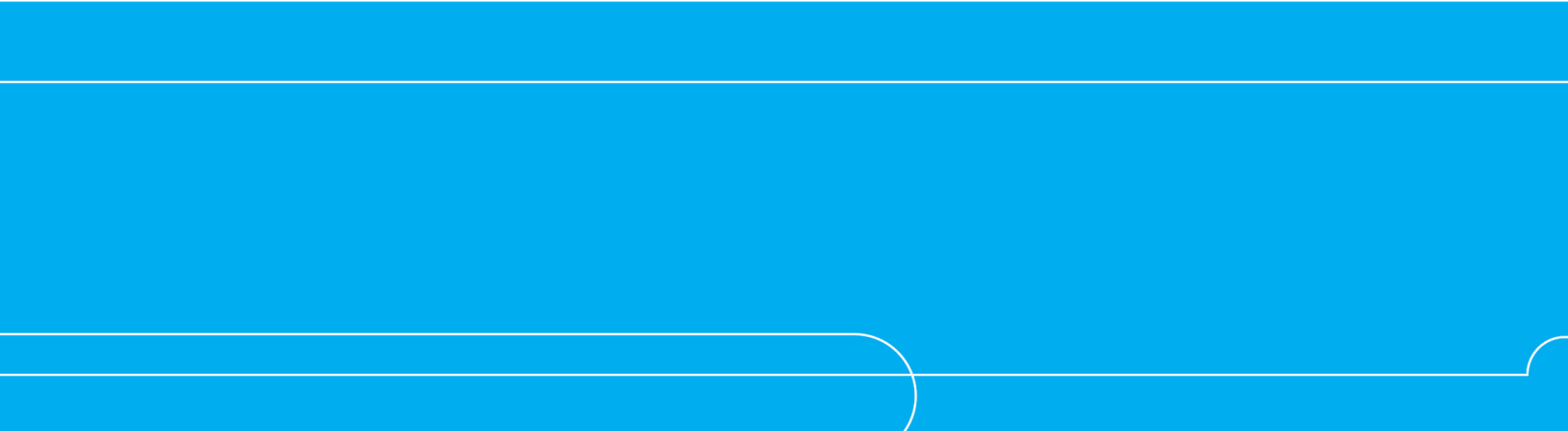


Occupational Health & Safety Policy and Practice

January 2022



OCCUPATIONAL HEALTH & SAFETY POLICY STATEMENT

VolkerFitzpatrick Limited is a multi-disciplinary construction contractor operating in the United Kingdom. Health and Safety is a core value which will be set in context with all other business objectives, to ensure the health, safety and welfare of all VolkerFitzpatrick employees and others who may be affected by the company's activities. This statement of policy, and the organisation and arrangements for its implementation, has been prepared to comply with section 2(3) of the Health & Safety at Work etc. Act 1974. It also applies to WoollensBrook Homes Limited and the WoollensBrook Group Limited group of companies, which are under common management. Further arrangements for its implementation are detailed within VolkerFitzpatrick company processes, procedures, and site management plans.

The company will treat the need to prevent accidents, injuries, ill health and fatigue to employees and others affected by its work as a top priority. In doing so, it will ensure priority is given to the assessment of risk, health and safety planning, and to provide proper information, instruction, training and supervision in accordance with the relevant statutory provisions and industry best practice.

The Senior Management of VolkerFitzpatrick is committed to review and improvement of health and safety performance, including implementing new guidelines and requirements in its endeavour to achieve industry best practice. VolkerFitzpatrick will establish and review quantifiable objectives and targets according to the nature of our activities, business and other legal requirements, to ensure continual improvement in both our occupational health & safety management systems and our performance.

As an employer, we have a legal responsibility to protect workers and others from all workplace risks to their health and safety. This means we need to think about the risks we face and do everything reasonably practicable to minimise them, including the risks associated with pandemics such as the coronavirus.

Adequate resources, commitment and the participation of all employees will ensure the continuation and development of a positive health and safety culture. VolkerFitzpatrick's policy is to take all reasonable steps to prevent work related accidents and ill-health, and to support the general health and well-being of its employees.

To implement this policy, VolkerFitzpatrick will:

- Ensure the effective planning of Health and Safety through the assessment of risk carried out in line with the hierarchy of control
- Build on existing arrangements to ensure we meet our legal obligations to protect the health, safety and wellbeing of our employees
- Make sure that the causes of accidents, ill-health and fatigue that may arise from its activities are, wherever possible, identified, understood, and either prevented or controlled
- Early intervention and proactive and supportive Health and Wellbeing
- Manage return to work after sickness certification and, wherever possible, support rehabilitation after prolonged illness
- Provide employees with information and services to help them take personal responsibility for maintaining and improving their own health

It is a fundamental company belief that a safe workforce is achieved through clear and effective communication at all levels of the organisation. Our PALS behavioural change programme maintains a culture where our employees contribute to safe systems of work through active and open participation and engagement.

All employees and others working for VolkerFitzpatrick are required to comply with this policy. In particular, by co-operating and carrying out activities safely, and in such a manner that does not intentionally or recklessly interfere with, or misuse, anything provided in the interest of health, safety or welfare. It is the responsibility of VolkerFitzpatrick management and supervisory staff to ensure that this policy and its arrangements are implemented.

This policy will be reviewed annually and revised as often as may be deemed appropriate by VolkerFitzpatrick, and then brought to the attention of all employees. It is accessible to interested parties via the VolkerFitzpatrick website, the company's document management system, noticeboards and reception areas or is available on request.

Richard Offord
Managing Director

Chris Evans
**VolkerFitzpatrick Director
(Representative for Occupational
Health and Safety)**

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 2 of 33
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January 2022

January 2022

Contents

OCCUPATIONAL HEALTH & SAFETY POLICY STATEMENT	2
INTRODUCTION	4
1.0 ORGANISATION AND ARRANGEMENTS	5
1.1 Arrangements for Implementation of Policy	5
1.2 Leadership	5
1.3 Responsibility for Health & Safety	6
1.4 Organisation and Structure	11
1.5 Interested Parties	12
1.6 Structure of Occupational Health & Safety Management System	13
1.7 Monitoring and Review	14
1.8 Competency	14
1.9 Classification of Workforce	15
2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL HEALTH & SAFETY PLANNING	16
2.1 Introduction	16
2.2 The Company Approach	17
2.3 The Health & Safety Planning Meeting	17
2.3 The Health & Safety Planning Meeting (Continued)	18
2.4 Management of Subcontractors & Outsourcing	18
2.5 Documented Information	18
3.0 COMPANY HEALTH & SAFETY PROCEDURES	20
3.1 Definition	20
3.2 Site Rules - Health & Safety	20
3.3 Accident and Incident Reporting	21
3.4 Construction (Design and Management) Regulations	22
3.5 Consultation & Participation of Workers	22
3.6 Control of Substances Hazardous to Health (COSHH) Regulations	22
3.7 Deliveries	23
3.8 Drugs and Alcohol Policy	23
3.9 Emergency Procedures	23
3.10 Fire Precautions	24
3.11 First Aid	24
3.12 Gross Misconduct	24
3.13 Occupational Health	25
3.14 Smoking Policy	25
3.15 Holes, Voids and Shafts	25
3.16 Temporary Works	26
3.17 Ladders	26
3.18 Lifting Operations	26
3.19 Lone Working	26
3.20 Manual Handling	27
3.21 Notices and Written Instructions	27
3.22 Office / Workplace Safety	27
3.23 Permits to Break Ground	28
3.24 Permits to Work	28
3.25 Personal Protective Equipment	29
3.26 Respiratory Protective Equipment (RPE) Face-Fit Testing	29
3.27 Plant & Work Equipment	29
3.28 Residential Caravans - Safety	30
3.29 Scaffolds and Working Platforms	30
3.30 Supervision of The Works	31
3.31 Vibration	31
3.32 Vehicles	31
3.33 Welfare	32
3.34 Working At Height	32
3.35 Working Conditions / Environment	32
3.36 Work in Rail Environment	32
3.37 Fatigue Management	33
3.38 Young Persons	33
4.0 IMS AUTHORISATION	33

INTRODUCTION

This document describes the arrangements in place to put into practical effect the commitment made in the Occupational Health & Safety Policy Statement.

The way in which VolkerFitzpatrick identifies and subsequently manages external and internal issues that are relevant to its purpose and its strategic direction is described within operational procedure Q19 *Determining the Context of our Organisation*.

Assessing context, together with the management of relevant issues arising, allows assurance of the business' ability to achieve the intended result(s) of its occupational health & safety management system.

The board of VolkerFitzpatrick is committed to maintaining high standards of health, safety and welfare throughout the group's operations. Company requirements are designed to secure, so far as is reasonably practicable, the health, safety and welfare of our employees and others, including the general public, who may be affected by our operations.

The company's Occupational Health & Safety Policy is applicable to all projects, offices and operational facilities.

Formal amendment to this document is the responsibility of the Health & Safety Director with the approval of the board of directors. This document will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of health and safety requirements will ensure that at least one copy is available on each site.

1.0 ORGANISATION AND ARRANGEMENTS

1.1 Arrangements for Implementation of Policy

The company will achieve the aims and objectives of this policy by:

- Providing clearly defined, safe systems of work and communicating them in sufficient detail to those affected
- Making due allowance in financial terms at the tender stage to ensure that sufficient resources and competent persons are provided for the management of health and safety at work
- Paying particular attention to the provision of safe access and egress
- Selecting and training personnel
- Providing such information, instruction, training and supervision as may be necessary to personnel at all levels, paying particular attention to personnel attending a location for the first time or on a temporary basis
- Controlling hazardous substances
- Ensuring the receipt of timely, adequate information from subcontractors and suppliers in respect of health and safety planning, e.g. risk and COSHH assessments, method statements and Work Package Plans, prior to work commencing
- Identifying hazards and assessing the risks to health and safety in the workplace together with the provision and maintenance of adequate control measures
- Making arrangements for consultation between management and employees
- Providing appropriate plant and equipment which is tested, certificated and safe to use
- Displaying and communicating such written or pictorial information as may be necessary to assist in the implementation of safe practices
- Maintaining high standards of hygiene, cleanliness and housekeeping
- Identifying workplaces which may be difficult to evacuate in an emergency and providing control measures that are tested to ensure suitability of robustness
- Establishing emergency procedures and ensuring they are under the control of trained and competent people
- Reporting and investigating accidents, disseminating findings and where appropriate revising arrangements and procedures
- Ensuring adequate and appropriate protective equipment is provided
- Ensuring the occupational health and mental well-being of employees working with us
- Carrying out appropriate health surveillance
- Monitoring and reviewing performance

1.2 Leadership

Leadership and commitment with respect to the quality of the services and products provided by, and the effectiveness of the Occupational Health & Safety Management System used by VolkerFitzpatrick, is displayed down through the various levels of senior management. From the VolkerFitzpatrick Board to the Senior Management Team and Safety Leadership Team, on through business unit and operation's senior management, support specialists, and through line management functions, to team leaders

Performance against the requirements of the Occupational Health & Safety Management System is regularly monitored and supported by leadership via Senior Manager's Tours, Project Reviews and Business Briefings.

