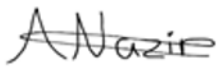
Stroma Specialist Access Ltd

HEALTH AND SAFETY POLICY

Signed on behalf of the company



Adam Nazir-Director

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INTRODUCTION

Within this document, any reference to the “company”, refers to Stroma Specialist Access Ltd.

This document has been produced in accordance with Section 2(3) of the Health and Safety at Work etc. Act 1974.

It contains both a statement of intent and clearly defines the organisation of health and safety responsibilities of the company directors, managers, employees and subcontractors including site team supervisors and technicians.

1. GENERAL STATEMENT OF POLICY.

The overall aim of the Company is to complete all of its contracts with a zero accident rate combined with a policy of continual improvement.

The Health, Safety and Welfare of our employees, and all others who could be affected by our undertakings, will not be compromised by other business objectives.

Stroma Specialist Access Ltd operates a HSQEI integrated management system under certification to 9001:2015,14001:2015 and 45001:2018 and in line with the HSE PDCA model. The Management System also follows the guiding principles of 27001 and cyber essentials in its framework of policies and procedures for Information Security. The company is also Constructionline and Builders Profile Gold certified. For air sealing, fire stopping and intumescent paint services, this is further supported by our FIRAS accreditation. For services involving rope access techniques, we are a fully licensed operator under our IRATA certification. For services on Infrastructure Rail, Utilities, Highways, this management system is further supported by RISQS and Contractor Assurance Case (CAC) for HS1 The company has a specific Training Policy statement, supported by associated management system procedures & policies, which ensures the relevant company and individual competency & certification requirements, are in place, to carry out the wide range of services, that the company can deliver, combined with an overall approach of continual improvement.

Site technicians that perform construction related work as part of services offered by company i.e. air sealing and fire stopping will be CSCS carded. Other operatives where performing services that are not construction related and not recognised by CSCS will not hold CSCS cards. However, where a specific organisation/affiliate body/client requires Stroma personnel to have a CSCS card, even though those personnel are not performing construction related work that is recognised by CSCS as construction work, the company will review these requests on a case by case basis.. Technicians undertaking work on Network Rail Infrastructure will be Sentinel sponsored and carded, in line with RISQS accreditation requirements.

It is the policy of the company to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information, training, instruction and supervision as they need for this purpose. The company also accepts responsibility for the health and safety of other people who may be affected by our activities.

Personal Data: The organisation will collect and use personal data to ensure the health, safety and welfare of its subcontractors, employees and others. Any use, storage and sharing of data will be in accordance with the requirements of the UK Data Protection Act 2018 and EU GDPR.

The allocation of duties and responsibilities for health and safety matters and the particular arrangements, which the company will make to implement the policy, are set out below.

The policy will be kept up to date, particularly as the business changes in nature or size. To ensure this, the policy and the way in which it has operated will be reviewed regularly and no less than once annually.

2. ORGANISATION OF HEALTH AND SAFETY RESPONSIBILITIES

2.1. Overall and final responsibility for health and safety in the company is that of the Managing Director.

2.2. The Directors, Contracts Managers and operations managers, shall monitor and review (if necessary) all working practices, procedures, materials and substances, and are directly reportable to the Managing Director.

2.3. The Operations Manager, (or any other individual nominated by the directors and charged with running a contract) shall be responsible for planning, organising and controlling individual contracts with regard to all matters of health and safety and procurement for contracts. This includes the preparation of a detailed and comprehensive contract specific Method Statement, Risk Assessment and (where applicable) COSHH Assessment.

2.4. The Stores Manager, is responsible for the monitoring and maintenance of all plant, tools, equipment and vehicles.

2.5. All employees and subcontractors have the responsibility to co-operate with supervisors and managers to create and maintain a healthy and safe workplace and to take reasonable care of themselves and others.

2.6. The Site Team Supervisor will be responsible for health and safety concerns on site and act as Safety Officer directly reportable to the Operations Manager or higher. All level 3 IRATA Technicians, where they are assigned as a “supervisor” will hold, as a minimum, an Emergency First Aid at Work certification, which is current and valid.

2.7. The Contracts Manager and Operation Managers are responsible for identifying training needs and organising the relevant courses and ensuring personnel employed have the relevant competency and certification to carry out their role. They are also responsible for site safety audits and accident investigation.

2.8. Duties of Operatives:

- To comply with the Company’s Health and Safety Policy and all relevant legislation.
- To use correct tools and equipment in the proper manner.

- To report any accident, dangerous occurrence or condition to the manager/supervisor.
- To take care for the safety of themselves and others.
- Not to use any plant, tools or equipment unless authorised and trained to do so.
- To observe all warning signs and instructions received from supervisor/manager.
- To ensure that guards are in position whilst plant and portable tools are in use.
- To wear the appropriate safety equipment, clothing and personal protective equipment.
- All subcontractors will ensure that they hold, current and valid certifications for the role they are contracted to undertake with the company.
- All Level 3 IRATA technician's, whether employee or subcontractor must hold ,as a minimum, a current and valid Emergency First Aid at Work certification.

Whenever an employee, supervisor, manager or subcontractor notices a health and safety problem which they are not able to put right, they must immediately inform the appropriate person named above.

Anyone can refuse to work if there are any Health and Safety Issues. Approval needs to be gained from Operations Manager and by client representative before continuing. Anybody refusing to work on safety grounds will not be subject to any disciplinary measures.

3. GENERAL ARRANGEMENTS

Accidents: Sheffield Office
First Aid Box is in the main foyer entrance.
First Aid Persons are: James Rhodes and Steve Clarke
Mental First Aider: Zoey Rhodes
Appointed Person responsible for the office first aid box is the Stores Manager.
Persons responsible for reporting incidents are the Health and Safety Manager and the Managing Director.
Accident Records are maintained by the Health and Safety Manager, on receipt of any accident sheets submitted by Operation Managers.

General Fire Safety: Sheffield Office

Escape routes checked by Stores Manager daily**.**
Fire extinguishers, Emergency Lighting, Fire Alarms, Evacuations and Activation Points checked and recorded in company Fire Records by Richard Heald Stores Manager.
Maintenance Company: Hollinsend Fire Prevention (DABAR). 0114 245 7540 / 07801 544 144 & HR Services for fire extinguishers service-Wakefield.

Advice and Consultancy:

Local HSE inspector's office and telephone number: Sovereign House, 110 Queen Street, Sheffield. Telephone 0114 291 2300

Health and Safety Consultant: Callidus-Daren Lawson
Rail Consultant: Rail Assure Ltd-Martin Nelson.

Training:
Managing Director. 0114 272 3004.

Special Training:	**Job Training Required:**
Working at height	IRATA
Manual Handling	Manual Handling Course
Track-side work	Sentinel Sponsorship
Access Tower	PASMA Course
Elevating Platforms	IPAF Course
Grinding etc.	Abrasive Wheels Course
Fixing Tools	Cartridge Gun Course
Confined Space Work	Confined Space Safe Entry Course
Structures Examinations	STE 4 – RAIL Insp.

Contractors and visitors:

Contractors are required to satisfy all criteria relating to insurance, experience, referees etc. before being instructed to work on the company contracts or premises.
All visitors to the company premises are requested to sign in the visitor's book, held in the main reception, issued with a badge and will be accompanied and supervised at all times. On site, local security arrangements will be strictly adhered to (Permit to Work Systems etc.). Visitors to site and office must agree to adhere to all company policies concerning health and safety matters; they will be required to read, understand and sign off as such any relevant documents (method statement, risk assessment and COSHH assessment). Visits to rail sites will need to be organised in advance for non PTS(sentinel) trained staff and arrangements made for a Temporary Track Visitors Permit to be issued.

First Aid:

Office Premises:

The company will use a mixture of trained first aiders and appointed persons for office premises. The minimum certification level for first aiders on office premises at Sheffield is EFAW- emergency first aid at work

A list of first aiders is displayed with each first aid box. A list of first aiders is also updated on the v Health & Safety Notice Board located at the foyer area at the Sheffield premises.

First Aid box at Sheffield office is located in foyer area. First aid boxes will be maintained by the Stores Manager and/or certified first aiders and appointed persons.

On Site Requirements:

For onsite requirements ,where first aid certification is required, relevant personnel will be trained first aiders. The minimum requirement for first aiders on site is: FAW-first aid at work. Note this is a minimum recommended level and Line Managers may enhance this level where assessed risk specifies a higher level. For example, rope access technicians' personnel working in remote areas may need a person with Outdoor first aid training certification, as this specifically covers first aid outside of a premises or work place which the FAW is more directed at.

First aid Boxes: These will be issued to the company vehicle as standard requirement and will be maintained by the Stores Manager. Additional items may be added as is specifically required for work undertaken and/or as specified in the site-specific RAMS. It is the relevant Line Managers responsibility to ensure that the required first aid equipment and certified person is in place for each job carried out.

First Aid record Premises and Onsite : All first aid cases which are treated are required to be recorded using the Accident Report Form which is available on the Staff Hub Intranet and in compliance with CP40- Accident procedure. Refer to " Accidents section within this policy for further information.

Mental First Aid:

Mental Health First Aid is the help offered to someone developing or having a mental ill-health problem, experiencing a worsening of an existing mental illness, or a mental health crisis. Mental health first aid will be given until appropriate professional help is received, or the crisis is resolved.

Responsibilities of the Company

It is the responsibility of the company as the employer to:

- Determine the need for an appropriate number of Mental Health First Aiders proportionate to the needs of the organisation.
- Enable a Mental Health First Aider to undertake appropriate training as required and to maintain their skills.
- Raise Mental Health Awareness throughout the organisation.
- Advise the Mental Health First Aider if there are any psychological hazards in the workplace.
- Clearly communicate to employees how they can access the help of a Mental Health First Aider in suitable public areas.
- Provide an appropriate space within the workplace that is accessible and suitable for private conversations.
- Ensure employees have access to Mental Health First Aiders during all working hours, where possible.
- Instruct Mental Health First Aiders not to exceed providing help, which is outside the scope of mental health first aid.
- Ensure employees and Mental Health First Aiders know what to do in a mental health crisis.

