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HEALTH AND SAFETY POLICY

January 2016



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STATEMENT OF INTENT

As Managing Director of Drytech Construction Limited I am fully committed to the development of a positive Health and Safety culture throughout the Company. I see the standards defined in the Health and Safety at Work Acts as the minimum requirement and expect to exceed this in many areas.

I attach equal importance to the successful provision of Health and Safety as I do to any other aspects of our business. Moreover, I am convinced by providing a safe working environment we can improve our business performance.

Whilst I accept I have ultimate responsibility for the health and safety of our employees, I recognise the legal necessity to obtain competent health and safety advice. To this end, I employ Alistair Moffat as Health and Safety advisor. I expect all staff to fully co-operate with every aspect of his duties.

I respect and value all the employees and intend to actively involve them with the health and safety issues. I welcome the attendance of the employees' representative at the health and safety meetings which are convened every eight weeks. I expect all our staff to work in a health and safety manner, comply with all safe systems of work and not interfere with anything designed to reduce risks to health and safety. To ensure that the company meets its health and safety objectives, I will ensure we have:

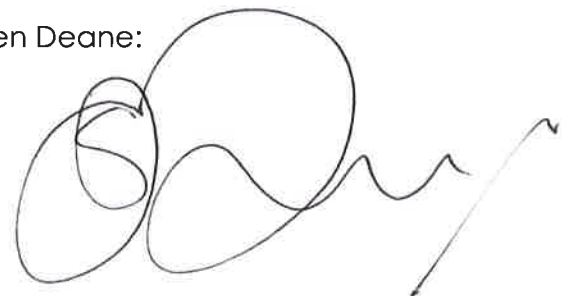
- Staff who are competent in their work discipline, aware of their health and safety responsibilities and do not put themselves or their work colleagues at risk when undertaking their duties.
- A training plan, which identifies health and safety needs for all levels of management.
- Identification of hazards and adequate assessment of risk to which my employees and others may be exposed.
- Effective reporting and thorough investigation by our safety adviser of all accidents or ill health issues.
- An effective and proactive health and safety management structure.
- A set of annually defined and agreed management health and safety targets.

Details of the organisation and arrangements for health and safety are set out in our policy document which I hope will be read by every employee during induction training. It is important all employees bring to the attention of the safety advisor any defect or shortfall in my arrangements for health and safety. This policy will be reviewed no later than 12 months from date of signature.


Signed:

Stephen Deane:

Date: 1st January 2016



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1. INTRODUCTION


- a. General Duties:** The Health and Safety at Work etc. Act 1974 (HSWA) imposes goal setting legal duties on every employer to ensure so far as is reasonably practicable, the health, safety and welfare at work of his employees and any other persons who may be affected by the employer's undertakings. These general duties are made explicit within the Management of Health and Safety at Work Regulations, 1999.
- b. Nature of the Business:** The supply and installation of drywall and drylining works associated with commercial construction. The Company does not normally undertake the role of Principle Contractor.
- c. Company Premises:** The Company is located at River House, Bexley High Street, Bexley, Kent. DA5 1JX. In reality the majority of staff and equipment are deployed at site on a continuous basis so there is no requirement for a stores depot.
- d. Competence:** The Company requires key skills and base line competences of all staff. Specific competences are defined within the terms of reference for each post. Where these standards cannot be met (typically a new employee) the Managing Director, in consultation with the Health and Safety Advisor, can make a valued judgement to allow the individual to attain this standard within a determinate period. The decision for allowing this is made on a case-by-case basis.
- e. Major Hazards:** The major hazards identified with Drytech Construction Limited operation of work are:
- Slips, trips and falls.
 - Falls from height (fixed scaffold, mobile scaffold and podiums)
 - Electrocution (and secondary injuries)
 - Hand injuries
 - Injuries resulting from the use of hand held knives
 - Eye injuries from impact tools and drills
 - Noise
 - Manual handling
- f. Responsibilities of Employees:** All staff, regardless of status, have a legal duty to take reasonable care of their own health and safety and for that of others who may be affected by their acts or omissions. Failure to comply with safe systems of work, instructions or processes will be result in disciplinary action which, considering the magnitude of the offence may result in termination of employment. Moreover, failure to comply with the HSWA, regulation or ACOPs may be a criminal offence resulting in fines or a custodial prison sentence.

