

**Health, Safety & Environmental Policy**

**VICTORIA GROUP**



**2024 Edition**

# Revision Status

Revision	Date Issued	Approved by	Signature
Draft	07/02/2023	Director Responsible for HSE	Signed on original
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This copy supersedes all previous copies.

The next review due: Q2 2025.

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**Section 1.0**  
**Statements of Intent**

## HEALTH & SAFETY POLICY STATEMENT OF INTENT

The objective of this policy is to attain and maintain high standards of health and safety performance throughout the Victoria Group (VG).

All persons conducting activities under the name of Victoria Group and its associated Ports will adhere to this Health & Safety Policy.

The Victoria Group will comply with the Health and Safety at Work etc. Act 1974 and Regulations subsequently laid under it and meet the standards required therein.

Hazards will be identified and the risk of injury, disease or dangerous occurrence will be minimised by the achievement and maintenance of high standards of health and safety. These standards will be achieved, so far as is reasonably practicable, by:

- Demonstrating a visible management commitment to high standards of health and safety performance and the promotion of a positive health and safety culture throughout the Group;
- Providing and maintaining a safe working environment that is without risk to health, together with adequate facilities and arrangements for the welfare of employees;
- Providing and maintaining plant, equipment and systems of work that are safe and without risk to health;
- Providing and maintaining means of access to and egress from the workplace that are safe and without risk;
- Having in place adequate arrangements for the regular assessment of work activities in order to identify related hazards and to control associated risk;
- Having in place effective systems to protect employees and other persons affected by Company activities;
- Having in place adequate arrangements to ensure safety and the absence of risks to health in connection with the use, handling, storage and transport of articles and substances;
- Providing such information, instruction, training and supervision as is necessary to ensure the health and safety of employees of the Group; and
- Obtain the co-operation of employees in enabling statutory obligations under health and safety legislation to be met.

**Signed**      *Steve Marshall*

**Date**              April 2023

***Director Responsible for  
Health, Safety & Environment***

**Review Date**      April 2024

## ENVIRONMENTAL POLICY & STATEMENT OF INTENT

The objective of this policy is to attain and maintain high standards of environmental performance throughout the Victoria Group. (VG).

All persons conducting activities under the name of Victoria Group and its associated Ports will adhere to this Environmental Policy.

It is the Policy of the Company to:

- Understand and comply with all applicable environmental and energy legal requirements;
- Adopt best available practice and seek to continually improve environmental performance;
- Protect the environment, by preventing pollution and contamination and minimising disturbance;
- Respond to incidents or emergencies quickly to reduce our impact on the environment;
- Reduce our CO2 emissions to meet Government targets and continue to work toward net zero 2050;
- Minimise the environmental impact by reducing, reusing and recycling waste;
- Promote efficient use of energy through monitoring and use of best technology practice;
- Raise employee awareness of the impact their activities have on the environment and encourage employee involvement in identifying areas for improvement;
- Maintain and review our Waste Management, Pollution Control and Major Accident Prevention Plans;
- Encourage environmental awareness with our Customers, Suppliers and Contractors; and
- Obtain the co-operation of employees in enabling environmental management legislation to be met.

**Signed**      *Steve Marshall*

**Date**              April 2023

***Director Responsible for  
Health, Safety & Environment***

**Review Date**      April 2024

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**Section 2.0**  
**Roles & Responsibilities**

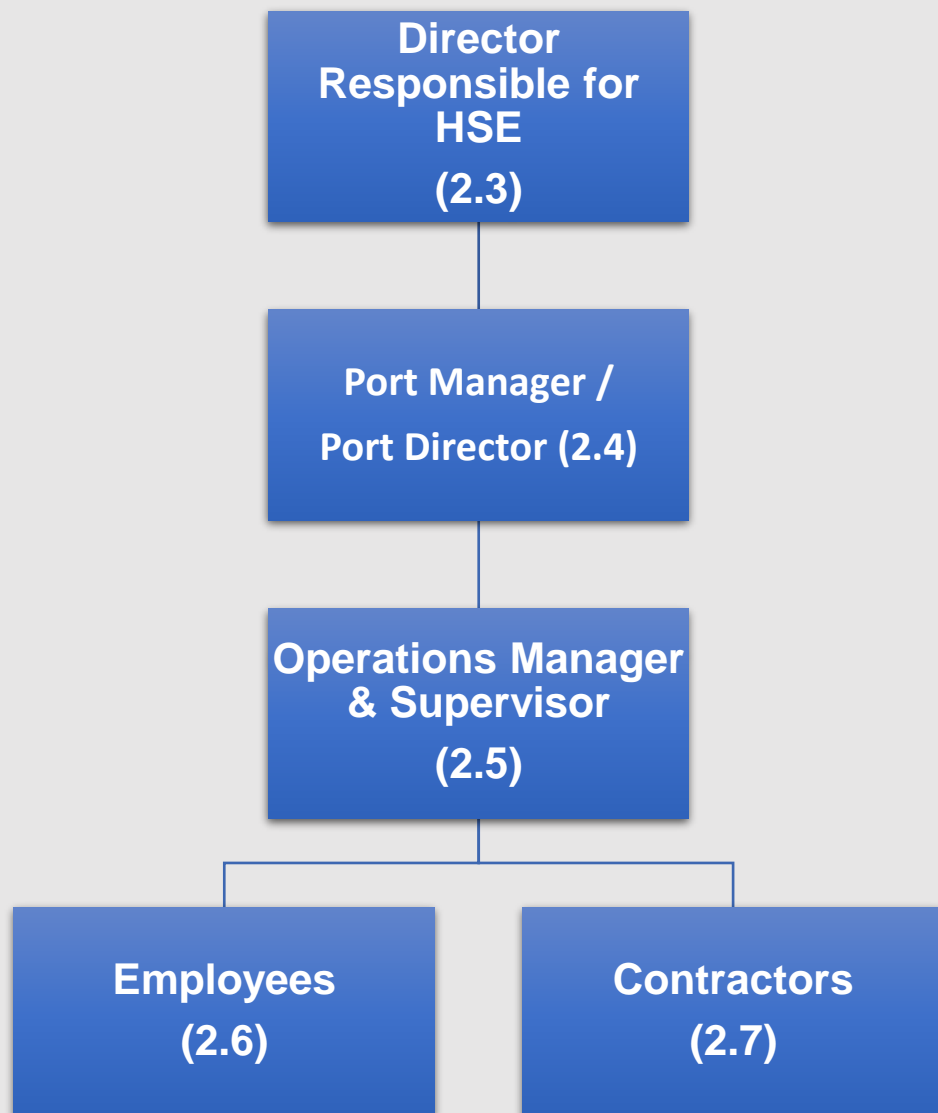
## **ROLES & RESPONSIBILITIES**

### **2.1 Introduction**

Health, safety and environmental (HSE) management is the responsibility of all personnel of Victoria Group and is a joint responsibility with contractors. It is the responsibility of the Director Responsible for HSE and Port Manager / Port Directors to ensure that all personnel and contractors are properly equipped, trained and motivated in order to ensure high HSE standards at work.

- Employees are deemed to be those persons directly employed, either on a full-time or part-time basis, by Victoria Group and those self-employed persons who undertake work on behalf of Victoria Group.
- Contractors are deemed to be those persons who work for Victoria Group but who are not direct employees. The term 'contractor' is understood to include all associated sub-contractors.
- Suppliers are deemed to be those persons who supply goods and/or services.

## 2.2 Company HSE Organisation Chart



## 2.3 Director Responsible for Health, Safety & Environment

The Director Responsible for Health, Safety and Environment (HSE) has overall responsibility for the health, safety and welfare of all Company employees, for the environmental impact of Company activities and fulfilment of all legal duties imposed on him, as the Employer, by relevant legislation.

In recognition of the legal duties imposed upon him, the Director Responsible for HSE will:

- Understand the main requirements of the Health and Safety at Work, etc. Act 1974.
- Ensure that every aspect of health, safety and the environment and its implications is given due consideration in all executive decisions.
- Set, monitor and review the effectiveness of the Company HSE Policy, ensuring that it meets current legislative requirements and accurately reflects Company activities.
- Ensure adequate resources are available to implement the Company HSE Policy and to enable legal and moral obligations to be met.
- Seek advice, as and when appropriate, on HSE issues.
- Maintain effective communication routes throughout the Company and ensure employees are aware of the Company HSE Policy and other HSE matters as they arise.
- Take immediate action in respect of:
  - Prohibition and improvement notices;
  - Matters of complaint by Health and Safety Executive Inspectors;
  - Concerns by employees or others, of HSE standards; and
  - Accidents, incidents and near misses involving Company employees.
- Ensure maintenance of registers and records as required by current legislation.
- Ensure that HSE management within the Company is periodically audited to ensure that high standards of HSE performance are being maintained and to identify areas where improvements are to be made.
- Ensure that HSE performance is regularly reviewed.