To support mental health the company will:

- Ensure Senior Management support is in place and they are aware of the work being conducted in Mental Health Awareness.
- Ensure all managers have completed the IHASCO on line Mental Health for Managers training Course.
- Produce, implement and communicate a mental health at work action plan, where required.
- Develop Mental Health awareness among employees.
- Encourage open conversations about mental health and the support available when employees are struggling
- Provide personnel with good working conditions
- Promote effective people management.
- Monitor employee mental health & wellbeing routinely.
- Mental Health First Aiders to attend meetings to discuss objectives, concerns etc.

Mental First Aider:

A Mental Health First Aider is a person who has been formally trained to administer mental health first aid in their workplace, by attending a Mental Health First Aid Course that has been delivered by an approved Mental Health First Aid training provider.

The company’s certified Mental First Aider is : Zoey Rhodes.

The Mental Health First Aider must:

- Hold a current Mental Health First Aid training certificate.
- Be able to be called away from their normal duties at short notice if required.
- Be able to maintain confidentiality as appropriate.

- Demonstrate an ability to relate well to others and adopt a degree of empathy.
- Make themselves contactable during working hours but should not give out personal contact details.

It is the responsibility of the Mental Health First Aider to:

- Maintain their Mental Health First Aider certificate.
- Provide mental health first aid within Stroma as required in line with their level of competence and training.
- Signpost people to professional help, recognising that their role as a Mental Health First Aider does not replace the need for ongoing support.
- Escalate and document any matters if required in a prompt and appropriate fashion.
- Complete CPD refresher training as required to do so.

Support for Mental Health First Aiders

Mental Health First Aiders may at some points find themselves distressed with the nature of the issues that they have been exposed to or experience their own mental ill-health. In these situations, Mental Health First Aiders are reminded of the need to look after their own wellbeing first. They can take a break from the role or step down from their role if they feel they need to, by notifying the in the first instance their relevant Line Manager or the Managing Director.

Confidentiality

The company recognises that respecting the privacy of information relating to individuals who have received mental health first aid or may be experiencing a mental health problem or a mental health crisis at work is of high importance.

All mental health first aiders and Human Resources representatives are obligated to treat all matters sensitively and confidentially. If at any time the Mental Health First Aider assesses there is a risk of harm to the individual concerned or another individual, they must escalate the matter to HR and they will advise on the next steps. If there is an urgent risk identified, emergency services should be contacted immediately. Mental Health First Aiders should be aware that confidentiality never applies when a person becomes a danger to themselves or others

Hazards

COSHH Regulations 2002:

The company has a duty of care to their employees and others when their operations involve the use of substances that could be hazardous to their health. Management has a responsibility to carry out a COSHH Assessment for substances that could be hazardous to health and to have in place a management system for ensuring that the control measures required are in order.

The Regulations

The Control of Substances Hazardous to Health Regulations 2002 (6th Edition 2013) defines in general and specific terms how STROMA is expected to safely manage the use of potentially harmful substances.

The Regulations are structured to describe a management strategy:

a. Assess the hazards and risks to health.
b. Implement a control programme.
c. Ensure that controls are being used properly and maintained.
d. Where necessary, monitor the control measures.
e. Where necessary, measure workers' exposure to hazardous substances.
f. Where necessary, carry out medical surveillance with an appropriate Occupational Health provider.
g. Inform, instruct, and train persons that are likely to be affected, regarding the risks and precautions to be taken.
h. Ensure records are kept.
i. All suppliers and sub-contractors must provide full COSHH information on any hazards associated with equipment or materials supplied to the company This information must be passed to the relevant supervision for assessment before potentially hazardous equipment and materials are used. Managers & staff are responsible for vetting materials and substances to be used.
j. The library of Safety Data Sheets and COSHH assessments are to be kept up to date within the Management system in compliance with CP02 COSHH procedure..
k. A stock of, or individually issued, protective clothing and safety equipment are to be provided when and where required.

All materials and substances are dealt with in accordance to COSHH Regulations 2002.

Manufacturer's Data Sheets are kept in the dedicated COSHH folder on x drive and on the Stroma Hub intranet.

A company assessment is carried out in conjunction with the suppliers' data sheets in line with requirements of internal management system procedure CP02 COSH

Where COSHH materials are used on site these will be detailed within the site-specific issued RAMS.

The company will have certified internal COSHH assessors for carrying out in house COSHH assessments.

Asbestos- Control of Asbestos Regulations 2012

Responsibilities:

The company policy on asbestos shall ensure that known and identified locations of asbestos are recorded and that any such asbestos information is made available to those persons who require it. Directors are responsible, so far as is reasonably practicable, for ensuring the health, safety and welfare at work of all employees in their respective departments. In particular they will:

- Prepare and revise as necessary department arrangements for the management and control of work involving asbestos.
- Ensure appropriate training, information and instruction is provided for relevant employees, and personal instruction as appropriate.
- Ensure that employees or relevant contractors are provided with appropriate information, regarding company procedures in areas containing Asbestos.

The company has a duty of care to ensure that all personnel are not exposed to asbestos fibres.

Full information on asbestos can be found here: https://www.hse.gov.uk/asbestos/

Legislation

The Health and Safety at Work, etc. Act 1974

Control of Asbestos Regulations 2012

Construction (Design and Management) Regulations 2015

Definitions

Asbestos

‘Asbestos’ is the general term used for the fibrous silicates. Three main types of asbestos were commonly used in construction:

- crocidolite (commonly known as blue asbestos)
- amosite (commonly known as brown asbestos)
- chrysotile (commonly known as white asbestos)

Any material containing one or more of these fibrous silicates at more than trace amounts falls within this definition.

Asbestos-Containing Material (ACM)

Any material containing fibrous silicates or mixtures of them. Descriptions of typical ACMs are provided in L143: Managing and working with asbestos Control of Asbestos Regulations 2012 (Health and Safety Executive (2013).

Training:

All personnel that work on site will complete certificated asbestos awareness training, which will be maintained on an ongoing basis.

Work on site -Duty of Care Register

Stroma Built Environment Ltd and Stroma Specialist Access Ltd will not undertake any work unless a Duty of care Register has been presented, prior to work commencement ,from the client, where it is envisaged that asbestos may be present.

Any structure prior to 1999 in UK, may contain asbestos.

The relevant Line Manager will request the register where required in compliance with the companies' procedures within its management system.

Stroma will only work in areas where asbestos has been identified in the submission of Duty of Car Register where the asbestos identified, has been encapsulated .

Housekeeping, Premises and Welfare on Site

Office Premises:

Workplace (Health, Safety and Welfare) Regulations 1992, apply to the company's premises at Sheffield provided for employees ,contracted personnel and visitors, which includes offices etc., and their associated corridors, staircases, access roads, and welfare facilities, etc. The regulations are in place to ensure that the workplace does not adversely affect the health and safety of employees while they are in the workplace.

Welfare Facilities at Sheffield office premises:

The company will ensure compliance with the HSE INDG293 Welfare at work regulations, where the following will be provided as a minimum:

- Adequate number of toilets and washbasins for those expected to use them -the facilities should be provided to allow everyone at work to use them without unreasonable delay;

- Where possible, separate facilities for men and women failing that, rooms with lockable doors.
- Facilities are kept clean and orderly - to help achieve this walls and floors should preferably be tiled (or covered in suitable waterproof, washable material) to make them easier to clean.
- A supply of toilet paper where it is provided in a holder or dispenser and, for female employees, a means of disposing of sanitary dressings.
- Facilities that are well lit and ventilated.
- Facilities with hot and cold running water.
- Washing facilities are within immediate vicinity of all sanitary convenience and in the vicinity of changing rooms.
- Enough soap or other washing agents.
- A basin large enough to wash hands and forearms if necessary.
- A means for drying hands, e.g. paper towels or a hot air dryer.
- Showers where necessary, e.g. for particularly strenuous, dirty work or work those results in contamination of the skin;
- An adequate supply of wholesome drinking water is provided at all premises.
- Suitable facilities for changing clothes for any person required to wear special clothing for the purposes of work.

For Sheffield premises that are rented by the company an assessment of the welfare facilities has been undertaken at start of lease and this complies with the requirements. Where standards are not maintained during the lease period, this will be formally raised with the Landlord.

The company will ensure that the welfare facilities are arranged to provide adequate privacy for the user, with the facilities fitted with doors at entrances and exits. All rooms containing a toilet should be well ventilated so that offensive odours do not linger. Rooms containing toilets will be an adequate distance away from rooms where food is processed, prepared or eaten, to ensure that it is not possible for undesirable odours to travel.

In the provision of adequate welfare facilities, Stroma will also ensure that any water system where applicable is checked for legionella bacteria growth. Refer to Legionella section below

Facilities for rest and to eat meals:

The company will ensure that there are suitable provisions for resting and eating, in particular: All will be non-smoking.

Suitable facilities provided for pregnant workers or nursing mothers. See below for New & Expectant Mothers.

The premises building services including HVAC, lighting and all other services will be maintained to satisfactory standard, ensuring the services are properly maintained and tested and kept clean and free from anything that may contaminate the air.

Ventilated Spaces

The company will ensure all enclosed office working spaces are ventilated with fresh/purified air. Air inlets should not be sited where they may draw in contaminated air (i.e. flue, exhaust ventilation system outlet, or area where vehicles manoeuvre). Employees must not be exposed to uncomfortable draughts. Mechanical ventilation systems will be regularly and adequately cleaned, tested and maintained ,where applicable.

Temperature in Indoor Workplaces

The company will ensure every effort is made to maintain a reasonable temperature in all workplaces during working hours. To achieve this, we will ensure:

- the workplace is adequately thermally insulated
- excessive effects of sunlight on temperature is avoided
- there are sufficient number of thermometers are provided in the workplace

The temperature in a workplace should normally be at least 16 degrees Celsius unless work involves rigorous physical effort where the temperature should be at least 13 degrees. The company will also ensure that the in other areas of the workplace other than workspaces, such as toilets and rest facilities, temperatures are reasonable.