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- g. Appointment of Safety Adviser:** The Managing Director has a legal duty to have in place, as permanently employed or contracted staff, a suitably qualified health and safety adviser. Suitably qualified means either NEBOSH Diploma, a degree in health and safety or NVQ Level 4. Tech IOSH or Grad IOSH is also a requirement.
- h. Continual Improvement:** The Managing Director recognises the need to set achievable goals. The H and S targets for the next well months are detailed at Annex 'A'. These are to driven through to the supervisory level using the Health and Safety committee meetings. The Health and Safety performance targets are to be reviewed at the Health and Safety committee meetings.


2. ORGANISATION

- a. Company Structure:** The organisational structure of the company is detailed overleaf.
- b. Consultation with Staff:** The Managing Director recognises the legal requirement to communicate with his staff through Safety committees. Moreover, he values their involvement with hazard identification, risk assessment and developing safe systems of work. The Managing Director chairs all health and safety meetings and the minutes are made available to all staff. The meetings are held every eight weeks and staff are invited to channel Health and Safety concerns or suggestions through their representatives.
- c. Accountability:** The Managing Director has overall responsibility on all matters concerning health and safety at work in respect of the Company. However, day-to-day management of health and safety is delegated to site supervisors. The Health and Safety Advisor is responsible for checking all health and safety instructions to staff.
- d. Terms of Reference for staff:** The general terms of reference of key staff are detailed at the arrangements section of this document (Para. 3.5). The Managing Director, Construction Director, Contract's Manager, Site Managers and Safety Adviser all have a collective responsibility for ensuring all staff adhere to their terms of reference when undertaking their duties.
- e. Management of Health and Safety at Work Regulation (MHSW Regs):** In addition to the general duties placed on the Managing Director by the HSWA, the MHSW Regulations are more explicit and adds clarity to those general duties. These duties are defined as follows;
- Ensuring suitable and sufficient risk assessments are undertaken for every work process. All risk assessments are specific to the work being undertaken, produced by a competent person and checked by the Health and Safety Advisor. The risk assessments for undertaking specific

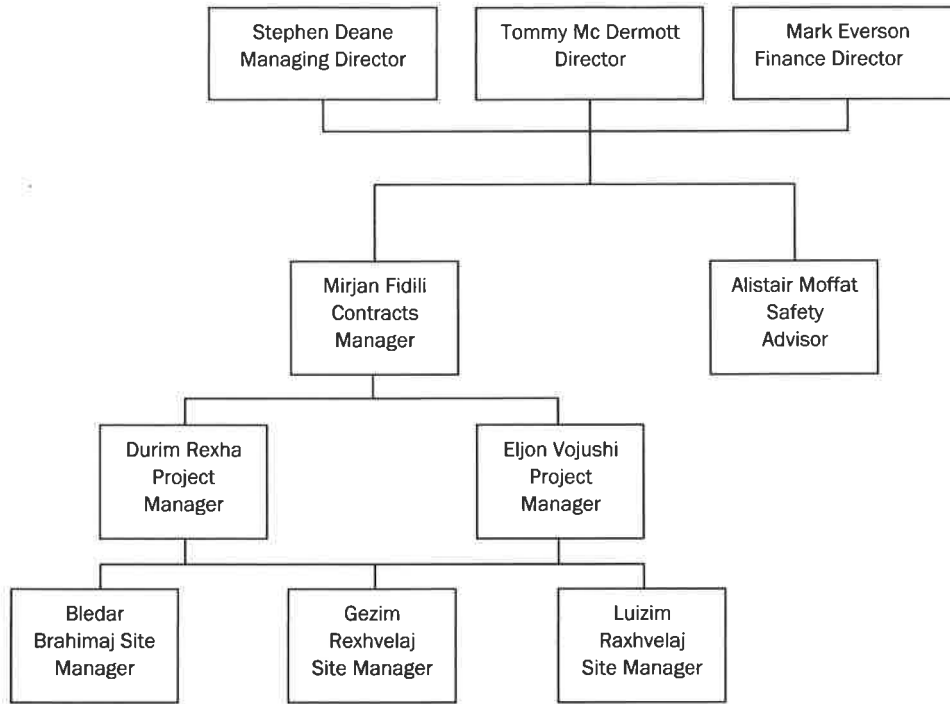
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work operations on site are held in the Safety File on the construction site. The general risk assessments are held in a central registry at the Company premises; copies are available for inclusion in the specific task file for each project. An example of a risk assessment form is included at Appendix 'B'.