### 2.3.1 Duties Under the Construction (Design & Management) Regulations 2015

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where the Company is the **Client**, the Director Responsible for Group Infrastructure will ensure that:

- Suitable arrangements are made for managing a project, including the allocation of sufficient time and other resources. Arrangements are suitable if:
  - the construction work can be carried out, so far as is reasonably practicable, without risks to the health or safety of any person affected by the project; and
  - Welfare facilities provided from the beginning and throughout the construction phase are in compliance with Schedule 2 of CDM 2015.
- Arrangements identified above are maintained and reviewed throughout the project.
- Where there is more than one contractor on site at any time (or it is foreseeable that there will be) the following are appointed in writing as soon as is practicable before the construction phase begins:
  - A Principal Designer who controls the pre-construction phase

- A Principal Contractor who controls the Construction Phase
- Reasonable steps are taken to ensure that Designers (including Principal Designer), Contractors (including Principal Contractor), and other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure health and safety of those working on the project.
- Reasonable steps are taken to ensure that the Principal Designer and Principal Contractor comply with their respective duties.
- Pre-construction information is provided as soon as is practicable to every designer and contractor appointed, or being considered for appointment, to the project.
- A Construction Phase Plan is drawn up before the construction phase begins.
- The Principal Designer prepares and maintains a Health and Safety File.
- The HSE are notified in writing when a project is notifiable. A project is notifiable when:
  - It lasts longer than 30 working days and has more than 20 persons on site at any one time and/or exceeds 500 person days
  - All parties involved with the project cooperate with one another.

## **2.4 Port Manager / Port Director**

Workplace Managers are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Company policies are observed within their area of responsibility. Authority is delegated to Workplace Managers to oversee and enforce the implementation of the Company HSE Policy in the workplace. Port Manager / Port Directors report to the Director Responsible for Health, Safety and Environment.

Workplace Managers will:

- Be trained to a minimum level three IOSH accredited qualification in Health and Safety to understand the Victoria Group HSE Policy and interpret legislation surrounding their duties.
- Ensure that employees and contractors comply with the Company HSE Policy.
- Responsible for the migration of relevant health and safety information into T100 safety management system.
- Ensure that all new employees receive adequate induction training as soon as is reasonably practicable after joining the Company and on starting at a new site.
- Ensure all employees and contractors receive suitable information, instruction, training and where appropriate, supervision to assure their competence for the work they are to undertake.
- Ensure that all contractors are competent to conduct the work they undertake by compiling and maintaining a list of approved contractors (and their sub-contractors) authorised to work for the company.
- Monitor the performance of contractors who undertake work on behalf of the Company.
- Ensure that all plant, equipment and materials are safe and suitable for the work for which they are to be used.

- Ensure that suitable and sufficient risk assessments of Company activities are undertaken to identify and implement effective control measures required to eliminate, reduce or control the risk of harm occurring to employees or others who may be affected by the activity.
- Ensure that the results of the risk assessments are effectively communicated throughout the Company and to others who may be affected by the activity.
- Provide, maintain and instruct employees in the use of personal protective equipment as identified by risk assessment.
- In respect of hazardous substances, ensure that appropriate information is available to enable suitable assessment of the process to be conducted.
- Ensure that accidents and near misses are investigated and recorded in T100.
- Ensure that all injuries, diseases and dangerous occurrences involving Company employees are investigated and, where appropriate, reported as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Promote a positive health and safety culture amongst all employees.
- Responsible for routine documented inspections of the workplace, facilities, plant and equipment so as to maintain HSE standards.
- Bring to the attention of the Director Responsible for HSE matters relating to HSE standards or performance in timely monthly, six monthly and annual reports.
- Advise and support clients, contractors, etc. and their safety officers on matters relating to the Company HSE Policy and all prevailing legislation.
- Ensure personnel at all workplaces are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Communicate HSE matters to employees and contractors via induction training or toolbox talks.

With specific respect to contractor management Managers will:

- Ensure approved Contractors are used.
- Ensure that all contractors receive induction training on arrival at workplaces under the control of the Company and that the training is recorded and repeated at appropriate intervals.
- Ensure all contractors receive suitable information, instruction and training to ensure their competence for the work they are to undertake.
- Provide an appropriate level of supervision to contractors engaged in Company business.
- Monitor the quality of contractor's work and ensure that it is being conducted safely.
- Ensure that all electrical appliances used by contractors have been tested and are safe to use.
- Ensure that all contractors in workplaces under the control of the Company are accounted for.

## 2.5 Operations Managers & Supervisors

Operations Managers & Supervisors are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Company policies are observed within their area of responsibility. Authority is delegated to Operations Managers to oversee and enforce the implementation of the Company Health & Safety Policy on site in the workplace. Wharf Supervisors report to the Operations Manager / Port Manager / Port Director.

Wharf Managers & Supervisors will:

- Be trained to a minimum IOSH Managing Safely qualification to understand the Victoria Group HSE Policy and interpret legislation surrounding their duties.
- Ensure that employees and contractors comply with the Company Health & Safety Policy.
- Establish and maintain high standards of health, safety and environmental performance on site.
- Promote a positive health and safety culture amongst all employees.
- Ensure a safe working environment with safe access and egress at all times.
- Ensure high standards of HSE performance are maintained in the workplace.
- Ensure a safe working environment with safe access and egress at all times.
- Ensure safe working practices are observed at all times.
- Assist Port Manager / Port Directors in the risk assessment process.
- Maintain all registers and records as required by current legislation.
- Ensure safe working practices are observed.
- Develop, implement, record, communicate and monitor the effectiveness of site-specific arrangements for health, safety and environment.
- Allocate necessary resources for health, safety and environmental management on site.
- Ensure that suitable and sufficient risk assessments have been undertaken for site-specific work activities.
- Ensure that personnel under their control are adequately inducted, trained, instructed and informed.
- Ensure that appropriate equipment is available and maintained in a safe condition.
- Ensure that accidents and near misses are recorded in T100 safety management system and investigated.
- Maintain all registers and records on site, as required by current legislation.
- Carry out routine documented inspections (minimum monthly) of sites, facilities, plant and equipment so as to maintain health, safety and environmental standards.
- Immediately bring to the attention of the Port Manager / Port Director matters relating to health, safety and environmental standards or performance.

- Advise and support clients, contractors, etc. and their safety officers on matters relating to the Company Health & Safety Policy and all prevailing legislation.
- Ensure personnel at all work sites are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- Communicate health, safety and environmental matters to employees and contractors via induction training or toolbox talks.

With specific respect to contractor management, Operations Manager will:

- Ensure that contractors are competent to perform work on behalf of the Company.
- Ensure that the risk assessments of the Company activities include measures to protect contractors.
- Ensure that contractors provide risk assessments for approval prior to commencing work, making certain that their risk assessments have taken into account how their activities may affect Company employees and other persons on Company premises.
- Monitor the quality of contractor's work and ensure that it is being conducted safely.
- Ensure that electrical appliances to be used by contractors have been tested and are safe to use.
- Ensure all contractors receive suitable information, instruction, training and where appropriate, supervision to ensure their competence for the work they are to undertake.
- Ensure that all contractors on premises under the control of the Company are accounted for.

## **2.6 Employees**

All employees of Victoria Group have legal duties under health, safety and welfare legislation while at work to ensure their personal safety and that of others who may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all employees will:

- Monitor Project / Contract Managers and Site Managers / Site Supervisors to enable legal duties to be met.
- Comply with ALL requirements of the Victoria Group HSE Policy and associated procedures.
- Not intentionally or recklessly interfere with, or misuse anything, provided by the Company in the interests of HSE.
- Actively promote a positive health and safety culture throughout the Company.
- Only undertake work for which they have been trained and are authorised, qualified and competent to undertake.
- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- When on site, follow all site safety rules and procedures.



- Use and maintain in a serviceable condition all plant and equipment in accordance with the training provided.
- Use and maintain in accordance with instructions and training given, and report the loss or defect of all personal protective equipment provided by the Company.
- Make themselves aware of all site and workplace first aid, fire and emergency procedures.
- Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

All employees are to ensure that the Company as their employer is made aware of any form of disablement that is likely to affect their ability to undertake the work they are assigned.

## **2.7 Contractors**

All contractors who undertake work on behalf of Victoria Group have legal duties under health, safety and welfare legislation while at work to ensure the health and safety of themselves and others that may be affected by their acts or omissions.