Lighting

The company will ensure every workplace will have sufficient lighting that is maintained to prevent discomfort and glare. Stairwells will be kept well-lit and outdoor traffic routes used by pedestrians will be adequately lit after dark.
The company will ensure that there is emergency lighting - which is powered by a source independent from that of normal lighting - in workspaces where sudden loss of light may present a serious risk.

Cleanliness and Waste in Offices

The company will ensure workplaces are kept regularly clean and ensure dirt and refuse is not allowed to accumulate. All surfaces of floors or traffic routes in the Sheffield premises will be maintained to assure it is free from holes, slopes or uneven or slippery surfaces which will likely cause person to slip trip or fall.

Gritting & Snow Clearing

The company will make suitable arrangements to ensure risks from snow and ice on the premises are minimised. This will involve gritting and snow clearing and may include possible temporary closure of some routes where a hazard presents itself that cannot be cleared.

Provision of rock salt and snow shovels are in place at Sheffield premises.

Slips, Trips and Falls

The company will manage the prevention and treatment slips, trips and falls through various prevention procedures and associated policies within the management system. The company have a dedicated procedure CP40- Accident Incident reporting & Investigation . for near misses and accidents and incidents that personnel may suffer. Anytime a recorded incident/accident occurs a review and assessment is made as part of the investigation as to whether the work area or activity needs to be adjusted to ensure all possible reduction control measures are in place. Where a procedural or process change is made ,then typically a CAR would be raised to identify a current issue within the management system procedure. Where any significant changes are made these will be communicated to personnel by the relevant Line Manager or Managing Director. Typically this would be via a toolbox talk. and are being maintained.

Good personal hygiene practices are encouraged, particularly on site where exposure to COSHH related substances is identified as a risk.

Waste disposal is in accordance with all current legislation. The company generates no substance or process requiring a special license. The company does have a specific waste transfer licence. Refer to company certifications held on x drive and the company Environmental Policy for further information.

Warehouse at Sheffield premises Stacking and storage is in compliance with all current legislation..

On site Welfare:

All access equipment is audited in compliance with LOLER 1998 – see section 12 of this document.
Special access to particular places shall be in compliance with the relevant legislation (Confined Spaces etc.)

.
When on site and not acting as a principal contractor, welfare and toilet facilities will be provided by the main contractor. When used by the company Ltd, the facilities shall be left in a similar or better state to those found.

Welfare Vans:

Where these are required, these will be specifically hired for specific jobs. The details will be contained within the site-specific RAMS. All rented welfare vans will be from approved suppliers and specifically where used on Network Rail property the supplier will be RISQS accredited.

Waste & Environmental/Emergency Arrangements including Fire Safety-Evacuation/First Aid/Site Security :

These requirements will be specified in the site specific RAMS .

All RAMS issued by the company are prepared by IOSH Manging Safely ,as a minimum, competence certified.

The requirements follow the requirements detailed within procedures and policies within the company's management system for reference:

- Waste & Environmental- refer to environmental policy
- Emergency Arrangements including Fire Safety-Evacuation-refer to Fire Policy
- First Aid-refer to this policy
- Site Security -refer to this policy

NOTE:

All company personnel are responsible for their own work area whilst in the office or on site and this should be kept clean, tidy and free from hazards and for onsite work ,in compliance with the requirements of the site-specific issued RAMS.

Legionella:

The company have measures in place in order to comply with the Health & Safety Executive (HSE) Approved Code of Practice (ACOP), Guidance L8 and HSG274.

The company will conduct and document legionella checks on water systems at Sheffield premises and these will be completed by the Stores Manager.

The company has in place the following:

- A risk assessment to identify and assess sources of risk from Legionella.
- An action plan which puts in place control measures that take account of the risk.
- Implement monitoring and recording procedures to ensure that the measures put in place are adequate and effective.
- Regular training of persons involved to ensure that they have an adequate level of knowledge and competence commensurate with their involvement with this requirement
- Review the risk assessment every 2 years or if any significant changes occur.
- Have appropriate equipment available to enable appointed persons to carry out the checks required.

What is Legionella?

The term Legionellosis covers Legionnaires disease, Pontiac Fever and Lochgoilhead Fever. Legionnaires disease is a Pneumonia that principally affects those who are susceptible due to age (especially young or old), illness, immunosuppression, smoking etc., and may be fatal. Legionella can also cause less serious illnesses which are not fatal but can affect all people.

Although Legionella bacteria are water-borne organisms, transmission of the disease is by inhaling water droplets in the form of an aerosol that contain Legionella bacteria. Legionella is widespread in natural sources of water.

They may enter man-made systems or water services where they multiply under certain favourable conditions, i.e. water held between 20c and 45c such as; running showers, spa bath equipment or cooling towers that can generate aerosols. Other sources include humidifiers and air washers.

The company will manage the risk of Legionella in accordance with the latest edition of ACOP Guidance L8. ACOP sets out the guidance to those with Health and Safety responsibilities to help comply with legal duties in relation to Legionella. For example, for those responsible for premises.

Responsibilities of manufacturers, installers of products and service providers are also included.

The following present a risk of Legionellosis:

- Water systems incorporating an evaporative type cooling tower.
- Water systems incorporating an evaporative condenser.
- Hot and Cold-water systems.
-

Other plant and systems containing water that is likely to exceed 20c and may release a spray or aerosol during operation when being maintained or tested may also present a risk.

For example, firefighting systems that are permanently charged with water often forming long-dead legs may represent a risk when tested.

Table 3 HSE L8 - Domestic Water Services (Hot and Cold Water)

Legionella Bacteria (cfu/litre)	Action Required
More than 100 but less than 1000	Either: a. If only one or two samples are positive, the system should be re-sampled. If a similar count is found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions. b. If the majority of samples are positive, the system may be colonised, albeit at a low level, with Legionella. Disinfection of the system should be considered but an immediate review of control measures and a risk assessment should be carried out to identify any other remedial action required.
More than 1000	The system should be re-sampled, and an immediate review of the control measures and risk assessment carried out to identify any further remedial actions, including possible disinfection of the system.

Advice:

Weekly Water Run-Offs

Any hot or cold outlet that is not used for a week or hot water dead leg should be run for 5 minutes.

Please note, consideration should be given to removing services that are no longer in use or required.

Showers should also be run at full temperature for 5 minutes on a weekly basis.

Monthly Water Temperature Checks

Please note, that if any of the outlets listed below are fed via a TMV, the temperature of the surface of the hot pipe feeding the TMV should be taken.

Hot water should be more than 50 ºC within 2 minutes, cold water should be less than 20 ºC within 2 m and mixed supply should be 43ºC (+ or - 3).

Please note, consideration should be given to removing services that are no longer in use or required.

New & Expectant Mothers:

1. The company recognises its obligations towards its employees when notified of an employee becoming a new and/or expectant mother. The company is committed to employee wellbeing and to encouraging and promoting a supportive environment and working culture for all employees, including new and expectant mothers.

Becoming a new or expectant mother should not prevent any employee from working or from progressing in her career in a safe, secure & comfortable environment. This means that it is the duty of the employer to assess the risks to the health & safety of new and expectant workers and ensure working conditions remain acceptable. The regulations also apply to women of child-bearing age.

2. When the company receives written notification of an employee becoming pregnant or becoming a new mother having given birth within the previous 6 months, or notifies the company that she is breastfeeding, the company will conduct a risk assessment to identify, remove, reduce or control the risks to the new or expectant mother.

3. Risk Assessment. The risk assessment will be carried out by the employee's line manager. If the risk assessment identifies risks that cannot be avoided and cannot be removed, reduced or controlled then the company will :

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

It should be noted that the risks that are being assessed encompass any risks posed to the health of the expectant or new mother's baby too.

4. Line Manager's Duty. Line managers should conduct a risk assessment as soon as being notified of their employee's pregnancy or motherhood. Support with this process can be gained from the company's HR department. During the employee's employment and time at work, her circumstances may change as the pregnancy develops, in which case managers should remain aware of changing circumstances and needs of the employee and conduct a risk assessment or update the current risk assessment as and when necessary. The company will

inform the employee of the risks identified and what is being done or proposed to mitigate the risks. The company will also notify the employee if no risks are identified. The line manager will also take into consideration any pregnancy or new mother related medical conditions that the employee may have, and any advice given by a GP, midwife or other medical professional.

5. Return to Work. Upon a new mother's return to work following maternity leave, the employee's line manager should conduct a risk assessment as stated in clause 3.

6. Workplace Facilities for New & Expectant Mothers. The company will provide adequate workplace facilities to ensure there is no discomfort or risk to new & expectant mothers. If the risk assessment conducted by the line manager identifies a specific need for the employer to provide a facility that is not yet available at the company, then the line manager should inform the HR Manager. Where an employee feels her DSE is not suitable for her current needs as a new or expectant mother, she may complete a new DSE Risk Assessment.

The company will provide adequate storing facilities separate to the main refrigerators for expressed milk where it is identified as a need following a risk assessment. For nursing mothers, Stroma will facilitate a suitable, private room for nursing mothers where it is identified as a need following a risk assessment.

7. Minimising your Risks as a New or Expectant Mother:

a. Take regular rest breaks.
b. Walk around to avoid sitting in one place for too long;
c. Speak to your line manager if you require additional help;
d. Identify when you are stressed - It is the responsibility of each employee to seek early assistance if you think you have symptoms of stress;
e. Do not attempt to lift or carry heavy loads by yourself.

Electrical Equipment

All electrical equipment in the office and on site shall be used in compliance with The Electricity at Work Regulations 1989. All site equipment is audited within a 6 monthly cycle, ideally every three months in line with current UKCG requirements. Office equipment will be PAT tested in line with current HSE guidance for "Maintaining portable electrical equipment in low risk environments" and specifically the suggested time intervals.

