



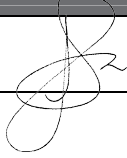
## **Health, Safety & Environmental Policy**

### **Voicepath Ltd**

**30 Chalks Road  
St George  
Bristol  
BS5 9EP**

**Issue Date: August 2017**

## Revision Status

| Revision | Date Issued | Approved by                  | Signature   |
|----------|-------------|------------------------------|---|
| 1.0      | August 2017 | Director Responsible for HSE |  |
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On receipt of this document / revision, please destroy all previous and now obsolete copies.

The next review is due: 1 August 2018.

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## **Section 1.0 Statements of Intent**

### **Health & Safety Policy Statement of Intent**

The objective of this policy is to attain and maintain high standards of health and safety performance throughout Voicepath Ltd.

All persons conducting activities under the name of Voicepath Ltd will adhere to this Health & Safety Policy.

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

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

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

**Signed**



**Date:**

1 August 2017

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

**Review Date:**

1 August 2018

### Environmental Policy & Statement of Intent

Voicepath Ltd considers environmental management to be of prime importance and is fully committed to fulfilling all environmental responsibilities as well as continuous improvement of environmental performance. As such Voicepath Ltd will work with clients, contractors, suppliers and the workforce towards achieving this goal.

The objective of this policy is to attain and maintain high standards of environmental performance throughout Voicepath Ltd.

All persons conducting activities under the name of Voicepath Ltd will adhere to this Environmental Policy.

It is the Policy of the Company to:

- ) Understand and comply with all legal requirements, codes of practice and regulations;
- ) Organise operations in order to minimise pollution and disturbance to neighbours and the general public;
- ) Provide assistance, training and information that may be necessary to personnel at all levels;
- ) Use materials and resources with regard to long-term sustainability;
- ) Employ a consistent framework for the management of environmental issues across all its operations;
- ) Audit environmental performance.

The successful management of environmental issues will be achieved by:

- ) Identification and management of environmental risks and aspects;
- ) Prevention of pollution;
- ) Minimisation of waste;
- ) Provision of prompt response to incidents and emergencies;
- ) Promotion of environmental issues and good practice; and
- ) Reviewing and reporting on the content and implementation of this policy.

**Signed**



**Date**

1 August 2017

**Director Responsible for**

**Health, Safety & Environment**

**Review Date**

1 August 2018



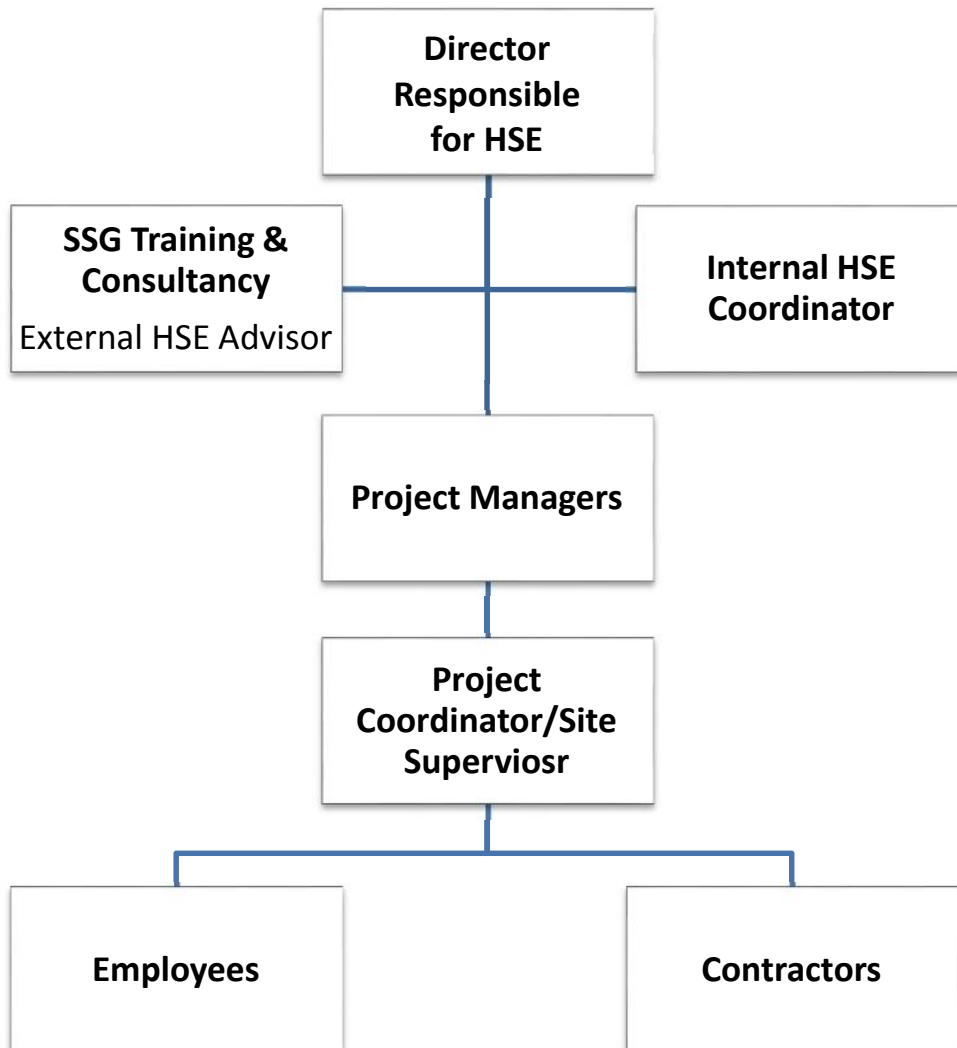
## Section 2.0 Roles & Responsibilities

**ROLES & RESPONSIBILITIES****2.1 Introduction**

Health, safety and environmental (HSE) management is the responsibility of all personnel of Voicepath Ltd and is a joint responsibility with contractors. It is the responsibility of the Director Responsible for HSE, Project Managers and Site Managers / Site Supervisors to ensure that all personnel and contractors are properly equipped, trained and motivated in order to ensure high HSE standards at work.

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

2.2 Company HSE Organisation Chart



### 2.3 Director Responsible for Health, Safety & Environment

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

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

- J Understand the main requirements of the Health and Safety at Work, etc. Act 1974.
- J Ensure that every aspect of health, safety and the environment and its implications is given due consideration in all executive decisions.
- J Set, monitor and review the effectiveness of the Company HSE Policy, ensuring that it meets current legislative requirements and accurately reflects Company activities.
- J Ensure adequate resources are available to implement the Company HSE Policy and to enable legal and moral obligations to be met.
- J Seek advice, as and when appropriate, on HSE issues.
- J Ensure that all new employees receive adequate induction training as soon as is reasonably practicable after joining the Company and on starting at a new site.
- J Ensure all employees and contractors receive suitable information, instruction, training and where appropriate, supervision to assure their competence for the work they are to undertake.
- J Ensure that all plant, equipment and materials are safe and suitable for the work for which they are to be used.
- J Ensure that suitable and sufficient risk assessments of Company activities are undertaken to identify and implement effective control measures required to eliminate, reduce or control the risk of harm occurring to employees or others who may be affected by the activity.
- J Ensure that the results of the risk assessments are effectively communicated throughout the Company and to others who may be affected by the activity.
- J Ensure employees are provided with PPE as identified by risk assessment.
- J Ensure employees are trained in the use and maintenance of PPE.
- J In respect of hazardous substances, ensure that appropriate information is available to enable suitable assessment of the process to be conducted.
- J Ensure that accidents and near misses are recorded.
- J Ensure that all injuries, diseases, dangerous occurrences and significant near misses involving Company employees are investigated and, where appropriate, reported as required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- J Maintain effective communication routes throughout the Company and ensure employees are aware of the Company HSE Policy and other HSE matters as they arise.
- J Take immediate action in respect of:
  - Z Prohibition and improvement notices;
  - Z Matters of complaint by Health and Safety Executive Inspectors;

- Z Concerns by employees or others, of HSE standards; and
- Z Accidents, incidents and near misses involving Company employees.
- J Ensure maintenance of registers and records as required by current legislation.
- J Ensure that HSE management within the Company is periodically audited to ensure that high standards of HSE performance are being maintained and to identify areas where improvements are to be made.
- J Ensure that HSE performance is regularly reviewed.

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

#### Client Responsibilities

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

- J Suitable arrangements are made for managing a project, including the allocation of sufficient time and other resources. Arrangements are suitable if:
  - Z the construction work can be carried out, so far as is reasonably practicable, without risks to the health or safety of any person affected by the project; and
- J Welfare facilities provided from the beginning and throughout the construction phase are in compliance with Schedule 2 of CDM 2015.
- J Arrangements identified above are maintained and reviewed throughout the project.
- J Where there is more than one contractor on site at any time (or it is foreseeable that there will be) the following are appointed in writing as soon as is practicable before the construction phase begins:
  - Z A Principal Designer who controls the pre-construction phase
  - Z A Principal Contractor who controls the Construction Phase
- J Reasonable steps are taken to ensure that Designers (including Principal Designer), Contractors (including Principal Contractor), and other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure health and safety of those working on the project.
- J Reasonable steps are taken to ensure that the Principal Designer and Principal Contractor comply with their respective duties.
- J Pre-construction information is provided as soon as is practicable to every designer and contractor appointed, or being considered for appointment, to the project.
- J A Construction Phase Plan is drawn up before the construction phase begins.
- J The Principal Designer prepares and maintains a Health and Safety File.
- J The HSE are notified in writing when a project is notifiable. A project is notifiable when:
  - Z It lasts longer than 30 working days and has more than 20 persons on site at any one time
  - Z Exceeds 500 person days
- J All parties involved with the project cooperate with one another.