- Every work process will be subjected to a hazard analysis and this study, underpinned by risk assessments, will form basis of the safe systems of work (SSoFw). The Health and Safety Adviser will check the effectiveness of all SSoFw prior to each project commencing. An example of a typical method statement is included at Appendix 'C'.
- Provision for pre-employment medical checks and health surveillance, as is appropriate, having regard to the environment of each installation. The pre-employment health questionnaire forms part of the staff induction form. A copy of this document is included at Appendix 'D'. All sub-contractor labour must complete a 'new starter' form. It is essential critical information (NI No, home address, next of kin etc) is recorded before an operative is allowed to start work.
- Establishing procedures, where necessary to be followed in the event of serious and imminent danger to employees and others whilst undertaking installation work. Portable electrical appliances represent a serious safety risk. The process for managing this risk is detailed at appendix 'E' and copies are given to the manager at each site.
- Providing employees with comprehensive and relevant information on risks to their health identified by assessments.
- Ensuring that employees are provided with adequate health and safety training. This is to be instigated at induction and repeated periodically. Training will also be provided if there is a perceived change to the risk. Aside from induction training and 'tool box' talks, training will be obtained from outside provider. A training needs analysis is to be undertaken at induction and the Health and Safety Advisor will book individuals onto the courses.
- Specific arrangements will also be in place to take into account the vulnerable. The only foreseen need will be for a young person who has joined the Company as a trainee.
- The Company extends the same duty of care to transient workers, contractors and others, as to those under a permanent contract of employment.

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Organisation Chart



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3. HEALTH AND SAFETY ARRANGEMENTS

- a. Management and Coordination:** The policy is for the Managing Director to have suitable provisions in place for managing and co-ordinating all aspects of health and safety. The Company is relatively young and will undoubtedly continue to grow in the medium term; hence it is essential that robust health and safety arrangements are in place.
- b. Risk Assessments:** The process of generating risk assessments and SSofW has been detailed at para. 2.5 above. In practice, copies of these will be held at the Company premises and discussed with the site supervisor of each project prior to starting every project.
- c. COSHH:** The Managing Director recognises his legal responsibility to comply with COSHH Regulations. In the first instance his aim is to remove or substitute any hazardous article or substances. The identification of hazardous substance is critical and must be undertaken by competent consultants (especially asbestos, lead paint, mould spores etc.) The risk of exposure to operatives must be reduced by comprehensive COSHH risk assessments. These must be undertaken by a competent person and checked by the Safety Adviser. The COSHH assessments must use all available information; HSE guidance, EH40 (occupational exposure limits); manufacturers safety data sheets (MSDS) to fully determine the risk. The aim is to limit exposure to operatives to considerably below the WEL recommended in EH40. Engineering controls (natural and forced ventilation) and limiting exposure are always preferred over PPE. The COSHH assessment is to be site specific and detail storage, handling, disposal and emergency procedures. The risk and controls are to be fully explained to all staff at induction, tool box talks and daily site briefings. COSHH risk assessments are held on site within the Drytech Construction Limited safety documentation (with copies in a central registry at the Company premises). An inventory of all substances (hazardous or otherwise) is to be held in the Company premises. All COSHH assessments are reviewed by the Safety Adviser every 12 months.
- d. Asbestos:** Although the foreseen risk of exposure to asbestos is very unlikely (as the Company business focuses on new builds) the management of the risk is detailed in the Drytech Construction Limited Asbestos Policy.
- e. Accident Reporting:** In the event of an accident occurring on Site in all incidents (regardless of the severity) the Site Manager or his nominated deputy is to contact the Safety Advisor immediately. If the accident is a minor injury in not reportable under RIDDOR then the Site Manager can complete the entry in the on-site accident book and send a copy to the Principal Contractor on Site and to the Drytech Construction Limited Company premises. If the accident is RIDDOR reportable the Safety Adviser, in conjunction with the Principal Contractor, will undertake a full investigation and compile a formal report. The Safety Advise will notify the HSE using the F2508. The accident reporting procedure is detailed at

