogatory comments about any colleagues, clients, candidates or any other person via the Facilities or any Networking Site;
- breaching any other Company's policies including in particular, but not limited to, the Information Security and Data Protection Policy, the Equal Opportunities and Diversity Policy;
- engaging in any behaviour which might cause either the Company to be in breach of the REC Code of Professional Conduct or You to be in breach of the Institute of Recruitment Professionals' Code of Ethics (if You are a member of that Institute);
- duplicating copyrighted or licensed software or other information without the appropriate authorisation;
- installing or downloading any software or hardware without the specific approval of a Director or other person delegated by him/ her to give such approval;
- forwarding or otherwise perpetuating junk mail or "chain-letter" type e-mail within or outside the Company;
- removing any hardware or software from the Facilities or the Company's premises without prior approval of a Director; and
- selling or advertising anything via the Facilities or broadcast messages about lost property, sponsorship or charity appeals, without the written agreement of your line manager.

If you engage in any prohibited activities this may result in the Company taking action against You under the Company's Disciplinary, Dismissal and Grievance Procedures and which ultimately could lead to the termination of Your employment.

Use of Networking Sites:

Networking Sites are a valuable business tool which the Company wishes to use to build its brand, reputation and business, and which it recognises You may wish to use to build Your own professional reputation. However, in addition to the benefits there are also certain risks attached to using Networking Sites including but not limited to the Company's Confidential Information, reputation and compliance with their legal obligations. In order to reduce those risks, for both Yourself and the Company, where and when You are representing the Company You must comply with conditions set out in this policy. Failure to comply with this policy may result in the Company taking action against You under the Company's Disciplinary and Grievance Procedure.

Professional Networking Sites

The Company may provide You with access to Professional Networking Sites. Such access is granted for work-related purposes only and should be done for the benefit of the Company alone, though professional networking activity may be done inside or outside of working hours.

Rules for using Professional Networking Sites

The following rules apply when You access or use a Professional Networking Site:

- You must have written permission from a Director before setting up an account for any Professional Networking Site.
- You should create the account on the Professional Networking Site using your work email address only.
- You must notify a Director of the details of your account including the password. Your password is confidential and should not be disclosed to any unauthorised person.
- You should only use the account for the purpose for which it was authorised. If you are commenting on a Professional Networking Site on behalf of the Company you must seek approval from a Director before submitting that comment.
- You shall inform the Company of activities that you carry out in relation to Professional Networking Sites including details of your membership of sites that you have set up and new contacts that you have made during the course of your employment.
- You must regularly backup your Professional Contacts.
- You must regularly upload Professional Contacts to the Company's database(s).
- You should not disclose Confidential Information unless You have been authorised to disclose by a Director.
- You must comply with the terms and conditions of use of all Networking Sites that You use. You should pay particular attention to any codes of behaviour or professional conduct contained within those terms and conditions.
- The Company is a REC Corporate member and as a result You are also required to comply with the Code of Professional Practice and individual recruiters with the Code of Ethics of the Institute of Professional Recruiters. Copies are available here: <http://www.rec.uk.com/about-recruitment/standards>.
- You must advise the Company if you become aware of any breach of this policy by a colleague. **Failure to do so may be a disciplinary offence.**
- The Company reserves the right to restrict your access to Professional Networking Sites and accounts that the Company has created for you.

Contacts made via Professional Networking Sites

- If You already have an account with any Professional Networking Site which contains Confidential Information belonging to the Company You must transfer that Confidential Information to a new account set up in accordance with section 4.1.1 of this policy. Such account shall be subject to the rules set out in section 4.1.1 of this policy and the following additional rules:
- You must keep Personal Contacts separate from Professional Contacts.
- The Company reserves the right to require You to provide evidence and details as to when You made your contacts and in which capacity they were made. You will be required to give access to your account(s) to a Director for this purpose. The Company's decision on whether a contact constitutes a Personal or Professional Contact shall be final.

Maintenance of company profile on Professional Networking Sites

Certain Professional Networking Sites contain company profile pages relating to the Company. For the avoidance of doubt, these profile pages may only be edited by authorised users. Amendment of the Company's profile pages by unauthorised users shall be a disciplinary offence (and for this purpose You are referred to the Company's Disciplinary, Dismissal and Grievance Procedures).

If you are authorised to make a comment on a Professional Networking Site you must state clearly that these are personal views and not the views of the Company.

Social Networking Sites

The Company respects Your right to a private life and therefore You may access social networking sites using the Facilities. However this should be done outside office hours and be kept to a reasonable limit. If there is any evidence that this privilege is being abused then the privilege may be withdrawn.

Your use of Social Networking Sites may impact on the Company and its business. Such impact includes potentially causing damage to its reputation, loss of Confidential Information, or exposure to other liabilities such as claims of discrimination, harassment or workplace bullying. The content of any communications or comments posted on a Social Networking Site must not damage or bring into disrepute the Company, its staff, clients or candidates. Therefore if You use Social Networking Sites, even where this is not via the Facilities or is outside of working hours You are prohibited from:

- engaging in any conduct or posting any comments which are detrimental to the Company;
- engaging in any conduct or posting any comments which could damage working relationships between members of staff, Introducers, suppliers, affiliates, Clients and Candidates of the Company. Where you express personal views You must state that these are personal views and do not represent the views of the Company;
- engaging in any conduct or posting any comments which could be derogatory to another person or third party or which could constitute unlawful discrimination or harassment;
- recording any Confidential Information regarding the Company on any social networking site or posting comments about any Company related topics such as the Company's performance; and/ or
- making information available which could provide any person with unauthorised access to the Company, the Facilities and/or any Confidential Information.
- You may be required to remove postings deemed to constitute a breach of this policy. This may include any 'likes' or 'dislikes' of other people's posts or the re-posting/tweeting of other people's comments (or links thereto) which of themselves may constitute a breach of this policy.

Post termination of employment or engagement restrictions

For the avoidance of doubt, the restrictions on the use of Networking Sites continue to apply throughout Your employment with the Company including any period of garden leave you may serve.

How to use the Facilities and Networking Sites

Information recipients

You must exercise caution when using the Facilities and any Networking Sites. In addition to the restrictions set out in sections 3 and 4 of this policy, care must be used in addressing emails, postings on Networking Sites or other electronic communications to make sure that they are not sent to the wrong individual or company. In particular, exercise care in using e-mail distribution lists or Networking Sites to make sure that all addressees or site group members are appropriate recipients of the information sent or posted.

Content and tone of communications

All e-mails, postings on Networking Sites and electronic communications should be courteous, professional and business-like and, as set out in sections 2 and 3, should not contain any material, which would reflect badly on the Company's reputation. If You receive an e-mail, posting or other communication containing material that is offensive or inappropriate to the office environment then You must inform a Director and delete on their instruction. Under no circumstances should such e-mails, postings or communications be forwarded internally or externally.

Out of Office messages

- If You are out of the office for more than 24 hours you should put an "Out of Office" message on your emails and on your voicemail(s). This message should indicate when you will be back in the office and should identify another person whom the sender or caller can contact in your absence should they need to.
- Your emails and phone calls may be monitored in your absence.

Deleting or archiving material

- You should not store large quantities of e-mail or downloaded files or attachments. The retention of data utilises large amounts of storage space on network servers, PCs and mobile media, and can adversely affect system performance.
- You should delete any e-mails or other communications sent or received that no longer require action or are no longer relevant to Your work or to the Company.
- You should retain any information that you need for record-keeping purposes in line with the Company's Information Security and Data Protection policy.

Suspect documents, messages or viruses

Any files or software downloaded from the Internet, personal mobile media or other software or hardware brought from home (and for which you have previously obtained authorisation to download as per section 2 of this policy) must be virus-checked before installation on the Facilities and use.

If you receive any suspect e-mails, communications, documents or computer virus alerts you should:

- contact a Director immediately;
- not open attachments to any email message whose address You do not recognise; and
- not forward them to any other internal or external user without the approval of a Director.

Passwords

- Your password(s) is/ are confidential and should not be disclosed to any unauthorised person.
- The Company reserves the right to access any accounts (whether email or networking sites) in which case You will be required to give Your password to a Director.
- Passwords should be changed regularly. To protect passwords, You should not access the Facilities in the presence of others and Confidential Information should never be left open on the screen when equipment is unattended.

Monitoring use of the Facilities, Professional and Social Networking Sites:

The Company has the right to monitor any and all aspects of the use of the Facilities and any Networking Sites and to monitor, intercept and/or record any communications made by using the Facilities and any Networking Sites. This is to ensure compliance with this policy or for any other purpose authorised under the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000.

By using the Facilities and any Networking Sites You consent voluntarily and knowingly to Your use being monitored. You also acknowledge the right of the Company to conduct such monitoring.

Termination of employment or engagement with the Company

- All email address lists or other contact information stored on the Facilities are Confidential Information and remain the property of the Company even after the termination of Your employment or engagement with the Company.
- You may not copy or remove any email address lists or other contact information stored on the Facilities without prior written permission from the Company.
- You should ensure that any genuinely Personal Contacts are, where possible, stored separately from any Professional Contacts. Upon termination of Your employment or engagement for whatever reason you may seek the Company's permission to remove or

copy Your Personal Contacts from the Facilities.

- On or prior to the termination of your employment or engagement with the Company for whatever reason you must speak to Your line manager to determine what steps to take in relation to any Professional Networking Sites you use. The Company reserves the right to require you to:
- advise your Professional Contacts on any Professional Networking Site of the date on which you will be leaving the Company and who Your Professional Contacts can contact at the Company when You leave the Company;
- delete Your account on any Professional Networking Site;
- delete all of Your Professional Contacts and not retain a copy of Your Professional Contacts' details without prior written permission from the Company;
- hand over control of your account on all or any Professional Networking Site(s) to a Director together with all passwords. A Director will be entitled to notify your contacts on all or any Professional Networking Site(s) of the fact that he/she has taken over your account.