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 Responsibility for Health & Safety**

BS ISO 45001:2018 uses the term 'top management' to identify a number of key responsibilities with regard to occupational health & safety management. The roles that fall within VolkerFitzpatrick's 'top management' for health and safety are shown below.

- Managing Director
- Divisional Managing Directors
- Operations Directors
- Project Director
- Commercial Director
- Health & Safety Director
- Divisional HSES Managers
- VolkerWessels UK Corporate Responsibility Director

'Top management' responsibilities for occupational health and safety include:

- Developing the Occupational Health & Safety Policy and objectives for VolkerFitzpatrick and ensuring that the correct organisational structure and resources are in place to support the intended outcomes of occupational health & safety management systems.
- Promoting the policy and objectives to employees to increase awareness, motivation and involvement
- Ensuring that the goals and responsibilities for individual employees reflect our overall health and safety objectives
- Ensuring our focus is on client requirements
- Ensuring the Occupational Health & Safety Management System (OHSMS) is implemented to meet the needs of VolkerFitzpatrick, its clients and other interested parties
- Reviewing the OHSMS periodically
- Identifying ways in which to improve the OHSMS
- Appointing a management representative to monitor and report on the development, performance and improvement of the OHSMS

Different roles have varying levels of authority with regard to our safety management system, and are explained as follows:

Managing Director

The Managing Director (MD) in coordination with the Board Director responsible for health and safety is ultimately accountable for the company's OHSMS and setting realistic goals for the continual improvement in risk management and reduction of harm / loss rates.

Director Responsible for Occupational Health & Safety

The Managing Director for Strategic Projects holds responsibility for occupational health & safety management and for the operations of VolkerFitzpatrick, from developing long-term strategy for the business to overseeing its day-to-day activities.

Divisional Managing Directors

Responsible to the Managing Director for:

- The safe delivery of all VolkerFitzpatrick contracts
- Overseeing and supporting the effective implementation of the OHSMS and liaising with clients to support their needs and objectives
- Training, supporting and mentoring their direct staff to develop their knowledge / application of the OHSMS
- Accepting their individual role in providing health and safety leadership and engaging active participation of workers in improving health & safety
- Leading management under their control to implement the Occupational Health & Safety Policy at all times
- Cooperating with the Health & Safety team to ensure proper communication exists at all levels
- Ensuring adequate planning is undertaken to provide appropriate resources, training and safe systems of working
- Ensuring the provision of this policy is kept under review having regard to changes in legislation, best practice and the company's business
- Treating the health and safety of persons under their control as a matter of the highest importance

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 6 of 33
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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 Responsibility for Health & Safety (Continued)****Contracts Management / Site Supervision**

It is the responsibility of Contract / Site Management to:

- Be familiar with and observe all relevant statutory provisions applicable to construction and related industries
- Implement the company's procedures for dealing with subcontractors and ensure proper cooperation and coordination takes place between the various parties who may share the workplace / site
- Provide an overall Health & Safety Plan for each project, making an adequate assessment of the risks involved, and ensuring that safe systems of work and method statements / work package plans are produced, followed and reviewed
- Ensure activity and / or substance-specific assessments under the Control of Substances Hazardous to Health (COSHH) Regulations are made and communicated to those at risk
- Ensure employees, self-employed, temporarily employed, trainees and non-employed persons have received adequate training and information about the activity they are required to undertake, particularly by ensuring induction is provided for those attending a location for the first time
- Ensure employees are aware of the company's policy for health & safety at work and that they have understood its requirements
- Liaise with others as applicable, support initiatives for health & safety representation
- Ensure proper protective equipment is provided, maintained and used
- Report all accidents and incidents to the appointed Health & Safety Manager, carry out investigations, make recommendations to prevent reoccurrence and ensure this information is effectively communicated
- Arrange four weekly health & safety meetings with the appointed Health & Safety Manager (HSE-04 *Four Weekly Health & Safety, Environmental and Quality Meeting*)
- Ensure that weekly safety inspections are carried out, including maintenance of appropriate inspection records (HSE-07 *Site Safety and Environmental Inspection Record* / HSE-07R *Health, Safety & Environmental Inspection Report*)
- Ensure proper arrangements are made for the safe evacuation of workplaces and that they are under the control of trained and competent people
- Implement the advice given by the company's appointed Health & Safety Managers
- Attend health & safety training arranged by the company
- Ensure all supervisors (directly employed and subcontractor) are interviewed prior to commencing work to assess their competence and suitability (H47 *Supervisor One to One Interview and Development*)
- Provide effective front-line supervision on site and ensure operatives are instructed in the detail of safe systems of work as it applies to particular construction operations.
- Support the implementation of the VolkerFitzpatrick behavioural campaign PALS and champion on their projects.

General Site Foremen / Gangers

It is the responsibility of Foremen and Gangers to:

- Ensure operatives are suitable, competent, trained and authorised to carry out the work, particularly where mechanical plant and equipment is involved
- Provide effective front-line supervision on site and ensure that operatives are instructed in the detail of safe systems of work as it applies to particular construction operations
- Encourage the workforce to work in a safe and tidy manner, in accordance with our minimum standards or identified by risk assessment paying particular attention to the wearing of personal protective equipment (PPE) and where necessary, disciplining offenders
- Be familiar with and observe all relevant statutory provisions applicable on site and take immediate action in respect of advice given by the company's appointed Health & Safety Managers
- Cooperate and liaise where appropriate with other contractors' site supervision

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 7 of 33
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1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 Responsibility for Health & Safety (Continued)****OHSMS Management Representative - Health & Safety Director**

The Health & Safety Director is the appointed Management Representative for health and safety and has the authority to take any action necessary to ensure that health and safety is maintained. Reporting to the Managing Director for Strategic Projects, it is the responsibility of the Health & Safety Director to:

- Ensure the effective use of the CR department and its resources
- Ensure the advisory service provided by the department is an effective and practical interpretation of applicable regulatory and company requirements
- Assist the Director Responsible for Occupational Health & Safety in setting realistic goals for the continual improvement in risk management and reduction of harm / loss rates
- Review and develop the OHSMS to ensure that goals and objectives are being achieved
- Ensure the goals set are periodically monitored to agreed standards
- Ensure the company is audited against the standards detailed in the OHSMS
- Identify opportunities for improvement
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health
- Inform, guide and support the business in creating workplaces with a positive health and safety culture
- Support the implementation of the VolkerFitzpatrick behavioural campaign PALS.

Divisional HSES Managers

The Divisional HSES Manager report to the Health & Safety Director. In addition to the duties detailed for a Health & Safety Manager below, both Manager roles are responsible for effective allocation of health and safety support across operational divisions within their designated remit.

Occupational Health & Safety Management - Health & Safety Managers / Health & Safety Advisors

For the purposes of clarification under BS ISO 45001:2018, dedicated Divisional HSES Managers, Health & Safety Managers and Health & Safety Advisors are directly employed by the operational divisions of VolkerFitzpatrick.

In addition to this, VolkerWessels UK (VW UK) Corporate Responsibility provides strategic direction, performance management, occupational health, IMS management, technical services, training and compliance support to all of the VW UK companies.

Health & Safety Manager / Health & Safety Advisor

Reporting to a Divisional HSES Manager, Health & Safety Managers and Health & Safety Advisors are part of a divisional HSES team responsible for ensuring effective implementation of the OHSMS. As a technical specialist they provide support, guidance and training.

The responsibilities of a Health & Safety Manager / Health & Safety Advisor are to:

- Play a key part in improving the health and maintaining the safety of employees, people working on our behalf, and any other parties affected by our activities
- Inform, guide and support the workforce in creating workplaces with a positive health and safety culture
- Visit sites regularly (every four weeks whenever possible) and monitor performance in relation to the policy and procedures
- Discuss and plan the safe implementation of future works
- Carry out auditing in accordance with company procedure Q03 *Audit* to ensure compliance with existing requirements and identify any areas for improvement
- Represent VolkerFitzpatrick in communications with the Health & Safety Executive, and other external enforcing authorities or organisations
- Ensure that reports are compiled where necessary to enable corrective action to be implemented by site management

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 Responsibility for Health & Safety (Continued)****Health & Safety Manager / Health & Safety Advisor (Continued)**

- Ensure thorough investigation is undertaken and appropriate records are compiled where accidents and incidents occur, and make recommendations to prevent reoccurrence
- Advise on health & safety training requirements
- Ensure that VolkerFitzpatrick's occupational health & safety management documentation is appropriate and maintained to reflect any changes in legislation and company requirements
- Maintain their competence through continual professional development
- Adhere to the professional code of conduct as set through membership of the Institute of Occupational Safety and Health (IOSH) and / or the International Institute of Risk and Safety Management (IIRSM)
- Identify opportunities for improvement
- Advise the site teams on HSEQS documentation

Rail Standards and Compliance Manager

Reporting to the Health & Safety Director, is responsible for:

- Establishing the rail-specific OHSMS requirements in line with BS ISO 45001:2018
- Working in close collaboration with the IMS Managers to ensure legal, sector specific, and other requirements are integrated within the OHSMS

Corporate Responsibility Director

The Corporate Responsibility (CR) Director is responsible for the implementation and development of sustainable business practices throughout VW UK shared services and business units, to maintain compliance to corporate, legal, and stakeholder requirements. Reporting to the VW UK CEO, the responsibilities of the CR Director are:

- Oversight of health, safety, environment, quality and sustainability activities and staff across VW UK business units
- Oversight of corporate governance and risk management
- Development of CR strategy through a strategic view of the business environment
- CR management reporting and communications within VW UK and to VolkerWessels
- Management of the integrated management system, its related systems and applicable memberships, affiliations and registration schemes
- Provision of occupational health services to VW UK and its business units
- Commitment to the growth and development of employees, including the delivery of training services and external course provision
- Development of sustainable business practices including the selection and integration of tools and techniques
- Understanding the role of government, business, NGOs, society, global and local issues and how they interact with each other and their impact on VW UK
- Development of systems and protocols, including IT platforms, to support the needs of the business units
- Lead officer for major incidents and provision of legal support services

Integrated Management Systems (IMS) Managers

Reporting to the CR Director the IMS Managers are responsible for:

- The coordination of activities related to the implementation, development and maintenance of the OHSMS
- Control, publishing and maintenance of the IMS within the document management system

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)**1.3 Responsibility for Health & Safety (Continued)****Commercial / Estimating / Procurement Managers**

It is the responsibility of the Commercial, Estimating and Procurement Managers to:

- Ensure subcontractors and suppliers working on behalf of VolkerFitzpatrick are aware of the occupational health & safety policy and practice document and provided with the site-specific procedures and site management plans
- Ensure the Procurement Policy is communicated to all subcontractors and suppliers.
- Check the health and safety performance of suppliers and subcontractors for accidents, incidents, regulator liaison, fines and court proceedings relating to health and safety offences through the use of Constructionline prior to contract award
- Arrange audits of suppliers and subcontractors with the Health and Safety Manager
- Undertake a HSEQ start-up meeting with the appointed subcontractor or supplier at contract award

All employees, subcontractors and any other persons working on our behalf

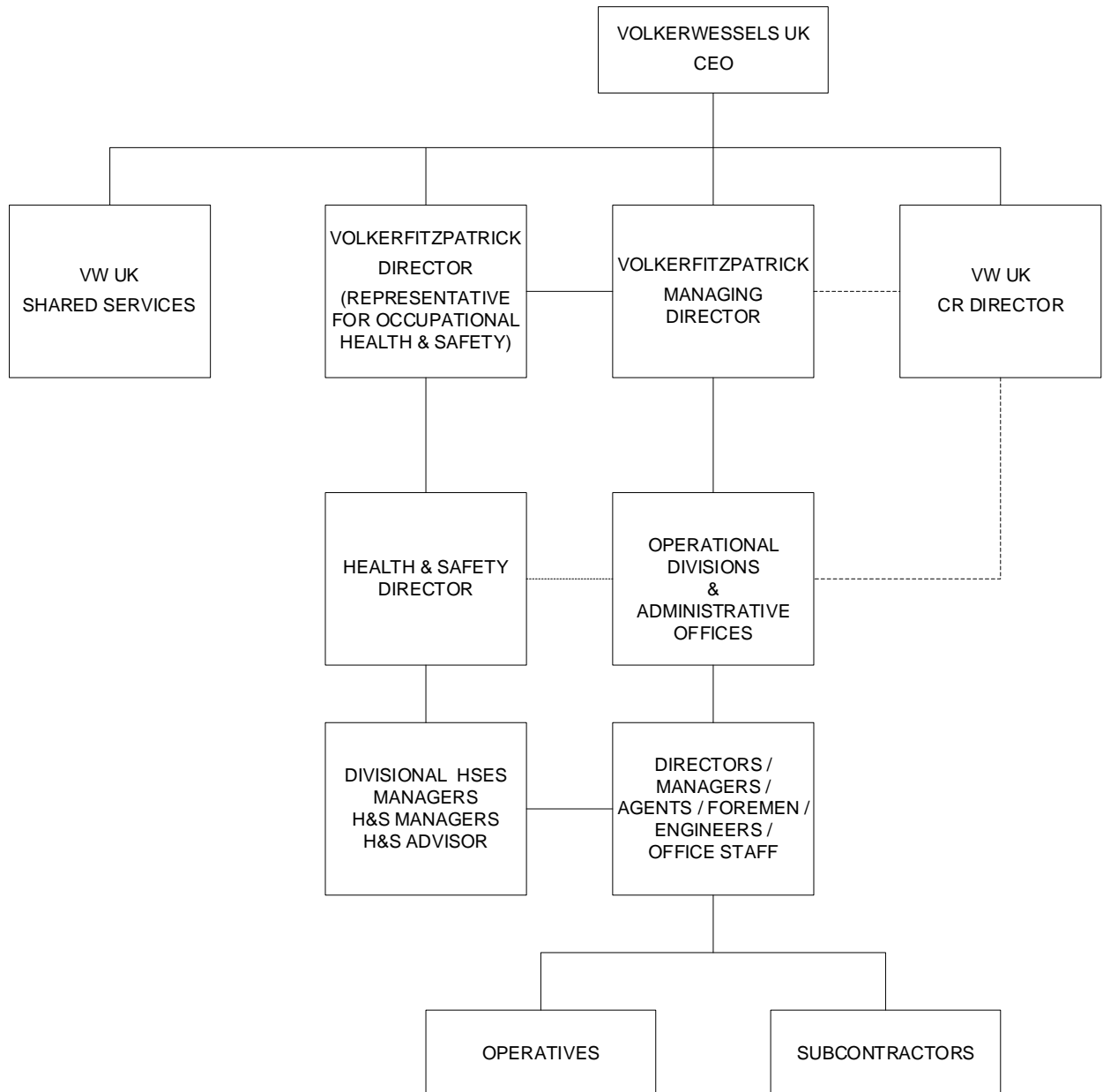
It is their responsibility to:

- Be familiar with the Occupational Health & Safety Policy and cooperate with management / supervision in its implementation
- Understand the parts of the Occupational Health & Safety Policy applicable to them and take reasonable care for the health and safety of themselves and others
- Follow the instructions given regarding safe working in general and safe methods of work for particular tasks
- Keep equipment in good order, use the correct equipment for the task, and report any defects in plant and equipment or any shortcoming in safe systems of work to their manager / supervisor
- Contribute to the safety culture, be aware of relevant site safety rules and abide by requirements
- Use and not abuse the protective equipment and measures provided in the interests of health and safety

1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.4 Organisation and Structure

The company is managed by the board of directors, with the structure for occupational health & safety management as detailed below:



1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.5 Interested Parties

BS ISO 45001:2018 requires the Interested Parties (including workers) of an organisation to be determined; Interested Parties include people or organisations that can affect, be affected by, or perceive themselves to be affected by a decision or activity of VolkerFitzpatrick / VolkerWessels UK. VolkerFitzpatrick understands the importance of meeting the requirements of its Interested Parties. Interested Parties (including their needs and expectations) that are affected by the VF OHSMS include:

Interested Parties	Needs and Expectations
<ul style="list-style-type: none"> Workers / VW UK Employees 	<ul style="list-style-type: none"> Quality of work / life, Job Security, challenge, personal and professional development, career opportunities.
<ul style="list-style-type: none"> Shareholders (e.g. VW NL) 	<ul style="list-style-type: none"> Sustainable growth and profitability.
<ul style="list-style-type: none"> Sub-contractors 	<ul style="list-style-type: none"> Surety of work, paid on time, collaborative working, respectable working environment, desire to work with a responsible organisation.
<ul style="list-style-type: none"> Clients / Customer 	<ul style="list-style-type: none"> High level of service delivery, on time and on budget, in line with client expectations.
<ul style="list-style-type: none"> Suppliers 	<ul style="list-style-type: none"> Information of what is required and when, payment terms are met.
<ul style="list-style-type: none"> Government agencies 	<ul style="list-style-type: none"> Compliance to applicable requirements
<ul style="list-style-type: none"> Regulatory bodies 	<ul style="list-style-type: none"> Compliance to all regulatory and statutory requirements
<ul style="list-style-type: none"> Local community 	<ul style="list-style-type: none"> Considerate construction company when working within local communities.
<ul style="list-style-type: none"> General Public 	<ul style="list-style-type: none"> Minimal disruption to their everyday lives, enhancing the infrastructure and communities.

Q19 *Determining the Context of our Organisation* further explains our Interested Parties.

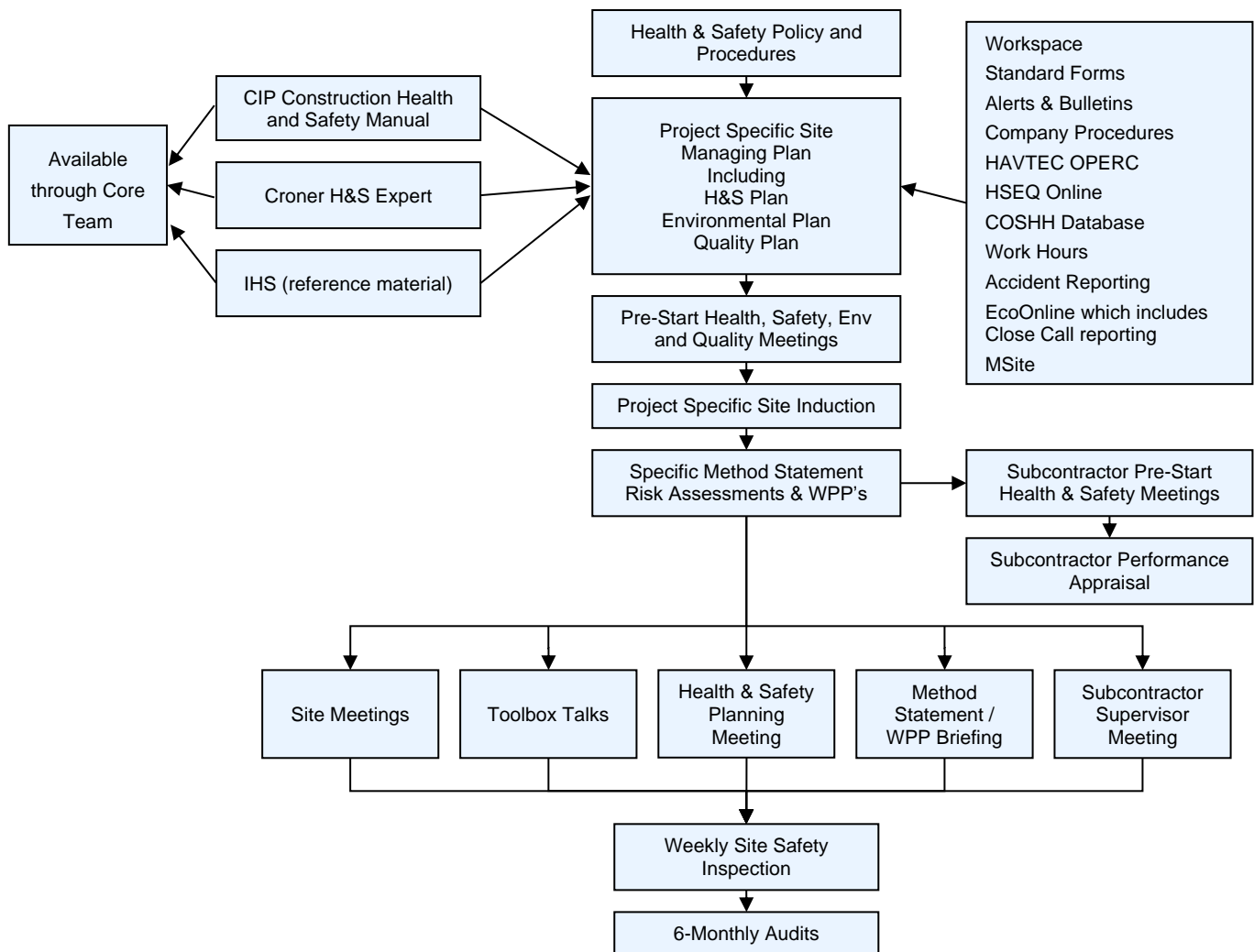
1.0 ORGANISATION AND ARRANGEMENTS (CONTINUED)