In recognition of the legal duties imposed upon them, all contractors who undertake work on behalf of Victoria Group will:

- Co-operate with the Director Responsible for HSE, Director Responsible for Group Infrastructure, Port Manager / Port Director, Operations Manager and their own Employer to enable them to comply with their legal duties.
- Comply with ALL requirements of the Victoria Group HSE Policy and other rules and procedures in place and notified to them.
- Not intentionally or recklessly interfere with or misuse anything provided by the Company in the interests of HSE.
- Actively promote a positive health and safety culture on site.
- Only undertake work for which they have been trained and are qualified and competent to undertake.
- Ensure that risk assessments and method statements relating to their work are presented to the Director Responsible for HSE and Port Manager / Port Director prior to commencement of work, if they are not following the Safe System of Work provided by Victoria Group.
- Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- When on site, follow all site safety rules and procedures.
- Use and maintain in a serviceable condition all plant and equipment.
- Use and maintain in accordance with instructions and training given, and report the loss or defect of all personal protective equipment provided by Victoria Group and their own Employer.
- Make themselves aware of all site first aid, fire and emergency procedures.

- Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- Ensure all accidents are entered in the T100 safety management system Accident Book held on site and in their Employers Accident Book.
- Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

## **Section 3.0**

### **General Arrangements for Health, Safety & the Environment**

## **GENERAL ARRANGEMENTS FOR HEALTH, SAFETY & THE ENVIRONMENT**

The attainment and maintenance of high standards of HSE within Victoria Group will be achieved by the identification of hazards associated with the activities undertaken by the Company. Effective precautions and control measures to eliminate, reduce or control the risk of harm to ALL persons exposed to the hazards will be identified and implemented.

### **3.1 Advice and Guidance**

The Director responsible for HSE for Victoria Group will use all sources of information available to comply with current legislation.

### **3.2 Review and Update**

- The Company's HSE Policy and performance will be reviewed annually and any necessary updates will be made.
- No alterations will be made to Company's HSE Policy, including the organisational structure and associated arrangements, without the prior consent of the Director Responsible for HSE.

### **3.3 Communication and Consultation**

- HSE information, where it relates to Company activities will be communicated throughout the Company as it becomes available by the quickest possible means.
- Concerns over the standards of HSE within the Company or issues relating to HSE are to be brought immediately to the attention of management.
- The Company consults with its employees on HSE matters in accordance with the Health and Safety (Consultation with Employees) Regulations 2004.
- The Company will consult staff through elected health and safety representatives individually or in groups on matters of health and safety.
- The Company will ensure that all information, instruction and training is provided to all employees in a language and format that the employee can readily understand. This will include any translated inductions, safety briefings, signage, works procedures, risk assessments, health and safety updates and all other forms of communication deemed necessary to ensure that the employee is competent to carry out their work activities.

### **3.4 Training and Competence**

- All new Management employees or designate will undertake relevant IOSH Level three accredited health and safety training.
- All new Company employees will receive induction training as soon as reasonably practicable and will undertake relevant IOSH accredited training applicable to their position.
- A record of the induction process will be maintained and refresher training carried out periodically as required.
- Site-specific induction training will be given to employees and contractors whenever work commences on a new site. A copy of the site-specific induction training record will be maintained on-site and in the main office. Where Victoria Group is the contractor, site induction training shall be conducted by the Principal Contractor / Client.
- Training needs and competence requirements will be analysed to ensure the provision of appropriate training.
- Employees shall only carry out work for which they hold the appropriate competences.
- Occupational competence will be maintained via continued membership of appropriate trade associations.
- Further training shall be given:
  - For periodic refresher training;
  - When required by current best practice;
  - When being exposed to new or increased risks;

- When being transferred or given a change in responsibility; and/or
- When there is a change in work methods, technology, equipment or practices.
- A Training Record will be maintained for all employees.
- All induction and training records and, where issued, certificates of training, qualifications and competence will be held in the main office.
- Training standards will be kept under review to ensure that the requirements of current legislation and risk assessments are met.

### **3.5 Risk Assessments, Method Statements and Safe Working Practice**

- T100 Safety Management Systems will be the only format used.
- Risk Assessments will follow a standard format within safety management system.
- The Company will generate Safe Working Method Statements as and when required.

Management will ensure:

- Where significant hazards are evident and there is a risk of harm or injury from a work activity, an appropriate risk assessment will be undertaken and communicated to all those at risk, in accordance with the Management of Health and Safety at Work Regulations 1999;
- Safety method statements or written procedures detailing safe systems of work are produced based on the findings of the risk assessments;
- That all risk assessments, safe systems of work and safety method statements are communicated to all who may be affected by the activity;
- That all personnel who may be affected by the activity are made aware, that if any aspect of the activity or the environment in which it is conducted alters then a review of the risk assessment must be undertaken and appropriate changes to the safe system of work or safety method statement effected before the work is continued;
- That master copies of all assessments, safe systems of work and method statements are held in the T100 safety management system cloud.
- Systems of work are presented to Principal Contractors prior to work commencing.

Project / Contract Managers and Site Managers / Site Supervisors will also ensure that safe systems of work and risk assessments of Company contractors are approved prior to work commencing on sites under the control of Company.

### **3.6 Personal Protective Equipment**

Company management will ensure that:

- Personal Protective Equipment (PPE) is provided and used at work wherever risks to health and safety cannot be adequately controlled in other ways, in accordance with the Personal Protective Equipment Regulations 2002.
- PPE is provided to employees as required by current legislation and as identified by risk assessment to supplement existing control measures.
- PPE provided is fit for purpose and appropriate to the risk involved.
- Suitable facilities for the storage of PPE are provided and used, including on site.
- Contractors provide and wear PPE to required standards.
- Information, instruction and training will be given to all employees and contractors on the safe use and maintenance of PPE.
- Employees and contractors will, in accordance with instructions given, make full use of all PPE provided and maintain it in a serviceable condition and report its loss or defect immediately.
- On site, PPE is provided and worn in accordance with the requirements of the Principal Contractor.
- Whilst on site, safety footwear and hi-visibility jackets to the appropriate standard shall be worn at all times whilst work is being conducted on behalf of the Company, without exception.
- Gloves and protective goggles are worn when using cutting, drilling or grinding equipment RPE will be worn where appropriate for grinding and mild steel welding.

### **3.7 Employment of Young Persons**

- Risk assessments will be carried out, or reviewed, to identify and address the risks to young persons (i.e. those under the age of 18), when employed by the Company.
- Protection will be provided from any risks to the health and safety of young persons associated with their lack of experience, lack of awareness of existing risks or immaturity, in accordance with the Management of Health and Safety at Work Regulations 1999.
- Unless as part of their training, or where the work is carried out under the supervision of a competent person and where the risk has been reduced to the lowest reasonably practicable level, young persons will *not* be employed where the work:
  - Is beyond their physical or psychological capability;
  - Involves exposure to toxic or carcinogenic substances or substances which cause heritable genetic damage, harm to unborn children or cause any other chronic health effect;
  - Involves an accident risk which they may not reasonably recognise due to their insufficient attention to safety or lack of experience or training; and/or
  - Involves a risk to health from extreme temperatures (hot or cold), noise or vibration.
- Young persons will be supervised at all times when performing any task which may put them at risk.

### **3.8 Employment of New and Expectant Mothers**

- Risk assessments of the activities undertaken by Victoria Group will take into account the needs of pregnant employees and new mothers, in accordance with the Management of Health and Safety at Work Regulations 1999. The assessment will identify and address the risks to the unborn child, a child of a woman who is still breastfeeding and to the mother and will determine which tasks the employee can perform.
- The assessment will ensure that adequate steps are taken to avoid the risk to new and expectant mothers arising from exposure to physical, biological and chemical agents and from working conditions.
- Where the risk cannot be avoided then working hours may be temporarily adjusted or suitable alternative work will be offered. If this is not viable then suspension on full pay will be exercised for as long as is necessary to protect the health and safety of the mother and that of her child.

### **3.9 Employment of Persons with Disabilities**

- Company risk assessments will take into account the needs of employees with disabilities, in accordance with the Disability Discrimination Act 1995.
- Employees are to ensure that the Company, as their employer, is made aware of any form of disablement that is likely to affect their ability to undertake the work they are assigned.
- Where appropriate, employees with disabilities will be monitored at regular intervals (e.g. by routine medical examination) to ensure their suitability for the work on which they are employed.

### **3.10 Health Monitoring and Surveillance**

- Company employees are to declare any aspect relating to their health that may put them at risk while undertaking the work for which they are employed or that may be affected by the environment in which it is to be undertaken.
- Employees will be provided with health surveillance appropriate to the risks to health and safety resulting from their employment, as identified by risk assessment or legal statute, in accordance with the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).
- The Company is committed to preventing employees from being subject to undue stress whilst at work.