**Designer Responsibilities**

In recognition of the legal duties imposed under the Construction (Design and Management) Regulations 2015, for projects where the Company is the **Designer**, the Director Responsible for HSE will:

- J Not accept an appointment unless they have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfill the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- J Not commence work in relation to a project unless satisfied that the client is aware of their duties under these Regulations.
- J Take reasonable steps to ensure that designers, contractors or other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure the health and safety of those working on the project.
- J When preparing or modifying a design, take into account the general principles of prevention and any pre-construction information to eliminate, so far as is reasonably practicable, foreseeable risks to the health or safety of any person:
  - Z carrying out or liable to be affected by construction work;
  - Z maintaining or cleaning a structure; or
  - Z using a structure designed as a workplace.
- J If it is not possible to eliminate these risks the designer must, so far as is reasonably practicable:
  - Z take steps to reduce or, if that is not possible, control the risks through the subsequent design process;
  - Z provide information about those risks to the principal designer; and
  - Z ensure appropriate information is included in the health and safety file.
- J Take all reasonable steps to provide, with the design, sufficient information about the design, construction or maintenance of the structure, to adequately assist the Client, other Designers and Contractors to comply with their duties under these Regulations.
- J Provide information that is both comprehensive as possible and as soon as is practicable.
- J Cooperate with all parties involved with the project. Report anything they are aware of in relation to the project which is likely to endanger their own health or safety or that of others to the relevant duty holder.

**Principal Designer Responsibilities (in addition to Designer)**

In recognition of the legal duties imposed under the Construction (Design and Management) Regulations 2015, for projects where the Company is the **Principal Designer**, the Director Responsible for HSE will:

- J Ensure that they have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- J Assist the client in the provision of the pre-construction information and provide pre-construction information, promptly and in a convenient form, to every designer and contractor appointed, or being considered for appointment, to the project.

- J Plan, manage and monitor the pre-construction phase and coordinate matters relating to health and safety during the pre-construction phase to ensure that, so far as is reasonably practicable, the project is carried out without risks to health or safety.
- J Take into account the general principles of prevention and where relevant, the content of any construction phase plan and any health and safety file.
- J Ensure all Designers comply with their duties.
- J Ensure that all persons working in relation to the pre-construction phase cooperate with the Client, the Principal Designer and each other.
- J Cooperate with all parties involved with the project.
- J Liaise with the Principal Contractor for the duration of the Principal Designer's appointment and share with the Principal Contractor information relevant to the planning, management and monitoring of the construction phase and the coordination of health and safety matters during the construction phase.

### **Principal Contractor Responsibilities**

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where the Company is the **Principal Contractor**, the Director Responsible for HSE will:

#### **Construction Phase**

- J Not accept an appointment unless they have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- J Not commence work in relation to a project unless satisfied that the client is aware of their duties under these Regulations.
- J Take reasonable steps to ensure that designers, contractors or other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure the health and safety of those working on the project.
- J Plan, manage and monitor the construction phase and coordinate matters relating to health and safety during the construction phase to ensure that, so far as is reasonably practicable, construction work is carried out without risks to health or safety. In particular the general principles of prevention must be taken into account when:
  - Z design, technical and organisational aspects are being decided in order to plan the various items or stages of work which are to take place simultaneously or in succession; and
  - Z estimating the period of time required to complete the work or work stages.
- J Organise cooperation between contractors (including successive contractors on the same construction site).
- J Coordinate implementation by the contractors of applicable legal requirements for health and safety.
- J Ensure that employers and self-employed persons apply the general principles of prevention in a consistent manner, particularly when complying with the provisions of Part 4; and where required, follow the construction phase plan.

- ) Ensure that employers and self-employed persons follow the construction phase plan.
- ) Provide a suitable Induction.
- ) Take the necessary steps to prevent access to the construction site by unauthorised persons.
- ) Provide facilities that comply with the requirements of Schedule 2 (Welfare) throughout the construction phase.
- ) Liaise with the Principal Designer for the duration of the Principal Designer's appointment and share with them information relevant to the planning, management and monitoring of the pre-construction phase and the coordination of health and safety matters during the pre-construction phase.

**Construction Phase Plan and Health and Safety File**

- ) Draw up a Construction Phase Plan, or make arrangements for a Construction Phase Plan during the pre-construction phase, and before setting up a construction site.
- ) The Construction Phase Plan must set out the health and safety arrangements and site rules taking account, where necessary, of the industrial activities taking place on the construction site and, where applicable, must include specific measures concerning work which falls within one or more of the categories set out in Schedule 3.
- ) Ensure that the Construction Phase Plan is appropriately reviewed, updated and revised from time to time throughout the project so that it continues to be sufficient to ensure that construction work is carried out, so far as is reasonably practicable, without risks to health or safety.
- ) Provide the Principal Designer with any information in the Principal Contractor's possession relevant to the Health and Safety File during the project.
- ) Ensure that the Health and Safety File is appropriately reviewed, updated and revised from time to time to take account of the work and any changes that have occurred, if the Principal Designer's appointment concludes before the end of the project. The Health and Safety File will be passed to the Client at the end of the project.

**Consultation and Engagement**

- ) Make and maintain arrangements which will enable the Principal Contractor and workers engaged in construction work to cooperate effectively in developing, promoting and checking the effectiveness of measures to ensure the health, safety and welfare of the workers;
- ) Consult those workers or their representatives in good time on matters connected with the project which may affect their health, safety or welfare, in so far as they or their representatives have not been similarly consulted by their employer;
- ) Ensure that those workers or their representatives can inspect and take copies of any information which the Principal Contractor has, or which CDM 2015 requires to be provided by the Principal Contractor, which relate to the health, safety or welfare of workers at the site, except any information which would affect national security, contravene data protection, cause substantial damage to the Company's undertaking or affect ongoing legal contravention or proceedings.
- ) Provide information that is both as comprehensive as possible and as soon as is practicable.



- J Cooperate with all parties involved with the project.
- J Report anything they are aware of in relation to the project which is likely to endanger their own health or safety or that of others to the relevant duty holder.

### **Contractor Responsibilities**

In recognition of the legal duties imposed under the Construction (Design & Management) Regulations 2015, for projects where the Company is a **Contractor** (other than the Principal Contractor), the Director Responsible for HSE will:

- J Not accept an appointment unless they have the skills, knowledge and experience, and, if they are an organisation, the organisational capability, necessary to fulfil the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project.
- J Take reasonable steps to ensure that designers, contractors or other team members that are appointed have the skills, knowledge, experience and organisational capability to fulfil their role and secure the health and safety of those working on the project.
- J Not commence work in relation to a project unless satisfied that the client is aware of their duties under these Regulations.
- J Plan, manage and monitor construction work carried out either by the contractor or by workers under the contractor's control, to ensure that, so far as is reasonably practicable, it is carried out without risks to health and safety.
- J Where there is more than one contractor working on a project, a contractor must comply with:
  - Z any directions given by the Principal Designer or the Principal Contractor and
  - Z the parts of the Construction Phase Plan that are relevant to that contractor's work on the project.
- J If there is only one contractor working on the project, the Contractor must take account of the general principles of prevention when:
  - Z design, technical and organisational aspects are being decided in order to plan the various items or stages of work which are to take place simultaneously or in succession; and
  - Z estimating the period of time required to complete the work or work stages.
- J If there is only one Contractor working on the project, draw up a Construction Phase Plan, or make arrangements for a Construction Phase Plan to be drawn up, as soon as is practicable prior to setting up a construction site.
- J Not employ or appoint any person to work on a construction site unless that person has, or is in the process of obtaining, the necessary skills, knowledge, training and experience to carry out the tasks allocated to that person in a manner that secures the health and safety of any person working on the construction site.
- J Provide each worker under their control with appropriate supervision, instructions and information so that construction work can be carried out, so far as is reasonably practicable, without risks to health and safety. This must include:
  - Z Suitable induction if not provided by the Principal Contractor.
  - Z Procedures to be followed in the event of serious and imminent danger to health and safety.

- Z Information on risks to health and safety.
- J Not begin work on a construction site unless reasonable steps have been taken to prevent access by unauthorised persons to that site.
- J Ensure, so far as is reasonably practicable, that the requirements of Schedule 2 (welfare) are complied with so far as they affect the contractor or any worker under that contractor's control.
- J Cooperate with all parties involved with the project.
- J Report anything they are aware of in relation to the project which is likely to endanger their own health or safety or that of others to the relevant duty holder.
- J Provide information that is both comprehensive as possible and as soon as is practicable.

## 2.4 Project Managers

Project Managers are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Company policies are observed within their area of responsibility. Authority is delegated to Project Managers to oversee and enforce the implementation of the Company HSE Policy throughout Company operations and on site. Project Managers report to the Director Responsible for HSE.

Project Managers will:

- ) Understand the Voicepath Ltd HSE Policy.
- ) Ensure that the Voicepath Ltd HSE Policy is effectively communicated to the personnel under their control.
- ) Ensure that employees and contractors comply with the Company HSE Policy.
- ) Establish and maintain high standards of HSE performance within their area of responsibility.
- ) Foster a positive health and safety culture amongst all employees.
- ) Ensure a safe working environment with safe access and egress at all times.
- ) Ensure safe working practices are observed.
- ) Develop, implement, record, communicate and monitor the effectiveness of site-specific arrangements for HSE.
- ) Allocate necessary resources for HSE management on site.
- ) Ensure that suitable and sufficient risk assessments have been undertaken for site-specific work activities.
- ) Ensure that personnel under their control are adequately inducted, trained, instructed and informed.
- ) Ensure that appropriate equipment is available and maintained in a safe condition.
- ) Ensure that accidents and near misses are recorded and investigated.
- ) Maintain all HSE registers, records and documentation, as required by current legislation.
- ) Carry out routine documented safety inspections (minimum monthly) of sites, facilities, plant and equipment so as to maintain HSE standards.
- ) Immediately bring to the attention of the Director Responsible for HSE matters relating to HSE standards or performance.
- ) Advise and support clients, contractors, etc. and their safety officers on matters relating to the Company HSE Policy and all prevailing legislation.
- ) Ensure personnel at all work sites are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- ) Communicate HSE matters to employees and contractors via induction training or toolbox talks.

## **2.5 Project Coordinator / Site Supervisors**

Project Coordinator/Site Supervisor are responsible for ensuring that the provisions of the Health and Safety at Work, etc. Act 1974, associated regulations and Company policies are observed within their area of responsibility. Authority is delegated to Project Coordinator/Site Supervisor to oversee and enforce the implementation of the Company HSE Policy on site in the workplace. Project Coordinator/Site Supervisor report to Project / Contract Managers.