Employees must be aware that failure to comply with the above rules regarding Networking Sites could result in disciplinary action or dismissal even if the failure to comply occurs outside the workplace. Further, the Company will seek to recover any damages suffered as result of an Employees failure to comply with the provisions of the policy and any costs incurred in enforcing the policy.

Status of this policy

This policy does not constitute a contract and the Company reserves the right to change its terms at any time. Failure to comply with this policy may lead to disciplinary action up to and including termination of Your employment or engagement with the Company.

2.15 Eating Restrictions and Food Storage Policy

Introduction

The objective of this policy to outline the rules in place relating to eating restrictions and food storage in the workplace.

Applicable Legislation

1. Workplace (Health, Safety and Welfare) Regulations 1992

Detail

No eating or drinking is allowed in areas where there is a high concentration of sensitive equipment, in particular the server room.

Employees who chose to eat or drink near their work area should take the necessary care as spilt liquids can cause damage to IT equipment and increase the risk of electrical fire.

All food is to be stored in the kitchen either in the fridges or the cupboard depending on the food type. No food is to be kept by or in desks.

Every care should be made to maintain a tidy workspace by clearing food away promptly.

All food is to be securely sealed when stored either in ITS original packaging or a plastic bag or box.

Any food placed in the fridge is to be labelled with a name and date it is put in the fridge.

Should there be food left over that has been ordered in this will be placed in the kitchen for all to consume thus reducing the amount of food waste produced by ITS.

Care should be taken by all staff when using the coffee machines and/or hot water as there is a risk of burns.

If a member of staff is using any sharp kitchen equipment i.e. knives care and attention should be taken. All sharp objects should be carried at the side, point down and knives should only be used for their intended purpose.

Any incidents that arise relating to this policy are recorded on an F01 – Improvement form on TMS-Orion.

All staff must report any and all hazards immediately to the Branch Director.

2.16 Data Protection Policy

Introduction

ITS holds and processes information about employees and job candidates for administrative and commercial purposes. When handling such information, ITS, and all staff or others who process or use any personal information, must comply with the Data Protection Principles.

In summary these state that personal data shall:

- be processed fairly and lawfully,
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject's rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

Definitions

"Data controller" further information about ITS data controller is available from the Branch Director who is the Data Controller.

"Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees, friends or family members.

"Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

Notification of Data Held

ITS shall notify all staff, candidates and other relevant data subjects of the types of data held and processed by ITS concerning them, and the reasons for which it is processed. The information which is currently held by ITS and the purposes for which it is processed are set out in the Data Protection Register entry. When processing for a new or different purpose is introduced the individuals affected by that change will be informed and the Data Protection Register entry will be amended.

Staff Responsibilities

Information provided by staff to ITS

All staff shall:

- ensure that all personal information which they provide to ITS in connection with their employment is accurate and up-to-date;
- inform ITS of any changes to information, for example, changes of address;
- check the information which ITS shall make available from time to time, in written or automated form, and inform ITS of any errors or, where appropriate, follow procedures for up-dating entries on computer forms.

ITS shall not be held responsible for errors of which it has not been informed.

Information held or processed by staff

When staff hold or process information about job candidates.

Staff shall ensure that:

- all personal information is kept securely;
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

Rights to Access Information

Staff in ITS have the right to access any personal data that is being kept about them either on computer or in structured and accessible

manual files. Any person may exercise this right by submitting a request in writing to the appropriate designated data controller.

ITS aims to comply with requests for access to personal information as quickly as possible; but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the designated data controller to the data subject making the request.

Subject Consent

In some cases, such as the handling of sensitive information or the processing of research data, ITS is entitled to process personal data only with the consent of the individual. Agreement to ITS processing some specified classes of personal data is a condition of acceptance of a student on to any course, and a condition of employment for staff.

ITS may process sensitive information about a person's health, disabilities, criminal convictions, race or ethnic origin in pursuit of the legitimate interests of ITS. ITS may also require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy, or for internal review.

ITS may also ask for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma or diabetes. ITS will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency. The consent of the data subject will always be sought prior to the collection of any sensitive data.

The Data Controller and the Designated Data Controllers

The Branch Director is the data controller, and the Principal is ultimately responsible for implementation. Responsibility for day-to-day matters will be delegated to the Directors as designated data controllers. Information and advice about the holding and processing of personal information is available from the management.

Retention of Data

ITS will keep different types of information for differing lengths of time, depending on legal and operational requirements. These requirements are described in Control of Records Process.

Compliance

Compliance with Data Protection is the responsibility of members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Branch Director.

Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the designated data controller initially. If the matter is not resolved it should be referred to the staff grievance or complaints procedure.

Data Security

Whether end users are using desktop or laptop PCs, there is a risk that data can be lost due to hardware failure or user error. Staff must accept responsibility for the machines they use to ensure that data is regularly backed up to minimise loss to the business as a result of such events. In particular, care of customer data must be taken very seriously.

- You should only take data sufficient for your need
- You should only hold data for the minimum time required to complete your work
- You should destroy data when no longer required and confirm to the client this has been done
- Where classified information must be processed on a portable computer in an area where not all personnel are cleared or have a "need to know", position the computer carefully to avoid casual overview.

Products for secure access control and hard-disk encryption are recommended for laptops that contain classified information and may be taken outside the organisation.

2.17 Control of Substances Hazardous to Health Policy

Introduction

The objective of this policy is to document how ITS assess and mitigate the risks associated with relevant substances that could potentially be hazardous to their employees including reference to flammable materials storage.

Applicable Legislation

1. Control of Substances Hazardous to Health (COSHH) Regulations 2002
2. Personal Protective Equipment at Work Regulations 1992

Detail

COSHH risk assessments will be conducted at ITS where employees need to use chemicals or substances that may be hazardous to health. Assessments will be reviewed before new chemicals or substances are introduced and when there are significant changes in work activities.

It will be the responsibility of all employees to identify chemicals and substances that are in their use and to ensure that a suitable and sufficient assessment has been undertaken and that a copy of this assessment is available for reference before use on site.

Where any chemicals or substances are provided by ITS for use by an employee, it will be the responsibility of the Branch Director to check that a suitable and sufficient risk assessment of the chemicals or substances has been carried out and recorded prior to use. In addition a data sheet and appropriate risk assessment will be made available to the employee to ensure the product is used within the Manufacturers Guidelines.

Due to the nature of the work carried out by the company, there are very few chemical substances that employee's would come into contact with on the company's premises, but employees are still required to be vigilant and take appropriate precautions. The chemical substances that employees of the company are most likely to come into contact with are those associated with cleaning equipment. All substances carry their own safety warning and guidance for their use, which must be adhered to by all employees. Generic COSHH sheets are kept on TMS-Orion and variances are kept at Branch Level.

If an employee is unsure whether a substance may potentially be damaging to their health they should contact the Branch Director. In this case, a range of suitable protective clothing and/or equipment, such as gloves and face masks, will be made available; this is in accordance to the Personal Protective Equipment at Work Regulations 1992.

All substances are to be disposed of in accordance to the data sheets and COSHH Risk Assessments.

Flammable Materials Storage

No flammable materials are to be stored in pods or desks due to the risk of fire caused by proximity to an ignition source i.e. your computer.

Any incidents that arise relating to this policy are recorded on an F01 - Improvement Form on TMS-Orion.

All staff must report any and all hazards immediately to the Branch Director.

2.18 Contractors (Selection and Onsite Control) Policy

Introduction

The Health and Safety at Work etc. Act provides that ITS and the contractor have duties to ensure the health and safety of their own and each other's employees. This means that the place of work, the equipment used, the systems of work employed and the competence of the personnel are covered by legal requirements.

Applicable Legislation

- The Health and Safety at Work, etc. Act 1974
- Workplace (Health, Safety and Welfare) Regulations 1992

Detail

Selection of Contractors

ITS ensure that any contractor is competent to carry out the tasks required. Cost will never be the main criteria for the selection of a contractor. Before commencing major works a pre-contract meeting will be arranged by the Project Manager to discuss safety matters.

Safety Policy

Managers selecting contractors to carry out works must ensure that their safety policy, where appropriate, outlines their commitment to safety. A copy of the contractor's Safety Policy will be requested during the tender process.

ITS must also satisfy itself that a copy of the policy document has been distributed to the employees and self-employed staff of the contractor and that its procedures are understood by them.

Risk Assessment

Contractors must provide ITS with risk assessments and detailed method statements on how the tasks will be completed and what tools/equipment will be used.

The commissioning manager must also investigate the following:

- Have the workers received training for the works to be carried out?
- To what extent is there supervision for the task?
- What is the competency of the contractors in the management of health and safety?
- What are the proposals for safe working?
- Has the contractor ever been subject to enforcement action?
- How does the contractor's accident record compare to that of other companies?
- Can the contractor's health and safety attitudes be checked with previous clients?
- The investigations must be recorded and kept on file by the Commissioning Manager for future reference.

2.19 Construction Site Arrangements Policy

Due to the nature of work carried out by ITS (recruitment) this policy acts a knowledge for what would be expected on a construction site. ITS are not responsible for nor do they set up construction sites and as such the following text is for information purposes.

Cartridge Operated Tools

There are two types of cartridge-operated tool, the high velocity type and the low velocity captive piston type. Where possible the low velocity captive piston type should be used, as there is less danger from ricochets and overdriving of the pins. Every tool should be marked with the type, serial number and kite marked to BS 4078.

Operators of cartridge operated tools must be trained in their use, issued with, and be in possession of, a valid training certificate relating to the tool in use.

No person should be in possession of a cartridge operated tool or cartridges unless he has been trained and is in possession of a valid training certificate.

Cartridges for immediate use only, shall be kept in a secure box with the tool, and guarded when not in use.