### **3.11 First Aid Provision**

- The Company will provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work, in accordance with the Health and Safety (First-Aid) Regulations 2013.
- Suitably trained persons will be nominated as qualified First Aiders or Emergency First Aiders to ensure adequate provision of first aid. These details will be prominently displayed in all company workplaces, and will be communicated through induction training.
- Company employees are expected to familiarise themselves with workplace first aid arrangements and facilities.
- All injuries occurring no matter how trivial are to be recorded in T100 accident book provided at the employee's workplace where the accident takes place and also in the T100 Company Accident Book held at the company premises.
- First Aid kits shall be held in all Company vehicles with the contents checked on a regular basis, and restocked if necessary.
- A qualified First Aider or Emergency First Aider shall be present or immediately contactable for assistance at all times whilst routine work is being undertaken.
- Whilst Company employees are employed as contractors to a Principal Contractor, employees are to familiarise themselves with the first aid facilities and procedures on that site.

### **3.12 Injuries, Diseases and Dangerous Occurrences**

- All accidents, near misses and dangerous occurrences involving Company employees will be thoroughly investigated.
- In the event of specified injury or fatality occurring to a Company employee statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 will be met.
- All accidents, dangerous occurrences and near misses occurring on Company premises are to be reported to the Port Manager / Port Director so that an investigation can be conducted.
- All accidents, dangerous occurrences and near misses occurring on site are to be reported to management so that an investigation can be conducted.
- While working as a contractor on the site of a Principal Contractor, reports of incidents involving Company employees are to be forwarded to the Principal Contractor.
- Reports of accidents involving contractors will be forwarded to their Employer to enable statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 to be met.

### **3.13 Fire Precautions and Prevention**

- A Fire Risk Assessment to identify fire and explosion risks for work premises, including sites under the control of the Company, will be undertaken prior to commencement of work, in accordance with the Regulatory Reform (Fire Safety) Order 2005 and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).
- Based on the results of the risk assessment, adequate means of raising the alarm, fighting the fire and means of escape will be provided to ensure the safe evacuation of personnel in the event that a fire occurs within the office.
- Fire precautions and prevention measures will be taken appropriate to the level of risk throughout premises and property under the control of Victoria Group.
- All Company employees will be instructed in the use of portable firefighting appliances as found on premises and in Company vehicles. Emergency procedures and evacuation routes will be communicated to all employees as part of their induction training.
- An adequate Fire Plan is in place and prominently displayed in offices and throughout the workplace, and communicated to all employees, contractors and visitors through induction training.
- In the event of a fire in offices or on site, the priority will be to raise the alarm and ensure

all personnel are evacuated safely. The alarm is to be raised and the local fire authorities summoned.

- The site specific fire alarm system will be maintained as necessary.
- The person discovering the fire may, if trained to do so, attempt to extinguish the fire using portable appliances and personnel are not put at risk and is to remain available to brief the fire authorities on arrival.
- Stores or materials shall not be left in access or egress routes where they may hinder escape in an emergency.
- Consideration will be given to neighbours who may be affected by a fire, as determined in the MAPP, to ensure that they are made aware of the fire and evacuated safely.
- Whilst working on sites or carrying out works within client's premises as a contractor, the fire arrangements of the Client / Principal Contractor are to be adhered to and communicated to Company employees by site-specific induction training prior to commencement of any work.

### **3.14 Smoking Policy Including Vaping**

- In compliance with the Smoke-free Regulations 2006/7, Company premises are smoke-free. Disciplinary action will be exercised if employees or contractors smoke whilst on Company premises or in Company vehicles and plant.
- Smoking / Vaping is only permitted in those external areas designated by management.
- Smoking / Vaping is strictly prohibited in areas where flammable liquids are stored or used.
- Whilst working on premises owned by the Client, or on the site of a Principal Contractor, the smoking policy of that Client or Principal Contractor will be adopted and, as such, all employees and contractors who undertake work on behalf of the Company are to adhere to that policy.

### **3.15 Alcohol and Controlled Substances**

- Disciplinary action will be exercised if, while under the influence of alcohol or controlled substances (drugs), employees or contractors enter Company premises, a site under the control of the Company or drive Company vehicles.
- Company employees and contractors shall not have alcohol or controlled substances in their possession whilst working on Company premises, on sites under the control of the Company or driving Company vehicles.
- Any person known or strongly suspected of being under the influence of alcohol or controlled substances will be removed from the workplace / work site immediately.

### **3.16 Violence towards Employees**

- Incidents of violence, threatening and/or abusive behaviour by employees whilst at work will result in disciplinary action.
- In the event that Company employees are faced with aggression or threat of violence, a non-confrontational position is to be adopted.

### **3.17 Lone Workers**

- Wherever practicable, Company employees are not to work alone in high-risk activities or areas.
- Where it is unavoidable, a suitable risk assessment will be made and the lone worker will ensure that management is aware of their whereabouts and the nature of the work being undertaken. The lone worker will make contact with nominated personnel at pre-arranged times throughout, and on completion of, the activity.
- Lone workers are included in the Company Liability insurance cover, in accordance with the Employer's' Liability (Compulsory Insurance) Act 1969 as amended 2008.



### **3.18 Mobile Phones**

- It is an offence under the Road Vehicles (Construction and Use) Regulations 2020 (as amended) to use a hand-held phone or similar device when driving.
- No calls are to be made or received by the driver of a moving vehicle unless the vehicle is fitted with a working 'hands free' kit and it is considered that it is safe to do so.
- Calls dealt with in this way are to be short duration calls only. Longer duration calls are to be dealt with by pulling over to the side of the road into a suitable parking area when it is safe to do so to continue the conversation.
- No calls are to be made / received on mobile phones while operating any plant or equipment unless either a hands free device is used or the plant or equipment has been stopped in a safe place for that purpose, switched off or made safe.
- Mobile phones must not be used whilst employees carry out hazardous work activities.
- Mobile phones must not be used in the vicinity of gas storage areas, chemical and oil storage areas or in the vicinity of other flammable substances.

### **3.19 Waste Policy**

- The Company has adopted an Environmental Policy Statement of Intent, for the management of environmental issues that includes waste.
- Waste will be managed in accordance with the Hazardous Waste Regulations 2005.
- The Company is registered as a licensed waste producer / carrier with the Environmental Agency.
- Routes exist for the legal disposal of waste arising from all materials in use by the Company, in accordance with current legislation and best practice.
- Where practicable, work will be planned and managed so as to minimise waste production.
- All waste shall be disposed of via an authorised disposal route.
- Waste shall not be illegally deposited, disposed of or treated by any person where that waste has been, or will be, under the control of the Company.
- Recycling of waste will be encouraged wherever possible.

### **3.20 Welfare**

- The Company is committed to providing a safe and healthy work environment that takes into account the welfare needs of all its employees, including those with disabilities.
- Welfare provision will be in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992 and Schedule 2 of the Construction (Design and Management) Regulations 2015.

### **3.21 Environmental Management**

- The Company will ensure that all staff are trained in the Environmental Policy and are given ongoing information, instruction and training to ensure its implementation in all company operations.
- Management is responsible for the implementation and monitoring of the Environmental Policy and for dealing with any complaints in connection with environmental issues which may arise in the course of the company work activities.
- Current environmental legislation will be regarded as setting the minimum standards of environmental performance for the company.
- The Company will implement measures to ensure that the business makes the most economic use of transport. Sharing of company vehicles will be optimised and travel to the company premises will be minimised to reduce the company use of fuel.
- Waste will be minimised through careful planning of design and use of materials. The Company will comply with the Duty of Care Regulations at all times and all services used for the disposal of waste will be checked to ensure that the appropriate licences are held.
- The Company will attempt through its purchasing policies to eliminate or reduce the use of ozone depleting chemicals and timber sourced from forests that have not been independently certified as sustainable.

- The Company wherever possible will attempt to use suppliers who are willing to take away packaging for re-use or recycling.
- The Company will attempt to reduce energy and water consumption and to minimise carbon dioxide emissions. The company will also promote the use of energy efficient products and source its energy from safe and sustainable sources.
- The Company will ensure that its operations do not cause a nuisance to the community through the generation of dust, noise or odour.
- In the office environment paper will be used sensibly with increased use of electronic communication to reduce the need for paper use. Paper and cardboard will be recycled whenever possible.
- The Company will check areas in which work takes place for endangered species, protected plant species, trees subject to a tree preservation order and protected archaeology before work takes place. Control measures will be introduced to reduce the environmental impact of company work activities to a minimum and to comply with all environmental safeguards required.