Project Coordinator/Site Supervisor will:

- ) Understand the Voicepath Ltd HSE Policy.
- ) Ensure that employees and contractors comply with the Company HSE Policy.
- ) Ensure high standards of HSE performance are maintained on site.
- ) Foster a positive health and safety culture amongst all employees.
- ) Ensure a safe working environment with safe access and egress at all times.
- ) Ensure safe working practices are observed at all times.
- ) Assist Project Managers in the risk assessment process.
- ) Maintain all HSE registers, records and documentation on site, as required by current legislation.
- ) Carry out routine documented safety inspections (minimum monthly) of sites, facilities, plant, machinery and equipment so as to maintain HSE standards.
- ) Immediately bring to the attention of Project Managers and the Director Responsible for HSE matters relating to HSE standards or performance.
- ) Advise and support clients, contractors, etc. and their safety officers on matters relating to the Company HSE Policy and all prevailing legislation.
- ) Ensure personnel on the work site are fully aware of potential hazards as identified by staff reports, inspections, safety audits, accident reports and near misses.
- ) Ensure that accidents and near misses are reported to Project Managers as soon as practicable.
- ) Communicate HSE matters to employees and contractors via induction training or toolbox talks.

## 2.6 Employees

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

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

- ) Co-operate with the Director Responsible for HSE, Project Managers and Site Managers / Site Supervisors to enable legal duties to be met.
- ) Comply with ALL requirements of the Voicepath Ltd HSE Policy and associated procedures.
- ) Not intentionally or recklessly interfere with, or misuse anything, provided by the Company in the interests of HSE.
- ) Actively promote a positive health and safety culture throughout the Company.
- ) Only undertake work for which they have been trained and are authorised, qualified and competent to undertake.
- ) Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- ) When on site, follow all site safety rules and procedures.
- ) Use and maintain in a serviceable condition all plant, machinery and equipment in accordance with the training provided.
- ) Use and maintain in accordance with instructions and training given, and report the loss or defect of all personal protective equipment provided by the Company.
- ) Make themselves aware of all site and workplace first aid, fire and emergency procedures.
- ) Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- ) Ensure all accidents are entered in the Company Accident Book and also in the Principal Contractors Accident Book whilst on site.
- ) Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site (i.e. Site Manager) to ensure appropriate investigation can be undertaken.

All employees are to ensure that the Company as their employer is made aware of any form of health condition or disablement that is likely to affect their ability to undertake the work they are assigned. Line managers must be made aware at the earliest opportunity of any health condition or physical impediment to an employee so that a risk assessment can be carried out and measures taken to ensure that the employee is able to continue to work safely.

## **2.7 Contractors**

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

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

- ) Co-operate with the Director Responsible for HSE, Project / Contract Managers, Site Managers / Site Supervisors and their own Employer to enable them to comply with their legal duties.
- ) Comply with ALL requirements of the Voicepath Ltd HSE Policy and other rules and procedures in place and notified to them.
- ) Not intentionally or recklessly interfere with or misuse anything provided by the Company in the interests of HSE.
- ) Actively promote a positive health and safety culture on site.
- ) Only undertake work for which they have been trained and are qualified and competent to undertake.
- ) Ensure that risk assessments and method statements relating to their work are presented to the Director Responsible for HSE and Project Managers prior to commencement of work, if they are not following the Safe System of Work provided by Voicepath Ltd.
- ) Not undertake an activity until a suitable and sufficient assessment has been conducted by a competent person and the results communicated to them and others who may be affected by the activity.
- ) When on site, follow all site safety rules and procedures.
- ) Use and maintain in a serviceable condition all plant and equipment, in accordance with the training provided.
- ) Use and maintain in accordance with instructions and training given, and report the loss or defect of all personal protective equipment provided by Voicepath Ltd and their own Employer.
- ) Make themselves aware of all site first aid, fire and emergency procedures.
- ) Raise all matters of concern relating to HSE as they arise to the appropriate responsible person.
- ) Ensure all accidents are entered in the Accident Book held on site and in their Employers Accident Book.
- ) Ensure all accidents and incidents, including near misses, are reported to the appropriate responsible person on site to ensure appropriate investigation can be undertaken.

## **2.8 Health, Safety & Environment Advisor - External**

Voicepath Ltd utilises the services of an external Company to fulfil the role of Health, Safety & Environment Advisor (HSE Advisor).

**SSG Training and Consultancy** is appointed as Competent Persons under the Management of Health & Safety at Work Regulations 1999 to advise Company personnel and contractors on matters of HSE policy, management, good practice and legislation.

**SSG Training and Consultancy** provides the following services according to requirements:

- ) Monitor the Voicepath Ltd HSE Policy and associated procedures pertaining to HSE and advise on updates as required by legislation and good practice.
- ) Provide appropriate support for HSE matters to Company personnel.
- ) Advise on HSE training needs.
- ) Annually audit and review HSE management at Voicepath Ltd.
- ) Provide an annual report to the Voicepath Ltd.
- ) A copy of the SSG Company CV is made available to Voicepath Ltd on an annual basis.

## **2.9 Health, Safety & Environment Coordinator - Internal**

Voicepath Ltd have appointed an internal Health, Safety & Environment Manager (HSE Manager) who is responsible for the provision and dissemination of advice and information to the Company personnel and contractors. The HSE Manager provides support to line management and ensures effective implementation of the HSE Policy and all associated policies and procedures, by means of regular reviews and monitoring of workplace activities.

The HSE Manager will:

- ) Maintain close contact with the Health and Safety Executive, and any appointed HSE consultants / advisors and other organisations from whom information may be obtained regarding HSE matters.
- ) Ensure that Voicepath Ltd is aware of statutory obligations and recommended codes of practice by interpreting and keeping management and employees informed of new and developing legislation and other standards.
- ) Provide guidance notes and HSE briefings to the Company Directors, other employees and contractors.
- ) Assist in identifying appropriate training (in-house or external).
- ) Attend meetings where HSE input is required.
- ) Collate and analyse accident information and advise on trends and action areas.
- ) Carry out accident investigations and report as required.
- ) Undertake other such related duties as may be directed.

## **Section 3.0 General Arrangements for Health, Safety & the Environment**



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

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

### **3.1 Advice and Guidance**

The external HSE Advisor to Voicepath Ltd is **SSG Training and Consultancy** of Plymouth who are available on 01752 201616.

### **3.2 Review and Update**

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

### **3.3 Communication and Consultation**

- ) HSE information, where it relates to Company activities will be communicated throughout the Company as it becomes available by the quickest possible means.
- ) Meetings and briefing sessions will be held at all levels in the organisation. At a minimum these will comprise:
  - Z Company induction
  - Z Site induction
  - Z Safety briefings
  - Z Toolbox talks
  - Z Pre-project meetings
  - Z Quarterly HSE Management meetings
  - Z Annual 1:1s / staff appraisals
- ) Concerns over the standards of HSE within the Company or issues relating to HSE are to be brought immediately to the attention of management
- ) The Company consults with its employees on HSE matters in accordance with the Health and Safety (Consultation with Employees) Regulations 1996.
- ) In the absence of elected health and safety representatives, the Company will consult staff individually or in groups on matters of health and safety.
- ) The Company will ensure that all information, instruction and training is provided to all employees in a language and format that the employee can readily understand. This will include any translated inductions, safety briefings, signage, works procedures, risk assessments, health and safety updates and all other forms of communication deemed necessary to ensure that the employee is competent to carry out their work activities.

**3.4 Contractor Management**

- ) Contractors are formally assessed to ensure that they are competent to conduct required work and to determine whether their systems for managing HSE meet Company standards and requirements, including where appropriate, sub-contractor management.
- ) A list of approved contractors (and their sub-contractors) authorised to work for the Company is compiled and maintained.
- ) The use of contractors who are not on the approved list is prohibited.
- ) Contractor performance is assessed on completion of work and approved status is reviewed / updated accordingly.

Management will ensure that:

- ) Only contractors on the Approved Contractor List and who are competent to perform the work are sub-contracted to undertake work on behalf of the Company.
- ) All contractors receive induction training on arrival at office premises / on site and that the training is recorded and repeated at appropriate intervals.
- ) Contractors receive suitable information, instruction and training to assure their competence for the work they are to undertake.
- ) An appropriate level of supervision is provided to contractors engaged in Company business.
- ) Company risk assessments include measures to protect contractors.
- ) Contractors provide risk assessments and method statements for approval prior to commencing work, making certain that their risk assessments have taken into account how their activities may affect Company employees and other persons.
- ) Electrical appliances to be used by contractors have been tested and are safe to use.
- ) The quality of contractor's work is monitored to ensure that it is being conducted safely.
- ) All contractors on premises under the control of the Company are accounted for.

**3.5 Training and Competence**

- ) All new Company employees will receive induction training as soon as reasonably practicable.
- ) A record of the induction process will be maintained.
- ) Site-specific induction training will be given to employees and contractors whenever work commences in a new place of work. A copy of the site-specific induction training record will be retained by the Company. Where Voicepath Ltd is a contractor, induction training shall be conducted by the Principal Contractor / Client.
- ) Training needs and competence requirements will be analysed to ensure the provision of appropriate training. The risk assessment process is used to identify specific training requirements associated with the use of hazardous machinery and equipment (e.g. telehandlers) and for specific work activities (e.g. working at height).
- ) Individual training needs are initially identified on induction and are reviewed annually.
- ) Employees will be provided with a suitable level of supervision until deemed competent to undertake tasks unsupervised.

- J Employees shall only carry out work for which they hold the appropriate competences.
- J Occupational competence will be maintained via continued membership of appropriate trade associations.
- J Further training shall be given:
  - Z For periodic refresher training;
  - Z When required by current best practice;
  - Z When being exposed to new or increased risks;
  - Z When being transferred or given a change in responsibility; and/or
  - Z When there is a change in work methods, technology, equipment or practices.
- J A Training Record will be maintained for all employees.
- J All induction and training records and, where issued, certificates of training, qualifications and competence will be held in the Company office, with copies of relevant records available on site.
- J Training standards will be kept under review to ensure that the requirements of current legislation and risk assessments are met.