Cartridges shall never be kept loose. Following use all spent cartridge rings or individual cartridges shall be collected and accounted for.

Eye protection to BS 2092 Grade One impact shall be worn when using cartridge tools.

Suitable ear protection giving the correct level of attenuation shall be worn when using cartridge tools.

Chain Saws

No person shall operate a chain saw unless he has been trained to an approved and recognised standard and is in possession of and using appropriate protective clothing.

Certificates of training (or copies of) for persons using chain saws shall be accessible at the place of use and be available for inspection upon demand.

Protective clothing worn should include steel toe-capped boots and protective gaiters (or appropriate forestry boots), protective leggings incorporating ballistic nylon inners, chain saw gloves with integral protective pads, a safety helmet complete with mesh visor and ear defenders.

Regular maintenance will be carried out on all chain saws and a record of such maintenance will be available upon request.

Manufacturer's recommendations regarding the use of low kick back chains and chain maintenance will be followed, as will requirements for the refuelling of petrol saws.

Chemicals/ COSHH

It is a legal requirement for suppliers to give users of their materials sufficient warning of dangerous chemicals, low flash point materials, adhesives, epoxy resins and paints, solvents etc.

In most cases the correct instructions for using these materials are clearly stated on the container or package.

It is essential that the proper procedures, as laid down by the manufacturer's instructions, be followed when handling such materials.

Supervisors will give adequate instructions for work involving the use of such materials and ensure that suitable protection is provided.

Where formal protective equipment i.e. gloves, goggles, respirators are required and issued then employees must ensure that they are worn.

If you come across an unexpected hazard you must inform your supervisor immediately.

The Company will endeavour at all times to comply with the Control of Substances Hazardous to Health Regulations (COSHH).

The Company will try to eliminate the use of hazardous substances, or substitute the substance with one which is less hazardous.

The Company will provide written assessments for all hazardous substances used at work. These assessments will be brought to the attention of all employees.

The Company employees must comply with these assessments.

If the assessment requires control measures these must be made available to employees.

Employees will be put under health surveillance where there is a reasonable likelihood that their work with a hazardous substance may result in an identifiable disease or an adverse health effect.

No substance will be used without a COSHH assessment being available.

Arrangements in Confined Spaces

A confined space can be defined as any area where there is poor ventilation, or there is a risk of dangerous fumes collecting. Examples of which could be sewers, manholes, tunnel inverts, tank shafts, deep bored piles etc.

Work will only be carried out in a confined space if there is no alternative way of carrying out the works safely so far as reasonably practicable.

Any employee chosen to work in confined space conditions should be over 18 years old, preferably under 50 years of age and not suffer from a disability.

Work in confined space must only be undertaken by employees who have received proper and adequate training for the purpose.

The Confined Space Regulations 1997 require that wherever work is carried out in confined spaces, pre-entry atmospheric testing must be carried out. If such testing indicates that the atmosphere is not safe, then forced ventilation and extraction must be introduced to achieve satisfactory fresh air circulation. Testing should continue during the period that anyone is in the confined space.

Suitable and adequate rescue equipment must be provided and kept adjacent to any confined space.

Employees must not enter any confined spaces without the express permission of their supervisor. A written safe system of work (permit to enter form) must be produced before entering a confined space.

No persons are permitted to enter sewers, manholes or other confined spaces without the necessary tests being carried out and the correct rescue equipment available.

The person entering the confined space must wear an Escape type safety harness attached to a tripod and lifting winch. A person must remain at the top at all times and keep in communication with the person in the confined space. Only intrinsically safe equipment is allowed to be used in a confined space.

Oxygen/acetylene etc. cylinders must never be taken into a confined space and if any welding/cutting operations are required to be carried out within a confined space then additional precautions must be taken i.e. breathing apparatus, fire fighting equipment etc. For this type of work the Company employees must consult with the Company Senior Site Representative.

Only trained persons are allowed to wear breathing apparatus.

Cranes and Lifting Appliances Procedure

By far the majority of accidents involving the use of cranes - more than 70% of an average annual total of 4,000 - occur during the slinging or movement of the load.

The safe and proper use of cranes and lifting appliances is essential if serious injury, collapse, overturning or other failures are to be avoided. Therefore, the guidance in the following sections, which has been produced to comply with current Legislation and BS 7121, must be followed.

Management of the Lifting Operation

A safe system of work needs to be established before lifting operations are carried out and communicated to all parties concerned. To ensure the implementation of the safe system of work the Crane Safety Check List must be completed by the crane company whether hired in by us or by sub-contractors. The main elements of a safe system are:-

- Planning the operation;
- The selection and use of a suitable crane and equipment;
- The maintenance, examination and testing of cranes and equipment;
- The provision of properly trained and competent personnel; this includes the appointment of a competent person to be the CRANE CONTROLLER (see Selection and Duties of Personnel);
- Adequate supervision;

The Crane Controller / Appointed Person

Every lifting operation must be under the control of a competent person appointed by the USER of the crane. The Crane Controller's duties include:

- The planning (including all the above points), selection of crane, lifting gear and equipment;
- Instruction and supervision necessary for the task;
- Ensuring the documentation is in order;
- The responsibility for the organisation and control of the operation.

The Crane Controller must be competent to carry out the above tasks. This person may have other duties but cannot be the crane driver or the banksman/slinger. If the user of the crane does not have the expertise to carry out the above duties then they should enter into a contract with an organisation or individual to undertake the work on their behalf.

Crane Driver

The crane driver should be responsible for the correct operation of the crane within the limits of the manufacturer's instructions and the agreed system of work. The crane driver should only respond to signals from one banksman/slinger who should be clearly identified.

The crane driver should be:-

- Trained and competent, the CPCS Certificate of Training Achievement may be useful in determining competency;
- Over 18 years of age, unless under supervision for training purposes;
- Fit, with particular regard to eyesight, hearing and physically able to operate the crane safely;
- Able to understand the banksman/slinger;

It is the responsibility of the crane owner to ensure that the crane driver fulfils the above requirements.

Banksman/Slinger

The banksman/slinger should be responsible for; attaching/detaching the load to and from the crane, for the use of the correct lifting gear and equipment, and for directing the safe movement of the crane.

The banksman/slinger should be:-

- Trained and competent;
- Over 18 years of age, unless under supervision for training purposes;
- Capable of judging distance, height and clearance;
- Capable of selecting suitable lifting gear/equipment;

The Crane Owner

The crane owner has a duty to provide a competent driver and a crane that is properly maintained and inspected, thoroughly examined, tested and certified. The USER retains the responsibility for appointing the Crane Controller and for planning and selecting the right crane for the task being undertaken.

Selection of Cranes

Each type of crane has certain features that help dictate the suitability for a particular job. When selecting a crane the following points should be considered:

- Weights, dimensions and characteristics of load;
- The radius of the operation;
- The height of the lift required;
- Site, ground and environmental conditions, or restrictions arising from existing buildings, overhead power-lines etc.
- Space available for access, erection/dismantling and operation.
- Ensuring all necessary test certificates and other relevant documents are available;
- The safety of persons not involved in the lifting operation.

The appointment of the Crane Controller (see Selection and Duties of Personnel) is the responsibility of the user but in most instances the user will not be competent to do this themselves, therefore they should enter into a contract with an organisation or individual to

undertake the work on their behalf.

IF WE ARE THE USER WE MUST ENSURE A CRANE CONTROLLER IS APPOINTED.

IF SUB-CONTRACTORS ARE THE USER WE MUST ENSURE THAT A COMPETENT PERSON IS APPOINTED AS THE CRANE CONTROLLER.

Selection and Duties of Personnel

Safe lifting depends on the selection of suitable personnel who are competent to carry out the required duties. Records of training and experience of persons such as the CRANE CONTROLLER and the crane driver will assist in the selection of suitable personnel.

Documentation

The following documentation must be produced for inspection at site before any crane starts work:

- The Certificate of four yearly tests and thorough examination.
- Also provides information relating to the type of crane etc.:
- The fourteen monthly thorough examination;
- The weekly inspection of the crane;
- The Certificate of test of lifting gear;
- The Certificate of test of wire rope.

It is also important to check that the safe load indicator system and load radius indicator are working and set correctly for the crane duties rigged.

Demolition Procedure

Before any demolition operations start, a thorough survey and examination of the structure is required to determine the nature of the original construction, the relationship and condition of adjoining property, information on existing services and health risks. This will ensure a safe system of work can be implemented.

Method Statement

A written method statement is essential for safe working. It should be produced by the demolition contractors before work starts and checked by the site management with assistance from the Safety Department. A detailed method statement should include:

The sequence and method of demolition with details of personnel access, working platforms and machinery requirements. Where possible the use of machines is recommended in preference to demolition by hand.

- The arrangements for protecting the public.
- The details of the removal or making safe of statutory services.
- The details of methods to deal with hazardous substances.
- The arrangements for the control of site transport.
- The arrangements for disposal of demolition debris.

Supervision

A competent person experienced and trained in the type of operation being undertaken is to be appointed in writing by the demolition contractor to supervise and control the work.

Control of Pollutants

- Asbestos (See Asbestos Policy)
- Dust. The works should be periodically sprayed with water to reduce the amount of airborne dust.
- Noise (See Noise Policy).
- Fire and Smoke. Many local authorities prohibit the burning of timbers, rubber, etc. in view of the fact that such materials can give off offensive smoke. In some case this may also be hazardous to health.
- Plant: All plant must be in a good condition and suitable for the task it is to perform. Operators of all plant must be trained and competent.

Protection of the Public

The precautions necessary to protect the public must include: high standards of site protection, safe systems of work and effective supervision and control.

All sites, where practicable, should be enclosed by a 2m high fence, which cannot be easily climbed. Access gates should be secured outside of normal working hours.

If it is impossible to enclose the site, excavations must be fenced or covered, vehicles and plant immobilised and services isolated or enclosed to prevent access. Outside working hours, ladders used for access must be removed and stored in a secure area.