1.6 Structure of Occupational Health & Safety Management System

The company has an occupational health & safety management system (OHSMS) to support the implementation of the policy and is stored on our document management system which provides access to

- Policies and procedures
- Site documentation
- Health and Safety forms
- Alerts and bulletins
- Health and safety objectives and targets
- RIDDOR performance
- Best practice guidance
- Links to external web-based health and safety information
- Lost Time Injury Frequency performance

The system is shown in outline below:



1.0 Organisation and Arrangements (Continued)**1.7 Monitoring and Review**

The Occupational Health & Safety Policy will be monitored and reviewed by:

- Internal and third-party inspection, audit and monitoring of our activities
- Safety performance monitoring (hazards, close calls, near misses, accidents and incidents)
- Comparison with current, new and proposed legal requirements or best practice
- Meetings carried out with directors, senior managers and occupational health & safety management

1.8 Competency

We take care that the Directors and Departmental Managers allocate responsibilities to those who have the appropriate competence (skills, knowledge and experience) for their role.

The VolkerFitzpatrick Mission Statement is - "Working together to Experience Excellence for our clients and our people." Delivery against the mission statement is supported by key business drivers, the 6Cs, setting out the parameters within which all staff are expected to operate as a business:

- Challenge yourself and others
- Communicate with the team
- Certainty of programme
- Cost awareness
- Campaign against rework
- Care about our people, projects and business

All staff have and will continue to attend Experience Excellence and 6Cs training and briefing updates.

Staff needs assessment of competency is undertaken against a skills matrix. Further, VolkerFitzpatrick is committed to offering training opportunities for all employees, and training needs are identified at annual Development Performance Reviews (DPR). Training can be undertaken either through a formal or informal approach, after which it is evaluated and recorded by the relevant team who also retain copies of certificates and cards that have been gained.

Functional roles are outlined in job descriptions where identified as appropriate for the role concerned.

Appropriate training will be identified and provided to all levels of VolkerFitzpatrick managerial and operational employees. Training may comprise safety induction (Msite), toolbox talks, method statement briefings, in-house training courses and specialist external training courses.

Training requirements are assessed both at commencement for new employees, and on an on-going basis for existing employees. The capabilities and expertise of our management / supervisory employees is assessed at occupational health & safety management meetings and Development Performance Reviews (DPR). Operational employees' training is assessed at site induction by supervisors on site, during working operations and during toolbox talks, when two-way discussion is encouraged.

All site personnel will receive a formal, signed off, induction talk given by a member of the site management team or complete an Online induction through MSite, which will include general and site-specific requirements. All site personnel will also receive a site orientation as part of the induction process.

Evaluation forms are required to be completed by each person attending training courses, which help assess the effectiveness of training courses and to identify further training needs.

Training records are maintained by the training department. Plant and equipment operators are required to provide evidence of training and competency e.g. CPCS card.

The company is committed to a fully qualified and certificated workforce and supports the Construction Skills Certificate Scheme (CSCS) and other industry approved registration schemes. It is our aim to have 100% of the workforce holding CSCS cards or an approved equivalent.

Training is provided for operatives and supervisors in accordance with the New Roads and Street Works Act for work on highways where necessary. This includes industry specific requirements such as the National Highways passport, NOPS passports and NERS passports.

1.0 Organisation and Arrangements (Continued)**1.9 Classification of Workforce**

VolkerFitzpatrick's aim is to ensure the health, safety and wellbeing of its employees whilst at work and to provide a consistent and timely set of processes, to ensure that any health issues are identified and addressed. In doing so it is recognised that not all employees are exposed to the same level of risk. Accordingly, workers can be considered in the following three categories in terms of personal or workplace safety issues:

1. Office and admin posts
2. Site management / general duty construction
3. Safety critical

An in-house occupational health service is available from the company Occupational Health Nurse and the level of service provided will be based on a health questionnaire and assessment of risk for each group.

2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL HEALTH & SAFETY PLANNING

2.1 Introduction

One of the fundamentals of occupational health & safety planning is to determine the risks and opportunities to be addressed towards:

1. Giving assurance that the OHSMS can achieve its intended outcomes
2. Prevent, reduce, or otherwise mitigate undesired effects
3. Achieve continual performance improvement

The determination of risks and opportunities must include the identification of hazards, the assessment of risk and opportunities, and the meeting of legal and contractual requirements.

Hazard means a source, or a situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these.

Hazard identification is the identification of undesired events that lead to the materialisation of the hazard and the mechanism by which those undesired events could occur. This includes long-term hazards to health (e.g. high levels of noise or exposure to harmful substances)

In its most simple terms, risk is a concept involving the possibility of an adverse outcome, and the level of certainty / uncertainty over the occurrence, the timing, or the magnitude of an adverse outcome. If either of these is absent, then there is no risk.

Risk assessment is a systematic process for describing and quantifying the risks associated with hazardous actions, or events, substances, or processes,

Hazard identification and risk assessment is the responsibility of the relevant manager for sites, offices and operational locations with the assistance of the Health & Safety Manager.

The principles of prevention to be applied are as follows:

- Avoiding risks
- Evaluating the risks which cannot be avoided
- Combating the risks at source
- Adapting the work to the individual, especially with regards to the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate, and to reducing their effect on health
- Adapting to technological progress and innovation
- Replacing the dangerous by the non-dangerous or the less dangerous
- Developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment
- Giving collective protective measures priority over individual protective measures
- Giving appropriate instructions to employees

All risk assessments shall be reviewed by the relevant manager if there is a reason to suspect it is no longer valid or there has been a significant change in the matters to which it relates. Office risk assessments shall be carried out and reviewed as necessary.

2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL AND HEALTH & SAFETY PLANNING (CONTINUED)

2.2 The Company Approach

Activities with risks to Health and Safety are considered at the HSE-01 *Health and Safety Planning Meeting Agenda* / HSE-01R *Health & Safety Planning Meeting Agenda - Rail Division*. From the tender programme the principal activities with any HSEQ risk will be referenced within H02-01 *Risk Assessment and Method Statement Schedule*.

Risk assessments detailed in the pre-construction information, together with further risk assessments deemed necessary including those for activities carried out by other contractors, shall be reviewed and approved for use.

The arrangements to safely execute the works are examined and planned. Within this process significant attention is paid to hazards and risks associated with the works. Where a significant risk has been identified in the meeting, a specific assessment shall be produced. Preventive and protective measures must be established, recorded and communicated to all relevant employees, and their ongoing effectiveness monitored and reviewed.

Method statements* shall be produced for all activities where significant risk has been identified. They shall contain details of safe methods of work and be used to communicate them to those persons involved in the work. This will be achieved through method statement briefing prior to the commencement of the works. Method statements* and risk assessments shall be authorised by VolkerFitzpatrick management, before work commences.

Residual risk following the implementation of control measures to reduce risk to as low as reasonably practicable (ALARP) shall be reviewed as the works are executed or if change(s) are identified.

**note, other systems are applied such as Work Package Plans and Task Briefing Sheets for Network Rail*

Regulations requiring risk assessment are considered and reviewed at the health & safety planning meeting and throughout the contract period and include, but are not limited to:

- Manual Handling
- Personal Protective Equipment
- Display Screen Equipment
- Noise at Work
- Fatigue Management
- COSHH
- Asbestos
- Lead
- Hand Arm Vibration
- Whole Body Vibration
- Work at height
- Fire

2.3 The Health & Safety Planning Meeting

Prior to construction commencing, a health and safety planning meeting shall be held to discuss formulation of a Health & Safety Plan as part of an integrated Site Management Plan or for rail projects, a Construction Phase Plan, and its subsequent implementation. This meeting will be attended by the Contracts / Project Manager, Agent, appointed Health & Safety Manager and others as appropriate. H02-02 *Qualitative Risk Assessment and Method Statement Template* or H02-03 *Quantitative Risk Assessment and Method Statement Template* are reviewed as part of this agenda, the requirements are established for site specific risk assessments coupled with any additional activities and associated hazards.

H02-G01 *Risk Rating Matrix* is utilised to provide guidance to ensure a consistent approach and risk rating score where a quantitative risk assessment is used.

The hazards and risks identified in the pre-construction information shall be assessed and developed where the Construction (Design and Management) Regulations 2015 apply.

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 17 of 33
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2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL AND HEALTH & SAFETY PLANNING (CONTINUED)

2.3 The Health & Safety Planning Meeting (Continued)

Activities which are likely to produce significant risks requiring specific risk assessments and those areas of construction operations which are likely to require detailed method statements, shall be identified and recorded for action at the meeting.

A Health & Safety Plan shall be produced, to further develop the pre-construction information and the items identified at the safety planning meeting. This will include details of consultation arrangements with employees and workers.