Machinery

All site and office machinery shall be operated in compliance with The Provision and Use of Work Equipment Regulations 1998 and any other relevant legislation. All site equipment shall be checked on dispatch from, and return to the stores. The Stores Manager is responsible for this procedure.

Work At Height

All works at height are carried out to comply with the Work at Height Regulations 2005. Detailed Method Statements and Risk Assessments shall be written for all Works at Height.

Manual Handling

Any manual handling operations are carried out in compliance with the Manual Handling Operations Regulations 1992. Where required personnel are certified in manual handling and any specific site operations requiring manual handling are formally dealt with by the Method Statement and Risk Assessment for that specific contract. Typically personnel will undertake on line manual handling certification provided by IHASCO, arranged for them by their relevant Line Manager.

4. CONSULTATION ON HEALTH AND SAFETY

Consultation between management and employees and subcontractors shall be through regular Health and Safety Meetings and Management Review Meetings. All employees and subcontractors are encouraged to attend and contribute to any matter that could affect the policy. However, if an important issue presents itself, then meetings can be called at any time. At all times, employees are freely encouraged to discuss any health and safety concerns with their Directors, Operations Manager, Contracts Manager, or directly with the Managing Director.

5. MONITORING OF SAFETY POLICY

In the long term, safety shall be maintained by monitoring and up dating procedures.
Monitoring of safety on site shall be the responsibility of the Site Team Supervisor and Operations Manager.
An approved health and safety consultant, shall make random unannounced site visits with the intention of monitoring health and safety performance. This consultant will report their findings directly to the Managing Director and applicable Operations Manager. In addition to this, it is the Operations Manager's responsibility to undertake site safety audits to monitor compliance with the Health and Safety Policy.
If any employee becomes aware of any information that may be relevant, they are encouraged to consult with the Team Supervisor, Operations Manager, Contracts Manager or the Managing Director. That person will then then disseminate the relevant information to all employees.
The Health and Safety Manager and Managing Director shall monitor all accidents and dangerous occurrences and wherever appropriate alter working procedures, to minimise similar hazards and risking occurring in the future.

6. SELECTION/TRAINING & COMMUNICATION

Employees and individual subcontractors shall have the necessary levels of natural aptitude, training, assessment and experience to safely carry out their roles, as required under standards BSI 9001:2015 and other accreditations as required. Any specific training required shall be identified and the necessary actions implemented. Specific Rail competencies will be certificated and assessed as required by standards.
Wherever practicable, training and assessments shall be carried out by independent, fully qualified and accredited organisations/training providers.

Where an interpreter is required for an employee or sub contractor, the company will undertake to provide this service.

The company regularly updates all employees & subcontractors on any matters which will include health &safety issues. The company formally conduct annually a Health &Safety Meeting, backed up by a documented 3 Monthly Operation Managers Meeting. The company also conduct

annually a Quality Management Review Meeting .Quality issues are also reviewed and documented at 3 Monthly Operation Manager Meetings. This means a formal meeting structure is in place on a 3 monthly basis. For all employees a formal company meeting takes place every 3 months, led by the Directors. Toolbox talks are issued on a regular basis where appropriate.

Sub contractors working for the company will also be kept informed of any changes in legislation, working practices etc by either Toolbox Talk process or other form of documented communication i.e. letter/e-mail.

6. PLANNING, ORGANISATION AND CONTROL OF WORK-

CDM REGULATIONS

Contracts shall not be taken on until it has been satisfied that all aspects of the contract have been evaluated with respect to the Health and Safety at Work Act 1974,Workplace Health, Safety and Welfare Regulations 1992 and are in compliance with the company's IMS company procedures relating to client contract set up from start to end of contract. This includes CDM Regulations 2015, and any other relevant legislation and regulations.

The company does not and has not to date undertook a role as a principal contractor nor principal designer. However, if Stroma were to be appointed as a contractor on a project, we would comply with Part 4 of the CDM Regulations. The company does not undertake role of designer but understands requirements applicable in relation to regulation 9 and 10 of the CDM regulations, as below:

- Work will only start on a project, once the client has confirmed to a client that all their duties as required under the regulations. And issued a construction phase plan.
- When preparing or modifying designs, to eliminate, reduce, or control foreseeable risks ,in relation to health and safety, that may arise during construction and the maintenance and use of the building once it is built, so far as is reasonable and practical..
- Provide information to the principal designer about those risks and any remaining risks having utilised the "general principles of prevention in design work", as outlined in the CDM Regulations 2015.
- The Principal designer will make known to the client all relevant information to the project, including all pre construction information and the communication channels required to the Principal Contractor, the Contractor and other designers as required, by the regulations, in order to fulfil duty under "providing design information".
- Provide information to other members of the project team to help them fulfil their duties.

The Operations Manager (or any other individual nominated by the Directors and charged with running a contract) as a client shall be responsible for planning, organising and controlling a contract from tender stage through to completion. They shall produce a detailed and comprehensive Method Statement, Risk Assessment and COSHH Assessment if necessary. These documents shall accurately set out how resources will be organised and managed in order to minimise the risk of potential hazards to employees and others. In compliance with requirements of regulation 10.

Where a Domestic Client does not make appointments the duties of Principal Designer, Principal Contractor and Designers may fall to Stroma where engaged as part of the project (default position).

Building Safety Act-2022 Regulations:

Contracts shall not be taken on until it has been satisfied that all aspects of the contract have been evaluated with respect to the Health and Safety at Work Act 1974,Workplace Health, Safety and Welfare Regulations 1992 and are in compliance with the company's IMS company procedures relating to client contract set up from start to end of contract. This includes Building Safety Act and any other relevant legislation and regulations.

The company does not and has not to date undertook a role as a principal contractor nor principal designer

Stroma Building Safety Act Requirements Competence Statement:

"Stroma understands the requirements and its own duties under the Building Safety Act in relation to the delivery of the services it provides to the construction and other related sectors. Stroma have the required competent personnel and management systems required to fulfil the competence and capacity to plan, manage and monitor the delivery of its services to ensure that it complies with all relevant requirements of the Building Safety Act combined with an overall aim of continual improvement. "

Therefore, the company shall ensure:

- In all its activities comply with requirements of the Build Safety Act as required by policies and procedures within its accredited management system of policies and procedures. This means Stroma has the correct processes in place to satisfy work quality to required standard.
- All personnel will be competent to undertake their roles as is required by our Training policy Statement.
- In the provision of its services Stroma will provide the correct materials as required by the Build Safety Act.

Below is an overview of the requirements:

Further detailed information can be found here:

https://www.gov.uk/guidance/safety-in-high-rise-residential-buildings-accountable-persons

https://www.gov.uk/guidance/design-and-building-work-meeting-building-requirements

https://www.gov.uk/guidance/the-building-safety-act

Background Information:

The Building Safety Act 2022 was introduced in the wake of safety concerns for occupants of high-rise buildings after the 2017 Grenfell Tower tragedy. The legislation is intended to improve the design, construction and management of higher-risk buildings
The Building Safety Act 2022 focuses on the following key areas:

- The safety and standards of all buildings.
- Assuring the safety of higher-risk buildings, both in construction and occupation.
- Improving the competence of the people responsible for overseeing, managing, and delivering works to higher-risk buildings.
- Ensuring clearer standards and guidance.
- Putting residents at the heart of a new system of building safety.

The Building Safety Act 2022 - key points of note

- Applies to new or existing occupied buildings over 18 metres high or seven storeys or more, which contain at least two residential units. The design, refurbishment, and construction requirements also apply to care homes and hospitals meeting the same height threshold.
- Creates a universal change in responsibility and culture within the building industry.
- Establishes a more effective regulatory and responsibility framework for the construction industry and introduces clearer standards and guidance.
- Puts residents at the heart of a new system of building safety
- Clarifies who has responsibility for fire and building safety throughout the life cycle of a higher-risk building. There are specific duties on organisations which own and manage high rise residential buildings to take a range of specific and prescribed actions to identify risks, put the required measures in place to keep the building and its' residents safe, and to evidence how they are doing this. The Building Safety Regulator (BSR) will assess compliance with the duties, and if it is satisfied they are being met will issue a Building Assessment Certificate to permit the building to be occupied.

Regulators:

The Health and Safety Executive (HSE) will act as the Building Safety Regulator.(BSR) They are the only Building Control Body that can be used for high-risk buildings and the Gateway Process must be followed, see below. Building Control on non-high-risk buildings goes through the “traditional” process. However, to undertake statutory control, the Building Control Provider has to be a registered Building Control Approver and ensure they have appropriate numbers of Registered Building Inspectors to undertake the work under their control. The list of Registered Building Inspectors is publicly available.

Does the Building Safety Act apply to all buildings?

The responsibility for competence applies to all building works subject to the Building Regulations.

The Act also puts specific controls in place for high-risk residential buildings (HRRB). HRRB’s are buildings over 18m in height or have seven or more storeys and two or more residential units (typically high-rise apartment blocks, student accommodation, hospitals and care homes). Relevant hospitals and care homes are only controlled through their design and construction phases. Hotels are not currently including in scope.

Other appointed regulators are National regulator of Construction Products (NRCP) and New homes Ombudsman

Further information on re4gulators can be found at this link: https://www.gov.uk/guidance/the-building-safety-act

Duty Holders:

Under the Building Safety Act regulations there are 5 core type of duty holders:

1.Client
2.Designer
3.Contractor
4.Principal Designer
5.Principal Contractor

It is possible for one person to take on more than one dutyholder role. For example, principal dutyholders do just that: they have designer or contractor duties, with additional principal dutyholder obligations on top.

Clients

Under the regulations , a ‘client’ is ‘any person for whom a project is carried out.’