Dumpers

The dumper is a common piece of transport seen on most sites.

Because it is so common it is often used by untrained and unauthorised persons, this leads annually to many accidents.

Dumper drivers must: -

- Be over 18 years of age and possess a current driving licence.
- Must hold a CPCS card
- Be trained and authorised to drive the dumper.
- This information must be provided by the employer of the driver.
- Carry out weekly checks on the condition of the vehicle.
- Ensure routine maintenance is carried out by a plant fitter.
- Ensure no passengers are carried.
- Dismount when the machine is being loaded.
- Use stop blocks to prevent tipping into excavation.
- Ensure that the vehicle is never overloaded.
- When towing ensure correct pins are used.

Be instructed in the proper use of starting handles - to grasp the handle with the palm of the hand, keeping the thumb and forefinger together, so that in the event of a kickback there is no risk of a broken or dislocated thumb.

Edges and Openings

Supervisors shall ensure that holes or openings are provided with fixed covers of strong material or properly secured barriers are erected around the perimeters.

All edges or openings from which men or materials can fall a distance of 2 metres or more must be protected by guard rails and toe boards.

Any covers used must be secured in place and fitted with a notice stating "DANGER - OPENING BELOW"

Electricity

Electrical equipment on site is normally of a temporary nature. It is both illegal and dangerous for such equipment to be tampered with. Any alterations to wiring, junction boxes, electrical tools etc. must be done by a competent electrician. If you require any alterations to an electrical system, ask your foreman.

All portable equipment, hand tools and temporary lighting shall be operated at a voltage not exceeding 110 volts.

Such a 110 volt supply may be operated from a double wound transformer, either single or three phase with the centre tap to earth. This effectively reduces the maximum potential voltage to 55 volts.

All portable generators shall only operate portable tools at 110 volts.

All portable equipment used on sites will be inspected by a competent person every 3 months. Office electrical equipment will be tested on an annual basis

Portable equipment is any plant / equipment with a plug fitting.

All equipment should be visually inspected before use and faults reported immediately to the office.

Emergency Planning

The Company employees will familiarise themselves with any emergency procedures formulated by the main contractor.

In the event of an emergency the supervisor will inform the Office

Emergency procedures are available in the office.

Personnel will be made aware during induction.

Procedures will be tested every 6 months, with weekly visual inspection of emergency equipment. Emergency procedures will be displayed on the office / site notice boards

Excavations

Before excavation work is undertaken, all reasonable steps must be taken to identify any underground cables or services that may be in the area.

Suitable precautions must be taken wherever there is any danger of collapse in any excavations. Spoil and heavy weights must be kept back (1m) from the edge of the trench.

For any excavations suitable and sufficient timbering materials must be available on site prior to work commencing or the sides of the excavation must be battered or stepped back.

Extra care must be taken during or after rain, or when there is the possibility of vibrations.

Where excavations cause a potential risk, suitable barriers or guard rails must be placed around excavations and spoil heaps, or the excavations must be securely covered to protect others from danger.

Proper means of access and egress must be provided.

All excavations must be inspected by a competent person :-

- At the start of every shift.
- After any collapse or fall of earth.
- Every 7 days with the results entered into the Excavation Register.

Excavators

Excavators are classified as lifting appliances and therefore the regulations relating to lifting appliances must be complied with. It is important that the different procedures are understood when an excavator is used solely with work concerned with an excavation and when it is required to be used as a "crane". The requirements for each class are listed below.

Excavators not used as cranes.

- A 12 monthly thorough examination by a competent person be recorded.
- The results of the thorough examination
- A weekly inspection, normally by the driver, and the results entered on the weekly inspection form.
- A notice in the cab "Do not use this excavator as a crane".

Excavators used as cranes without any restrictions and with a fixed SWL of 1 Tonne or less.

- The SWL marked on the machine or displayed in the cab.
- Crane hook properly fitted and tested.

Excavators used as cranes for work immediately connected with the excavation with a fixed SWL greater than 1 Tonne.

- Check valves to be fitted to any excavator manufactured after 1 July 1987. Machines manufactured prior to this date must have check valves fitted as soon as practicable.
- The SWL marked on machine or displayed in cab.
- A crane hook properly fitted and tested.
- A Certificate of Exemption CON(LO)1981/2 Form F2513.

Excavators used as cranes without any restrictions and with variable SWL greater than 1 Tonne.

Check valves to be fitted to any excavator manufactured after 1st July 1987. Machines manufactured prior to this date must have check valves fitted as soon as practicable.

- The SWL marked on machine or displayed in cab.
- A crane hook properly fitted and tested.
- An automatic safe load indicator.
- A load radius indicator.

General Requirements

The operator must be over 18 years of age, trained and authorised to drive excavators and hold a CPCS card

No passengers are to be carried.

Bucket must be grounded when machine is parked.

A gap of not less than 600mm is to be maintained between the machine and nearest obstruction when the machine is working. If this is not possible access must be prevented.

Before digging starts checks should be made to ensure there are no buried or overhead services. (See Underground/Overhead Services sections).

Fire Prevention Onsite

All operatives will be advised of any special requirements concerning fire precautions that have been advised by main contractors or clients.

All employees should :-

- Know the location of and how to use the fire extinguisher nearest their work area.
- Know the correct type of extinguisher for the various type of fire.
- Obey NO SMOKING and NO OPEN FLAME signs.
- Know the location of fire exits and fire alarms.
- Keep fire fighting equipment and fire exits and passageways clear and ready for immediate use.
- Keep their work area tidy and free from combustible material.
- Keep solvents and other flammable/combustible materials in approved labelled containers and stored in proper locations - not under stairs or in passageways.
- Keep sparks, flames and excessive heat away from solvent and other combustible materials.
- Shut off engines of petrol driven vehicles and other equipment before adding fuel.
- Not put clothes on or near heating appliances.
- All personnel will be made aware of the fire prevention procedures during induction.

Precautions will be tested every 6 months with a fire drill which will be recorded FIRE.

Precautions and Emergency Procedure - Site Operations

The company is aware of and follows the advice contained in The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation, published by The Loss Prevention Council and HSE guidance booklet HS(G) 168 Fire Safety in Construction. All potential fire hazards will be identified in the site risk assessments and steps will be taken to remove the hazards from site or to minimise the risks, if the company is principal contractor for the project and the project has high risk fire aspects to be controlled or if there is a lot of burning and hot work to be carried out, then a fire safety plan will be produced which will form part of the overall pit safety plan.

If contractors have to carry out work which increases the risk of fire, then fire extinguishers may be required local to the job site.

The contractor doing the work should ensure all loose flammable material is moved away from the area and have their own fire extinguisher close-by and available for immediate use should the need arise.

Fork Lift Truck/Telescopic Materials Handlers Procedure

It is estimated that each year there are over 20,000 reportable injuries involving transport at work, of which about one third involve lift trucks. These injuries, some fatal, create suffering for those involved and their dependants. They also involve a heavy cost on the employer's business. Even an accident not involving injury may result in costly damage to trucks, buildings and the goods being handled.

Lift truck accidents are frequently associated with lack of suitable operator training. Such training is an essential first step in reducing damage and injury to key personnel.

Training

All fork lift truck operators or their employer must :

- Provide evidence of competency to operate the particular type of lift truck by producing records of training.

General Requirements

- Drivers must be over 18 years of age and possess a current driving licence.
- The operator must carry out daily/weekly checks on the vehicle.
- Routine maintenance must be carried out by a plant fitter.
- Loads must not be placed directly onto scaffolding, suitable loading bays are to be provided.
- Operating conditions on site must be adequate to maintain the machine's stability.
- No passengers are to be carried in the vehicle.
- Passengers riding on the forks is prohibited unless a proper constructed cage is provided.
- Materials delivered to site must be in a suitable form for forklift handling.
- Speed of travel must be kept low to suit site conditions.
- Machine must never be overloaded.
- Never travel with load raised.
- When machine is not in use, the forks must be lowered to the ground and the engine immobilised.

Arrangements – Falling Objects

Where there is a foreseeable risk of head injury from falling objects, safety helmets must be worn at all times.

Employees must take extra care when working at heights as there are many serious injuries and fatalities caused by falling materials, tools etc.

If employees are working at heights they must take care that equipment is stored carefully and that tools are fitted with safety lines.

When stacking or moving materials on working platforms employees must make sure that these cannot fall on persons working or walking below.

Fragile Roofs

Proper supports will be provided when employees are required to work on or near fragile roofs.

Employees must use the supports provided.

Where necessary safety harness and lines will be provided and must be used.

No work to be carried out until the specific risk assessment / method statement has been completed and communicated to the employee's

Fumes

The accumulation of fumes in the working environment can be minimised by effective ventilation.

In confined spaces where dangerous fumes or oxygen deficiency is likely to be present, a permit to work system must be implemented.

Consideration must be given to the positioning of plant to ensure that fumes do not affect personnel in the vicinity including members of the public

Hand Tools

Many accidents occur because of the misuse of such hand tools as hammers, screwdrivers, chisels, saws, axes, picks, shovels and crowbars.

Most accidents happen because people do not use the correct tool for the job or they fail to maintain them in good working order.

Employees must :-

- Ensure that hand tools provided by the company are in good condition.
- Always use the correct tool for the task and don't improvise.
- Always keep tools clean and put them away after use.
- Check tools regularly and arrange for them to be replaced if they are worn or damaged.
- Ensure handles are securely fitted to files, screwdrivers, hammers etc.
- If tools are faulty these must be taken out of use and returned to the office

Highly Flammable Liquids

Highly flammable liquids are identified by a red triangular notice that shows a flame and the words Highly Flammable Liquid.

When using highly flammable liquids smoking and naked lights are not allowed.

All laid down procedures associated with the storage, use and disposal of highly flammable liquids must be strictly adhered to.