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appendix F and a copy of this is to be displayed on Drytech Construction Limited notice boards on construction sites.


f. Electricity: The Company policy on electricity only allows competent and authorised persons to carry out work on any electrical system or equipment. The controls exercised by the Company are in line with PUWER and Electricity at Work Regulations. Specific details are listed at Appendix 'E' with key controls being listed below:

- All fixed electrical installation are periodically inspected (IEE Regs).
- Only double insulated portable equipment is to be used.
- Cordless portable hand tools (drill guns etc.) is to be used wherever possible
- Only 110v supplies permitted (no 240v working allowed).
- Users must undertake pre-use inspections on all equipment.
- All equipment is to be supplied via an approved residual current device.
- All portable equipment given a unique identification number and entered on a register.
- All equipment is to be inspected and PAT tested every 3 months.
- Live working is prohibited.

g. Responsibilities of key members of staff: The following staff have specific health and safety responsibilities which must be supported with the correct competences and resources. If any member of staff are unsure of their duties or lack responsibilities to undertake them in a competent manner they must inform the safety advisor immediately:-

Safety Adviser

- i. Reporting to the Director for ensuring the Company Health and Safety Policy is legally compliant. The monitoring and assessment of the overall effectiveness of the Safety policy, improving the company's safety performance and create within the company a positive Health and Safety culture.
- ii. Ensure all staff, from Director level to the site operatives are aware of their legal requirement to comply with safe systems of work through training, information and supervision. Ensure the company safety arrangements are effective and suitably managed. Undertake site inspections in association with site management to ensure all regulations are being observed, statutory notices have been posted, statutory inspections are being implemented and recorded. Welfare facilities are adequate.
- iii. Investigating the cause of accidents or dangerous occurrences and recommending means of preventing recurrence. Record and analyse information on injuries, ill health damage and production losses. Assist with training for all levels of employees

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and suggesting methods to promote general awareness of injury prevention.


- iv. Advise the Contract Managers and Site Managers in completing method statements and risk assessments to establish suitable precautions and control measures. Foster within the company, at all levels, an understanding that injury prevention is an essential and integral part of our business. Ensure effective means of communication on health and safety are established between all levels of management.
- v. Review all critical Health and Safety documentation (Health and Safety Policy, Safety Management System etc.)
- vi. Undertaking noise surveys to identify processes which exceed the statutory limits. Once identified implement control measures.

Construction Director

- i. Prepare at the initial design stage a documented schedule of work operations, to ensure that all activities on site are adequately assessed for hazards to health and safety and establish procedures to eliminate or control risks, provide outline method statements and safe systems of work.
- ii. In conjunction with the Safety Adviser undertake a pre-tender assessment on all sub-contractors based on experience, accidents record and safety culture to decide which labour master/subcontractor to employ
- iii. In conjunction with the safety adviser produce a pre-start safety plan (known as the Site Safety File) for each contract. In conjunction with the safety adviser ensure that tenders are adequate to comply with the statutory and policy requirements, in respect to health, safety and welfare.
- iv. At the commencement of a project ensure Site Managers have a clear understanding of the working methods and practices. Throughout the project monitor progress in accordance with the planned work schedule and compliance with the safe system of work.