### **3.6 Risk Assessments, Method Statements and Safe Working Procedures**

- J Risk Assessments will follow a standard format.
- J Risk Assessments will reviewed at least annually or:
  - Z When Company operations change;
  - Z Following an incident / near miss;
  - Z Following a change in legislation or industry best practice.
- J The Company will generate Method Statements and Safe Working Procedures as and when required.

Management will ensure:

- J Where significant hazards are evident and there is a risk of harm or injury from a work activity, an appropriate Risk Assessment will be undertaken and communicated to all those at risk, in accordance with the Management of Health and Safety at Work Regulations 1999;
- J Method Statements or Safe Working Procedures are produced based on the findings of Risk Assessments;
- J That all Risk Assessments, Method Statements and Safe Working Procedures are communicated to all who may be affected by the activity;
- J That all personnel who may be affected by the activity are made aware, that if any aspect of the activity or the environment in which it is conducted alters then a review of the Risk Assessments must be undertaken and appropriate changes to Method Statements and Safe Working Procedures effected before the work is continued;
- J That master copies of all Risk Assessments, Method Statements and Safe Working Procedures are held in the Company office, with working copies of relevant documentation maintained on site.
- J Risk Assessments, Method Statements and Safe Working Procedures are presented to the Principal Contractor prior to work commencing on site.

Company management will also ensure that Risk Assessments, Method Statements and Safe Working Procedures of contractors are approved prior to work commencing on sites where the Company is the Principal Contractor.

### **3.6.1 Permit to Work**

High risk work activities are additionally controlled via a Permit to Work system. The range of high risk activities for which a Permit to Work is required includes, but is not limited to:

- ) Digging
- ) Hot work
- ) Excavations

Permits to Work are communicated to and signed off by all workers involved with the activity. Work is immediately stopped if there is any deviation from documented permit controls.

### **3.7 Personal Protective Equipment**

Company management will ensure that:

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

### **3.8 Employment of Young Persons**

- ) Risk assessments will be carried out, or reviewed, to identify and address the risks to young persons (i.e. those under the age of 18), when employed by the Company.

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

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

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

### **3.10 Employment of Persons with Disabilities**

- J Company risk assessments take into account the needs of employees with disabilities, in accordance with the Equality Act 2010.
- J Employees are to ensure that the Company, as their employer, is made aware of any form of disablement that is likely to affect their ability to undertake the work they are assigned.
- J Where appropriate, employees with disabilities will be monitored at regular intervals (e.g. by routine medical examination) to ensure their suitability for the work on which they are employed.

### **3.11 Occupational Health and Wellbeing**

- J Company employees are to declare any aspect relating to their health that may put them at risk while undertaking the work for which they are employed or that may be affected by the environment in which it is to be undertaken.
- J The Company is committed to the promotion of wellbeing in the organisation and preventing employees from being subject to undue stress whilst at work.

- ) To the extent that is reasonably practicable, the Company will endeavour to balance job demands and pressures with individual capabilities, and to support staff suffering from stress or common mental health problems (CMHPs) such as anxiety and depression.
- ) A personal risk assessment may be undertaken to identify the extent and causes of employees' stress, together with reasonable adjustments to support staff, including any necessary interventions to prevent and manage stress more effectively. Working hours may be temporarily adjusted or suitable alternative work may be offered to staff.

### **3.11.1 Health Monitoring and Surveillance**

- ) Employees will be provided with health monitoring / surveillance appropriate to the risks to health and safety resulting from their employment, as identified by risk assessment or legal statute, in accordance with the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health (CoSHH) Regulations 2002 (as amended).

### **3.11.2 Health Referrals**

- ) Employees will be referred to a medical professional as and when necessary if any concerns are raised with respect to their health or fitness to perform work duties.

### **3.12 Workplace Monitoring and Safety Inspections**

- ) Monitoring systems will be put in place to ensure that the activities of employees and contractors are carried out in a safe manner in compliance with Company risk assessments, safe working procedures and method statements.
- ) Monitoring systems will be put in place to ensure that equipment and the general working environment are maintained in a safe condition in line with Company risk assessments, safe working procedures, method statements, and where appropriate, manufacturers' requirements.
- ) Periodic, documented workplace and site safety inspections will be conducted by management.

### **3.13 First Aid Provision**

- ) The Company will provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work, in accordance with the Health and Safety (First-Aid) Regulations 1981.
- ) Suitably trained persons will be nominated as qualified First Aiders or Emergency First Aiders to ensure adequate provision of first aid. These details will be prominently displayed in all Company workplaces, and will be communicated through induction training.
- ) A qualified First Aider or Emergency First Aider shall be present or immediately contactable for assistance at all times whilst routine work is being undertaken.
- ) Company employees will familiarise themselves with workplace / site first aid arrangements and facilities.
- ) First Aid kits shall be held in all Company vehicles with the contents checked on a regular basis, and restocked if necessary.

- ) Whilst Company employees are employed as contractors to a Principal Contractor, employees are to familiarise themselves with the first aid facilities and procedures on that site.

### **3.13.1 Medication**

- ) Tablets and medicines are not kept in first-aid kits as first aid at work does not include giving tablets or medicines to treat illness. The only exception to this is where aspirin is used when giving first aid to a casualty with a suspected heart attack, in accordance with currently accepted first-aid practice. First aiders keep a small amount of aspirin to hand, separate from first aid kits, for this purpose.
- ) Employees who have their own medication such as inhalers for asthma or epipens for the treatment of severe allergic reactions (e.g. to peanuts, bee stings) are expected to administer this themselves if able to do so and must not use these to treat any other employees. First-aiders should not administer medication to other employees, but may assist employees to do so themselves and/ or contact emergency services as appropriate.
- ) If it is identified that Schedule 19 medication may need to be administered in an emergency, First Aiders will be given additional training in its use.

## **3.14 Incident Recording, Reporting & Investigation - Injuries, Diseases and Dangerous Occurrences, Near Misses**

### **3.14.1 Accident Book Records**

- ) A Data Protection Act 1998 compliant Accident Book is kept in the office and on each work site. Accident report forms are removed from Accident Books and are held securely in personnel files located in the main office and in site offices, in accordance with Data Protection Act 1998 requirements.
- ) All injuries occurring no matter how trivial are to be recorded in the Accident Book provided on the site where the accident takes place and also in the Company Accident Book held at the Company premises.

### **3.14.2 Incident Reporting**

- ) All recordable incidents and near misses are notified to Company management.
- ) All reportable accidents and dangerous occurrences occurring on Company premises are to be reported to the Director Responsible for HSE so that an investigation can be conducted.
- ) The Company notifies their insurers of any RIDDOR reportable incident.
- ) In the event of a written diagnosis of an occupational disease, a specified injury or fatality occurring to a Company employee statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 will be met.
- ) Accidents involving a member of the public / third party resulting in direct transport from the scene of the accident to hospital for treatment will be reported in accordance with RIDDOR 2013.
- ) All accidents, dangerous occurrences and near misses occurring on site are to be reported to site management, in the first instance, so that an investigation can be initiated.
- ) Reports of accidents involving contractors will be forwarded to their Employer to enable statutory reporting requirements under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 to be met

- ) While working as a contractor on the site of a Principal Contractor, reports of incidents involving Company employees are to be forwarded to the Principal Contractor.

### **3.14.3 Incident Investigation**

- ) All accidents, near misses and dangerous occurrences involving Company employees or third parties will be investigated to an appropriate degree in accordance with the actual / potential severity of outcome, in order to determine root causes and identify remedial actions to prevent recurrence.
- ) Learning outcomes and remedial actions taken are disseminated throughout the Company following an incident investigation in order to reduce the potential for recurrence.

### **3.15 Enforcement Authority Visits**

- ) HSE Inspectors, Environmental Health Officers and Fire Officers all have statutory authority to visit company premises and work sites to enforce legislation under their control.
- ) Management will ensure the fullest co-operation with all visiting enforcement officers and the Company will always be responsive to recommendations and advice received. The Director Responsible for HSE and Company management will liaise with visiting Enforcement Officers and ensure that they are accompanied, as required, during their visits.

### **3.16 Fire Safety**

- ) A Fire Risk Assessment to identify fire and explosion risks for work premises, including sites under the control of the Company, will be undertaken prior to commencement of work, in accordance with the Regulatory Reform (Fire Safety) Order 2005 and the Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR).
- ) Site Fire Risk Assessments and procedures on construction sites will be in accordance with the Fire Prevention on Construction Sites: The Joint Code of Practice 9<sup>th</sup> edition, issued by the Fire Protection Association and HSE guidance HSG168 Fire Safety in Construction.
- ) Based on the results of the Fire Risk Assessment, adequate means of raising the alarm, fighting the fire and means of escape will be provided to ensure the safe evacuation of personnel in the event that a fire occurs.
- ) Fire precautions and prevention measures will be taken appropriate to the level of risk throughout premises and property under the control of Voicepath Ltd.
- ) An adequate Fire Plan will be in place, prominently displayed in offices and throughout the workplace, and communicated to all employees, contractors and visitors on induction.
- ) In the event of a fire in offices or on site, the priority will be to raise the alarm and ensure all personnel are evacuated safely. The alarm is to be raised and the local fire authorities summoned.
- ) The person discovering the fire may attempt to extinguish the fire using portable appliances if the fire is of a small nature, personnel are not put at risk and they are confident and competent to do so. The person should remain available to brief the fire authorities on arrival. Under no circumstances should a person attempt to extinguish a larger fire. The primary aim should be to evacuate from the building or work site.
- ) A designated Fire Warden and deputy are appointed for the Company office and for each work site, tasked with maintaining the Fire Log, ensuring that checks of systems and



appliances are conducted as specified in the Fire Log and conducting fire drills and workplace inspections.