Specific assessments shall also be considered at this meeting to address COSHH, noise, PPE, manual handling etc. and shall be included in the respective method statement or compiled and maintained separately.

On a four-weekly basis, site safety meetings will be held to plan, monitor, review and update the health & safety systems on site.

2.4 Management of Subcontractors & Outsourcing

2.4.1 Subcontractors

All tender enquiries to subcontractors indicate VolkerFitzpatrick's occupational health and safety requirements. Prior to appointment it shall be emphasised to the relevant representative or manager of the subcontractor that VolkerFitzpatrick expects full cooperation from them in achieving the required health & safety performance standards.

As part of the process of selecting subcontractors, their health and safety performance will be reviewed to confirm an acceptable occupational health & safety management system is in place. Audits, accident and performance records and the taking of references will be implemented as appropriate in accordance with company procedures to ensure competent contractors are employed and sufficiently resourced.

Prior to commencing work, subcontractors will attend a subcontract pre-start health & safety meeting to plan and develop safe systems of work for the identified scope of works.

At regular intervals the contract / project manager will convene meetings with the site representatives of all subcontractors to discuss occupational health & safety performance. These meetings will provide an opportunity for subcontractors to make an input into the safe management of the site.

All subcontractors must notify VolkerFitzpatrick and gain approval of their intention to subcontract any elements of their work and employment conditions.

VolkerFitzpatrick will conduct a one-to-one interview with all proposed subcontractor supervisors to ensure they are competent and share our commitment and values towards health, safety, environment and quality.

2.4.2 Outsourcing

External organisations are fully responsible for their own management processes and procedures. However, where they are providing a function, service, or site activity under VolkerFitzpatrick management they will fall within the scope of our occupational health & safety management system. Therefore, all service or product suppliers (including those undertaking pre-fabrication or assembly) are required to comply with all appropriate legal and contractual requirements with regard to VolkerFitzpatrick's occupational health and safety performance standards. This is described within the formally agreed procurement terms.

2.5 Documented Information

2.5.1 Control of Documented Information

Documented information can be in any format and media and from any source. Documented information can refer to:

- The occupational health & safety management system itself, including related processes
- Information created in order for the organisation to operate (documentation)
- Evidence of results achieved (records)

To operate in a consistent manner, and to meet legal, corporate, client and other requirements we maintain an Integrated Management System (IMS) which includes all VW UK policies, procedures, forms, standards, and reference information.

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 18 of 33
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2.0 RISKS & OPPORTUNITIES AND OCCUPATIONAL AND HEALTH & SAFETY PLANNING (CONTINUED)**2.5.1 Control of Documented Information (Continued)**

Q01 *Control of Documented Information - Overview* describes the business approach towards control. Q01-01 *Control of the Integrated Management System (IMS)* defines how we establish, create, format, reference, control, and make available the IMS documentation. This document also defines how we control the IMS screens and other storage areas within the document management system including the document library and the project folder structure.

2.5.2 Control of Records

Q01-02 *Control of Records and Workspace on Projects* defines the controls for retaining documented information, including but not limited to construction information, specifications (including drawings) and records (completed forms, plans or emails). It includes guidance on project-based document storage and access to records through the document management system and permissions determined by folder security and individual employee access rights.

Q01-03 *Control of Records and Workspace in Offices and Departments* defines the controls for retaining documented information, including but not limited to shared services departments and regional business unit offices. It includes guidance on document storage and access to records through the document management system.

Q01-04 *Control of Archiving* defines the controls for archiving project and office records.

3.0 COMPANY HEALTH & SAFETY PROCEDURES

3.1 Definition

This section defines the standards and rules, which complement VolkerFitzpatrick company procedures, CIP Construction Health & Safety Manual and Site Management Plans. It is the responsibility of all employees to observe these rules, to behave in a safe and reasonable manner, and to adhere to all instructions given by appointed management with regard to the respective location.

Failure to comply with the following rules will render employees liable to disciplinary action. It should also be borne in mind that a breach of health & safety legislation is a criminal offence and action taken by an enforcing officer may result in heavy penalties i.e. fines and / or imprisonment.

Occupational Health & Safety is the responsibility of everyone: directors, managers, site and office staff, fellow employees and yourself. All persons have a responsibility to contribute towards making their place of employment a safe place to work. Occupational Health & Safety measures are introduced to control risks to everyone at the location, including employees, subcontractors, visitors, members of the public and anyone else who could be harmed.

3.2 Site Rules - Health & Safety

VolkerFitzpatrick's site rules comprise the following as a minimum, and are applicable to all contracts:

- All persons having any business on site must attend an induction and receive and understand a copy of the site rules
- All persons must report to the site office and sign in before entering the site and sign out on leaving the site
- All persons on site must wear a safety helmet, protective toe cap mid sole protection ankle high, lace up footwear. No Rigger boots, cut level E gloves, light eye protection and high visibility clothing at all times (the site offices and welfare facilities are excluded from this rule)
- Trainers will not be permitted at any time. Visitors shall be made aware regarding protective footwear, but may be exempt if agreed and accompanied by site management
- The correct task specific personal protective equipment must be worn at all times, e.g. gloves, goggles, masks, ear defenders, etc. and also in accordance with any local rules
- Unauthorised personnel must not alter scaffolding
- No one is to operate vehicles, plant or machinery, including fitting abrasive wheels and erecting or dismantling scaffolding unless they are appropriately trained or suitably qualified, e.g. CPCS or similar and authorised in writing by VolkerFitzpatrick, (H09-09 *Permit to Operate Plant*). This is a VolkerFitzpatrick zero-tolerance issue and unauthorised persons operating plant will be removed from site
- Excavator operatives who are found to have incorrectly fitted a bucket onto the quick hitch system and not ensured that all associated safety devices are correctly fitted will be removed from site. This is a zero-tolerance issue
- Keys must not be left in unattended plant or vehicles unless client specific requirements require keys maintained (i.e. Airports)
- Failure to wear a suitable harness and lanyard connected to a safe attachment point is a zero-tolerance issue where and when appropriate
- The use of handheld mobile phones while operating plant / vehicles whilst on site is prohibited, except if parked up and the engine switched off
- Defective vehicles (including light commercial and HGV), plant or machinery must not be used at any time and the defect(s) should be brought to the attention of the site management immediately
- No person under the influence of drugs or alcohol will be permitted to remain on site
- Welfare facilities are to be kept clean and tidy at all times
- Smoking, drinking or eating is only permitted in designated areas
- Warning signs must be obeyed at all times
- All hazards, close calls, near misses, accidents and dangerous occurrences must be reported to the site office and entered on to EcoOnline, and all injuries entered in the accident book
- Operatives using any equipment producing a naked flame or sparks must have within arm's reach a suitable fire extinguisher. The operative must also be in the possession of a Hot Works Permit
- A Permit to Work is required for any person entering a confined space
- A Permit to Break Ground is required every time before breaking the ground surface
- Permit to use Ladders / Step Ladders
- Only certificated and authorised personnel will be allowed to sling loads or direct cranes

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.2 Site Rules - Health & Safety (Continued)**

- Drivers of all excavators and reversing vehicles must have good all-round visibility or be supervised by a Plant and Vehicle Marshal.
- It is incumbent upon all operatives to work in a safe manner and not to endanger themselves or other persons by their actions
- Portable electric tools and equipment are predominantly battery operated, however all power tools shall only operate at 110-volt power or lower and wherever possible use RCD protection
- No radios on site unless as part of an approved site communication system
- All materials used on site which have a hazard symbol on the container / bag, must have a COSHH assessment sheet, which should form part of the Method Statement. We encourage the use of, where possible, materials that are non-hazardous and friendly to the environment
- All pedestrian and vehicle control signs must be complied with
- No persons are permitted to work underneath any unprotected overhead activities
- Permits to Work are required for specific high-risk activities. Work must not commence until the relevant Permit to Work has been issued
- Horseplay will not be tolerated
- No small, unmanned aircraft will be utilised unless the accountable manager for that project has approved the nomination and the data privacy impact assessment has been completed

3.3 Accident and Incident Reporting

Medical treatment should be sought for injuries sustained at work, no matter how minor and an appropriate record must be made in the accident book.

All accidents and incidents, diseases, dangerous occurrences and damage to property belonging to VolkerFitzpatrick or others, shall be reported to site management and the appointed Health & Safety Manager as soon as it is practicable, so that they may be thoroughly investigated to prevent a reoccurrence.

All injuries, diseases or dangerous occurrences suspected of being covered by RIDDOR must be notified to the relevant enforcing authority and appointed Health & Safety Manager as soon as practicable.

A local (site team) investigation shall be held into all accidents and incidents, where a formal investigation is not required. Refer to H07-02 *Local Accident & Incident Report* for guidance.

A formal investigation will be undertaken for all RIDDOR reportable injuries, serious injuries, fatalities, reportable diseases, reportable dangerous occurrences, significant close calls or near misses, or any other event warranting formal investigation due to its scale, nature or impact.

The Health & Safety Director, in certain situations may request a formal investigation to be carried out for some accidents and incidents that would ordinarily be treated as local investigation. The Health & Safety Director expects to draw important lessons from a formal investigation.

Formal investigations will be completed by a representative of Health & Safety and documented using H07-03 *Formal Accident Incident Close Call or Environmental Investigation Report*.

Records of accidents, direct employee plus subcontract and site personnel numbers, and total hours worked are to be prepared monthly for company safety performance measurement.

All personnel are encouraged to report hazards, near misses and close calls on our projects using EcoOnline, this can be through mobile device data capture or by desktop data capture and / or form H07-06-VF *Close Call Report Card*. Project teams will ensure these are reviewed, closed out, trends monitored for action and feedback is given to those raising them.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.4 Construction (Design and Management) Regulations

VolkerFitzpatrick recognises their responsibilities under the Construction Design and Management Regulations 2015 (CDM).

Whilst generally employed as a Principal Contractor and where appointed Principal Designer, VolkerFitzpatrick accepts and discharges its responsibilities in order to achieve standards of health and safety performance in excess of the statutory minimum. Please see Q17 *Principal Designer Role* for more information.

Project specific arrangements are described in the *Site Management Plan* or the *Construction Phase Plan*.