A client’s arrangements are ‘suitable’ if:

- They ensure not just that the design work is carried out so that the building work to which the design relates, if built, would comply with all relevant requirements, but also that the building work is carried out in compliance with all relevant requirements.
- They enable the designers and contractors to cooperate with each other to ensure compliance with all relevant requirements.
- They provide for periodic review of the design and building work to identify whether it is HRB work.

Once these arrangements are in place, a client must:

- Ensure that they are maintained and reviewed throughout the project.
- Provide information about the building to every designer and contractor on the project as soon as practicable.
- Cooperate with other persons working on or in relation to the project such that other BRegs dutyholders can fulfil their duties or function. Note the wording here: clients must cooperate with all persons where a failure to do so might interfere with the ability of dutyholders on the project to fulfil their duties or function. Since this is likely to be rather hard to predict, it is best simply to cooperate with everyone with a legitimate interest in the project – regardless of whether they are dutyholders.

Definitive responsibilities will be assigned to the full spectrum of duty holders involved in a building project – such as the client, the principal designer, designer, principal contractor, or contractor.

Effectively, anyone who might create a risk during their contribution to a construction or refurbishment – either as an individual or via a multi-disciplinary service provider – will be expected to manage that risk and its associated compliance demands

There is a special sub-category of client called a ‘domestic client’, which means ‘a client for whom a project is carried out which is not in the course or furtherance of a business of that client.’

This includes Mr and Mrs Smith extending their home. They are treated differently because, rather like consumers, they are generally inexpert buyers of design and building services and are thus deserving of protection. Although they still have duties, these duties are less onerous than those of non-domestic clients.

A client cannot escape the client duties. Indeed, if a client fails to appoint others to dutyholder roles, or if other dutyholders’ contracts come to an end before the project has concluded, a client may find itself responsible for carrying out other duties on top of its own.

Other dutyholders

The other dutyholders all have a general duty to cooperate and comply with relevant requirements, which of course helps clients in meeting their duties.

A ‘designer’ is ‘any person who in the course of a business either carries out any design work, or arranges for, or instructs, any person under their control to do so.’

This definition is rather broad and can easily extend to persons who might ordinarily think of themselves primarily as contractors or clients (or domestic clients).

A ‘contractor’ is ‘any person who, in the course of a business, carries out, manages or controls any building work.’

This group can include a client but not a domestic client.

In a bid to assign accountability for compliance, the BRegs require you to identify one designer and one contractor to be responsible for signing off on, respectively, all the design work and all the building work. The collective name for these persons is ‘principal dutyholders’.

Principal dutyholders are the client’s best friends, the persons they rely on to help them to comply, secure a completion certificate from the relevant authority, and thus manage their ongoing liabilities for the safety of users in their buildings.

A ‘principal designer’ takes on additional duties on top of their duties as designers. To do so, they must have ‘control over the design work.’

A ‘principal contractor’ takes on additional duties on top of their duties as contractors. They must have ‘control over the building work.’

Although there can only ever be one of each principal dutyholder in post at one time, it is of course possible to replace them mid-project.

NOTE: Although the named duty holder roles detailed in the Building Safety Act regulations are similar to those stated in the CDM regulations, they are completely different.

It is perhaps advisable to think of two sets of roles BRegs dutyholders’ and ‘CDM dutyholders,’

Accountable Person:

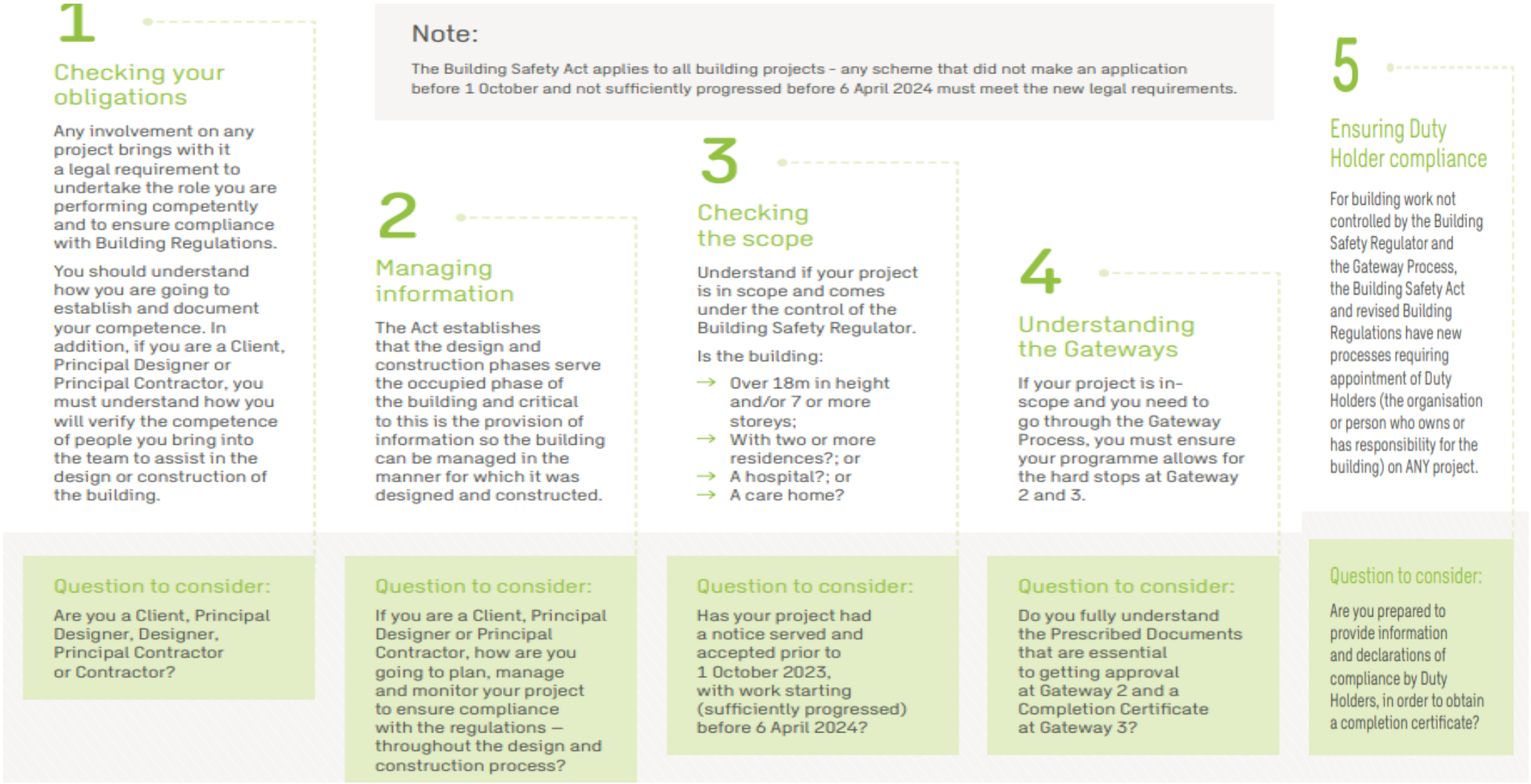
the ‘Accountable Person’, oversees and/or manages the HRB in occupation. This individual is accountable for registering the building with the Building Safety Regulator and regularly logging information about the building and reviewing risk assessments. The Accountable Person has to be absolutely clear how they are going to ensure their continuing responsibilities throughout the occupation of the building are met.

All existing buildings over 18m or 7 storeys, with two or more residences, should have been registered with the Building Safety Regulator. If this has not occurred the Accountable Person is in breach of their responsibility under the Act. The BSR will now start the process of requesting the Safety Management System for consideration. The invitations will be sent on a priority basis and the whole exercise is expected to last five years and then continue on a 5 yearly review cycle.

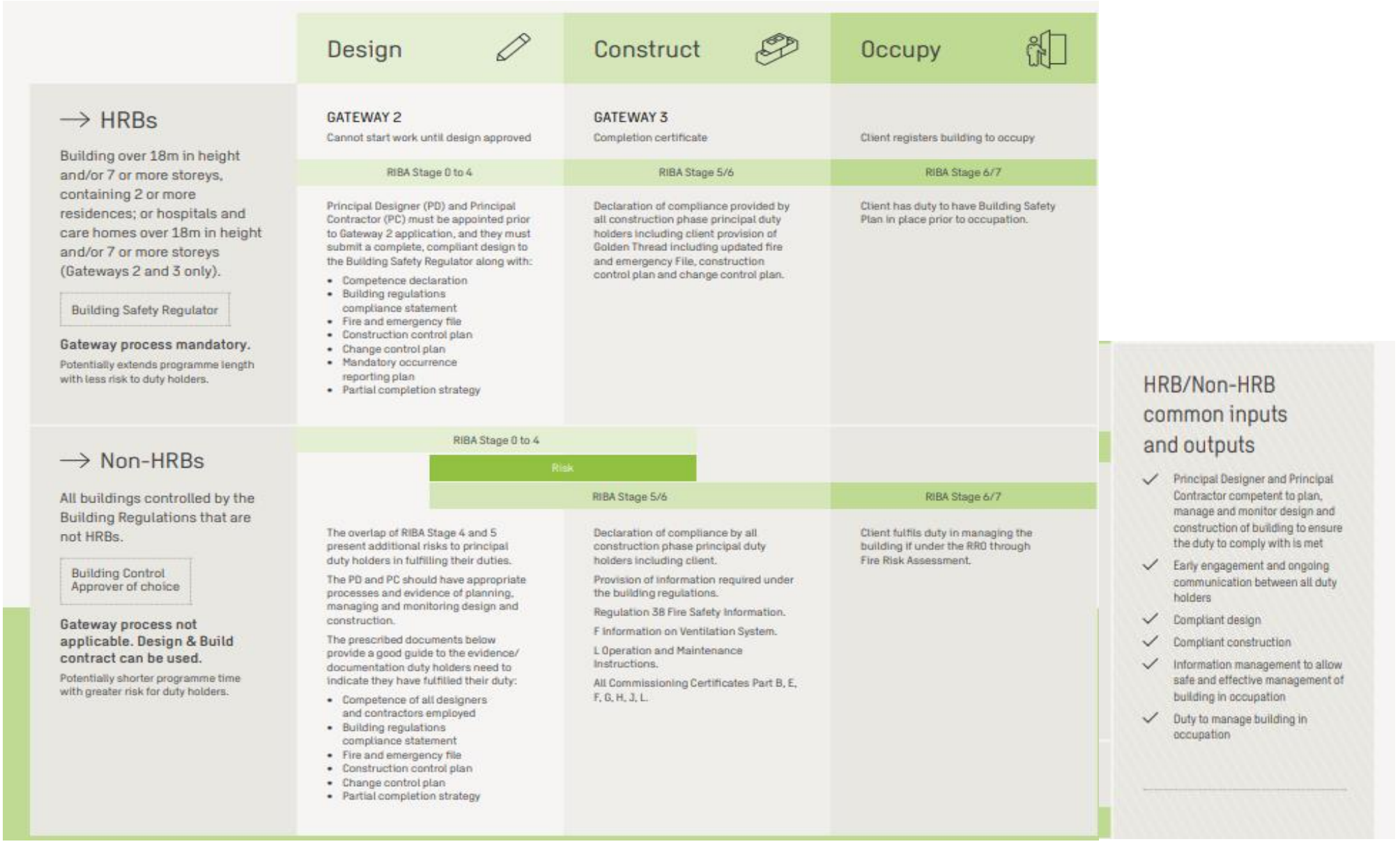
Accountability for Non-HRB in occupation comes under other legislation, in terms of fire precautions the duties are imposed through the Regulatory Reform (Fire Safety) Order.