- ) The designated Fire Warden and deputy (and other employees as considered necessary) will be trained in basic fire safety and the use of portable fire fighting appliances, as found on the premises and in Company vehicles.
- ) Emergency procedures and evacuation routes will be communicated to all employees as part of their induction training.
- ) Maintenance of fire alarm systems will be conducted by a competent, specialist authority under contract.
- ) Stores or materials shall not be left along access or egress routes where they may hinder escape in an emergency.
- ) Consideration will be given to neighbours who may be affected by a fire to ensure that they are made aware of the fire and evacuated safely.
- ) Whilst working on sites or carrying out works within Client's premises as a contractor, the fire arrangements of the Client / Principal Contractor are to be adhered to and communicated to Company employees by site-specific induction training prior to commencement of any work.
- ) Whilst working on Company premises, contractors are to familiarise themselves with emergency procedures and evacuation routes.

### **3.17 Smoking Policy**

- ) In compliance with the Smoke-free Regulations 2006, Company premises and workplaces are smoke-free. Disciplinary action will be exercised if employees or contractors smoke whilst on Company sites, premises or in Company vehicles.
- ) "No Smoking" signage is clearly displayed on Company premises and Company managed work sites.
- ) Smoking is only permitted in those external areas designated by management. Designated areas will be advised to employees on induction.
- ) Smoking is strictly prohibited in areas where flammable liquids are stored or used.
- ) Whilst working on premises owned by the Client, or on the site of a Principal Contractor, the smoking policy of that Client or Principal Contractor will be adopted and, as such, all employees and contractors who undertake work on behalf of the Company are to adhere to that policy.

### **3.18 Alcohol and Controlled Substances**

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

**3.18.1 Prescribed Drugs & Over the Counter Medicines**

- ) Staff must notify their Line Manager if using prescribed drugs or over the counter medicines to ensure that their work is not adversely affected by the use of such drugs (e.g. some antihistamines can cause drowsiness, a particular risk while driving or using machinery).

**3.19 Violence towards Employees**

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

**3.20 Visitors**

- ) Visitors to Company premises are to be accompanied at all times and remain the responsibility of their host during fire, evacuation or other unusual, or unplanned, circumstances.

**3.21 Lone Workers**

- ) Wherever practicable, Company employees are not to work alone in high-risk activities or areas.
- ) Lone working is not permitted where there is a reasonably foreseeable risk that the work may result in an accident, violence or harm. A log is maintained of sites where there has been an incident involving threatening, intimidating and/or violent behaviour.
- ) Staff are not permitted to return to a site on their own where a previous incident of threatening, intimidating and/or violent behaviour has occurred.
- ) Where it is unavoidable, the lone worker will ensure that management is aware of their whereabouts and the nature of the work being undertaken. The lone worker will make contact with nominated personnel at pre-arranged times throughout, and on completion of, the activity. Such arrangements will be documented in a specific risk assessment or Company procedure which will be communicated to all persons potentially involved.
- ) Lone workers are included in the Company Liability insurance cover, in accordance with the Employer's' Liability (Compulsory Insurance) Act 1969.

**3.22 Mobile Phones**

- ) It is an offence under the Road Vehicles (Construction and Use) Regulations 2003 (as amended) to use a hand-held phone or similar device when driving.
- ) No calls are to be made or received by the driver of a moving vehicle unless the vehicle is fitted with a working 'hands free' kit and it is considered that it is safe to do so.
- ) Calls dealt with in this way are to be short duration calls only. Longer duration calls are to be dealt with by pulling over to the side of the road into a suitable parking area when it is safe to do so to continue the conversation.
- ) No calls are to be made / received on mobile phones while operating any plant, machinery or equipment unless the plant, machinery or equipment has been stopped in a safe place for that purpose, switched off or made safe.
- ) Mobile phones must not be used whilst employees carry out hazardous work activities.

- J Mobile phones must not be used in the vicinity of gas storage areas, chemical and oil storage areas or in the vicinity of other flammable substances.

### **3.23 Environmental Management**

- J The Company will ensure that all staff are trained in the Environmental Policy and are given information, instruction and training to ensure its implementation in all Company operations.
- J Any complaints in connection with environmental issues shall be investigated and action taken accordingly.
- J Current UK environmental legislation will be regarded as the minimum standard of acceptable environmental performance for the Company.
- J The Company will implement measures to ensure that the business makes the most economic use of transport. Sharing of Company vehicles will be optimised and travel to the Company premises will be minimised to reduce the Company use of fuel.
- J The Company will attempt to eliminate or reduce the use of ozone depleting chemicals and timber sourced from forests that have not been independently certified as sustainable.
- J The Company will attempt to reduce energy and water consumption and to minimise carbon dioxide emissions. The Company will also promote the use of energy efficient products and source its energy from safe and sustainable sources.
- J The Company will ensure that its operations do not cause a nuisance to the community through the generation of dust, noise or odour.
- J Paper will be used sensibly with increased use of electronic communication to reduce the need for paper consumption.
- J The Company will check work sites for endangered species, protected plant species, trees subject to a tree preservation order and protected archaeology, before work starts.
- J Control measures will be introduced to reduce the environmental impact of Company work activities to a minimum and to comply with all required environmental safeguards.
- J Sub-contractors will be selected on the basis that they comply with these environmental commitments and agree to be bound by the Company Environmental Policy
- J Procedures and facilities shall be put in place to manage any foreseeable spillages of liquids related to Company work activities.

### **3.24 Waste Management**

- J Waste shall be managed in accordance with the Environmental Protection Act 1990, Part 2 and the Waste (England and Wales) Regulations 2011.
- J The Company shall comply with the Waste Duty of Care Code of Practice 2016 at all times.
- J Staff are given information, instruction and training to ensure waste materials are managed in a compliant manner.
- J The Waste Hierarchy of Control shall be applied to all waste materials with the highest option selected first where practicable.
- J Products and processes are carefully designed to eliminate the production of waste materials wherever possible.

- ) Waste materials are segregated wherever possible and stored securely in appropriate facilities to prevent their release.
- ) A Waste Transfer Note or similar documented information is produced for each shipment of waste, based on the Environment Agency's template. Records are retained for at least two years.
- ) The appropriate six digit EWC code is selected and clearly identified on all waste transfer and consignment notes.
- ) The Company shall register as a 'Lower Tier' carrier if it only carries its own waste incidental to its main business.
- ) The Company shall register as an 'Upper Tier' carrier if construction wastes are carried.
- ) All third-party waste contractors shall be checked using the Environment Agency Public Registers to ensure they hold a valid Carrier's License and Environmental Permit for the wastes involved.

### **3.24.1 Hazardous Waste**

- ) In addition to the general requirements outlined above, hazardous waste shall be managed according to the Hazardous Waste Regulations 2005 and the subsequent Hazardous Waste (England & Wales) (Amendment) Regulations 2016, as well as relevant Environment Agency and HSE Guidance.
- ) Consignment notes accompany all movements of hazardous waste and shall be retained for at least three years.
- ) A unique Consignment Code is produced for each shipment of hazardous waste using the first six digits of the company's name, plus a further five digits selected by the company, and is recorded on all consignment notes.
- ) The company shall ensure that the correct SIC 2007 code is entered on every consignment note.

### **3.25 Welfare Provision**

- ) The Company is committed to providing a safe and healthy work environment that takes into account the welfare needs of all its employees, including those with disabilities.
- ) Welfare provision will be in accordance with the Workplace (Health, Safety and Welfare) Regulations 1992 and Schedule 2 of the Construction (Design and Management) Regulations 2015.
- ) Ventilation will be adequate to ensure the comfort of employees. Where mechanical ventilation or air conditioning is provided, regular cleaning, maintenance and inspection will be conducted.
- ) In offices, temperature will be maintained not less than 16°C but whenever practicable will be maintained in the range 19.4° C – 22.8° C. Windows, skylights or glass partitions will not allow excessive temperatures to be reached in the offices during hot weather.
- ) Lighting will be suitable and sufficient and, so far as is reasonably practicable be from natural light to enable people to work, use facilities and move from place to place safely and without experiencing eye strain.
- ) Eating and rest facilities with adequate access to boiling water and a means to heat food will be provided.

- ) Welfare facilities will be adequate with sufficient toilets, hand washing and drying facilities. A wholesome supply of drinking water will be available.
- ) Suitable storage and drying facilities for clothing will be provided, as required.
- ) Workstations will be comfortable, with safe and suitable chairs and sufficient space.

**3.26 Safety Signage**

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

**3.27 Access and Egress**

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

**3.28 Security**

- ) Access to Company premises is restricted to authorised persons only and all reasonably practicable security measures are taken to prevent unauthorised access. All unauthorised persons are immediately escorted off the premises.

## **Section 4.0 Workplace Arrangements for Health, Safety & the Environment**

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

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

**4.1 Asbestos and Asbestos Containing Materials (ACMs)**

- ) The Company will comply with its duty to manage asbestos in Company premises as required under the Control of Asbestos Regulations 2012.
- ) An Asbestos Management Survey will be conducted for all Company premises constructed prior to 2000 by a competent surveyor to assess the risk and determine appropriate controls.
- ) The Company will act on the recommendations of the survey report in order to manage any associated risk.
- ) Prior to any refurbishment work a Refurbishment & Demolition Survey will be conducted.
- ) All locations where asbestos or ACMs are identified as being present will be recorded in an Asbestos Register.

Company employees shall not generally conduct work involving exposure to asbestos / ACMs. Confirmation will be obtained from the Client / Principal Contractor, if practicable, that the nature of the work does not involve exposure to asbestos / ACMs prior to work commencing. If asbestos / ACMs are discovered, or suspected, the following action is to be taken:

- ) Work is stopped, the area is secured and measures are put in place to ensure that the asbestos / ACM remains undisturbed; and
- ) Company management and the Client / Principal Contractor are to be informed in order to ensure that an assessment is undertaken and an action plan developed before work is allowed to continue.

In compliance with the Control of Asbestos Regulations 2012, training is mandatory for anyone liable to be exposed to asbestos fibres at work. As a minimum, a half day UKATA approved asbestos awareness course will be undertaken, supplemented by annual refresher training.

Any work undertaken on licensed asbestos products will be undertaken by a specialist licensed contractor. Work on non-licensed asbestos products must be approved by management and may only be undertaken provided the following conditions are met:

- ) The exposure is sporadic and of low intensity;
- ) The control limit is not exceeded, 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm<sup>3</sup>),
- ) The work comprises:
  - Z Short duration, non-continuous maintenance activities;
  - Z Removal of materials in which the fibres are firmly linked in a matrix;
  - Z Encapsulation of ACMs which are in good condition; and/or
  - Z Air monitoring or collection and analysis of samples.