H.M. INSPECTORS OF FACTORIES AND ENVIRONMENTAL HEALTH OFFICERS (E.H.O.), POWERS AND PROCEDURES

The Company is aware and appreciates the powers, duties and responsibilities of Enforcing Officers, and will undertake at all times to co-operate with them in all aspects of their duties.

An Inspector may visit a construction operation, depot, workshop or office (in the case of offices this will be an E.H.O.) at any time for the purpose of ensuring that the provisions of any of the Acts or Regulations are being complied with. Alternatively, an Inspector may visit to specifically investigate the circumstances of an accident or dangerous occurrence, or for some special purpose.

If an Inspector discovers a contravention during his inspection, he can either:

- Issue a "Prohibition Notice".
- Issue an "Improvement Notice".
- Advise that he is going to prosecute.
- Give instructions and then confirm these in writing.

The site manager should accompany the Inspector during his visit and note any irregularities mentioned by the Inspector.

If the Inspector should issue a 'Prohibition Notice' the process, plant or equipment affected by the notice must be stopped immediately and remedial actions taken. Work should not recommence until specific instructions are given by a director.

If the Inspector issues an "Improvement Notice" any process, plant or equipment affected by it can continue but immediate steps should be taken by the site foreman to correct the problems mentioned in the notice in accordance with the instructions given by the Inspector at the time. A director must be informed immediately by telephone.

If an Inspector visits and simply draws attention to any problems without issuing a notice, a note should be made of the Inspector's comments and a director informed immediately by telephone:-

It is the Company's policy that a visiting Inspector should be treated with courtesy and given every co-operation during the course of his inspection.

It must be stressed that he has the right to a free access to the whole of the operation, to inspect any books or documents which are legally required to be kept, to interview any persons and take a statement of fact from them, take samples, take photographs and make recordings.

Every Inspector is appointed in writing and must produce this on being asked to do so. This right should be exercised by the site manager who has any reason to doubt that a person is not a bona fide Inspector.

Hoists

Hoists should only be operated by competent authorised persons.

Where the hoist is operated by a control rope it should be operated from ground level by one nominated person. The control man should be able to see all landing stages.

Passengers must never ride on open platform hoists. Gates are provided at landing stages and they must be kept closed unless the platform is at the landing stage. These gates must not be removed.

Barrows must not be overloaded and must be scotched when on the hoist platform.

There must not be any projections when loading a platform which could catch in the guides or tower of the hoist. Daily inspections

must be completed by the hoist operator before it is put into use.

Weekly inspections must be recorded

The hoist must have a 12 monthly test certificate for materials

The hoist must have a 6 monthly test certificate for men / materials

Housekeeping

Remember the saying that a tidy site is generally a safe site.

Tidy up your own debris and help keep your site clean and tidy.

Keep walkways, working platforms, stairs and ladder accesses clear of materials and rubbish that may trip up yourself or others.

Stack materials in a tidy manner.

Help keep mess huts, drying rooms, toilets etc. clean and tidy. Clothing and footwear must be left in the drying room not in the canteen.

Do not leave tools and equipment where they will be a hazard to others.

Position all cables and hoses out of the way, where possible, suspend them above head height. Remember - accumulated debris is a fire risk and a traffic hazard.

Ladders

Ladders cause a great deal of serious accidents therefore before you use them check the following :-

- Always inspect ladders before use and ensure that they are sound with no splits or cracks in the stiles and rungs and with no rungs missing. Never attempt to repair damaged ladders.
- Always place the ladder on a firm level base at an angle of 4 units of length vertical to 1 unit of length horizontal.
- Always ensure that the ladder is securely lashed to prevent accidental movement. If the ladder cannot be tied at the top, then someone must hold it at the base, but this is only effective for ladders up to a height of 6m (20ft).
- Always make sure that your feet are as clean as possible before climbing.
- Always ensure that where ladders are used as a means of access they must extend a suitable distance past the landing place or 5 rungs above the edge of the landing place.
- Never overreach at the working position, if you cannot reach easily move the ladder.
- Do not work from a ladder unless specifically authorised to do so by your foreman. This should only ever be if the job is of short duration and can be done safely.
- Wooden ladders should not be painted as this hides defects.
- Ladders should only be used for access only
- Ladders must only be used as working platforms if there is no alternative. Working platforms such as podium steps will be used where possible

Lifting Gear

All lifting gear will be obtained with a current test certificate which will be kept at the company offices.

To comply with current Statutory Regulations all lifting gear will be inspected every six months, any items with obvious defects will be destroyed.

Lifting gear is often subjected to severe usage and it is important that the correct size of chain brothers, slings etc. are used when lifting. Employees must always check with site supervision to ensure that they know the correct weight of the object to be lifted and the correct Safe Working Load and size of the lifting gear required.

Employees should not use lifting gear unless they are satisfied with its condition. Visual checks must be used prior to any usage.

All items of lifting gear must be marked with an individual identification mark and its safe working load.

All lifting hooks must be fitted with a safety catch, be moused, or shaped to prevent the sling eye or the load from becoming dislodged. Any faulty equipment must be taken out of use immediately and returned to the office.

Liquid Petroleum Gas

There is great danger when using LPG if there is insufficient ventilation, particularly where cookers, gas rings and heaters are used in confined spaces.

Do not block up ventilation or sleep in offices, caravans etc. that are using LPG.

Always check that spaces are well ventilated and that cabins are fitted with high and low level ventilators. Cylinders should always be stored and used in an upright position.

LPG cylinders should be stored in the open air, protected by a 2m high fence with access via lockable gates. There should be sufficient shelter to prevent cylinders from extreme weather conditions. The floor should be paved or compacted level.

The area should be kept clear of all flammable material and there should be no adjacent drains, excavations or cellars etc. Notices stating "LPG - HIGHLY FLAMMABLE - NO SMOKING" must be prominently displayed. Fire extinguishers of the dry powder type should be readily available.

Acetylene may be stored with LPG but Oxygen must be stored separately.

Cylinders should be fixed outside mess huts, offices etc. and the gas piped through the walls. Manufactured clips should be provided at the cylinder end and appliance end and be securely fastened.

Mobile Plant

Only trained and authorised employees over the age of 18 years are allowed to drive on site. Only persons in possession of a CPC card will be permitted to operate plant, other than when undergoing training and assessment.

Drivers must :-

- Walk around their machine before starting it to check for defects and obstructions. Report any defects immediately.
- Strictly observe machine operating instructions. No machine should be operated other than from the driving position.
- Never allow passengers to ride on a machine which is not designed to carry passengers.
- Never drive with a vehicle body in a raised position. Be aware of overhead power lines and other obstructions.
- Ask for a banksman if their vision is restricted - if you can't see don't go. When they are working with a banksman they must never move off unless they can see that he is in the clear.
- Always make sure they know how to stop a machine before they start it. Switch off the engine when they leave the machine and never leave a suspended load.
- Park only on level ground with the brake applied and buckets, blades, shovels and other attachments resting on the ground.
- Fill their machine to capacity, but not overload it.
- Ensure the machine is immobilised by removing the keys when not in use.
- Machine must be left parked in a safe position when not in use

Monitoring and Review of Company's Safety Performance

The safety director, the company health & safety advisers and other staff nominated by the safety director will monitor the implementation of the company's health and safety policy and to review the company's performance. To assist in this role, there will be a formal report produced at 6 monthly intervals and the report will cover:-

- Review of any significant accidents or incidents - is a procedural change required?
- Review of any criticisms from HSE, clients or other parties - is a procedural change required?
- Review of last period's "safety objectives". Have they been achieved?
- Review any new legislation, guidance notes or HSE initiatives
- Review the company's health and safety policy document and working procedures as appropriate.
- Review training requirements.
- Set health and safety objectives for next period.

On a regular basis, the health & safety adviser will carry out audits of the company's procedures and will submit a formal report to the safety director.

In addition, the health & safety adviser will carry out routine site inspections to monitor working practices and be available to advise all employees on health and safety issues.

Inspection and Reports Procedures

Procedure During and Following a Health & Safety Adviser's Site Inspection

The health & safety adviser will make routine inspections of the site to monitor working practices and report on his findings. He will also advise the site manager and operatives of any health and safety issues as they arise. As well as monitoring work in progress he will be concerned with work to be completed in the immediate future, discussing with the site manager the items that should be included in the risk assessment, and what job planning has been carried out.

On completion of the visit, he will produce a written report of his findings. These will be discussed with the site manager who will sign, acknowledging receipt of the report. A part of this inspection is to ensure the site supervisor has carried out the weekly general site inspection as described below.

The action column on the report, will at this stage be blank. As the site manager actions the items raised, he should indicate this in the action column with his initials and the date action was taken. Once all items have been cleared, the site manager should send one copy to the safety director or nominated manager as confirmation that the items have been actioned.

The health & safety adviser's office will also send the safety director a typed copy of the report for his information. In this way the safety director can monitor the site manager's actions.

If on a subsequent visit the health & safety adviser is of the opinion that adequate action has not been, a will not be taken, he must inform the safety director as quickly as possible.

If the health & safety adviser is of the opinion that an operation constitutes a risk of serious injury to any person then he will take whatever action he feels necessary. If the site manager disagrees with this action, the health & safety adviser will record his opinion in his written report and inform the safety director as quickly as possible and copy him with the report by the quickest possible means. The safety director will then resolve the issue.

Inspections by Site Supervisor

On each site the site supervisor will undertake a general health and safety inspection of the work areas under his control.

He can delegate this inspection to some other employee or even a subcontractor's supervisor. In fact there is a lot of merit in sharing the inspection responsibility with other supervisory staff so that they all feel they have ownership of the health and safety conditions on site and they can all have an input through the inspection system as to which areas if any need improvement.