5 priorities for Building Safety Act 2022 compliance

It is key for everyone in the industry to understand their legal obligations under the Building Safety Act 2022. Here are the core areas to consider as a first step to ensuring compliance with new legislation.



The Building Safety Act for High Risk & Non-High Risk Buildings:



What are " Gateways"?

The Building Safety Act introduces the Gateway approach for the High Risk Buildings

There will be no choice of Building Control provider and all building works, new build, extension, refurbishments will be subject to the control of the Building Safety Regulator and the Gateway Approach

Designers for example will be familiar with the need to provide a Fire Statement at Gateway 1 as part of their planning application. This Statement lays down that the key considerations of Building Regulations have been considered in the design submitted and that if planning approval is gained the "form" of the building will not need to be amended to allow compliance with the Building Regulations as the detailed design is undertaken.

Gateway 2 makes it mandatory to have Building Regulation Approval for the project before commencement. Also, the information to be provided to pass through Gateway 2 far exceeds traditional statutory expectations and includes:

- Competency statements for the Principal Designer and Contractor (this will mean contractors having to be selected much earlier in the programme than is generally the case currently)
- A statement clearly laying out the key standards used to design the building and substantiation as to why the chosen approach is appropriate.
- Statements on how the building will be controlled in construction to ensure compliance.
- A statement as to how changes in the design will be recognised and managed throughout construction to ensure that approval is gained from the BSR before the specific work is undertaken.
- An acknowledgement of the duty of Mandatory Occurrence reporting and the system put in place to assure that reports will be made if necessary.
- If a phased completion is anticipated the plan for this approach must be submitted and approved prior to commencement

The Building Safety Act 2022 gives the BSR 12 weeks (or 8 weeks for alterations and extensions) to give a decision following the submission of an application. The design team is advised to be certain of the compliance of the proposed design prior to applying, however the period of time can be extended if agreed by both parties to allow time to reach an approvable proposal as a rejection would mean work cannot commence on site.

Gateway 3 is to ensure that buildings are correctly built, and information has been provided to the Accountable Person to allow the building to safely occupied. To allow occupation the contractor has to apply to the BSR for the issue of a Completion Certificate – the BSR have up to 8 weeks to respond to this application.

When the Completion Certificate has been issued, the Accountable Person can apply to register the building. The building can only be legally occupied once this is done. To occupy, the Accountable Person should have a Building Safety Case in place, based on the Golden Thread, and within six months of registration the Accountable Person will be invited to submit this document for consideration.

The Gateway process predicates against the Design and Build contract and in many respects reduces risk for the PD and PC. This was intentionally done following the recommendation of Dame Judith Hackett who stated "The review repeatedly heard that common practices such as design and build contracts and value engineering can often result in uncontrolled, undocumented and poorly designed changes being made to the original design intent".

Regulatory Reform (Fire Safety) Order 2005 amendments – Fire Safety Act 2021

More prescriptive guidance is set in the new Fire Safety Act 2021, particularly aimed at the building owner 'Responsible Person', including:

- Fire risk assessments which must consider external walls and all fire doors entering onto common parts.

- The competency for those involved in the process and its documentation.
- Tougher financial penalties are also a feature of the new reforms.

Core considerations for building design, construction & management

- Clients, principal designers, and contractors need to think carefully how they are to ensure they meet their responsibilities under the Act and how their teams need to be expanded/ trained and to ensure they do not fail and become liable. Everyone needs to work with the mindset that the operational safety of the building is key, and accountability does not stop at the end of the design or construction.
- The introduction of the Gateway 1 means that earlier consideration needs to be given to fire strategies to ensure passage through the planning process on HRBs. Although Gateway 1 does not apply to non HRBs, the PD should consider compliance with the Building Regulations from the outset to ensure the building that gains Planning Permission can be detailed to comply with the Building Regulations without change to its "form"
- Gateway 2 means that for projects in scope, design and build cannot be used which reduces risk for Duty Holders. This is not the case for Non HRBs and duty holders need to carefully consider how they will plan manage and monitor their fulfilment of their duties, and evidence this.
- The greater emphasis on providing appropriate information to the client to allow the building in occupations to be managed in the way intended through the design and construction process (for HRBs called the 'Golden Thread') means it is likely further digital investment will be needed to ensure building information is stored to an appropriate environment.
- The process of applying for a completion certificate and then registering the building prior to occupation on HRBs means careful consideration needs to be given around the programming of this phase of the development. On all buildings principal duty holders have to understand the statutory requirement to make a formal declaration that they have fulfilled their duty before a completion certificate can be issued by the Building Control Body.

What are "Golden threads" ?

The Building Safety Act will enforce the requirements for keeping vital, up-to-date safety information about how a building has been designed, built, and managed.

This 'Golden Thread of Information' will be stored digitally for the entire life of the building. It enables you to understand a building and the steps needed to keep both the building and people safe, now and in the future.

Note: the longest part of the Golden Threads existence will be when the building is occupied and therefore the environment it is held in should enable the Accountable Person to update and add to the information easily.

What are the key differences between Building Safety Act Regulations and CDM Regulations?

Confusion still arises because the term ‘Principal Designer’ - introduced under the Construction (Design and Management) Regulations 2015 (CDM) - now applies to the new Building Regulations regime, creating one term with two completely separate and distinct sets of duties and regulatory requirements.

Under CDM, the primary duty of the Principal Designer is to plan, manage and monitor the pre-construction phase of a project and to co-ordinate matters relating to **health and safety.** This is to ensure, so far as is reasonably practicable, that construction projects are designed and managed without risks to the **health or safety** of those who build, use and maintain them.

Under the Building Regulations, the Principal Designer is required to ‘plan, manage and monitor the **design** work during the design phase and to ‘co-ordinate matters relating to the **design** work comprised in the project so that all reasonable steps are taken to ensure that the design is such that if the building work to which the **design** relates were built in accordance with that **design** the building work would be in compliance with all relevant requirements’

In other words, the new Principal Designer duty holder must take ‘all reasonable steps’ to ensure the design work on a project is co-ordinated to demonstrate compliance with the Building Regulations. Although individual designers remain responsible for the compliance of their own design work, the new Principal Designer will have overall responsibility for co-ordinating the design and must only accept commissions where they have the ‘skills, knowledge, experience and behaviours necessary to fulfil their duties’,

Note: Appointment of any contractors, suppliers, consultant’s competency will be assessed, through the application of the companies IMS procedures, relating to employment and supply of goods and services.

Sufficient financial resources shall be available throughout the contract for all necessary Health and Safety facilities including personal protective equipment.

All equipment shall be maintained in safe working order and operated correctly; all employees shall have the relevant experience, training, supervision, instruction and certification to carry out their duties.
Elements of the work that affect other parties shall be effectively co-ordinated with all concerned.

8. HEALTH AND SAFETY IN THE WORKPLACE

One person within each team shall be nominated by the Operations Manager to be responsible for Health and Safety at the work place and act as the Safety Officer. This shall usually be the Site Team Supervisor. Specific duties include;

1. Liaison with the client's representative and office.
2. Provision of first aid, fire precautions and contact with emergency services.
3. Reporting accidents and matters of concern to the Operations Manager.
4. Organising and controlling all working procedures to comply with the Method Statement, Risk Assessment and COSHH Assessment.

Display Screen Equipment(DSE)

Possible hazards associated with the use of DSE are mainly those leading to musculoskeletal problems, visual fatigue and stress.

The likelihood of experiencing any of these problems is remote and usually related to duration and intensity of the use of DSE, combined with the ergonomic factors of the workstation and the environment in which it is situated. Fears that ionising and non-ionising electromagnetic radiation from DSE are damaging to the health of pregnant mothers and the unborn foetus have been shown to be groundless.

Stroma follows the principles of DSE requirements as prescribed by HSE Document: INDG36-Working with display screen equipment-

Link: https://www.hse.gov.uk/pubns/indg36.htm

Below is an overview of requirements.

The Regulations apply only to the protection of employees who are 'users' as defined by the Regulations. A 'user' means an employee who habitually uses DSE as a significant part of normal work, whether at his/her own employer's workstation, at another employer's workstation, or at a workstation at home. Whether an employee is a 'user' depends on a number of factors which will indicate whether he/she habitually uses DSE as a significant part of normal work.

The Regulations define DSE as any alphanumeric or graphic display screen and cover both conventional (cathode ray tube) screens and other display processes such as liquid crystal displays and microfiche.