If non-licensed asbestos products are friable or have deteriorated additional requirements apply. For all notifiable non-licensed work (NNLW), management will ensure that:

- ) The HSE is notified of the work;
- ) Health surveillance / medical examinations are carried out by a health professional for employees involved with the work;
- ) Health records for employees involved with the work are maintained; and
- ) Written records are kept of NNLW e.g. a copy of the notification together with a list of workers and the level of likely exposure of workers to asbestos.

A record of all work involving asbestos is maintained in the Construction Phase Plan.

#### **4.2 Blood Borne Diseases / Infectious Diseases / Health Hazards**

- ) Employees are briefed in the risk of needle-stick injury and the potential for infection from cuts, including contraction of blood-borne viruses such as hepatitis, and the precautions to take.
- ) Employees are briefed in the risk of exposure to, and the symptoms of biological hazards such as tetanus and Leptospirosis / Weils Disease and the precautions to take.
- ) Health monitoring / surveillance is undertaken as and when identified as appropriate via risk / CoSHH assessment.
- ) Employees who are at risk of contracting blood-borne viruses / needle-stick injuries are advised to have a Hepatitis B vaccination and to inform management of the date of vaccination.
- ) Employees are advised to keep inoculations against tetanus up to date.
- ) Information relating to inoculations and vaccinations is recorded in personnel files.

#### **4.3 Cartridge Operated Tools**

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

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

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

Company management will ensure that:

- ) All hazardous substances / chemicals used by the Company are identified and inventoried.



- ) REACH Safety Data Sheets for all hazardous substances used by the Company will be obtained from suppliers
- ) A comprehensive assessment of the processes involving the use of hazardous substances or those generating hazardous by-products such as dust and fumes is carried out.
- ) Regular reviews of assessments of processes involving the use of, or contact with, hazardous substances are undertaken.
- ) Appropriate control measures are put into place to prevent, reduce or control the exposure of all personnel to the harmful effects of hazardous substances and by products of processes.
- ) Suitable and sufficient PPE / RPE is provided to employees exposed to hazardous substances and materials. Employees are adequately trained in the use of any specialist PPE / RPE.
- ) Appropriate information, instruction and training will be given to employees exposed to hazardous substances and materials.

#### **4.5 Confined Spaces**

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

#### **4.6 Construction Site Hazards (General)**

- ) All employees required to visit construction sites are aware of the dangers inherent to those sites. These include but are not limited to:
  - Z Contaminated ground
  - Z Demolition work
  - Z Dust and fumes
  - Z Excavations
  - Z Lifting operations and lifting equipment (including cranes, fork lift trucks, goods hoists / passenger hoists, lifts / escalators)
  - Z Noise
  - Z Plant, work equipment and machinery

Z Working at height (including ladders, scaffolding)

Z Working near / over water

- J Whilst employees may be exposed to the above hazards on site, they may not necessarily have any active direct involvement in work activities associated with these hazards.
- J All employees visiting site will report to Site Management on arrival.
- J All employees visiting site will ensure that they receive adequate induction from Site Management, to include site hazards.
- J The relevant PPE will be provided. This will comprise but not be limited to high-vis jacket / vest, hard hat and protective boots. Hearing protection and eye protection will be provided when identified by risk assessment.
- J When necessary additional information, training and instruction will be provided regarding construction site hazards.
- J Employees inexperienced in construction site hazards will be accompanied by an experienced employee at all times until they are deemed competent.

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

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

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

- J All staff driving on Company business must be qualified and medically fit to drive the vehicle and hold adequate insurance. Employees must inform the Company of any disqualifications or other reasons such as medical conditions that may affect their ability to drive or operate vehicles or plant.
- J All staff who drive on Company business possess a valid driving licence. Drivers are required to report any endorsements or penalty points incurred to their Line Manager.
- J The Company monitors the number of points on individual licences and conducts annual checks via the DVLA under authorisation from staff.
- J Drivers are required to provide a copy of their insurance certificate to their Line Manager on an annual basis, in order to verify business use insurance cover.
- J Drivers are required to have eye tests in accordance with DVLA requirements.
- J Where considered necessary employees will be provided with Company vehicles to allow them to travel to and from locations where they are required to undertake work on behalf of the Company and where agreed for their private use.

- ) The Company will provide vehicles for use that are in roadworthy condition, meet all current legislative requirements and are fit for their intended use. Vehicles will be insured, taxed, serviced and maintained in a roadworthy condition at no expense to the individual user.
- ) Employees provided with a Company vehicle will ensure the vehicle remains in a safe and roadworthy condition and servicing schedules, as recommended by the manufacturer, are adhered to. Defects are to be immediately reported to the Company office and remedial action taken at the earliest opportunity.
- ) All those driving on Company business will at all times meet the requirements of the Road Traffic Act and follow the guidance detailed in the Highway Code.
- ) All those driving on Company business will drive courteously and in a non-aggressive manner.
- ) All those driving on Company business will plan their journeys to ensure that sufficient time is allowed for the journey taking into account prevailing weather and road conditions.
- ) Penalties incurred for breaches of the Road Traffic Act and other relevant legislation will be met by the individual employee. Disciplinary action may be taken against employees who frequently or excessively incur penalties for breaches of road traffic legislation whilst driving on Company business.
- ) All driving activities will be managed in accordance with the Company Driving Policy, Codes of Practice and Safe Systems of Work.
- ) Drivers must sign that they will comply with these procedures and records will be maintained.

#### **4.9 Dust and Fumes, Respiratory Protective Equipment**

- ) All processes conducted by Company employees and contractors that result in the generation of dust or fumes will be subject to an assessment under the Control of Substances Hazardous to Health Regulations 2002 (as amended).
- ) Control measures to protect personnel exposed to dust or fumes will be identified and put in place. All personnel likely to be exposed to dust or fumes are to be informed of the harmful effects and of the precautions and control measures to be implemented to prevent, reduce or control exposure.
- ) Where identified by the risk assessment, suitable personal protective equipment will be provided to supplement other control measures. Personal protective equipment is to be worn by all personnel identified in the assessment in accordance with the training and instruction provided.
- ) Where the need to wear respiratory protective equipment (RPE) is identified via CoSHH assessment, suitable and appropriate RPE with the required assigned protection factor (APF) will be provided in accordance with HSE Guidance (HSG53, 4<sup>th</sup> edition 2013, Respiratory Protective Equipment at Work – A Practical Guide).
- ) Each person who is required to wear RPE will undergo a fit test for each type of RPE worn, prior to first use and annually thereafter.
- ) All persons wearing RPE will be clean shaven to ensure effectiveness of protection.

#### **4.10 Contaminated Ground**

- ) Prior to any works being carried out on contaminated land, a full assessment will be undertaken by a competent person to determine the type and levels of contaminant present.
- ) An assessment of the risks from identified contaminants will be undertaken and employees issued with appropriate Personal Protective Equipment (PPE). All operatives will receive suitable training and information in the use of the PPE provided.
- ) All operatives undertaking works will be trained, competent and authorised.
- ) Where appropriate, health surveillance measures will be introduced and records kept. Decontamination and hygiene facilities will be appropriate for the identified contaminants.
- ) Only waste hauliers and receivers on the Company Approved Contractors List will be used. All hauliers and receivers will be licensed.
- ) Contractors will be required to provide safe systems of work in accordance with current legislation, ACoP's and HSE Guidance.

#### **4.11 Electricity and Portable Electrical Appliances**

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

- ) Conducting a documented inspection of the fixed electrical installation at intervals not exceeding five years, or at a frequency specified on the Electrical Installation Condition Report.
- ) Ensuring access to electrical distribution panels is unobstructed.
- ) Ensuring all electrical distribution panels and points of electrical isolation are clearly marked, identifying the circuits and equipment they control.
- ) Restricting access to all rooms containing electrical installations to authorised persons only.
- ) Ensuring adequate signage is in place warning of access restrictions and potential hazards (fire, electrocution).

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

- ) The use of battery operated tools or 110 volts within the workplace wherever practicable.
- ) Wherever practicable, circuits will be protected by residual current devices (RCD) where mains voltage is to be used.
- ) Electrical appliances used outdoors will be protected by a 30mA RCD. RCDs will be tested regularly by operation of the test button and will undergo a combined inspection and test, conducted by a competent person, at regular frequencies in accordance with HSE guidance.
- ) Sufficient socket outlets will be provided and the use of adaptors and extension leads is to be discouraged. Sockets are not to be overloaded.
- ) Workplace tools used on site will be in good condition and double insulated.
- ) All equipment is to be switched off before unplugging or cleaning.
- ) All electrical equipment shall be switched off and unplugged when not required for use.

- ) Undertaking assessments to identify hazards associated with each individual item of machinery and implement specific safety rules and procedures for the authorised operative to follow.
- ) Ensuring all electrical appliances and equipment are periodically examined and tested at a frequency in accordance with current HSE guidance HSG107 Maintaining Portable Electrical Equipment.
- ) Maintaining a record of all inspections / tests of electrical equipment and appliances.
- ) Ensuring that equipment operators regularly carry out a visual inspection of equipment and associated cables and plugs for signs of obvious damage.
- ) Ensuring that all safety devices and guards are serviceable and in place prior to the use of equipment.
- ) Immediately reporting and prohibiting the use of defective equipment, including leads and plugs.
- ) Only authorised and competent persons will be permitted to repair or alter electrical equipment. Temporary or makeshift repairs are not to be undertaken.

### 4.11.1 Generators

- ) Portable petrol / diesel fuelled generators are not to be used in enclosed or partially enclosed spaces due to the risk of carbon monoxide poisoning.
- ) All backup generators are maintained in good working order and are subject to regular inspection and annual services.
- ) Generators are periodically tested to ensure functionality.
- ) Backup generators are installed in adequately ventilated areas with restricted access.
- ) Access restrictions are clearly signed.
- ) Carbon monoxide detectors are installed adjacent to backup generators.
- ) Only authorised persons are permitted to undertake inspections of backup generators.
- ) Only authorised contractors are permitted to undertake maintenance / annual services of backup generators.