Once the inspection has been completed, it is for the site manager to ensure the necessary corrective action are taken and this should be confirmed on the inspection checklist indicating when the item has been cleared. There is no need to formally submit the inspection checklist to the office, but they must be retained and filed on site. The visiting health and safety adviser will check to ensure the weekly inspections have been undertaken.

Inspections Contract Managers

Contract managers must undertake an inspection of all sites under their control on a quarterly basis and submit a report to the Managing Director confirming they have completed the quarterly inspection. They can use the same checklist as the site supervisors or they can devise and follow their own system. However in carrying out this inspection, they must ensure the weekly inspections have been completed by site personnel.

Other Site Based Inspections

In addition to the general weekly health and safety inspection there are a number of statutory inspections such as :-

- Weekly inspection of any scaffolding in the site register.
- Inspections of any excavation works. If the excavation is open for 7 days or longer an entry must be made in the site register.
- Lifting Equipment arriving on site must be checked to ensure there is a current Thorough Examination Certificate for the item of plant, or if the plant is new, a Declaration of Conformity Certificate from the suppliers or manufacturers. If no such certificate is available the plant should not be allowed onto site or be allowed to commence work until such certificate has been seen by the site manager. For normal lifting equipment the requirement is for a 12 monthly re-examination, but if the item is used for raising or lowering people, the examination must take place at 6 monthly intervals.
- Lifting Equipment and plant in general should be inspected by a competent person (usually the driver or operator) on a weekly basis and an entry made in the site register.
- Plant operators must be trained. Therefore site managers should check the training or competence certificates of all plant operatives when they arrive on site. There is a section in the site register to record such details. If the person cannot produce such evidence they must not be allowed to operate plant. This applies to sub-contractors as well as to direct staff.
- Lifting accessories must have a current test certificate then be tested 6 monthly.

Arrangements – Noise at Work

The Company is aware of the general requirements of the Noise at Work legislation. While accepting that individual activities undertaken by the Company are unlikely in normal circumstances to breach the lower action level, should such activities ever be considered to do so then appropriate competent assessments will be made.

If Company employees consider any noise level at work to be excessive then the Company Director must be informed. Excessive noise levels can generally be estimated as:

If people have to shout or have difficulty in being understood by someone 2.0 metres away then the Company accepts there might be a noise problem. If the same difficulties persist at 1.0 metre then it is likely the noise level is excessive and appropriate action will be taken.

Such action may include the reduction of noise at source or the wearing of appropriate hearing protection.

If company employees work within a designated ear protection zone then they must wear the appropriate hearing protection.

If a noise assessment is required a Competent person will be employed from a Consultancy to carry out the assessment on behalf of the Company

Noise - Environmental Protection

Construction and Demolition can pose different problems of noise control compared with most other types of industrial activity for the following reasons :-

- They are mainly carried out in the open.
- They are of temporary duration, although they can cause great disturbance while they last.
- The noise they make arises from many different activities and kinds of plant and its intensity and character can vary greatly at different phases of the work.
- The sites cannot be excluded from planning controls, as factories can from areas that are sensitive to noise.

Most of the noise from construction and demolition sites is generated by machinery. Increased mechanisation has brought about the use of more powerful and potentially noisier machines. It is now widely recognised that these noise levels are often unacceptable and that reductions are necessary for the benefit of both the industry and the public.

The Control of Pollution Act 1974 provides general powers for the control of noise arising from premises, including land. Under Sections 58 and 59 of the Act, Local Authorities and Courts may lay down the requirements designed to abate a noise which they are satisfied amounts to a statutory nuisance. These powers may be exercised either before work starts or after they have commenced.

Policy

Before work commences on site an application must be made to the Local Authority (LA) for prior consent to carry out such works, as required by Section 61 of the Control of Pollution Act (COPA). The application under this section must contain information on the type of work and the method by which it is to be carried out. The LA after considering the application will issue a consent form detailing their noise control requirements.

Failure to comply with the prior consent form or if noise levels are excessive, the LA can serve a notice under section 60 of the COPA specifying its requirements.

Community Relations

Good relations with people living and working within the vicinity of site operations are of paramount importance. Early establishment and maintenance of these relations throughout the carrying out of site operations will go some ways to allaying people's fears. It is suggested that good relationships can be developed by keeping everyone informed by letter of progress and by treating complaints fairly and quickly. The person, Company, or Organisation carrying out work on site should appoint a responsible person to liaise with the public.

Overhead Power Lines

No work should be carried out directly below overhead power lines without consultation with site management to find out if the cables have been disconnected and written permission to this effect has been given.

Assume all overhead lines are live until informed otherwise. Voltage as low as 240v can kill.

Do not assume you can work next to an overhead line because it looks safe. It is very difficult to judge distance when looking up into the sky.

Where plant has to operate near overhead lines precautions will be taken using "goal posts" and barriers. Report any defects immediately.

Do not use cranes, tipper Lorries or plant with upward acting motion in the vicinity of overhead power lines.

Power Operated Tools

Power operated tools must only be used by operatives trained and authorised in their use.

All power-operated tools must be inspected by the user immediately prior to being used.

Power tools should only be used for those jobs for which they were designed.

Power tools and equipment should be properly maintained and kept in good condition, as per manufacturer's recommendation.

It is important that proper connections are made to energy supplies whether electric, compressed air, hydraulics etc. Unless specifically authorised otherwise, when using electric tools, only 110v supply should be used.

Visual inspection of equipment will be carried out before use, with maintenance inspections being carried out by a competent person.

Protective Clothing and Equipment

The Company will carry out its duties under the Personal Protective Equipment at Work Regulations 1992.

The Company employees will comply with any written assessments carried out by the Company and the main contractor. The Company accepts that the use of personal protective clothing is considered as a last resort to minimise the risks.

Head protection will be worn at all times when there is a foreseeable risk of head injury or when any Supervising Manager or the Company Director requests it to be worn. Head protection shall be in good condition, free from defects and external decoration and changed when damaged, or noticeably deteriorated.

At any time when head protection is not worn, it shall be readily to hand should circumstances change and the need for it to be worn arise.

Eye protection, goggles to BS 2092 Grade One impact, shall be worn at any time when there is any foreseeable risk of eye injury. Such risks may include;

- Striking of masonry nails.
- Use of cartridge operated tools.
- Chipping of metal or masonry.
- Chipping of paint or scale.
- Use of abrasive wheels.
- Use of compressed air to remove dusts or swarf.

Only appropriately recommended full ear defenders will be worn, following competent noise assessments of any activity arising from the Companies activities or any other work near where the company employees are working.

Hand protection will be worn and selected on the basis of any likely risk encountered.

The appropriate respiratory protective equipment will be provided whenever there is a likelihood of toxic materials being present in the atmosphere that cannot be effectively controlled at source.

Foot protection. All Company employees will wear robust and substantial footwear.

The wearing of footwear with integral steel toecaps and steel midsoles is encouraged.

Safety harnesses must be worn when it is not possible to provide a proper working platform, or the use of safety nets is impracticable.

At all times the type and enforcement of the wearing of any protective clothing rests with the Company Director, his agent, or any senior representative of any main contractor including Foremen, Site Management, Enforcement Officers and Safety Officers. Any person not complying will be reprimanded

Stores and Storage

Where storage cabins and/or containers are provided they will be fitted with shelving that is braced where necessary and have access

ways at least 1 metre wide.

When materials are stacked the following items will be taken into consideration: -

- The ground on which materials are to be stacked shall be firm and level.
- The stacks will be stable (wedged if necessary) and not too high.
- Batons will be placed under materials to allow re-slinging.
- Items with a circular face i.e. manhole rings will be stored on their flat face whenever possible.

Scaffolding

Scaffolding will be provided for any work which cannot safely be carried out from the ground or part of a building.

Only authorised persons are allowed to erect, modify or dismantle scaffolding.

If scaffolding is incomplete it must carry a notice to that effect.

Employees shall use properly, and not interfere with, equipment provided for safe access to, and egress from, their working place.

The Company acknowledges and is aware of the hazards associated with working at heights.

As a user of scaffolds, either traditional tube and fitting or propriety systems, the Company undertakes to inspect each scaffold before working from it, ensure that the Scaffolding Inspection Register is completed accordingly and to report any defects to the Company Director or Senior Site Representative.

Scaffolds used by the Company shall be erected on firm level ground, have sole boards of a minimum dimension 219mm wide, 35mm thick and 610mm long and base plates dimension 150mm by 150mm, fitted to each standard.

For general purpose use the maximum bay width shall not exceed 2.1 metres.

Standards shall be erected on base plates and joints in standards shall be made with appropriate load bearing fittings and staggered in height.

For general purpose use the maximum lift height shall not exceed 2 metres. Ledgers shall be fixed to standards with load bearing fittings (right angled couplers).

Scaffolds used by the Company will be braced. Two types of bracing are expected to be in use, ledger to ledger bracing and facade bracing.

Transoms and putlogs will be fixed to ledgers with right-angled or putlog couplers.

Any platform (for access or working) erected where men or materials can fall shall be fitted with both toe boards and a guard rail, and must be properly close boarded to the width of the scaffold.

The gap between the toe board and the intermediate guardrail shall not exceed 470mm. The gap between the intermediate guardrail and top guardrail shall not exceed 470mm. The height of the top rail shall be between 910 to 1050mm above the platform

Scaffolding Erected by the Company

All scaffolds must be erected in accordance with the CDM Regulations 2015, the current British Standards BS5973 and BS 5974.

All tubes and fittings must comply with BS 1139.

All scaffold boards must comply with BS 2482.

Scaffolds can only be erected, altered or dismantled by Company employees holding a current CISRS record card.

The Company Senior Site Representative will make sure that all scaffolds are erected, altered or dismantled to the above standards.

The Company must make available a copy of the current British Standards to all relevant employees.

The Company Senior Site Representative and the Company scaffolders must familiarise themselves with the above standards and be kept informed of any changes in the British Standards.