3.5 Consultation & Participation of Workers

It is a fundamental company belief that the creation of a safe workforce is achieved through clear and effective communication at all levels within the organisation. Our PALS behavioural change programme maintains a culture where our employees and workers contribute to the safe systems of work through active and open participation.

VolkerFitzpatrick will ensure that the views of those under our employment and management shall be represented with regard to the implementation, performance evaluation and action for improvement of the OH&S Management System.

Consultation involves listening to employees' views and taking account of what they say before any decision is taken.

Employees / workers will be consulted on matters that affect their health and safety and in particular, with regard to:

- The introduction of any measures or new technologies
- Arrangements for appointing competent persons
- Relevant health and safety information
- Planning and organisation of any health and safety training

This will be either directly or through elected representatives.

Employees, workers or representatives may make representations to management on potential hazards and dangerous occurrences at the workplace, which affect, or could affect, themselves or others.

Consultation may be carried out during:

- Inductions
- Toolbox talks
- PALS briefings
- Method statement / Work Package Plan / Task briefings
- Subcontractors' progress meetings
- Four weekly health and safety meetings
- Pre-arranged or ad-hoc meetings following any responses to information posted on notice boards

3.6 Control of Substances Hazardous to Health (COSHH) Regulations

When selecting substances or materials for use in any process, preference must be given to the substance or material that produces least risk to personnel and the environment.

COSHH is specifically addressed at internal and subcontractor pre-start meetings with COSHH assessments forming an integral part of the safe systems of work and are produced using H48-01 *COSHH Assessment Tool*.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.7 Deliveries

Drivers delivering goods and materials must report to management to receive instructions on when, where and how to unload their vehicle. They must remain with their vehicles, except to visit welfare facilities or offices to deal with paperwork. When outside of the vehicle the driver must wear the appropriate PPE for the site.

Vehicles must not be overloaded. Loads must be evenly distributed, secured and must not project beyond the side or back of the vehicle. The design and construction of the vehicle must be suitable for the load(s). Drivers or operators are responsible for checking the security of their loads. Where necessary, abnormal loads must be formally notified, and a warning vehicle should be in attendance. When vehicles are being loaded, the driver should only remain in the cab if it can protect him from the risks of falling materials / objects and other relevant hazards. When loading and unloading deliveries employees must observe the requirements of the working at height policy. VolkerFitzpatrick have a zero-tolerance policy with regards to that no person should access wagon beds without suitable edge protection or fall arrest (zero-tolerance).

3.8 Drugs and Alcohol Policy

The *VolkerWessels UK Drugs and Alcohol Policy* is designed to ensure safety by placing and enforcing strict limits regarding the misuse of drugs or alcohol. We ask all VolkerFitzpatrick employees and those working on our behalf, to lead by example, challenge unsafe attitudes and behaviours to establish a workplace free of harm.

All employees, those working on our behalf, and visitors to VolkerFitzpatrick sites or offices must be aware of the requirements of the *VolkerWessels UK Drug and Alcohol Policy*, and the implications of failing to comply, as part of the site of office induction process.

The Policy is available to all employees on the document management system and copies can be provided on request.

To ensure compliance with this policy you may be required to undergo testing in the following circumstances:

- **Pre-employment (rail) and new employee screening** - all safety-critical rail candidates (e.g. Personal Track Safety (PTS) card holders) must undergo a medical and screening for drugs and alcohol prior to employment in accordance with rail industry standards. All other new employees must undergo screening for drugs and alcohol as soon as practicable after their start date
- **Random** - unannounced random drugs and alcohol screening could take place at any time whilst at work or on duty of any employee, subcontractor, self-employed or agency worker. A minimum percentage of personnel will be subject to unannounced random alcohol and drug screening each year
- **For Cause** - screening to find out whether drugs or alcohol were a factor in an accident or incident, where the person's actions or omissions are suspected of contributing to the accident or incident, or the behaviour of the person gives cause to suspect that person is unfit to continue work
- **Transfer or promotion** - any employee who is transferred or promoted to a safety critical post will be screened for drugs and alcohol, even if the employee already holds a safety critical post

All testing is undertaken to ensure that employee's safeguards, confidentiality and dignity are maintained to a high standard at all times.

3.9 Emergency Procedures

Procedures to deal with potential serious and imminent danger and danger areas e.g. first aid, fire and means of escape in an emergency, shall be detailed at each construction site and office location, and detailed within the Health & Safety Plan for construction sites. A competent person shall be nominated to implement these procedures. Testing of the emergency procedures / plans are to be undertaken on a risk assessed basis to determine the robustness of emergency response.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.10 Fire Precautions**

A fire safety risk assessment shall be carried out for all locations to identify necessary arrangements and control measures.

A fire plan shall be produced and displayed for permanent offices and appropriate projects to include location of firefighting equipment, fire or smoke detectors, emergency lighting, fire call points and fire exits. Training, appointment of marshals and evacuation procedures shall be established.

Adequate fire notices and signs shall be prominently displayed, as identified by the fire safety risk assessment.

All emergency procedures pertinent to the work activity shall be adhered to. These procedures will vary from location to location and training will be given.

All fire escape routes, firefighting equipment and fire doors shall be kept free from obstruction and routinely monitored.

Any used or missing firefighting equipment shall be reported to management, who will ensure that it is replaced as soon as possible.

3.11 First Aid

The company affirms its responsibilities under the Health & Safety (First-Aid) Regulations 1981 to provide or ensure that adequate equipment, facilities and trained persons are provided, to render first aid.

At least one qualified first aider shall be provided at each work location dependent on the risk of injury or ill health. additional first aiders will may be required based on the risk at the location, numbers of persons employed and work patterns i.e. shifts.

An appointed person shall be identified at each location who may also be a first aider.

It shall be the first aiders / appointed person's responsibility to ensure that appropriate first aid equipment / facilities are maintained.

3.12 Gross Misconduct

An employee will be liable to summary dismissal if he / she is found to have acted in any of the following unsafe ways:

- A serious or wilful breach of the safety rules specific to each location
- Failure of a drugs and alcohol test
- Unauthorised removal or interference with any guard or protective device
- Unauthorised operation of any item of machinery, plant or equipment
- Unauthorised removal of any item of first aid equipment
- Wilful damage to, misuse of, or interference with any item provided in the interest of health, safety or welfare at work
- Unauthorised removal or defacing of any label, sign or warning device
- Misuse of chemicals, flammable or hazardous substances, or toxic materials
- Smoking in any designated 'No Smoking' area
- Smoking whilst handling flammable substances
- Horseplay or practical jokes which could cause accidents
- Making false statements or in any way deliberately interfering with evidence following an accident or dangerous occurrence
- Misuse of pneumatic, hydraulic or electrical equipment
- Dangerously overloading any item of lifting equipment
- Overloading or misuse of any vehicles

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.13 Occupational Health

Elements of VolkerFitzpatrick's Occupational Health system include:

- **Pre-employment health questionnaire** to ensure employees are fit and capable for effective performance at work without risk to health
- **Management of work activities to eliminate / reduce risks to health**, including planning, organisation and risk assessment
- **Health surveillance** to evaluate whether there are any adverse effects the work or working environment are having on the individual and to act upon the earliest signs of possible harm
- **Assessment of fatigue**, as it is a significant risk during construction activities due to the safety critical nature of the work. The risk of accidents from cumulative fatigue is well recognised
- **Consideration of new and expectant mothers** (see *VolkerWessels UK Employee Handbook*) - the Human Resources Department will notify the Company Occupational Health Nurse. Risk assessment will be carried out on the individual employee concerned

Procedures detailing how these are managed within VolkerFitzpatrick are contained within this document and within the company management system.

3.14 Smoking Policy

The Health Act 2006 states "all employees have a right to work in a smoke free environment" and that "premises must be smoke free if they are used as a place of work".

Therefore, smoking is not permitted in any part of any building, including corridors, lifts, stairways, lavatories, reception areas or entrances and ALL company owned or hired vehicles. Smoking is also prohibited within 5m of any doorway or fire escape.

Smoking is only permitted in a designated "Smoking Area". VW UK determines that electronic cigarettes (e-cigarettes), products that can be used for the consumption of nicotine-containing vapour via a mouthpiece (vaping), should be treated in the same manner as cigarettes. This policy applies to all employees, contractors, customers and visitors and all staff are obliged to support the implementation of this policy. Appropriate "No Smoking" signs will be clearly displayed at all entrances and exits, within the premises, and in company vehicles.

Those who do not comply with the smoking law are liable to a fixed penalty fine and possible criminal prosecution. If you would like further advice or assistance on quitting smoking, please contact Occupational Health on 01992 305045 or the NHS by calling 0300 123 1044 (<http://smokefree.nhs.uk/>).

3.15 Holes, Voids and Shafts

The VolkerFitzpatrick procedure Q25-VF *Temporary Works* must be followed at all times.

Effective measures must be put in place to prevent falls of persons or materials down holes, voids and shafts.

All lift / elevator shafts shall be constructed in such a way so as to protect both those carrying out the construction and those carrying out the lift installation. Safe working platforms should be provided for all those working in lift shafts.

Openings to lift shafts must be fully protected with a secure, full height system which prevents unauthorised entry and prevents the risks of falls of people or materials. Lift shaft opening protection must not be removed unless a safe working platform is provided or the lift doors are in place.

Penetrations and voids should be limited in size and number as far as practicable and have mesh cast in during construction or be fitted with other robust protection such as metal guard rails or covers, which prevent falls through them.

All floor openings must be protected with robust, securely fixed (screwed or bolted, not nailed) and clearly marked (e.g. 'Hole below - Do not remove') covers to prevent the fall of materials or persons through them. Covers should be constructed so that they do not present a tripping hazard.

Protective measures may only be removed when the work is actually taking place in or around the opening and effective measures employed to prevent falls of those working on them. Protective measures must be replaced as soon as practical and be regularly inspected (at least weekly).

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 25 of 33
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3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.16 Temporary Works

Under most forms of contract in use in the UK, the overall project responsibility for temporary works rests with the Principal Contractor. Legal duties cannot be passed on to someone else by means of contract. This means that when VolkerFitzpatrick are acting as Principal Contractor, they must approve all temporary works.