### 4.12 Gas / Oil Installations and Appliances, Plant Rooms

The Company recognises the need to ensure that all gas / oil installations and appliances shall be safe at all times. Management will ensure that:

- ) Gas-fired boilers, appliances and associated pipework / flues are inspected and serviced by a GasSafe registered engineer every 12 months and that records are kept on file.
- ) Oil-fired boilers, appliances and associated pipework / flues are inspected and serviced in accordance by a competent Oftec registered engineer every 12 months and that records are kept on file.
- ) Plant / boiler rooms are kept locked / secure, with access restricted to authorised persons only.
- ) Adequate signage is in place warning of access restrictions and potential hazards (fire, explosion).
- ) Smoking and naked flames are strictly prohibited in plant / boiler rooms.

- ) Hot surfaces / pipes are insulated to retain heat and protect against burns.
- ) Plant / boiler rooms are maintained in a clean and tidy state. Storage of materials and equipment in plant / boiler rooms is not permitted.
- ) Clear access is maintained to all control panels.
- ) Emergency shut-off / isolation switches are installed and clearly labelled as to function.
- ) Carbon monoxide detectors are installed in all plant / boiler rooms and in rooms containing gas / oil appliances.

### 4.13 Hot Works

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

- ) Soldering and brazing

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

When conducting hot work:

- ) Appropriate fire fighting provisions shall be available;
- ) All sources of fuel shall be removed prior to work commencing;
- ) The area of the work shall be monitored on completion of the work until the risk of fire has been removed; and
- ) No hot work shall be conducted within 30 minutes of the end of the working day.

All hot work conducted by contractors shall be subject to a Safe System of Work approved by management prior to work commencing.

#### 4.13.1 Soldering

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

- ) Monitoring employees' exposure to solder flux fumes;
- ) Utilising a CoSHH assessment to determine the potential health risks caused by exposure to solder flux fumes and deciding whether or not exposure is 'significant' and what precautions are needed to protect workers health , including suitable health checks (health surveillance);
- ) Putting in place appropriate systems of work and controls, e.g. tip extraction, local extraction ventilation, to prevent or control exposure to solder flux fumes and keeping equipment in efficient working order;
- ) Providing adequate washing facilities;
- ) Informing the workforce of the potential health risks caused by working with solder flux fumes and the precautions to be taken;
- ) Training workers in the use of any control measures and protective equipment.
- ) In addition, the Company will report any instances of medically confirmed occupational asthma or dermatitis to the Health and Safety Executive in accordance with RIDDOR 2013.

#### **4.14 Housekeeping**

- ) In order to promote a safe working environment and good hygiene standards, high standards of housekeeping will be maintained at all times throughout Company premises.
- ) Construction sites will be kept in good order, in accordance with Regulation 18 of L153 Managing Health and Safety in Construction
- ) All materials will be stored to reduce the risk of injury to personnel and to minimise fire risk.
- ) Combustible materials will not be stored adjacent to heat / ignition sources.
- ) Rubbish will not be allowed to accumulate and will be safely disposed of on a regular basis.
- ) All spillages will be cleared up immediately.
- ) Vehicular and pedestrian access and egress routes shall be maintained at all times, both internally and external to buildings. Routes are to be kept clear for emergency purposes.

#### **4.15 Legionella / Water Hygiene**

- ) Legionnaires' disease is contracted through inhalation of tiny airborne droplets or particles of water containing viable Legionella bacteria. Given the right conditions, the bacteria can grow in hot and cold water systems, air conditioning, etc. The bacteria grow rapidly in water temperatures that range between 20°C - 45°C. Those most at risk at contracting the disease are the elderly and people whose immune system is impaired.
- ) A Responsible Person and deputy shall be appointed who shall be responsible for identifying and assessing sources of risk and putting in place a management plan (including a written scheme for the prevention and control of the risk for each water system) to comply with general legislation and the Approved Code of Practice L8: The Control of Legionella Bacteria in Water Systems.
- ) Appropriate control measures for individual premises will be identified in legionella risk assessments.
- ) Call-out arrangements for automatic water systems are in place.
- ) Annual audits of the arrangements in place to control legionella in water systems will be undertaken.

#### **4.16 Lifting Operations and Lifting Equipment**

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

- ) Hiring in suitable equipment, together with operators and banksmen, where necessary;
- ) Ensuring all lifting operations and lifting equipment conform to the Lifting Operations and Lifting Equipment Regulations 1998;
- ) Ensuring all those employees involved in lifting operations are suitably competent to perform the work and operate the equipment;
- ) Ensuring all lifting equipment used for the movement of persons is inspected and tested by a competent person every 6 months and that the results are recorded as necessary;
- ) Ensuring all lifting equipment not used for the movement of persons is inspected and tested by a competent person every 12 months and that the results are recorded as necessary;

- J Ensuring that all wire ropes, strops and chains are fitted to crane hooks correctly;
- J Ensuring that all lifting accessories are inspected and tested by a competent person every 6 months and that the results are recorded as necessary;
- J Ensuring that all lifting gear is fit for purpose and capable of safely carrying out the work it is employed to do;
- J Performing a risk assessment prior to any lift to identify the measures required to protect those involved with the lift;
- J Effectively communicating to all personnel involved with the lift the established Safe System of Work which includes:
  - Z Thorough planning of the operation, along with the selection, provision and use of suitable lifting devices and equipment;
  - Z A suitable and sufficient Lifting Plan;
  - Z The maintenance, testing and examination of all equipment;
  - Z Supervision by a trained and competent person/banksman with the necessary authority to progress or stop a job as is necessary;
  - Z The prevention of unauthorised use or movement of equipment by any unauthorised person; and
  - Z The safety of all personnel involved in the lift as well as those not involved in the lift but who may be affected by the lifting operation.
- J Marking all lifting gear and equipment with a means of identification to show its safe working load.
- J Ensuring that all lifting equipment is subject to thorough ongoing examination, and where appropriate, inspection by competent persons.
- J Communicating Lifting Plans to all employees and others involved in or affected by the lift.

#### **4.16.1 Goods Lifts / Hoists**

- J All work involving the use of a goods lift / hoist is to be carried out in accordance with the Lifting Operations and Lifting Equipment Regulations 1998.
- J The Company will ensure that the goods lift / hoist:
  - Z Is suitable, strong and stable enough for the particular use and is marked to indicate safe working loads;
  - Z Is positioned and installed to minimise any risks;
  - Z Is used safely;
  - Z Is subject to documented regular inspections and a thorough annual examination by competent persons.
- J The goods lift / hoist will be maintained in safe working order via implementation of a preventative maintenance programme;
- J The goods lift / hoist will be fitted with appropriate emergency stop / alarm devices that are easily identifiable and accessible;
- J A risk assessment will be carried out on the goods lift / hoist;
- J The results of the risk assessment will be communicated to all employees.



#### **4.17 Manual Handling Operations**

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

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

#### **4.18 Noise**

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

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

- ) Where appropriate, a Work Equipment & Machinery Assessment will be conducted for plant and work equipment.
- ) Company employees will only use plant and work equipment that is correct and suitable for the job and will ensure that the plant / equipment is maintained in an effective state, in efficient working order and in good repair, in accordance with the Provision and Use of Work Equipment Regulations 1998.

- ) Sufficient clear and unobstructed working space will be provided around plant / work equipment to allow persons to work without the risk of injury.
- ) Adequate lighting and ventilation will be provided to allow personnel to operate plant / work equipment safely.
- ) Plant and equipment will be regularly inspected and tested as required by current legislation and defects or loss reported immediately. Records of inspection and maintenance will be held in the main office.
- ) Defective equipment will be taken out of service immediately to a place where it cannot be brought back into use until it has been repaired by a competent person.
- ) Only authorised and competent persons will undertake maintenance, repairs, testing, installation or alterations of any nature to any plant or equipment.
- ) Where required all safety devices and guards will be operable and in use.
- ) Where the use of the equipment involves a specific risk to health and safety, the use of the equipment will be restricted to personnel who are trained, competent and authorised in its use.
- ) All employees will receive adequate training and instruction in the use and safe operation of all plant and equipment that they are required to operate.
- ) Plant and work equipment must not be used when unprotected members of the public are present.

### **4.19.1 Hired Plant / Equipment**

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

### **4.19.2 Machinery**

- ) Machinery will only be operated by trained and qualified personnel authorised by management.
- ) Personnel under the age of 18 will not be permitted to operate machinery unless they have completed approved training and are under the supervision of a competent person.
- ) Guards on machinery will be in place at all times and correctly adjusted prior to use.
- ) Defective machinery shall be immediately reported to management, and taken out of service.
- ) Hearing protection provided will be worn at all times by all personnel within areas of operation of noisy machinery, subject to a noise assessment.
- ) Sufficient clear and unobstructed working space will be provided around machinery to allow persons to work without the risk of injury.

- ) Adequate lighting and ventilation will be provided to allow personnel to operate machinery safely.
- ) Local Exhaust Ventilation and dust extraction equipment is utilised as specified by risk assessment.

#### **4.19.3 Hand / Small Tools**

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

#### **4.20 Restricted Spaces**

- ) Under no circumstances is work undertaken in a designated confined space. A confined space is defined as a place that is substantially, though not necessarily entirely, enclosed and where there is a foreseeable risk of injury from hazardous substances or conditions within the space or from nearby.
- ) Work in restricted spaces is avoided whenever possible. Activities conducted within a restricted space are the subject of a risk assessment to ensure adequate control measures are in place to protect personnel involved or affected by the activity.
- ) No person shall work alone when working in a restricted space. Employees must be accompanied / monitored at all times either by a colleague or third party.
- ) A visual inspection of the restricted space is conducted prior to entry to ascertain its condition and whether it is safe to enter.
- ) Suitable access equipment is used to gain entry to restricted spaces (e.g. loft hatch ladder).
- ) Restricted spaces are ventilated prior to entry in hot weather to reduce the potential for heat stress.
- ) Bump caps are worn in restricted spaces where there is the potential for head injury due to low structures (e.g. timber beams in lofts, pipework in ducts).
- ) Dust masks (FFP3), gloves, goggles and disposable coveralls are worn if there is a risk of significant exposure to insulation fibres.
- ) Care is taken when accessing lofts / attics to prevent falls through ceilings. Access is only permitted in areas that are either boarded over or where crawling boards are supplied and available for use to bridge across joists.
- ) Torches are used when inspecting unlit restricted spaces.