### **3.22 Safety Signage**

- Appropriate safety signs and notices will be posted throughout Company premises and on Company managed sites as identified via risk assessment and in accordance with the Health and Safety (Safety Signs and Signals) Regulations 1996.

### **3.23 Access and Egress**

- All workplace access and egress routes are kept clear at all times.
- Emergency escape routes are unobstructed. Stores or materials shall not be left in access or egress routes where they may hinder escape in an emergency.
- If operatives are unable to access their working area safely, they must inform their Line Manager and not take personal risks.
- On sites where the Company is the Principal Contractor, access to the site is restricted to authorised persons only and all reasonably practicable site security measures are taken to prevent unauthorised access. All unauthorised persons are immediately escorted off site.
- When working on construction sites, all access equipment is made safe when not in use and secured against unauthorised use.

### 3.24 Homeworking

- The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes dealing with the risks to employees who are classed as homeworkers.
- The definition of a homeworker is `any person who carries out work at their home on behalf of; authorised by or with the consent or knowledge of the Company and its management`.
- The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999, and guidance (INDG 226) issued by the Health and Safety Executive.
- Work activities carried out at an employee`s home will be subject to risk assessment in the same way as if the work was carried out at company premises.
  - All equipment provided by the Company for use at home will be inspected and maintained in accordance with the relevant legal requirements and company policy.
  - The employee will be responsible for the maintenance of the building structure and equipment, fixtures and fittings within their home that they own, including the domestic electrical system.
  - All display screen equipment provided by the Company for use at home will be subject to a system of analysis and inspection.
  - All homeworkers will be provided with suitable and adequate information, instruction and training relevant to the work activities carried out by them at home.
  - All homeworkers will be provided with adequate first aid provisions in accordance with an assessment of the nature of the work activity and the risks involved.
  - All homeworkers are required to report all accidents and incidents involving work activities carried out at their home to their manager / supervisor.
  - Managers / supervisors of homeworkers are responsible for ensuring their health, safety and welfare, including making regular contact by telephone or other means of communication.

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## **Section 4.0**

### **Workplace Arrangements for Health, Safety & the Environment**

## **WORKPLACE ARRANGEMENTS FOR HEALTH, SAFETY & THE ENVIRONMENT**

The following topics have been identified as significant in terms of workplace hazards and detail the Company's policy on how the risk to personnel exposed to them will be reduced or controlled.

### **4.1 Abrasive Wheels**

- The abrasive wheel marking system should conform to Annex A of BS EN 12413 and BS ISO 525.
- Only trained personnel who have been appointed by management are permitted to change any class of abrasive wheel.
- The Company will ensure that suitable storage facilities are available in order to keep wheels clean and free from damage and that a sufficient quantity of suitable eye protection to BS EN 166B is available when required.
- Guards or shields supplied by the manufacturer are correctly fitted to all machines while in use and are not altered in any way.
- Adequate ventilation is to be provided to remove the various gases and fumes emitted during grinding processes. Where adequate ventilation cannot be achieved suitable respiratory protection will be provided to protect personnel from the harmful effects of exposure to gas and fumes - Bulletin No: STSU1 – 2019.
- Defective abrasive wheel machines are taken out of use immediately.

### **4.2 Asbestos and Asbestos Containing Materials (ACMs)**

- The Company recognises that it has a responsibility to provide a safe and healthy working around asbestos containing material and a responsible person/duty holder will comply with the Control of Asbestos Regulations 2012 & the ACOP L143 Managing and Working with Asbestos. In compliance with the Control of Asbestos Regulations 2012, training is mandatory for anyone liable to be exposed to asbestos fibres at work and where asbestos containing material is found the Port will maintain an asbestos register clearly detailing areas and precautions to be taken.

### **4.3 Cartridge Operated Tools**

- Only low velocity, indirect-type, cartridge-operated tools will be used.
- Only trained personnel who have been authorised by management may operate cartridge-operated tools.
- Suitable ear protection and eye protection to BS EN 166B must be worn when operating these tools.
- Explosive charges shall be stored in a secure stowage separate to the tool.
- Only the required amount of charges to complete the task shall be issued to authorised persons.
- Operators must ensure that the work area is clear of other persons and flammable vapours prior to using these tools.

### **4.4 Chemicals / Hazardous Substances**

All hazardous substances / chemicals used or generated by the Company will be subject to a CoSHH assessment to identify the measures required to reduce the risk of harm occurring to employees as a result of exposure, in accordance with the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).

Company management will ensure that:

- All hazardous substances / chemicals used by the Company are identified and inventoried.
- Safety Data Sheets for all hazardous substances used by the Company will be obtained from suppliers.

- A comprehensive assessment of the processes involving the use of hazardous substances or those generating hazardous by-products such as dust and fumes is to be carried out.
- Regular reviews of assessments of processes involving the use of, or contact with, hazardous substances are to be undertaken.
- Appropriate control measures are to be put into place to prevent, reduce or control the exposure of all personnel to the harmful effects of hazardous substances and by products of processes.
- Suitable and sufficient personal protection equipment is to be provided to employees exposed to hazardous substances and materials. Employees are to be adequately trained in the use of specialist personal protection equipment.
- Appropriate information, instruction and training will be given to employees exposed to hazardous substances and materials.

#### **4.6 Compressors and Compressed Air Tools**

- Compressors under contract of hire will have a current Certificate of Thorough Examination.
- Compressors owned by the Company will be subject to regular maintenance in accordance with manufacturers' recommendations.
- Regular inspections of compressors and compressed air tools will be conducted to detect leaks / corrosion / other problems.
- All safety valves and gauges will be functioning correctly with the safe working pressure clearly marked on the air receiver.
- Compressors and compressed air tools are only to be operated by trained and competent persons.
- Defective compressors, hoses or tools are to be removed from service immediately to a place where they cannot be introduced back into service until a repair has been effected by a competent person.
- Only trained personnel who have been authorised by management may operate gas cartridge-operated and portable compressed air tools, i.e. nail guns.
- Operators must ensure that the work area is clear of other persons, all guards are fitted and interlocks checked and in a serviceable condition prior to using these tools.
- All persons operating compressed air lines must wear the PPE provided to prevent injury from flying debris.

#### **4.6 Confined Spaces**

- A confined space is defined as a place that is substantially, though not necessarily entirely, enclosed and where there is a foreseeable risk of injury from hazardous substances or conditions within the space or from nearby.
- Where work in a confined space is unavoidable it is conducted in accordance with a Safe System of Work as required under the Confined Spaces Regulations 1997.
- Activities conducted within the confined space are the subject of a risk assessment to ensure adequate control measures are in place to protect personnel involved or affected by the activity. Where a significant risk is identified a formal Permit to Work system will be in operation.
- No person shall work alone when working in a confined space. All persons will be trained for confined space work and a trained competent 'Topman' will always be in attendance when confined space work is being undertaken.
- Contractors who undertake work on behalf of Victoria Group are to comply with this policy and follow safe working procedures when working in confined spaces.
- Persons working in dark spaces will be provided with portable lighting. Support personnel will be on hand at all times with hand torches.

#### **4.7 Display Screen Equipment**

- All Company workstations consisting of Display Screen Equipment (DSE) will be the subject of an ergonomic assessment to identify the measures required to reduce the risk of harm occurring to the operators/users of such workstations, in accordance with the Health and Safety (Display Screen Equipment) Regulations 1992.
- Employees whose work requires them to operate their DSE workstation daily for a significant part of the day will be entitled to a free vision screening or eye test on request. Where such examinations identify the requirement, the Company will provide, free of charge, corrective appliances required specifically for DSE work.
- Employees whose work requires them to be at their DSE workstation for a significant part of their working day are to vary their work routine such that they perform other work activities away from their display screen equipment for approximately 10-15 minutes per hour.

#### **4.8 Driving on Company Business**

- All staff driving on Company business must be qualified and medically fit to drive the vehicle and hold adequate insurance. Employees must inform the company of any disqualifications or other reasons such as medical conditions that may affect their ability to drive or operate vehicles or plant.

#### **4.9 Dust and Fumes**

- All processes conducted by Company employees and contractors that result in the generation of dust or fumes will be subject to an assessment under the Control of Substances Hazardous to Health Regulations 2002 (as amended).
- Control measures to protect personnel exposed to dust or fumes will be identified and put in place. All personnel likely to be exposed to the dust are to be informed of the harmful effects and of the precautions and control measures to be implemented to prevent, reduce or control exposure to the dust or fumes.
- Where identified by the risk assessment, suitable personal protective equipment will be provided to supplement other control measures. Personal protective equipment is to be worn by all personnel identified in the assessment in accordance with the training and instruction provided.