Guidance towards VolkerFitzpatrick management of temporary works is described within Q25-VF *Temporary Works*. All projects must comply with the requirements set out within the procedure. This includes:

- The use of a Q25-02-VF *Temporary Works Design Brief / VFR-DF-325 Temporary Works Design Brief (Rail)*
- The establishment and maintenance of a Q25-03-VF *Temporary Works Register / VFR-DF-317 Temporary Works Schedule (Rail)*
- The formal appointment of a Temporary Works Coordinator using form Q25-04-VF *Assessment & Appointment of Temporary Works Coordinator & Temporary Works Supervisor / VFR-DF-319 Temporary Works Assessment (Rail)*
- The use of Q25-11-VF *Temporary Works Permit to Proceed Erect, Load & Strike / VFR-EF-323 Temporary Works Permit (Rail)*

3.17 Ladders

H04-01 *Portable Ladders and Stepladders Permit* is required for all ladder use.

Ladders can only be used for access between one level and another. Any other use is to be avoided and will only be permitted, subject to specific risk assessment and agreement with VolkerFitzpatrick, where no safer alternative means of access e.g. podium steps, mobile towers is practicable.

Metallic ladders must not be used near to any electrical hazards.

Stepladders are only to be used as a last resort where it is impractical to provide an alternative such as a mobile tower, mobile powered elevating platform or podium steps etc. and only for single short duration tasks of less than 15 minutes. Repetitive use of stepladders will only be permitted in exceptional circumstances with the written approval of VolkerFitzpatrick.

3.18 Lifting Operations

All lifting operations must be in compliance with the requirements of safety legislation including the Health & Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Provision and Use of Work Equipment Regulations 1998 and most specifically the Lifting Operations and Lifting Equipment Regulations 1998. All lifting must therefore be proven to be planned, supervised and safely executed. The process outlined in H55 *Control of Lifting Operations, Equipment and Accessories* must be followed.

All those involved in the planning, site supervision and carrying out of lifting operations must have the appropriate level of competency for the task being undertaken. VolkerFitzpatrick requires that competency checks are undertaken to be assured that all those undertaking roles within lifting operations have the necessary skills, knowledge and experience to carry out their duties.

All lifting operations must be covered by an appropriate Lifting Plan(s). The level of detail within such plans will be reflective of the nature and complexity of each lifting operation but must include a Works Package Schedule of Common Lifts.

All Lifting plans must be directly referenced to appropriate risk assessment(s) and development of a method statement(s).

All Lifting Plans must be submitted to VolkerFitzpatrick for approval and / or acceptance.

All hired crane, contract hire, and subcontractor managed lifting operations, and most specifically multi-crane activities on site must be coordinated via the identified VolkerFitzpatrick project Lifting Coordinator.

3.19 Lone Working

Lone workers are defined as those who work by themselves without close or direct supervision. Lone working will be designed out where possible and only where absolutely necessary is it to be undertaken. Where lone working is necessary, however brief or minor, a specific risk assessment is required to be undertaken and appropriate control measures put in place.

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 26 of 33
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3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.20 Manual Handling**

Lifting and moving loads by hand are one of the most common causes of injury at work. Many injuries result from repetitive operations, but one poor lift can cause permanent and often painful damage.

- Where practicable the need for manual handling shall be eliminated
- Manual handling assessments need to address task, load, work environment and the individual's capability
- Mechanisation of repetitive operations (i.e. kerbs, cable troughing etc.) will be adopted as the solution requires

3.21 Notices and Written Instructions

All hazard / warning signs and notices displayed on the premises shall be complied with, taking into consideration persons whose first language is not English.

Where applicable, work permits will be strictly enforced e.g., confined space work, where only authorised persons will be allowed to work.

3.22 Office / Workplace Safety

Electrical installations shall only be installed by a competent person and tested at regular intervals in accordance with the Electricity at Work Regulations 1989.

- Offices shall be kept at a reasonable temperature, be well ventilated and lit
- Passages and stairs shall be kept clear of obstructions and well lit
- Flooring shall be kept in a safe condition. Damaged carpeting, liquid spillages etc. shall be reported to management
- Filing cabinets shall be loaded from the bottom drawers first and only one drawer opened at a time. Storage racking shall be of adequate strength, properly loaded, stable, and securely fixed where possible
- Great care shall be taken in the storage and use of toxic, flammable and corrosive substances, chemicals and liquids. They shall be stored and used in accordance with the manufacturers' instructions / COSHH assessment
- Portable electric tools and equipment shall operate at 110V or lower. Where this is not possible RCD protection shall be used
- Electrical equipment shall be visually inspected and checked for defects at regular intervals and, if a fault is suspected, taken out of use and checked by a qualified electrician. Trailing electric cables shall be avoided
- An appropriate maintenance system (e.g. HSE guidance) shall be established for all electrical equipment and records of inspection and testing maintained as necessary
- Employees who are considered to be display screen equipment users (through DSE assessment) shall be entitled to free eyesight tests and the provision of corrective eyewear if prescribed
- DSE users will be provided with suitable equipment to establish an ergonomic workstation. Suitable instruction on its adjustment will be provided
- Adequate welfare facilities shall be provided
- All dangerous parts of machinery shall be adequately guarded

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.23 Permits to Break Ground

The following will be implemented as part of the Permit to break ground process:

- Excavator operators and Plant and Vehicle Marshals will be briefed on the H14 *Safe Working Procedure for Working in the Vicinity of Underground and Overhead Services* prior to commencing work
- Subcontractors will provide personnel trained to operate Cable Avoidance Tools (CAT & Genny) if required to carry out excavation works
- During excavation re-scanning with the CAT will continue every 300mm
- 500mm exclusion of mechanical plant and equipment re known services

3.24 Permits to Work

Permit to work requirements shall be determined by the site agent / manager and appointed Health & Safety Manager for all locations. Employees must check to see if such a system is in place for the work that they are undertaking before commencing. All permits to work shall be prepared by an authorised, competent person who is familiar with the relevant work procedures, hazards, and all necessary precautions after a thorough assessment has been carried out. The person responsible for carrying out the works shall sign the permit prior to work starting, confirming that they are aware of the conditions laid down within it and agreeing to abide by them. On the completion of the works or expiry of the permit, the person responsible for carrying out the works should either:

1. Sign the permit off as work completed and all personnel, materials and equipment withdrawn or,
2. Request an extension from the competent person, and ensure authorisation is given by the authorised person

In the event of an emergency occurring wherever a Permit to Work is in operation, personnel will be removed; the permit shall be withdrawn and cancelled immediately. Work shall only recommence when all procedures have again been checked and the permit has been re-issued and duly signed by the authorised person. Where there has been a change to the working environment which introduces new or unknown hazards, work shall cease immediately, and all personnel shall be withdrawn from the affected area. If possible, equipment shall be withdrawn and the area made safe.

Permits will be required for the following activities:

- Confined spaces (HSE-21 *Confined Space - Entry Permit*)
- Electrical intake rooms (HSE-25 *Permit to Work in Electric Intake Room*)
- Electrical works (HSE-26 *Electrical Permit to Work*)
- Hot works (HSE-27 *Hot Works Permit*)
- Ceiling voids (HSE-28 *Permit to Work in Ceiling Void*)
- Demolition (HSE-40 *Permit to Demolish*)
- Rope access (HSE-41 *Permit to Use Rope Access*)
- Permit to Erect, Climb or Dismantle a Tower Crane (HSE-49 *Permit to Erect, Climb or Dismantle a Tower Crane*)
- Metal Ribbed Decking Permit to Install and Completion Certificate (HSE-50 *Metal Ribbed Decking Permit to Install and Completion Certificate*)
- Tower Crane Operations Guidance (HSE-51 *Tower Crane Operations Guidance*)
- Tower Crane Erection, Climbing and Dismantling Checklist (HSE-52 *Tower Crane Erection Climbing and Dismantling Checklist*)
- Steps and Ladders Permit (H04-01 *Portable Ladders and Stepladders Permit*)
- Roof Access Permit (H04-03 *Roof Access Permit (Inspection and Maintenance only)*)
- Lifting operations (H55 *Control of Lifting Operations, Equipment and Accessories*)
- Excavation / breaking ground (H14-01 *Permit to Break Ground (Trial Holes Only)* / H14-02 *Permit to Break Ground (Main Work Activities)* / H14-03 *Permit to Break Ground (Transient or Reactive Works)*)
- Plant operation (H09-09 *Permit to Operate Plant*)
- Temporary works (Q25-11-VF *Temporary Works Permit to Proceed Erect, Load & Strike* / HSE-29R *Temporary Works Permit*)

This list is not exhaustive, and all operations should be examined in detail and permits initiated if necessary. A Permit to Break Ground system will however be implemented on all sites where there is ground level surface breakout, excavation or filling.

Approved for IMS:	IMS Manager	Document owner:	Health & Safety Director	Workspace file:	n/a	Page 28 of 33
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3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.25 Personal Protective Equipment**

The company recognises its responsibility under the Personal Protective Equipment Regulations to assess the risks, to provide and train personnel in the use of suitable PPE and to maintain and replace this as necessary. Therefore:

- Protective equipment shall be used, stored and maintained in accordance with manufacturers' instructions and the training provided
- Any damage, loss, fault or unsuitability of protective equipment shall be reported to management
- VolkerFitzpatrick will issue suitable protective equipment to directly employed staff and operatives, and undertake to replace such equipment whenever necessary

3.26 Respiratory Protective Equipment (RPE) Face-Fit Testing

It is a legal requirement that those individuals, who have to wear respiratory protective face equipment, are face fit tested to ensure they are worn correctly to protect them from ill health from hazardous substances therefore any individual attending a VolkerFitzpatrick project without proof of face fit testing, will not be permitted to commence any works which require the need to wear respiratory protective equipment.

3.27 Plant & Work Equipment

VolkerFitzpatrick requires all plant and equipment used on site to comply with the Provision and Use of Work Equipment Regulations 1998, and the Lifting Operations and Lifting Equipment Regulations 1998 as applicable.

All work equipment (heavy excavation plant to handheld tools) must be suitable for the purpose for which it is intended.

To be able to work as safely as possible it is essential that work equipment is maintained and inspected by a competent person, in accordance with legal requirements and manufacturers' recommendations.

Records of inspection, test and thorough examination are required to be maintained.

Operation of any machine, plant or equipment is not permitted unless employees have been trained, authorised, or is under adequate supervision.

Operatives must not use mobile phones or 'hands free' whilst operating plant.