Site Managers


- i. In conjunction with the safety adviser and the contracts manager ensure the Site Safety File is fully developed before work commences. Ensure the proposed working method complies with statutory regulations and Drytech Construction Limited Site rules and practices.

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- ii. Control and coordinate the activities of all sub-contractors involved with the project who are under the direct control of Drytech Construction Limited. Establish a good working relationship with the Principle Contractor, attend the safety committee meetings and site safety meetings and cooperate with the safety adviser in the assimilation and promulgation of safety documentation (safety bulletins etc.).
- iii. Ensure all site plant and equipment is safe to use, mechanically sound, free from defects, properly maintained and where applicable copies of the statutory, test and/or plant are up to date and available.
- iv. Carry out the duties of the COSHH controller and in conjunction with the safety advisor implement the company's policy on the control of substances hazardous to health. Establish procedure to ensure adequate and suitable protective clothing and equipment is readily available, issued with information and where necessary training in its use to the appropriate level of use.
- v. Monitor the condition of such equipment to ensure its operational effectiveness is not impaired. Ensure all staff are aware of the Principal Contractors emergency procedures to be taken in the event of serious and imminent danger. Comply with all practice evacuations and fire drills.
- vi. Ensure all accidents, injuries and dangerous occurrences are promptly reported to the safety advisor. Ensure all registers, records and certificates are kept up to date and available for examination, that all statutory abstracts, notices, posters, safety information placards and site responsible persons names and emergency contact information are displayed at the appropriate location on site.
- vii. Undertake weekly site inspections, tool box talks and task briefings. Ensure the records of all critical safety documentation are returned promptly to the Drytech Construction Limited Company office.

Operatives

- i. Accountable through their own line management to the Drytech Construction Limited Site Manager to cooperate with him in so far as is necessary to enable them to comply with any duty or requirement imposed on them by any legal provision and policy requirement.
- ii. Take reasonable care for the health and safety of themselves and others who may be affected by their activities, avoid

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improvisation and any deviance from the agreed safe system of work. Conversely where appropriate make suggestions on ways to eliminate hazards.

- iii. Comply with the instructions from their supervisor or foreman, given at task allocation or toolbox talk on the safe systems of work, correct tools and use of plant and equipment. Correctly wear PPE and use PPE. Refrain from horseplay or the misuse of equipment. Cooperate with the investigations of accidents.

Company car drivers

- i. It is incumbent upon on all employees who are given permission to drive a Drytech Construction Limited owned vehicle to ensure they are is kept in a roadworthy and safe condition at all times. Copies of HSE guidance sheets, INDG 382 is provided to all new drivers. Fire extinguishers, emergency triangles and first aid kits must be kept with the vehicles.
- ii. Monthly safety check sheets (SMS-SF31) are to be completed and returned to the Safety Adviser.


h. Fire Prevention: Construction sites represent a considerable potential fire and explosion hazard. The Safety Advisor must ensure the Principle Contractor has a fully developed and approved Fire Management Plan in place before allowing staff to work on the site. The Site Supervisor must apprise all staff of the evacuation routes, muster points and fire points. The specific details of fire prevention are detailed on appendix 'F'. The Site Supervisor must undertake a daily fire check. Fire prevention is everyone's responsibility and staff should:

- Prevent accumulation of waste.
- Keep their work areas clean and tidy
- Not smoke whilst on site (see smoking policy)
- Report any fire hazards to the Site Supervisor
- Safe and proper use of all electrical equipment

With regards to the Company premises the responsibility of undertaking a fire risk assessment for common areas lays with the Landlord of the Production Unit. The Drytech Construction Limited management have a duty to ensure a fire risk assessment is undertaken for all areas under their control. Sources of ignition are minimised by the following:

- All fixed wiring is subjected to periodic inspections (IEE Regs)
- All fixed and portable electrical equipment is PAT tested and inspected
- Users undertake pre-use checks on equipment
- Smoking is prohibited

i. First Aid: The Safety Advisor will be responsible for:

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- Coordinating first aid and undertaking the first aid risk assessment.
- Maintaining a list of qualified first aiders.
- Ensuring sufficient staff are trained.