A safe system of work must be adopted by the scaffolder when erecting or dismantling the scaffold. The scaffold must be erected or dismantled in an orderly and planned manner so as not to put themselves or others at risk.

All materials should be lowered to the ground and not stored on the scaffold. Components should not be thrown on the ground, but lowered hand to hand in an orderly fashion or brought down by crane, gin wheel or other suitable means.

All materials will be properly stored and maintained on site.

When erecting, altering or dismantling any scaffold suitable warning notices must be displayed.

The Company Senior Site Representative will ensure that all scaffolds are erected on ground that has been prepared, levelled and consolidated.

No work should be carried out under overhead cables unless written approval has been given that it is safe to do so.

After the completion of each lift of scaffold the Company Senior Site Representative will carry out a joint inspection with the main contractor's site representative and a hand over certificate will be issued.

Statutory Information

The Company shall display or ensure the display of statutory notices on any site on which it is working, which include:

- Health and Safety Law poster.
- Copy of Employers Liability Insurance Certificate.
- Copy of the Wood Working Machine Regulations abstract F2470, where wood working machines are used.
- The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR) Notice.

Information required to be shown on the Health and Safety Law poster shall be made freely available to employees.

For works of longer than 30 days duration the Company shall satisfy itself that the appropriate notification on Form F 10 has been forwarded to the Enforcing Authority.

The company will ensure that the statutory tests, thorough examinations and inspections of plant are carried out and that statutory records are kept.

If plant is hired in, the company representative on site will ensure that copies of all relevant documents are provided.

Training

All employees will obtain recognition from the construction skills certification scheme.

Employees

The safety director will carry out an annual review of health & safety training needs and will produce an annual training programme for all levels of staff. In carrying out the review the safety director will pay particular attention to persons whose role has changed, possibly due to a change in their scope of work, or possibly due to legislation changes such as the introduction of the Construction (Design and Management) Regulations 2015. Employees taking on board additional responsibility may need additional training.

The training needs will be agreed by the board and budgets allocated. The safety director and health & safety adviser will monitor that the training schedule is completed.

Site Induction Training

The site manager (or his delegated representative) will carry out induction training for all new arrivals to site informing them of the significant risks identified in the health and safety plan together with the sites emergency and first aid procedures. He will also cover :-

- The significant risks and precautions to be taken.
- The PPE requirements.
- Where/how to obtain additional PPE as required.
- Details of site emergency procedures.
- Details of site welfare arrangements.
- Details of any method statements relevant to the actual work the person is involved.
- The site rules in general.
- Confirmation of the induction talk will be recorded in the site diary or the induction register.

Plant Operatives

All plant operatives will be trained and certificated in accordance with the training schemes run by the CITB,

National Plant Register, or to a similar standard.

Training will be carried to the CPCS standard.

Additional training will be carried out as required for items such as abrasive wheels, cartridge tools, and other plant and equipment as required.

Records will be maintained in the safety director's office.

Vehicles

Only employees authorised by the company and in possession of a current driving licence are allowed to drive company vehicles.

If they drive a vehicle on site or on the public highway they must obey all applicable speed limits and rules.

Vehicles used for the transport of men must have fixed seats. Passengers must not be allowed to ride on any vehicle for which a passenger seat has not been specifically provided.

Drivers must report immediately to a director if there is something mechanically wrong i.e. brakes, steering etc.

Waste Management

The carriage and disposal of waste needs to be managed effectively to ensure the environment is protected. The term "waste" includes scrap, effluent, unwanted surplus substances and any substances or articles to be disposed of as being broken, worn out, contaminated or otherwise spoiled. In short, anything that is removed from our sites.

The procedures in this section set out what we must do to comply with current legislation and this will inevitably lead to a better environment for us all.

Waste Broker

On sites where we provide the skips or other containers for contractors to deposit their waste, we become what are known as a "Waste Broker". As a "Waste Broker" we must:-

Initiate a Waste Management Plan if the contract is over £300,000.00

Complete a Transfer Note detailing the type of waste to be removed i.e. "general builders' waste". A separate Note does not need to be completed for each individual load providing the waste and the details on the Note remain constant. In this case the Transfer Note only needs to be renewed annually.

Before the waste is removed check that the haulier is a Registered Carrier by examining their Certificate of Registration issued by the Waste Regulation Authority.

Give the Registered Carrier a copy of our completed Transfer Note which he will then give to the Waste Manager at the tip.

Be provided with evidence by the haulier that the waste is being disposed of at a tip licensed for the purpose.

Waste Producer and Disposer

Where a sub-contractor produces waste and then disposes of it himself, i.e. a groundwork's contractor, we must-

- Check they are a Registered Carrier by examining their Certificate of Registration issued by the Waste Regulation Authority.
- Obtain copies of their completed Transfer Note.
- Be provided by the sub-contractor with evidence that the waste is being disposed of at a tip licensed for the purpose.

Waste Producer with Separate Haulier

Where a sub-contractor produces waste and makes his own arrangements for its disposal, we must:-

Check they have completed the Transfer Note by obtaining copies.

Check they use a Registered Carrier by obtaining copies of their haulier's Certificate of Registration issued by the Waste Regulation Authority.

Be provided with evidence by the sub-contractor that the waste is being disposed of by their haulier at a tip licensed for the purpose.

Examples of Special Waste

Certain types of dangerous waste are defined as "special waste" (see list below). If any of these are being removed from site we must carry out the above, except instead of obtaining copies of the Transfer Note we must obtain copies of the completed Consignment Note, which are available from the Local Waste Regulation Authority.

- Special waste includes:
- Acids and Alkalis
- Antimony and antimony compounds
- Arsenic compounds
- Asbestos (all chemical forms)
- Barium compounds
- Beryllium and beryllium compounds Biocides and phytopharmaceutical substances
- Boron compounds
- Cadmium and cadmium compounds Copper compounds
- Heterocyclic organic compounds containing oxygen, nitrogen or sulphur
- Hexavalent chromium compounds
- Hydrocarbons and their oxygen, nitrogen and sulphur compounds
- Inorganic cyanides ITS Construction (Reading) Ltd Issue 3 Date of Issue: July 2014 Health and Safety Document
- Lead compounds
- Mercury compounds
- Nickel and nickel compounds
- Organic halogen compounds, excluding inert polymeric materials
- Plasterboard
- Peroxides, chlorates, perchlorates and azides
- Pharmaceutical and veterinary compounds Phosphorus and its compounds Selenium and selenium compounds Silver compounds
- Tarry materials from refining and tar residues from distilling
- Tellurium and tellurium compounds Thallium and thallium compounds Vanadium compounds
- Zinc compounds

Welding

Where welding operations are to be carried out the company will ensure that welding appliances have been inspected and serviced to the manufacturer's recommendations and that records of inspection and servicing have been kept/obtained.

Employees carrying out welding operations will:-

- Wear suitable eye and body protection.
- Erect screens to protect the eyes of people not engaged in welding operations from welding arc flash.
- Ensure that welding cables are kept clear of water and that they are placed where they cannot be damaged.
- Ensure that the item being worked on is fixed to prevent movement.

2.20 Business Continuity Policy

Introduction

This business continuity policy documents disaster recovery related strategies, procedures, decisions and related practices.

Statement of Goals and Objectives

- To provide operational continuity and quick recovery for all critical systems impacted by a technology related disaster event.
- To ensure that the disaster recovery program is properly communicated to all staff, clearly identifying all essential roles and responsibilities.
- To ensure adherence to established safety procedures, exit plans and related emergency requirements.
- To maintain an orderly process for business resumption and systems recovery.
- To ensure that disaster recovery activities and strategies are continually revised as needed.

Planning Assumptions

Requirements Assumptions

- Accounting, Payroll and front of house systems
- Reading
- To Ensure all payroll services can operate on a weekly basis , front of house systems can be accessed all working days
- All onsite servers and remote server

Recovery Assumptions

- 50% of critical functions will be restored within 24 hours.
- 100% of critical functions will be restored within 48 hours.
- Business Site Down, Technology Site Down
- This plan applies to disaster events lasting no longer than 5 days
- Pulsant offsite service provider, CTI in house IT support
- This plan is not designed to address disasters occurring in foreign locations

Plan Activation Criteria

Plan Activation Criteria

- Power outage, Fire, Communications Equipment Failure and IT Equipment Failure

Plan Activation Procedures

- The Branch Director will evaluate the local situation and will only activate the plan if the problem will be in existence for more than 8 hours.
- The local director will then confirm with the Holdings directors of the plan.
- The plan will then be communicated to all staff involved by e-mail , phone or verbal

Scenarios and Response Strategies

This section is used to identify the disaster scenarios covered by this plan, and the designated response strategy associated with each. Add rows as needed for additional scenarios.

| Scenario Description | Planned Response Strategy | Expected Response Results | Post-Disaster Expectations |
|----------------------|--|------------------------------------|--|
| Power outage at site | To move staff to nearest branch office | 60% of critical functions within 3 | Once the main office is accessible, data |

| | | | |
|------------|---|--|--|
| | or to operate from home to remote server | hours | entries created at the hot-site will be restored to production systems |
| IT Failure | To move staff to nearest branch office or to operate from home to remote server | 50% of critical functions and 100% within 24 hours | Once all systems are repaired or replaced all back up data will be restored. |

Disaster Recovery Requirements

Technology Requirements

- Local server and remote server both these systems are used on a daily basis for payroll and sourcing staff

Operational Requirements

- We operate on a daily basis for sourcing staff and a weekly basis for payroll

Communications Requirements

- All e-mail's can be accessed remotely and mobile phones are available at all sites

Backup Requirements

- Software and data backups all backups are done daily and are stored offsite

Documentation Requirements

- Time sheets

Supplies Requirements

- Not Applicable

Training Requirements

- Not Applicable

Disaster recover Procedures

This section should be used to specify "step-by-step" procedures to be followed in the event of a covered disaster event:

Communications Procedures

- All communications will be issued by the local director with liason with the accounts department

Remote Access Procedures

- All payroll functions can be operated remotely
- All e-mails can be accessed remotely

Technical Implementation Procedures

- All systems can be placed onto the remote server by IT support and operated remotely

Backup and Data Recovery Procedures

- All backups can be downloaded over the inter net

Temporary Access Procedures

- All logins and passwords are already in place on remote server

Technical Support Procedures

- Complete IT support will give technical support

Alternative Operating Procedures

- Some work can be carried out on a manual basis but short term only within a 24 hour period

2.21 Asbestos

Introduction

The objective of this policy is to detail what an employee should do in the event that they are exposed to asbestos whilst carrying out work activities.