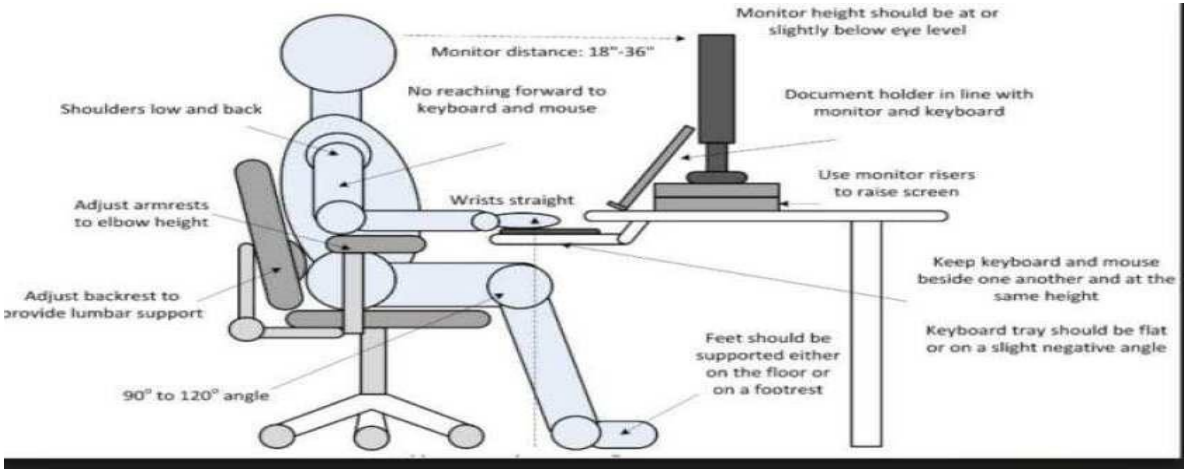
Risk assessment: The Regulations require a risk assessment of all workstations used by 'users' as defined, or by 'operators' who are essentially self-employed 'users'. Risk assessments should draw on the experience of 'users'. An ergonomic checklist based on the schedule to the Regulations can be useful for this purpose. In complex situations, task analysis may be required. Training should be given by persons sufficiently qualified in ergonomic principles and practice.

DSE Training & Assessment- Stroma ,for all new starters will complete an on line certified course for DSE assessment (IHASCO).This completion includes an assessment of work station. The completion of course is evidenced by a certificate. Where applicable existing employees can complete course on direction from Line Manager.

In all circumstances, the risks which are identified by the assessment, or by a review, must be reduced to the lowest extent reasonably practicable. A workstation comprises the display screen, keyboard or other inputting device such as a mouse, optical accessories to the screen equipment, disk drive, telephone, modem, printer, document holder, work chair, work desk, work surface and the immediate work environment. An example is provided below (Fig.1) for the correct seating position and posture when using the DSE.

The risk assessment is reviewed anytime in which the employee's workstation has been modified or changed in anyway. Details regarding the last review date of the risk assessment can be found in the DSE control register

Example of a workstation layout and ergonomics. Figure 1



For those employees who are based at home permanently, referred to as "home workers", Stroma are required to ensure that a home worker's DSE is the same as someone who works in a Stroma office. The requirements will be discussed with the employee during their induction and completion of the on line(IHASCO) training course as detailed above. The Line Manager will arrange for any specific equipment that may be needed.

For those employees that occasionally or temporarily work from home and are not defined as "home workers", they need to ensure that their DSE work is being carried out following the same requirements as if working in the office wherever reasonably practicable. This includes ideally working at a desk or table on an appropriate chair and not, for example, on sofa or bed. Where applicable, Stroma will consider providing equipment to the employee; however, this will be reviewed on an individual basis.

Risk assessments & Training: Completion of DSE training (IHASCO) is recorded via completion of certificate. Additionally an in house risk assessments will be recorded on the DSE Risk Register**.**

Users should know how to adjust furniture and equipment and deploy workstation components to achieve correct posture and reduce stress. They should understand the need to regularly clean and inspect equipment and the importance of having breaks and changes of activity. Staff should ensure that they always take a 10 minute break every hour when using DSE equipment. This can either be through taking a definite break or through carrying out a completely different task which means them leaving their workstation and moving around.

Eye tests: Eye tests must be provided by employers to employees who are DSE 'users' if they request them. In effect, this means a "sight test" as defined in the Opticians Act and includes a test of vision and an examination of the eye. Stroma will fund the cost of an eye test and where glasses are required for the purposes of DSE usage, the business will support the purchase, via reimbursement through expenses in line with HSE guidelines. If the sight tests indicate that a 'user' needs 'special corrective appliances' (spectacles), as distinct from their normal spectacles, to overcome vision defects at the specific viewing distances recommended by the guidance to the Regulations, they must be provided by the employer free of charge. However, Stroma is only obliged to provide basic spectacles which are adequate for the purpose. If users choose more expensive spectacles, they must pay the difference in cost between the basic ones and those of their choice. If a user's normal corrective spectacles are adequate for safe use at their DSE, the employer is not responsible for the provision of additional spectacles.

Home Working Advice and Guidance: When you are carrying out work for Stroma, the business has a duty of care to ensure you are working safely. This applies if you occasionally work from home. Whilst we cannot control your home environment below is some guidance to enable you to achieve the most suitable and comfortable working environment at home. It is important that you follow this advice in order to ensure you are working safely.

Location: Use an area within your home that has enough space to set up a suitable working area if possible, based on the role you undertake. Also try and ensure there is sufficient light, fresh air ventilation and no trailing cables that could create a trip hazard. It is also recommended that you avoid using a sofa or bed; however, it is accepted that this may not be possible given your personal circumstances.

IT Equipment : Ensure that you check your IT equipment is safe before use each day. Please ensure that you do not overload your sockets or daisy chain caballing around your house..

Incident Reporting: Even though you are at home, near-misses and accidents should be reported to your Line Manager who will complete the incident and investigation forms required.

Contact with Others: It is important that you keep in regular contact with your Line Manager and or colleagues to keep them informed that you are safe and well.

Workstation Set-Up Advice

Home Office: If you have a home office with a desk and chair, please refer to Fig.1 on the correct set-up you should be trying to attain to. If you cannot achieve this, please try implementing some of the suggested measures in the remainder of this Section where applicable to your situation.

Working at a Kitchen/ Dining Table: Please refer to Fig.1 and try to achieve this as much as possible based on your current circumstances. The following provides addition advice to help in obtaining the most effective working position.

Chair: Try and keep your knees below your hips and an open 100 degree hip angle. As it is unlikely that you will have an adjustable chair you can try to get into an ideal sitting position using a cushion or pillow to sit on and a rolled up towel against your lower back for lumbar support. These measures will help to take the strain and load off your spine but only use them if they
feel comfortable. Make sure that your feet are placed firmly on the floor. If you can't do this please use a box, or similar raised object as a suitable footrest. If you have a footrest at work and can take it home, please do so.

Screen Height: To ensure your screen is at the right height based on your seating position,
consider raising this using a laptop stand, monitor stand or alternatively using books or other suitable items. You may not achieve the ideal position but aim to raise your screen by a minimum of 15 cm. Your eyes should naturally be aligned with the top third of your screen when you are looking.
straight ahead, any small adjustment will help. The aim is to avoid dropping your head as much as possible to try and avoid neck and shoulder strain that could affect your health.

Mouse and Keyboard:If you are raising up your laptop you should ideally use an external keyboard
and mouse so that you are not working with your arms too high or over extended. Take your keyboard and mouse home with you if possible, particularly if you already have ergonomic versions.
Your elbows should be at a 90 degree angle, tucked closely to your body, and your wrists should be in a neutral position (flat). This posture helps keep you from rounding your shoulders and pulling your neck muscles that could lead to future health problems. If you can't attach an external mouse and keyboard, leave your laptop in place on the table rather than raising it up but you must take more frequent breaks. Try and stand up and move around every 15 minutes

Working from a Lounge Chair: Your elbows should be at a 90 degree angle, tucked closely to your body, and your wrists should be in a neutral position (flat). This posture helps keep you from rounding your shoulders and straining your neck muscles that could lead to future health problems. If you can't attach an external mouse and keyboard, leave your laptop in place on your lap or a tray on your lap. You must take more frequent breaks, try and stand up and walk around every 15 minutes (more on taking breaks and exercises below). Avoid leaving your laptop on your chair as this may cause it to overheat and therefore it becomes a fire risk.

Screen Glare:If you can, try not to put your laptop directly underneath a bright artificial light. Try and use natural light as much as possible where it does not cause your eyes to become strained or tired. Where screen glare becomes a problem, try and use curtains or blinds to reduce the impact on your screen where possible. Breaks and Exercise: Rregardless of your home working environment, the best way to look after your health and wellbeing is to take regular breaks and to move around as much as possible. Depending on your home set-up, you should aim to take breaks from between
5 to 20 minutes based on your situation. For example, if you have a suitable home office environment the break may be between 5-10 minutes; however, if you a makeshift set up/ work from your armchair then it is recommended that you take between 15-20 minutes break.

Here are some tips to help you to move more:

Stand up every time you use the phone. Try and do more activities away from the screen e.g. reading paperwork. Listen to your body, if you feel any aches and pains something is not right and needs to be looked at. Re-visit the guidance to see if you can implement anything to help your situation.
Take regular food and drinks breaks. This will mean you move away from your workstation to a different environment. Set up a reminder e.g. a timer on your phone. You can also install apps
such as on your laptop that allow you to set reminders.

Routine: It is important that you get into a routine as quickly as possible when working at home. Set out a plan to differentiate between work and home time, do something that separates out the 2, for example set up a calendar or tasks list for the day ahead, wear different clothing or sit it different areas of your home. Understand when you are at your most productive at certain times of the day
based on the personal situation. For example, due to childcare you may want to start earlier or finish later. If you wish to work a slightly different work pattern when working at home, please discuss your requirements with your Line Manager to see if these can be accommodated.