#### **4.10 Electricity and Portable Electrical Appliances**

The Company recognises the need to ensure that all electrical equipment shall be safe at all times. This will be achieved by:

- The use of battery operated tools or 110 volts within the workplace wherever practicable;
- Wherever practicable, circuits will be protected by residual current devices (RCD) where mains voltage is to be used. Where fitted, residual current devices will be tested regularly by operation of the test button;
- Sufficient socket outlets will be provided and the use of adaptors and extension leads is to be discouraged. Sockets are not to be overloaded.
- Workplace tools used on site will be in good condition and double insulated;
- All equipment is to be switched off before unplugging or cleaning;
- All electrical equipment shall be switched off and unplugged when not required for use;
- Undertaking assessments to identify hazards associated with each individual item of machinery and implement specific safety rules and procedures for the authorised operative to follow;
- Ensuring all electrical appliances and equipment are periodically examined and tested at a frequency in accordance with current HSE guidance;
- Maintaining a record of all inspections / tests of electrical equipment and appliances;
- Ensuring that equipment operators regularly carry out a visual inspection of equipment and associated cables and plugs for signs of obvious damage;
- Ensuring that all safety devices and guards are serviceable and in place prior to the use of equipment;



- Immediately reporting and prohibiting the use of defective equipment, including leads and plugs;
- Only authorised and competent persons will be permitted to repair or alter electrical equipment. Temporary or makeshift repairs are not to be undertaken.

#### **4.11 Flammable Liquids / Fuels**

- All flammable liquids / fuels shall be stored in accordance with the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).

Management will ensure that:

- Only the required quantity of flammable liquids / fuels is stored on Company premises for immediate use.
- All flammable liquids / fuels shall be kept in approved containments and in an approved stowage. Each storage area shall be designated as a 'No Smoking Area'.
- The storage and use of flammable liquids / fuels are subject to a risk assessment to ensure adequate control and mitigation measures are in place to protect against foreseeable incidents.
- All persons involved in the storage, handling, use and transport of flammable liquids / fuels will be supplied with suitable information, instruction and training on the precautions and actions to take to safeguard themselves and others.
- When not in use, containers of flammable liquids / fuels are kept closed and stored in suitable cabinets or bins of fire-resisting construction, which are designed to retain spills (110% capacity volume).
- Containers are located in designated areas away from the immediate work process area and do not jeopardise the means of escape from the area.
- Flammable liquids / fuels are stored separately from other dangerous substances that may enhance the risk of fire or compromise the integrity of the container (e.g. energetic substances, oxidizers and corrosive materials).
- The carriage of fuels will satisfy The Carriage of Dangerous Goods by Road Regulations 1996.

#### **4.12 Gases, LPG, Refrigerants**

- Compressed gas cylinders shall be stored in a designated, secure stowage when not in use, observing segregation rules at all times.
- If LPG is present on Company premises, LPG cylinders shall be stored in a designated stowage in the open air, which shall satisfy the requirements of current legislation and best practice when not in use. LPG cylinders shall not be stored within 3 metres of any other compressed gas cylinders, including acetylene. Empty cylinders and cylinders not in use shall be removed to the storage area as soon as practicable. Only those LPG cylinders in use or connected to equipment may be kept in work areas.
- Refrigerant cylinders shall be stored and transported in a secure, designated storage. The storage shall satisfy the requirements of current legislation and best practice.
- All work with refrigerants shall be subject to risk assessment and carried out in accordance with a safe system of work.

#### **4.13 Hot Works**

Hot work results from equipment utilising a naked flame or generating heat and sparks and includes the following:

- Soldering and brazing
- Welding and cutting
- Use of blow lamps

All hot work will be the subject of an assessment and if it is considered foreseeable that accidental injury or damage is likely to occur as a result of the hot work, a Hot Work Permit system will be employed.

When conducting hot work:

- Appropriate firefighting provisions shall be available;
- Appropriate RPE must be worn and / or LEV's available Bulletin: STSU1 – 2019;
- All sources of fuel shall be removed prior to work commencing;
- The area of the work shall be monitored on completion of the work until the risk of fire has been removed; and
- No hot work shall be conducted within 30 minutes of the end of the working day.
- All hot work conducted by contractors shall be subject to a Safe System of Work approved by management prior to work commencing.

#### **a. Soldering**

The Company recognises the need to minimise exposure to solder flux fumes. This will be achieved by:

- Monitoring employees' exposure to solder flux fumes;
- Utilising a CoSHH assessment to determine the potential health risks caused by exposure to solder flux fumes and deciding whether or not exposure is 'significant' and what precautions are needed to protect workers health , including suitable health checks (health surveillance);
- Putting in place appropriate systems of work and controls, e.g. tip extraction, local extraction ventilation, to prevent or control exposure to solder flux fumes and keeping equipment in efficient working order;
- Providing adequate washing facilities;
- Informing the workforce of the potential health risks caused by working with solder flux fumes and the precautions to be taken;
- Training workers in the use of any control measures and protective equipment.

In addition, the Company will report any instances of medically confirmed occupational asthma or dermatitis to the Health and Safety Executive in accordance with RIDDOR 2013.

#### **b. Welding, Cutting and Burning**

- The hazards associated with welding operations are burns, damage to the eyes from ultra-violet radiation, electric shock, possible explosion, noise, fumes and gases. Welding operations are therefore only to be undertaken by trained and competent personnel.
- Adequate ventilation is to be provided to remove the various gases and fumes emitted during welding processes. Where adequate ventilation cannot be achieved suitable respiratory protection will be provided to protect personnel from the harmful effects of exposure to gas and fumes - Bulletin No: STSU1 – 2019.
- All welding operations are to be screened to protect persons working nearby. The use of portable screens will be utilised at all times.
- Welding and burning operations are only to be conducted in areas where there is no risk of fire due to the proximity of combustible materials, flammable liquids or flammable gases. An appropriate fire extinguisher is to be available prior to commencing the hot work and an inspection of the working area is to be conducted on completion to ascertain that no fire risk exists.

#### **4.14 Housekeeping**

- In order to promote a safe working environment and good hygiene standards, high standards of housekeeping will be maintained at all times throughout Company premises.
- All materials will be stored to reduce the risk injury to personnel and to minimise fire risk.
- Combustible materials will not be stored adjacent to heat sources.
- Rubbish will not be allowed to accumulate and will be safely disposed of regularly.
- All spillages will be cleared up immediately.

- Vehicular and pedestrian access and egress routes shall be maintained at all times, both internally and external to buildings. Routes are to be kept clear for emergency purposes.

#### **4.15 Lifting Operations and Lifting Equipment**

The Company recognises the need to ensure that all lifting equipment and lifting operations shall be safe at all times. This will be achieved by:

- Hiring in suitable equipment, together with operators and banksmen, where necessary;
- Ensuring all lifting operations and lifting equipment conform to the Lifting Operations and Lifting Equipment Regulations 1998;
- Ensuring all those employees involved in lifting operations are suitably competent to perform the work and operate the equipment;
- Ensuring that all wire ropes and chains are fitted to crane hooks correctly; that they are inspected and tested, and that the results are recorded as necessary;
- Ensuring that all lifting gear is fit for purpose and capable of safely carrying out the work it is employed to do;
- Performing a risk assessment prior to any lift to identify the measures required to protect those involved with the lift;
- Effectively communicating to all personnel involved with the lift the established Safe System of Work which includes:
  - Thorough planning of the operation, along with the selection, provision and use of suitable lifting devices and equipment;
  - The maintenance, testing and examination of all equipment;
  - Supervision by a trained and competent person/banksman with the necessary authority to progress or stop a job as is necessary;
  - The prevention of unauthorised use or movement of equipment by any unauthorised person; and
  - The safety of all personnel involved in the lift as well as those not involved in the lift but who may be affected by the lifting operation.
- Marking all lifting gear and equipment with a means of identification to show its safe working load.
- Ensuring that all lifting equipment is subject to thorough ongoing examination, and where appropriate, inspection by competent persons.

##### **a. Use of Cranes**

- All work involving the use of cranes (mobile or otherwise) is to be carried out in accordance with BS 7121 Safe Use of Cranes.
- All crane operations are to be planned and controlled by a suitable competent and responsible Appointed Person.
- The maximum capacity at a given radius for each lift to be clearly recorded in a Lift Plan for each crane. Operators do not lift loads that exceed the specified maximum capacity.
- A Safe System of Work must be in place and communicated to all personnel prior to work commencing.

##### **b. Fork Lift Trucks**

The Company recognises the need to ensure that all operations involving the use of fork lift trucks shall be as safe as reasonably practicable at all times. This will be achieved by adhering to the following:

- Fork lift trucks are only to be operated by suitably competent and authorised personnel.
- A risk assessment and safe working procedure will be established for all fork lift truck operations to protect those at risk.
- The results of the risk assessment and safe working procedure will be communicated to all relevant employees;
- Appropriate PPE as identified by risk assessment will be worn at all times when operating a fork lift truck or when working in areas where fork lift trucks operate.