Applicable Legislation

- Control of Asbestos Regulations 2012

Detail

In the unlikely event that exposure, or suspicion of asbestos occurs, you should:

- Stop work immediately;
- Prevent any dust/fibres being released e.g. turn off power tools, minimise air movement;
- Evacuate the immediate area and prevent access by others;
- Inform those responsible for the premises and the Branch Director, so that the necessary sampling can be arranged;
- Do not return to that area until informed that it is safe to do so;

Remember, if you are uncertain as to the content of the material, stop work and seek advice.

In the event that asbestos is found, on an ITS site, the following steps require to be taken by a specialist to manage the risk:

- find out where the asbestos is on the premises, its amount and what condition it is in;
- make and keep up to date a record of the location and condition of the materials containing asbestos or which are presumed to contain asbestos;
- carry out a risk assessment on materials containing asbestos;
- prepare and implement a plan that sets out in detail how the risk from this material is going to be managed;
- review and monitor the plan and the arrangements;
- provide information on the location and condition of the material to anyone who is liable to work on or disturb it (including staff);
- Specialist help is generally required to determine the presence of materials containing asbestos and to remove asbestos. The HSE advises that if asbestos is in good condition and is not likely to be disturbed or damaged, it is usually safer to leave it in place and manage it.

In the event that asbestos is found, on a Customers site, the following steps require to be taken by an engineer:

- Stop work immediately;
- Report findings to site contact;
- Report instance to Branch Director, who will record this on the customers information;
- Wait until an investigation has been completed before completing the work if possible;
- Inform the Branch Director who will record this on an F01 – Improvement form

Any incidents that arise relating to this policy are recorded on an F01 – Improvement form on TMS-Orion.

All Staff must report any and all hazards immediately to the Branch Director.

2.22 Anti-Bribery and Corruption Policy

Introduction

One of the Company's core values is to uphold responsible and fair business practice. It is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

Applicable Legislation

1. Bribery Act 2010

Detail

Definitions

In this policy "we", "us", and "the Company" mean the appropriate ITS company as listed above.

"*Bribe*" means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage; "to Bribe" and "Bribery" are construed accordingly.

"*Relevant Person*" means any individual (whether an officer or employee of the Company, or a temporary worker, contractor or consultant providing services to or on behalf of the Company) or any corporate entity who performs functions for or on behalf of the Company.

Purpose and scope of this policy

This Policy sets out the steps all of us must take to prevent bribery and corruption in our businesses and to comply with relevant legislation. It is aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected;
- enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others;
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

All Relevant Persons are expected to adhere to the principles set out in this Policy.

The Bribery Act 2010

The Bribery Act 2010 (the Bribery Act) came into force on 1 July 2011. The Bribery Act affects the Company in its business relations anywhere in the world.

Under the Bribery Act it is an offence to:

- bribe a person i.e. to offer, promise or give a financial or other advantage to another person, whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- receive a Bribe i.e. to request, agree to receive or accept a financial or other advantage for or in relation to improper conduct;
- bribe a foreign public official; and
- fail to prevent Bribery.

Risks of not acting with integrity

Involvement in Bribery or corruption carries many risks. Among them are:

- a company which pays or accepts Bribes is not in control of its business and is at risk of blackmail;
- if the Company is found guilty of Bribery or even of failing to have adequate procedures in place to prevent Bribery, it will be

- subject to unlimited fines;
- any person found guilty of Bribery will be subject to fines and/or imprisonment of up to 10 years;
- a public exposure, or even allegation, of bribery would entail severe reputational damage. The Company's banking or supply facilities might be withdrawn or be available on much less favourable terms, and the Company could be blacklisted as an approved tenderer for both public and private sector contracts;
- the cost of our insurance cover could increase very significantly; and
- good people will not want to work for us.

Benefits of acting with integrity

Equally, there are very clear benefits to acting with propriety. These include:

- we increase our chances of being selected as a supplier in both the public and private sectors;
- we remain in good standing with our banks and our own suppliers and they will want to keep doing business with us;
- a business with high ethical standards is a good place to work; and
- it is a requirement of the REC Code of Professional Practice that we act with integrity at all times.

Policy statement

All Relevant Persons and Associated Persons are required at all times:

- not to commit an offence listed above at section 4 or any other offence;
- to comply with the Bribery Act;
- to act honestly, responsibly and with integrity;
- to safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe.

All Relevant Persons and all Associated Persons are expected to adhere strictly at all times to the guidelines set out in this Policy. If you are in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to a Director.

Gifts and Hospitality

The Company occasionally provides gifts and hospitality to clients, customers, contractors, and suppliers. This is not prohibited by the Bribery Act provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage;
- it complies with local laws;
- it is given in the Company's name, not in the giver's personal name;
- it does not include cash or a cash equivalent (such as gift vouchers);
- it is of an appropriate and reasonable type and value and given at an appropriate time;
- it is given openly, not secretly;
- it is approved in advance by a director of the Company.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Facilitation payments

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

What are the indicators of bribery?

Common indicators of corruption include those listed below. There may well be others. For example:

- payments are for abnormal amounts (e.g. commission), or made in an unusual way, eg what would normally be a single

payments is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction;

- process is bypassed for approval or sign-off of terms or submission of tender documents, payments, or other commercial matters; those whose job it is to monitor commercial processes (e.g [insert person or department specific to Company, e.g. Internal Audit]) may be prevented from or hindered in doing so;
- individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- decisions are taken for which there is no clear rationale;
- records are incomplete or missing.

Political contributions

You should be aware that such contributions can be (or be seen as) Bribes in disguise. We do not make donations to political parties.

Charitable donations

Bribes may even be disguised as charitable donations. Whilst individuals may of course make personal donations to charity, they should not do so on behalf of the Company without prior approval from a Director.

Responsibility to report and the reporting procedure

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected Bribery or corruption. All Relevant Persons have a duty to prevent, detect and report any incident of Bribery and any potential risks of Bribery. If you know or suspect that any Relevant Person plans to offer, promise or give a Bribe or to request, agree to receive or accept a Bribe in connection with the Company's business, you must disclose this to a Director as quickly as possible to allow appropriate action to be taken promptly.

The Company is committed to taking appropriate action against Bribery and corruption. This may include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company will keep your disclosure confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption.

Record keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

Monitoring compliance

The Company Directors have primary responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. S/he will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

Training

The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to Bribery will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Sanctions for breach of this Policy

A breach of any of the provisions of this Policy by any Relevant Person who is an officer or employee of the Company will constitute a **disciplinary offence** and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it **may be treated as gross misconduct and could render the officer or employee liable to summary dismissal.**

Breach of this policy by any Relevant Person who is a temporary worker, contractor or consultant providing his/ her services to the Company may lead to the immediate termination of that temporary worker's, contractor's or consultant's engagement by the Company.

Breach of this policy by any Relevant Person which is a corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and the Company.

2.23 Alcohol and Drugs in the Workplace

- The Company believes that it is essential that all employees, workers and those who render services to the Company or at the Company's premises are in full command of themselves and of all of their faculties throughout the working day.
- The Company requires you to present yourself for work on each occasion required under your contract in complete command of all your faculties i.e. without any dependence on alcohol or any other drugs of a non-medicinal nature and to maintain that state until the completion of your working hours under your contract. If during the course of your working day you have to take medicinal drugs on a regular basis, this fact should be known to a Director confidentially.
- In the event that you present yourself at work or during working hours you are in a condition where a Director believes you to be under the influence of alcohol or drugs and you are not able to carry out your duties in a proper, fit and safe way you will not be allowed to commence work or continue work. Instead you will be suspended without pay and not allowed to return until such a time as you are in full control of your faculties.
- In addition such behaviour will be subject to the disciplinary procedure of the Company and after due investigation may result in dismissal as a result of gross misconduct.
- The Company is obliged to investigate all the circumstances surrounding such behaviour prior to commencing the disciplinary procedure and this may, where necessary, include seeking medical advice as to your condition including requiring you to submit to a medical examination. The Company is obliged to investigate such matters in as much detail as possible and therefore expects you to comply with any requests that you submit to such examinations. You may appeal in accordance with the Company's disciplinary procedure.
- If the disciplinary procedure is evoked and you receive a disciplinary sanction short of dismissal or if you have a successful appeal the Company will recommend that you take advantage of counselling services to help control your problem and you will be required to act on any such recommendation. In the event that you need to be absent from work for a period of treatment for either alcohol or drug dependency a reasonable leave of absence will normally be granted to cover this on an unpaid basis.
- If the Company suspects that you are in the possession of alcohol or drugs you will be required to consent to a search of your belongings. If you are found to be in possession of any alcohol or illegal substances you will be suspended from your duties pending further investigation. This matter will be dealt with under the Company's disciplinary procedure and after due investigation it may result in dismissal for gross misconduct.
- If the Company believes you are dealing, buying, selling or receiving drugs or alcohol you will be suspended from your duties while an investigation is carried out. Where a criminal offence is suspected the Company shall inform the police.
- All employees and workers are required to inform the Company or any appropriate person if they suspect any fellow worker may be acting in breach of this policy.