GDPR: When working at home it is important to know that you are bound by the same GDPR Regulations as you are in the office. The following are key points for you to adopt when working from home:

Use an encrypted, password-protected laptop. Always lock your screen when working from home.
Make sure you're protected with the latest antivirus and antimalware software.
Avoid downloading sensitive documents or taking them home from the office; use the Staff Intranet or online soft platforms to view the data instead.
Keep your work hidden. Be mindful of where you work and if a third-party can view your screen from inside or outside of your home.
Avoid printing sensitive data at home.
Avoid data breaches by not transferring or emailing items to others.
Remember to report any data breaches that may occur at home.
Any sensitive paper documents must be shredded when not required anymore, never put them in the recycling or general waste.
Don’t leave your laptop, tablet, desktop or mobile on display. Where possible move out of sight of others.

9. REFUSAL TO WORK.

The company does not expect anyone to work in an unsafe manner to achieve results. If work cannot be undertaken safely then it must not be done. It is a fundamental principle that all personnel can refuse to work if they feel it is not safe to continue to do so.

Any person refusing to work on the grounds of safety will not be subject to any disciplinary procedures.

Further guidance on this aspect is detailed within the company’s management system. CP40 Work safe procedure ,which outlines the process for refusal to work.

In respect of personnel working on UK Rail infrastructure, please also refer to the Rail Health & Safety Policy which is a support policy to this policy, specifically for the UK Rail infrastructure.

10. REVIEW OF HEALTH AND SAFETY MATTERS

Regular meetings concerning Health and Safety shall be held both formally and informally and it is important to involve all employees and to encourage everybody to attend and to contribute to all matters that could affect the policy.
Health and Safety and meetings will be held annually. Management Review Meetings will be held annually. However meetings can be called at any time where necessary.

11. REPORTING OF ACCIDENTS AND NEAR MISSES

The company has a dedicated procedure CP44 Record/Investigation Incidents and accidents within the management system which details the actions and processes required.

All accidents, dangerous occurrences and near misses shall be reported to the Company Operations Manager and company QHSE Manager and Managing Director; details shall be entered into the accident book.

All accident reports must be given to company QHSE Manager for upkeep of records.

RIDDOR:

Where appropriate, any reportable accident and or reportable dangerous occurrence, that meet the criteria detailed under the regulations RIDDOR 2013, authorisation should be gained from ideally the Managing Director, another Director in their absence ,a senior Manager in their absence , or the ,QHSE Manager in their absence ,or in their absence a suitably competent person with minimum of IOSH Managing Safely certification or equivalent and above or in their absence , the company appointed external H&S consultant for guidance.

Reporting of reportable accidents and/or reportable dangerous occurrence(s) can be by the following methods:

Phone 0845 300 9923(Monday to Friday 0830 to 1700)
Internet www.hse.gov.uk/riddor
Out of hours: www.hse.gov.uk/contact/outofhours.htm

12. TOOLS, MATERIALS and EQUIPMENT

All tools, materials and equipment shall be used in accordance with all relevant legislation and manufacturer's instruction and will be purchased from approved suppliers, in accordance with company purchasing procedures. All rigged and personal fall protection equipment shall receive a pre use inspection and function test. Any damaged/worn tools or equipment shall be quarantined and returned to stores for repair or disposal.

12.1. Tools

All tools shall be used in accordance with the manufacturer's instructions with the relevant personal protective equipment. Only trained and certified operatives shall use certain tools (cartridge guns for example).

12.2. Materials and Chemicals Used

All materials and chemicals shall be used in accordance with manufacturer recommendations, COSHH assessments and data sheets. Copies of COSHH data sheets shall be kept in the office and on site. All relevant personal protective equipment shall be provided and used.

12.3. Equipment

Equipment shall be specified to exceed all foreseeable loading and requirements. Equipment shall only be purchased from approved suppliers who can provide certificates of conformity, demonstrating compliance to CEN or other relevant standards.
Safety critical equipment shall be subject to controls that are much more stringent. It shall be identified with a reference number giving traceability to original manufacturers test certificates / conformity certificates. All safety critical equipment shall be logged in and out of stores for each contract and have a formal recorded audit / thorough examination every 6 months.
Any damaged or suspect equipment shall be quarantined, returned to the stores and examined. If necessary, it will be destroyed and recorded as such, thus preventing inadvertent use by other parties.

13. PPE/RPE

The Company will provide all personnel site with the correct PPE/RPE in line with current legislation requirements for tasks and/or services being performed, free of charge..

For Non Rail Infrastructure Operatives:

A basic on-site operative kit will consist of the minimum:

Full High Visibility clothing to ISO 20471:2013+A1:2016.
A safety helmet to BS EN 397:2012+A1:2012 all over white in colour
Safety footwear which complies with ISO 20345:2021. Safety boots are to have toe protection, mid sole protection and provide ankle support. Rigger boots are not approved.
All safety gloves provided shall comply as minimum with the requirements of EN 388:2016. Rigger gloves are not approved.

For Rail Infrastructure Operatives:

The Company will provide, free of charge, for all personnel, the correct PPE in line with Network Rail Standard NR/L2/OHS/021. For work on NRHS level one standards C/01/SS/38/1001 and C/01/SS/38/2001 will apply. For work on or near the line, this will comprise of

Full High Visibility jacket or coat to ISO 20471:2013+A1:2016. Class 2 and RIS-3270-TOM for colour and visibility, and of BS EN 343:2019 class 4:4 for water vapour resistance and water penetration. High Visibility clothing shall be marked with the Company Logo in accordance with the standard.
Hoodies – This includes personally purchased garments often worn under PPE, are not approved, as they limit the wearers peripheral vision and ability to hear verbal communications and warning alerts. Hoods on coats/jackets should be removed on the infrastructure as they limit the wearers peripheral vision and ability to hear verbal communications and warning alerts.
High visibility over-trousers or leggings which meet the requirements of BS EN ISO 20471:2013+A1:2016 Class 2 and RIS-3270-TOM for colour and visibility and of BS EN 343: 2019 class 4:4 for water vapour resistance and water penetration. Shorts or three quarter trousers/leggings do not mitigate risks from slips, trip and falls, lineside vegetation, sunburn, sparks, chemicals, vermin and insect bites and hence, are not approved
A safety helmet to BS EN 397:2012+A1:2012 all over white in colour. Note when the wearer is accessing Network Rail Infrastructure under a Track Visitor Permit (TVP) ,the safety hat shall be blue in colour (PANTONE® 2935c) and comply to BS EN 397:2012+A1:2012 and any attachments used ,shall be compatible.
Safety footwear which complies with ISO 20345:2021. Safety boots are to have toe protection, mid sole protection and provide ankle support. Rigger boots are not approved.
Eye protection shall be worn when accessing the infrastructure and shall comply with standard EN 166: 2001 as a minimum. Examples of eye protection, include spectacles, goggles, visors, and face shields.
All safety gloves provided shall comply as minimum with the requirements of EN 388:2016. Rigger gloves are not approved

For all personnel, rail, non-rail and other sectors, additional PPE based on job specific risk assessments, will be provided free of charge and may therefore include additional eye protection, ear protection (defenders/plugs), masks, disposable gloves etc and will be allocated as per job requirement and assigned to vehicle and on job despatch sheet, free of charge. Specialised RPE where required will be issued on a job-by-job basis where required as identified by the specific job risk assessment and provided free of charge.

PPE/RPE will be issued on induction into the company, where applicable and detailed on the Stores LOLER spreadsheet, where applicable. The Stores Manager will be responsible for recording PPE/RPE allocation. PPE/RPE will be signed for, on an acknowledgement form.

For IRATA certified Rope Access subcontractor Technicians, personal rope access kit ,will be issued to them, by the company on a job by job basis. This means that on completion of the job the subcontractor will return the issued kit to the Stores Team. The Stores team will inspect and check the kit as per required procedures within the IMS.

14. CLIENT REPRESENTATIVES ,OTHER VISITORS AND PUBLIC SAFETY

CLIENT REPRESENTATIVES ,OTHER VISITORS:

Client representatives and other visitors to site must abide by all company policies concerning health and safety matters. All other relevant legislation must be adhered to. To this end, they will be required to read, understand and sign off as such the site-specific Risk Assessment, Method Statement and COSHH Assessment (if applicable).
On site, the Site Team Supervisor shall be responsible for the safety of any company client's representatives or visitors.

PUBLIC SAFETY:

The general public is defined for the purpose of this Safety Policy as any person who is not employed by the company

a) Employees of neighbouring businesses;

b) Visitors to the company's and neighbouring business premises;

c) Pedestrians and road users;

d) Any persons who could be affected by the company activities.

General public areas must be kept free from any unsafe obstructions The company's work does not generally affect public areas.

Some exceptions are: -

Loading & unloading of vehicles whether they be company vehicles or deliveries. Care must be taken not to move or store materials in public areas in such a way that they cause a hazard.

Occasionally inspections will be carried out from public areas. Once again care must be taken not to cause a hazard

Trespassers' safety must also be considered so they are protected from danger. There is a particularly strong liability towards children who may be 'attracted' onto company premises after working hours. The precautions to exclude children depend on circumstances. Every reasonable precaution must be taken to keep trespassers out of company's premises. Considerations must be given to safeguard trespassers should they gain entry, i.e. the premises should be left in a safe condition

15. COMPLIANCE WITH HEALTH AND SAFETY POLICY

In order to achieve the objectives of the safety policy it is important that everybody contributes to discussions on this policy and maintains current standards.

Any person not complying with this policy shall be warned that they are not doing so and the non-compliance must be resolved. Any person failing to comply for a second time will be suspended from work pending investigation.

Any breaches of the Health and Safety Policy shall be reported to the Site Team Supervisor and the Operations Manager.
It shall be the responsibility of the Managing Director to ensure that personnel are consulted on a regular basis and any changes to the policy are communicated.