- In addition to PPE requirements, fork lift truck operators must wear a seat belt at all times when in the truck cab.
- A documented check of each fork lift truck must be conducted prior to use / on a daily basis.
- Operational areas for fork lift trucks are designated and communicated to appropriate staff. Appropriate signage is erected warning of the hazard.
- The maximum capacity for a fork lift truck is clearly signed. Operators do not lift loads that exceed the specified maximum capacity.
- The carriage of passengers on a fork lift truck is strictly prohibited.
- Keys are removed when not in use.

#### **4.16 Manual Handling Operations**

The Company recognises the need to ensure that all manual handling operations shall be as safe as reasonably practicable at all times, in accordance with the Manual Handling Operations Regulations 1992 (as amended). This will be achieved by:

- Wherever possible, the requirement to conduct manual handling operations will be avoided by use of a fork lift truck or other suitable mechanical means. Where manual-handling operations cannot be avoided then mechanical aids will be utilised, or the load split to reduce the risk of harm, or group-handling techniques will be used.
- An assessment of manual handling operations will be conducted to identify control measures required to protect those at risk from the manual handling operation.
- The results of the manual handling operations risk assessment will be communicated to all employees.
- Employees will be adequately trained in correct manual handling techniques.
- Appropriate information relating to the weight, centre of gravity or the heaviest side of the load will be provided to those personnel involved in the manual handling of the load.
- Where vehicles are used to eliminate or reduce manual handling operations, loads shall be checked as secure by the driver prior to moving the vehicle.

#### **4.17 Marine Vessels and Plant**

- All marine vessels, plant and equipment are maintained and operated in accordance with MCA specifications. Vessels are subject to periodic inspection by the MCA and are not operated without current certification.
- Appropriate and adequate manning levels are maintained at all times on marine vessels.
- Crew members are suitably competent and able to operate marine vessels, plant and equipment.
- All crew members follow the safe operating procedures established for the vessel.

#### **4.18 Noise**

- The Company aims to protect employees hearing from excessive noise whilst at work, in accordance with the Control of Noise at Work Regulations 2005.
- The Company will seek to ensure, so far as is reasonably practicable, that all equipment used, hired or purchased will only generate noise levels below those recommended by applicable approved codes of practice and official guidance notes.
- Where noise levels are likely to exceed the Lower Exposure Action Value perceived at the operator's ear an assessment will be conducted and control measures identified and implemented to reduce or control personal exposure.
- Suitable ear defenders providing adequate attenuation will be provided where appropriate to all affected personnel, at no cost to them, together with appropriate instructions on their use.
- Where noise levels are likely to exceed the Upper Exposure Action Value perceived at the operator's ear the wearing of hearing protection will be enforced and hearing protection zones identified.
- In no situation will the exposure limit value (ELV) be exceeded.
- All employees will use hearing protection provided for their protection.

#### **4.19 Plant, Work Equipment and Machinery**

- Where appropriate, a Work Equipment & Machinery Assessment will be conducted for plant and work equipment.
- Company employees will only use plant and work equipment that is correct and suitable for the job and will ensure that the plant / equipment is maintained in an effective state, in efficient working order and in good repair, in accordance with the Provision and Use of Work Equipment Regulations 1998.
- Sufficient clear and unobstructed working space will be provided around plant / work equipment to allow persons to work without the risk of injury.
- Adequate lighting and ventilation will be provided to allow personnel to operate plant / work equipment safely.
- Plant and equipment will be regularly inspected and tested as required by current legislation and defects or loss reported immediately. Records of inspection and maintenance will be held in the main office.
- Defective equipment will be taken out of service immediately to a place where it cannot be brought back into use until it has been repaired by a competent person.
- Only authorised and competent persons will undertake maintenance, repairs, testing, installation or alterations of any nature to any plant or equipment.
- Where required all safety devices and guards will be operable and in use.
- Where the use of the equipment involves a specific risk to health and safety, the use of the equipment will be restricted to personnel who are trained, competent and authorised in its use.
- All employees will receive adequate training and instruction in the use and safe operation of all plant and equipment that they are required to operate.
- Plant and work equipment must not be used when unprotected members of the public are present.

##### **a. Hired Plant / Equipment**

- Where required, plant / equipment will be hired as and when necessary from a reputable company.
- All reasonable precautions shall be taken to ensure that hired plant / equipment is safe to use.
- When plant / equipment is hired in for use by the Company, suitable instruction, training and demonstration of its safe use is to be provided by the Hire Company before it is operated by employees.
- If employees are not deemed competent to operate the hired plant or equipment, a competent operator will be obtained to operate that equipment.

##### **b. Workshop Machinery**

- Machinery within the Workshop will only be operated by trained and qualified personnel authorised by the Workshop Managers.
- Personnel under the age of 18 will not be permitted to operate machinery unless they have completed approved training and are under the supervision of a competent person.
- Guards on the machinery will be in place at all times and correctly adjusted prior to use.
- Defective machinery shall be immediately reported to the Workshop Manager, and taken out of service.
- Hearing protection provided will be worn at all times by all personnel within the Workshop subject to a noise assessment.
- Sufficient clear and unobstructed working space will be provided around the machines to allow persons to work without the risk of injury.
- Adequate lighting and ventilation will be provided to allow personnel to operate machinery safely.
- Local Exhaust Ventilation and dust extraction equipment must be checked running prior to the use of the Equipment.

### **c. Hand / Small Tools**

- All hand / small tools are of a suitable quality and are used only for their intended purpose and in the correct manner.
- All hand / small tools are kept clean, well maintained and are stored in a safe manner and condition so as not to cause an obstruction or danger to others when not in use.
- Site operatives are adequately trained in the use of hand / small tools.

#### **4.20 Pressure Cleaners**

- Pressure cleaners will be installed, maintained, tested and repaired by a competent person, and records of maintenance and tests kept.
- Equipment is to be operated by trained, authorised and competent personnel and eye protection is to be worn at all times by operators to protect from flying debris.

#### **4.21 Slips, Trips and Falls**

- Trailing leads and hoses are laid to minimise the risk of trips. Cable protection is fitted when possible to reduce the risk of tripping.
- Floor coverings will be sound and in good state of repair. All spillages will be cleared away immediately.
- All corridors, accesses, egresses and stairwells will be adequately lit and kept clear of obstacles and rubbish.
- Offices and working areas will be kept tidy at all times and all rubbish will be removed at the end of each day.

#### **4.22 Storage Racking, Materials Storage and Handling**

- All racking designed for the storage of materials will be fit for purpose and capable of supporting the required loads.
- Safe working loads will be marked on all racks.
- Company personnel will be trained in safe methods of stacking materials on the racking and removing materials from the racking.
- Materials will be stored and stacked to reduce the risk of manual handling injuries.
- All storage racking will be regularly inspected by a competent person to ensure stability and integrity. Inspections will be recorded.

#### **4.23 Vibration**

Hand Arm Vibration and Whole Body Vibration can occur from regular and frequent use of:

- Hand held power tools
- Hand guided power equipment
- Powered machines which process hand held materials
- Plant and vehicles

In accordance with the Control of Vibration at Work Regulations 2005 management will:

- Conduct assessments to determine the risks from vibration to employees;
- Decide if employees are likely to be exposed above the daily exposure action value (EAV) and if they are:
  - Introduce a programme of controls to eliminate risk, or reduce exposure to as low a level as is reasonably practicable; and
  - Provide health surveillance (regular health checks) to those employees who continue to be regularly exposed above the action value or otherwise continue to be at risk.
- Decide if employees are likely to be exposed above the daily exposure limit value (ELV) and if they are:
  - Take immediate action to reduce their exposure below the limit value.

- Vibration levels shall be a consideration when purchasing or hiring equipment used by the Company.

#### **4.24 Waste Management**

- Waste will be managed in accordance with the Hazardous Waste Regulations 2005.
- For projects in excess of £300,000 a Site Waste Management Plan will be produced and implemented in accordance with the Site Waste Management Plan Regulations.
- Fluid and solid waste will be managed to ensure the protection of personnel who may be exposed to such materials and to minimise any potential harm to the environment.
- An assessment of the potential harm from exposure to waste materials will be undertaken to identify appropriate control measures to reduce the risk of harm occurring to personnel involved in handling waste materials.
- Waste management procedures will be communicated to all employees during induction training.
- Tanks and drums provided to hold waste oils and other fluids are to be bunded and all spillage immediately cleared away.
- Waste materials will be removed under contract by a licensed operator, and where appropriate, in accordance with the Hazardous Waste Regulations 2005.