Each Site Supervisor will carry out duties under the First Aid at Work Regulations (ACOP) and specifically ensure:

- The first aid boxes are fully maintained.
- Staff are aware of the eye wash stations.

j. Working at Height: The WAH Regulations require that all work at height is risk assessed. The Company adheres to this protocol. The control measures are as follows:


- Work at height is avoided wherever possible.
- All staff working on mobile scaffold towers are competent (PASMA trained).
- Working from stepladders is prohibited unless supported by a risk assessment.
- Only approved (CE marked) access staging is used.
- All mobile access equipment is subjected to a regime of inspection (and scafftagged)
- Full body harnesses are worn by staff in MEWPs.
- All fall arrest equipment is registered and subjected to a regime of inspection.
- All fixed scaffolding, provided by a Principal Contractor, is signed off by a competent scaffolding sub-contractor.

If the any equipment is hired the Safety Advisor is to ensure it conforms to the statutory requirements. Only fall arrest equipment that is CE marked or supplied with a 'Declaration of Conformity' is to be used.

k. Display Screen Regulations; The Directors recognise their duty of care to employees in undertaking an assessment, in accordance with the Regulations, of every employee who uses a computer on a regular basis. A competent member of staff, within the office staff, will be responsible for undertaking these assessments. The Company policy will be as follows:

- Assessments are only to be undertaken on office based staff.
- The period between inspections is not to exceed 12 months.
- Provide training for the assessor (s) and information to all staff.
- On request, arrange and pay for eye tests.
- If special glasses are deemed necessary contribute £50.00 towards the cost.

l. Health and Safety Committees: Drytech Construction Limited is currently a non-union Company. The Managing Director recognises his responsibilities under the Safety Committee Regulations 1977. The Managing Director chairs the Health and Safety committee with his deputy being the Safety Advisor. The meetings are to be held every eight weeks. All staff are

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welcome to attend but similarly the management reserve the right to request the attendance of any employee.

m. Manual Handling: The Company policy is in line with the Regulations in that all manual handling tasks should be avoided wherever possible. However, where this is unavoidable, the Site Manager on site must undertake a risk assessment. As the same materials are used in most of the installations the majority of Risk Assessments have been completed. The following items represent the highest risk:

- Natural stone cladding which can weigh up to 40kg/m²
- Render board which can weigh 28kg/sheet
- Bags of acrylic render/compound (20kg)

n. Noise: The majority of noise generated by Drytech Construction Limited operatives is from chop saws when cutting metal sections. As this represents an environmental hazard (nuisance noise) and Health and Safety breach, acoustic boots are to be used to reduce the noise at source. These are to be deployed across all sites and sound measurements to be undertaken to ensure they are being used in the most effective manner. The Principle Contractor on each site has a statutory duty to create and maintain a safe working environment which includes reducing noise to acceptable levels. All employees must comply with the control measures to reduce noise by:


- Avoiding areas of excessive noise
- Being vigilant in observing warning signage
- Wearing appropriate ear protection/PPE

Each Site Manager will make staff aware of the hazards associated with noise and ensure ear defenders are used when required.

o. Dust: All staff undertaking activities which generate dust must be equipped with suitable respiratory PPE. All equipment which has the potential to create dust must be equipped with an effective extraction device. The perceived major risk is dust generated by preparing surfaces (sanding) or drilling. Disposable respiratory masks are readily available and must be worn by all employees when exposed to dust particles. 'Face Fit' testing must be implemented by a competent person and records held in safety documentation on site.

p. Personal Protective Equipment: The Managing Director is fully aware of his legal responsibility to supply PPE free of charge to his employees. Furthermore, employees are not expected to re-use PPE that has been worn by other employees (i.e. boots). Employees are issued (at induction) and must wear at all times the following PPE:


- Safety boots
- Hard hat and high visibility jacket
- Gloves (appropriate to the task)

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- Ear defenders and safety goggles

It is not practical to have a determinate period to replace PPE (aside from hard hats) and employees are expected to notify the Site Supervisor when replacements are required. It is incumbent for employees to keep PPE clean (especially high visibility jackets).