All machine guarding shall be utilised.

Any fault, damage, defect or malfunction of any machinery, plant, equipment, tools or guards shall be reported to management for action, which may include taking the item out of use.

Repair, maintenance or cleaning of machinery, plant or equipment shall only be carried out in accordance with manufacturers' recommendations and risk assessment where appropriate.

No machinery, plant or equipment shall be left in motion, or with the engine running, whilst unattended unless client specific requirements mandate keys must be left in (i.e., airports on airside). Plant and vehicles must be immobilised, and the ignition key removed whilst unattended, keys must be kept in a secure place when not in use.

Please see H09 *Working with Plant* and its associated plant standards for further information.

No repairs or maintenance work on any equipment shall be undertaken unless employees are trained and authorised to do so, including changing of abrasive wheels.

The use and control of Mobile Elevated Work Platforms (MEWP's) must observe the minimum standards as stated in the VolkerFitzpatrick procedure H50 *Mobile Elevated Work Platforms (MEWPs) Minimum Standard*.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.28 Residential Caravans - Safety

Site agents / managers shall ensure that caravans are spaced at a minimum of 6m apart and at least 15m from petrol, oil and bulk storage of liquefied petroleum gas (LPG). These distances vary from one local authority to another and should be checked with the local fire officer before allowing caravans on site.

Where electricity is to be supplied to caravans, a residual current circuit breaker must be fitted, and all wiring must be checked by a competent electrician who will also be responsible for connecting or disconnecting the supply.

Where LPG is used, the following precautions must be taken:

- Gas cylinders shall be set up outside the caravan(s) or in the specific lockers where they are open to fresh air
- Cylinder valves should be turned off when not in use. At the same time a check should be made to ensure all taps inside the caravans are also turned off
- All fires shall have adequate guarding, and clothing shall not be hung on or near the fire
- Fires or burners shall not be left on when the caravan is unattended
- All gas fires and equipment shall be routinely inspected and tested in accordance with the manufacturers' instructions
- When fires or burners are in use, a roof light, window or other vent shall be open to ensure proper ventilation
- Fire extinguishers and fire blankets shall be provided for each caravan
- Gas lights shall not be used without mantels
- When gas cylinders run out, extreme care must be taken to ensure that replacements are reconnected correctly, particularly as the regulators for butane gas and propane gas are not interchangeable
- If a gas leak is suspected, the alarm shall be raised, the area evacuated, and the supply isolated if possible, without putting anyone at risk

3.29 Scaffolds and Working Platforms

All scaffolding erected on VolkerFitzpatrick projects must be by trained, competent personnel and erected and dismantled in accordance with the UK National Association of Scaffold Contractors (NASC) Guide TG20:13.

Design scaffolds must be approved by VolkerFitzpatrick prior to construction and must be checked by the subcontractor's competent person prior to loading.

A 'Scafftag' or similar approved system must be attached to each access point to the scaffold / mobile tower and the results of inspections recorded both on the 'Scafftag' and the site register.

All mobile scaffold towers are to be PASMA type unless otherwise agreed with VolkerFitzpatrick.

Trestle and bandstand scaffolds are not permitted.

Stilts or similar devices are not permitted.

Where aluminium tower access equipment is in use on site, all personnel erecting, altering or dismantling are to be PASMA trained and certified.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.30 Supervision of The Works

In addition to the Supervisors responsibilities for health and safety stated in section 1 the following shall apply:

- Where non-English-speaking personnel are to be employed, the Supervisor must be able to speak English and be able to translate for those working for them who cannot. The Supervisor must be in direct contact with the non-English speaking personnel at all times. A suitable ratio must be agreed at tender stage, of not more than one interpreter to 8 non-English-speaking personnel
- Subcontractors will maintain a manager(s) / supervisor(s) on site at all times, who are available to receive and implement safety instructions from VolkerFitzpatrick, when any work is being undertaken
- All first line supervisors will carry out daily briefings to their operatives at the start of the shift (Safe Start) on the tasks to be undertaken, location of work, equipment, materials, PPE and safety considerations
- All supervisors / foremen must have attained the Site Supervisor Safety Training Scheme (SSSTS) qualification as a minimum requirement for working on a VolkerFitzpatrick project

3.31 Vibration

VolkerFitzpatrick recognises Hand Arm Vibration Syndrome (HAVS) as a serious cause of concern for persons using handheld vibratory tools, particular those of a rotary or percussive nature.

It is necessary to limit exposure to Hand Arm Vibration using the following methods listed in order of priority:

- Eliminate the hazard by substitution i.e. use of machine mounted breakers, concrete crushers, diamond drilling, etc.
- Use of low vibration equipment in preference to standard tools
- Reduce the length of exposure, for example through job rotation

These preventative measures need to be applied in conjunction with the provision of information and training for workers and their supervisors together with the introduction of health surveillance.

The specific control measures to limit exposure to vibration needs to be documented in a risk assessment which clearly defines measures to reduce or prevent exposure.

VolkerFitzpatrick will comply with the legislative requirements in respect of HAVS and whole-body vibration by providing information and monitoring and recording exposure. For more guidance on Hand arm vibration, refer to H13 *Control of Vibration at Work* and H13-PM01 *Control of Vibration at Work Process Map*.

All Hand arm vibration monitoring must be document for surveillance use H13-01 *Daily Vibration Log*.

3.32 Vehicles

Regular checks of vehicles, in conjunction with company procedures and manufacturers' recommendations, shall be carried out prior to use.

Driving or operating any vehicle is not permitted without the appropriate driving licence, competency or authorisation. Unauthorised passengers or unauthorised loads shall not be carried.

Vehicles shall not be used for unauthorised purposes. Vehicles shall not be loaded beyond the stated capacity. Driving or operating vehicles whilst suffering from a medical condition or illness that may affect ability is not permitted. Driving or operating vehicles whilst under the influence of alcohol or any other drug, which may affect operating ability, is not permitted.

All available safety features such as seat belts shall be utilised.

Use of mobile phones in vehicles whilst driving is restricted to hands free use only however still avoid making or taking phone calls when driving wherever possible. For VolkerFitzpatrick Rail projects: Use of blue tooth technology is not permitted (Network Rail Lifesaving Rule).

If you need to take a call, park in a position of safety before accepting the call.

All personnel driving at work will be required to comply with the *VolkerWessels UK Driving for Work Policy and Handbook*.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)

3.33 Welfare

The company will provide suitable and sufficient welfare facilities as detailed in the Workplace Health, Safety & Welfare Regulations or CDM 2015 Regulations as applicable.

3.34 Working At Height

Working at height (H04 *Working at Height*) is a high-risk activity which requires the closest attention to detail at all stages of the work. There is no 'safe height' and anyone who is off the ground or adjacent to excavations, basements, etc. is at risk of falling. Safe work at height shall be managed through the hierarchy of:

- AVOID the risk by not working at height - where it is reasonably practicable to carry out the work safely other than at a height do so
- PREVENT falls - where it is not reasonably practicable to avoid work at height, you should assess the risks and take measures to allow the work to be done whilst preventing, so far as is reasonably practicable, people or objects falling. This might include ensuring the work is carried out safely from an existing place of work, or choosing the right work equipment to prevent falls
- MITIGATE the consequences of a fall - where the risk of people or objects falling still remains you should take steps to minimise the distance and consequences of such falls. This also involves the selection and use of work equipment
- At all stages give collective protective measures (e.g., guardrails, nets, airbags, etc.) precedence over personal protective measures (e.g. safety harnesses)

3.35 Working Conditions / Environment

All employees shall make proper use of all safety equipment and facilities provided to control working conditions / environment.

Work areas shall be kept clear and in a clean and tidy condition.

All rubbish and waste materials including chemicals or oils within the working area shall be disposed of using the facilities provided, at correct disposal points and in accordance with the details within the appropriate method statements or specific site arrangements.

Chemicals, oils or other hazardous substances shall not be discharged into watercourses, sewers or drains. Any spillage of liquids shall be correctly contained and removed as soon as is practicable.

Toilet and welfare facilities provided shall be kept clean and tidy.

Personnel shall inspect their work areas continually to ensure they are safe and that no fire or ignition sources are left unattended during or at the end of each working period. Where the activity being undertaken carries any risk of a fire, fully charged extinguishers and precautions to stop flying sparks i.e. fire blankets / screens shall be in place. Where hot work has been undertaken the area shall be checked and any hot spots doused.

All materials shall be stored in such a manner as to eliminate hazards.

Warning signs and suitable precautions shall be provided to protect anyone from falls from height.

Any person found contravening these requirements shall be subject to disciplinary action.

3.36 Work in Rail Environment

As a large, well-established contractor, VolkerFitzpatrick Rail hold a RISQS accreditation which details the arrangements for working in a rail environment along with a Principal Contractors Licence for works on Network Rail Infrastructure. They, along with the supporting procedures, enable rail work to be conducted safely, efficiently and in compliance with all relevant Railway Group and Network Rail Standards.

For work on London Underground, VolkerFitzpatrick have developed procedures and systems to be compliant with Quality, Environment, Safety and Health (QUENSH) standards and relevant Engineering Standards as detailed by client and contract requirements.

3.0 COMPANY HEALTH & SAFETY PROCEDURES (CONTINUED)**3.37 Fatigue Management**

The company will treat the need to prevent fatigue to its employees and others affected by its work as a top priority. In doing so, it will ensure priority is given to the assessment of fatigue in its health and safety planning and to provide proper information, instruction and supervision in accordance with relevant statutory provisions such as Network Rail standard NR/L2/ERG/003 Fatigue Risk Management and other client standards and industry best practice.

3.38 Young Persons

Where it is intended to employ young persons, those being under 18 years of age, a specific risk assessment for the type of work they will be involved in shall be carried out in accordance with the Management of Health and Safety at Work Regulations 1999.

Persons under 18 years of age are prohibited from operating lifting appliances and giving signals or operating certain woodworking machines unless under supervision during training. Special consideration must be made when a person under the age of 21 years is to operate certain vehicles or plant on a public highway, i.e. only if a valid driving licence is held (medium / large sized vehicles etc.).

4.0 IMS AUTHORISATION**Document owner approval:**

Andrew Battye, Health & Safety Director - 26.01.2022

Approval for IMS:

Sarah Howard, IMS Manager - 28.01.2022