#### **4.25 Weather Conditions**

- Consideration of the anticipated weather conditions will be given to ensure that suitable precautions are taken to safeguard those undertaking or those who may be affected by the work.
- Industry guidance will be consulted when deciding the maximum wind speeds for working at height.
- The decision to continue or suspend work at height will be based on wind speed, control measures already in place to prevent the fall of personnel or materials, position and height of the work activity and the size of materials being handled.

#### **4.26 Welfare Facilities**

Where reasonably practicable, the following facilities will be provided for employees and contractors of the Company:

- Washing facilities
- Rest facilities
- Sanitary facilities
- Methods for heating food and boiling water
- Storage and drying facilities for clothing

Where the company is working as a contractor, negotiations will be conducted to enable employees and contractors of Victoria Group to share the facilities provided by the Principal Contractor. The Port Manager / Port Director will ensure that site welfare arrangements are in compliance with Schedule 2 of the Construction (Design and Management) Regulations 2007.

## **4.27 Working at Height / Working on Fragile Surfaces**

### **a. General**

- All work at height will be conducted in accordance with the Work at Height Regulations 2005 (as amended).
- The Company's overriding principle is to do all that is reasonably practicable to prevent anyone from falling.
- The Company shall:
  - Avoid work at height where they can;
  - Use work equipment or other measures to prevent falls where they cannot avoid working at height;
  - Where they cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distances and consequences of a fall should one occur.
- The Company will ensure:
  - All work is properly planned and organised;
  - All work at height takes account of weather conditions that could endanger health and safety;
  - Those involved in work at height are trained and competent;
  - The place where work at height is done is safe;
  - Equipment for work at height is appropriately inspected;
  - The risks from fragile surfaces are properly controlled;
  - The risks from falling objects are properly controlled.
- It is prohibited to drop or throw anything from a height unless sufficient and adequate controls have been identified via risk assessment and implemented.
- It is prohibited to drop or throw anything from a height of more than one storey. Employees and Contractors are to lower items down using ropes or via chutes into skips. If necessary. Lowering materials must be conducted in a controlled manner.

### **b. Risk Assessment**

- Before carrying out any work at height, including the use of ladders, a risk assessment of the work to be undertaken will be conducted. The risk assessment will take into account weather conditions and other aspects of the environment to ensure the safety of personnel at height and identify the measures required to protect persons working at height.
- All equipment identified by the risk assessment and provided for working at height will be sound and fit for purpose and will be the subject of regular inspection and testing to ensure its continued suitability for the job.

### **c. Scaffolding and Towers**

- All scaffolds and towers shall be erected by fully trained, competent contractors (i.e. PASMA certified) in accordance with current legislation, British Standards, approved Codes of Practice, company procedure and Industry standards.
- 'Designed' scaffolds will be designed by a competent person in accordance with current standards, guidance and Codes of Practice.
- Scaffolds will be erected by appropriately trained, competent employees in accordance with industry standards and design specifications.
- All scaffolds will be inspected by a trained and competent person, and records of such inspections kept:
  - Prior to use;
  - After any substantial addition or dismantling;
  - After alteration;
  - After any event likely to affect its strength or stability; and
  - Weekly.
- Where practicable, hand-over certificates will be issued to the Company and a joint inspection carried out.



- Employees of Victoria Group shall not use any scaffold unless it has been erected and inspected as above.
- During erection, unauthorised access to scaffolds will be prevented by the use of appropriate barriers and signage.
- Where Victoria Group use portable tower scaffolding the person responsible for erecting, dismantling and using the equipment will be trained and competent.

#### **d. PPE and Safety Harnesses**

- All employees will wear PPE identified through assessment. Appropriate training will be given in its use and maintenance.
- Where practicable, safety harnesses/man anchor systems shall be worn whilst working at height or on fragile surfaces, attached to suitable anchor points.
- All safety harnesses/man anchor systems and anchor points shall be tested, certified and checked 'in date' for test prior to use.

#### **e. Ladders and Stepladders**

- All persons using ladders and stepladders will be fully trained and aware of the hazards and risks
- Ladders, including stepladders, used by the Company will be of the correct type and in good condition. Measures must be taken to ensure that ladders and stepladders are secure, on a solid footing and, in the case of access ladders, are effectively secured to prevent movement.
- Ladders will be the subject of regular inspection by a competent person and defective ladders will be taken out of service immediately and reported to line management.

#### **f. MEWPS / Articulated Booms Lifts**

- All work with MEWPS / Articulated Booms Lifts will be carried out by fully trained operators with current certification.
- Mobile Elevated Work Platforms and Scissor Lifts shall only be operated by trained, competent operators.
- Safety Harnesses will be worn at all times whilst work is being conducted from MEWPs.

#### **g. Fragile Surfaces**

- Fragile surfaces are provided with adequate means of support / protection (platforms, coverings, guard rails) for anticipated loads. Suitable and sufficient warning notices are prominently displayed on approaches to fragile surfaces.
- When working at height or on fragile surfaces, all employees will wear PPE identified through risk assessment. Appropriate training will be given in its use and maintenance.

### **4.28 Working Near or Over Water**

Hazardous areas include: docks, locks, canals, wharves, lakes, ponds (natural and artificial), reservoirs, water-filled pits, sewage ponds, slurry ponds, rivers, streams, swimming pools, water-holding tanks and the sea.

- All operatives will have suitable training and instruction before working near or over water.
- Before carrying out any work near or over water a risk assessment of the work to be undertaken will be conducted. The risk assessment will take into account weather conditions and other aspects of the environment to ensure the safety of personnel and identify the measures required protecting persons working at height, including a safe system of work.
- Appropriate rescue equipment must be provided for the location, taking into account any reasonably foreseeable changes that may occur (e.g. tides or spate rivers).
- Whenever possible, entry into the water shall be prevented by physical barriers.

- Where practicable, safety harnesses/man anchor systems shall be worn whilst working near or over water and attached to suitable anchor points. All safety harnesses/man anchor systems shall be tested, certified and checked 'in date' for test prior to use.
- All employees will wear PPE identified through assessment, including high-visibility clothing. Appropriate training will be given in its use and maintenance.
- All life jackets and buoyancy aids provided conform to the appropriate BS EN standard.
- Lifebuoys and or throw lines will be available where there is a possibility of operatives being carried away by the water.
- A means of raising the alarm will be provided.
- Where necessary, the surface of water will be illuminated at night.
- All personnel will be accounted for at all times.
- Emergency recovery procedures will be assessed, recorded and periodically exercised.

#### **4.29 Port Marine Safety Code**

- The Company recognises the need to comply with the Port Marine Safety Code as both Duty Holder and Marine Berth and Jetty and will maintain, review and audit it's SMS to remain compliant.
- The Duty Holder will appoint the Harbour Master and Designated Person who will ensure the Designated Person is able to provide independent assurance about the operation of the marine safety management system. The Designated Person will have direct access to the Duty Holder and must have a thorough knowledge and understanding of the requirements of the Code and associated port and marine legislation.

#### **4.30 Legionella**

- The Company recognises that it has a responsibility to provide a safe and healthy working environment and acknowledges that this includes controlling the health risks associated with legionella bacteria in water systems.
- The presence of legionella bacteria in water systems can, under certain circumstances, result in the potentially fatal legionnaires disease in employees and other persons who breath in the contaminated water droplets.
- The Company will endeavour to comply with the relevant legal requirements, as contained within the Management of Health and Safety at Work Regulations 1999 and the Notification of Cooling Towers and Evaporative Condensers Regulations 1992, and with the specific Approved Codes of Practice (L8) and guidance notes issued by the Health and Safety Executive.
- The Company will carry out a risk assessment in respect of the risk of legionella within the water systems within company premises, including an assessments of the water temperatures.

#### **4.31 Workplace Transport**

- The Company recognises the need to control and manage transport while protecting its pedestrian traffic where in some instances they coexist.
- The Company will endeavour to comply with the relevant legal requirements, as contained within The Workplace (Health, Safety and Welfare) Regulations 1992 specifically Regulation 17 to formulate safe access and egress where pedestrians and vehicles can circulate in a safe manner.
- The Company will carry out a risk assessment to reduce, so far as is reasonably practicable the risk to its personnel, customers and contractors.

#### **4.32 Control of Major Accident Hazards**

- The Company recognises the need to comply with Control Of Major Accident Hazards Regulations 2015 and will take all necessary measures to prevent major accidents involving dangerous substances and limit the consequences to people and the environment of any major accidents which do occur.
- A detailed MAPP will be produced detailing all emergency procedures, including domino effect and will be subject to periodic audit.