- q. Staff Welfare:** The Company Policy is in line with the Construction (Design and Management) Regulations 2007 to provide adequate sanitation, washing facilities and drinking water. A site cabin is established as soon as access to the site is possible. As the company fulfils the role of sub-contractor; toilets, washing and canteen facilities are usually provided by the Principal Contractor.
- r. Smoking Policy:** The policy of the Company is to prohibit smoking by all employees whilst at work. This is made clear to staff during recruitment. Those wishing to smoke at lunch time periods and rest breaks must smoke in designated smoking areas (as agreed by the Principle Contractor).
- s. Site Rules:** The company has the following site rules for all employees working on a construction site:
- All Drytech Construction Limited staff must possess a current and appropriate CSCS card.
 - Hard hats to be worn at all times.
 - Safety boots to be worn at all time.
 - High visibility clothing is to be worn at all times.
 - Eye protection (safety glasses or goggles) is to be worn at all times.
 - All employees must sign the site attendance record sheet.
 - No alcohol is to be consumed or staff report for work under the influence of drink.
 - No drugs or illegal substances are to be consumed or staff report for work under the influence.
 - No horse play or practical jokes.
 - Rubbish is not allowed to accumulate on site.
 - All hazardous substances are stored correctly.
 - Good housekeeping is exercised.
 - No smoking.
- t. Lifting Equipment:** There is no foreseen requirement for staff to be involved with the selection, use or maintenance of any lifting equipment. However, if this situation changes the equipment is to be inspected in accordance with the table at para. 4a.
- u. Discipline on Site:** The monitoring and enforcement of the Site Rules forms is an essential part of the Safety Management System. Site Managers are to use the Discipline Notification Form to record breaches (non-conforming actions which occur on site). The forms (see Appendix 'G') are to be completed and promulgated with the instructions below:

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- Immediately following the incident the Construction Director and Safety Adviser must be informed (verbally or by E-mail).
- Once the form has been completed the master copy is to remain on the Site Correspondence file. A second copy is to be sent to the Safety Adviser so the information can be entered into the training database. A third copy is to be given to the Principal Contractor on Site.
- Any resulting actions to prevent a reoccurrence (additional tool box talks, further training etc.) must be recorded in the Site Manager's Diary.

4. MONITORING

a. Inspection Regime: The following tables show the interval and personnel undertaking inspections.

Table 1 - Non-statutory inspections:

Type of Inspection	Interval
Site Supervisor	Weekly
Contract Manager	Monthly
Safety Adviser	Every three weeks
Director's Safety Tours	Every six weeks

Table 2 - Statutory Inspections:

Type of Inspection	Interval	Additional Requirements
Fall arrest equipment	Daily Pre and Post use. Formally recorded examination. Thorough examination and inspection every 12 months	Not recorded Recorded on SMS-SF11 To be undertaken by hiring agent or Principal Contractor
Mobile towers	Daily Pre and Post use Weekly examination	Not recorded Recorded on SMS-SF16
Lifting equipment	Daily Pre and Post use Formally recorded Thorough examination and inspection every 12 months	Not recorded Recorded on SMS-SF13 To be undertaken by hiring agent or Principal Contractor
Telehandler	Daily Pre and Post use Thorough examination and inspection every 12 months	Recorded on SMS-SF15 To be undertaken by hiring agent or Principal Contractor
Portable electrical equipment	Daily Pre and Post use PAT Tested every 12 months	Not recorded Recorded on inventory of electrical equipment.
Premises	Risk assessment every 12 months	