#### **4.21 Roadworks**

- ) Where roadworks are being undertaken, or there is a risk that affects other road users a risk assessment will be conducted.
- ) All roadworks and warnings shall be in accordance with the provisions laid out in the New Roads and Street Works Act 1991, The Highways Act and the accompanying Approved Codes of Practice.

- ) Where works affect other road users appropriate traffic signs and barriers shall be erected to guide and warn traffic and pedestrians.
- ) Roadworks shall be suitably lighted and guarded in hours of darkness.
- ) All traffic signs and barriers shall be removed immediately on completion of their requirement.

### **4.22 Slips, Trips and Falls**

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

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

- ) All racking designed for the storage of materials will be fit for purpose and capable of supporting the required loads.
- ) All racking systems will be of good mechanical construction, of sound material, adequate strength and installed and maintained in accordance with the manufacturer's instructions.
- ) The maximum safe working load and design configuration is conspicuously displayed.
- ) Company personnel will be trained in safe methods of stacking materials on the racking and removing materials from the racking.
- ) Materials will be stored and stacked to reduce the risk of manual handling injuries.
- ) All storage racking will be visually inspected on a weekly basis and a record of inspections will be kept on file.

### **4.24 Underground / Overhead Utilities**

- ) All work involving potential contact with overhead or underground electrical cables or other utilities / services will be properly planned and will be subject to a detailed risk assessment in order to identify and implement appropriate control measures to ensure the safety of all personnel associated with the work.
- ) A safe system of work will be established and implemented for all work on or near underground services, in accordance with HSG47 Avoiding Danger from Underground Services.
- ) A safe system of work will be established and implemented for all work on or near underground services, in accordance with GS6 Avoiding Danger from Overhead Power Lines.

### **4.25 Vibration**

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

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

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

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

#### **4.26 Waste Management - Sharps**

- ) Employees are aware of the procedures to follow and the PPE / equipment to use when required to handle sharps.
- ) Suitable containers will be provided for the disposal of sharps.

#### **4.27 Weather Conditions**

Consideration of the anticipated weather conditions will be given to ensure that suitable precautions are taken to safeguard those undertaking or those who may be affected by the work.

- ) Employees are aware of the increased risk of slips, trips and falls in wet, muddy, and icy conditions and the need to wear appropriate footwear.
- ) Employees are aware of the effects of working in cold conditions and the precautionary measures to take to avoid hypothermia or cold stress.
- ) Employees are aware of the effects of strong sunlight and the precautionary measures to take to avoid sunburn or heat exposure.

Industry guidance will be consulted when deciding the maximum wind speeds for working at height.

The decision to continue or suspend work at height will be based on wind speed, control measures already in place to prevent the fall of personnel or materials, position and height of the work activity and the size of materials being handled.

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

##### **4.28.1 General**

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

##### **4.28.2 Risk Assessment**

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

##### **4.28.3 Scaffolding and Towers**

- ) All scaffolds and towers shall be erected by fully trained, competent contractors (i.e. PASMA certified) in accordance with current legislation, British Standards, approved Codes of Practice, Company procedure and Industry standards.
- ) 'Designed' scaffolds will be designed by a competent person in accordance with current standards, guidance and Codes of Practice.

- J Scaffolds will be erected by appropriately trained, competent employees in accordance with industry standards and design specifications.
- J All scaffolds will be inspected by a trained and competent person, and records of such inspections kept:
  - Z Prior to use;
  - Z After any substantial addition or dismantling;
  - Z After alteration;
  - Z After any event likely to affect its strength or stability; and
  - Z Weekly.
- J Where practicable, hand-over certificates will be issued to the Company and a joint inspection carried out.
- J Employees of Voicepath Ltd shall not use any scaffold unless it has been erected and inspected as above.
- J During erection, unauthorised access to scaffolds will be prevented by the use of appropriate barriers and signage.
- J Where Voicepath Ltd use portable tower scaffolding the person responsible for erecting, dismantling and using the equipment will be trained and competent.

#### **4.28.4 Personal Fall Protection Equipment (PFPE)**

- J All employees will wear PFPE (including safety harnesses, lanyards, karabiners, fall restraint / arrest systems and personal rescue devices) as identified through assessment. Appropriate training by a competent resource will be given in its use and maintenance.
- J Where practicable, safety harnesses shall be worn whilst working at height or on fragile surfaces, attached to suitable anchor points via lanyards and karabiners.
- J All safety harnesses, lanyards, karabiners, fall restraint / arrest systems and personal rescue devices shall be inspected and certified by a trained and competent person, and records of such inspections kept.
- J Inspections will be conducted at least every six months, unless equipment is used in arduous environments in which case it is inspected every three months.
- J All safety harnesses, lanyards, karabiners, fall restraint / arrest systems and personal rescue devices are inspected and checked 'in date' for test prior to use.

#### **4.28.5 Roof Work**

- J Before carrying out any roof work a risk assessment will be undertaken and a safety method statement prepared, that takes into account safe methods of access and fall prevention / mitigation.
- J HSE guidance HSG33 Health and Safety in Roof Work is followed.
- J The Company only permits employees to access roofs that have adequate edge protection (e.g. parapet walls of appropriate height) or that have designated walkways from which a fall from the roof is not possible either due to distance from the roof edge or provision of guardrails. Employees are made aware of these restrictions.
- J Where it is necessary to access a roof for inspection purposes either a suitable means of access is arranged (i.e. scaffold) or the work is contracted to a company making use of specialist pole / drone technology to collect images.

**4.28.6 Man-safe Systems**

- ) In the absence of edge protection and other means of preventing falls, then, in accordance with the hierarchy of control as specified in the Work at Height Regulations 2005, a man-safe system may be used.
- ) All man-safe systems, including anchor points, shall be inspected and certified by a trained and competent person, and records of such inspections kept.
- ) All man-safe systems shall be checked 'in date' for test prior to use.
- ) All persons who are required to make use of a man-safe system wear a full body harness fitted with self-retracting lanyard, inertia reel fall arrest system and personal rescue device at all times. The self-retracting lanyard must ensure that the shortest distance to the point of attachment to the man-safe system is maintained at all times. A short (2m) fall restraint lanyard may only be used if work is conducted near to the man-safe system **and** away from the roof edge i.e. there is no possibility of reaching the fall risk.
- ) Personal rescue devices are of sufficient spool length to enable lowering to the ground. If due to building height the personal rescue device would be ineffective, operatives must be equipped with a self-rescue ladder, kept to hand at all times.
- ) All persons remain attached to the man-safe system at all times whilst exposed to work at height.
- ) Unless using a specialist fastening device, two karabiners must be used when crossing man-safe cable supports in order to maintain a point of attachment at all times.
- ) Refer to Section 4.28.4 Personal Fall Protection Equipment.

**4.28.7 Ladders and Stepladders**

- ) All persons using ladders and stepladders will be fully trained and aware of the hazards and risks
- ) Ladders, including stepladders, used by the Company will be of the correct type (Class 1 or EN 131) and in good condition. Measures must be taken to ensure that ladders and stepladders are secure, on a solid footing and, in the case of access ladders, are effectively secured to prevent movement.
- ) Ladders will be the subject of regular inspection by a competent person and defective ladders will be taken out of service immediately and reported to line management.

**4.28.8 MEWPS**

- ) All work involving the use of MEWPs is planned and conducted in accordance with HSE guidance GIS6 The Selection, Management and Use of Mobile Elevating Work Platforms.
- ) Mobile Elevated Work Platforms shall only be operated by fully trained, competent operators with current IPAF certification.
- ) Safety Harnesses will be worn at all times whilst work is being conducted from boom-style MEWPs (e.g. cherry pickers). The requirement for use of a safety harness in other types of static MEWP (e.g. scissor lift) will be determined via risk assessment.
- ) Where a harness is worn, this is used in conjunction with a short work restraint lanyard secured to a suitable anchorage point within the basket.
- ) When working next to or over water a risk assessment is carried out to determine whether the greatest risk of injury to the operator is from falling from the MEWP basket or



drowning, if the MEWP falls into the water. Life jackets are worn in preference to harnesses where the risk of drowning is greater.

- ) A rescue plan is in place for falls from MEWPS which is incorporated into emergency procedures.

### **4.28.9 Fragile Surfaces**

- ) All work on fragile surfaces is planned and conducted in accordance with HSE guidance GEIS5 Fragile Roofs.
- ) Fragile surfaces are provided with adequate means of support / protection (platforms, coverings, guard rails) for anticipated loads. Suitable and sufficient warning notices are prominently displayed on approaches to fragile surfaces.
- ) When working at height or on fragile surfaces, all employees will wear PPE identified through risk assessment. Appropriate training will be given in its use and maintenance.

### **4.29 Working Platforms and Trestles**

Trestles are suitable as board platforms. They should be free from defects and inspected regularly. Trestles should be levelled for stability on a firm base.

- ) Platforms based on trestles should be fully boarded, adequately supported and provided with edge protection where appropriate.
- ) Safe means of access should be provided to trestle platforms, usually by a step ladder.
- ) Working platforms must be no less than 600mm in width.

### **4.30 Preparation for Cable Runs**

Tools will be used with consideration to dust and noise levels, where necessary dust extract power tools will be used.

- ) Liaison with the Authority will be required to establish safe access, work interface and reduction of risks to third parties.
- ) Area's to be worked will be surveyed for hidden services e.g. gas, electric etc. Work will be planned to minimise numbers exposed to dust and noise.
- ) Signs and barriers will be used to establish work areas. Ear, eye and respiratory protection will be provided as required by the assessment of the working environment by the Company's Representative.

### **4.31 Installation of Cable Trunking and Traywork**

All sharp edges will be removed from containment systems or protective strips/grommets fitted. Operatives will take care when handling lengths of trunking, being aware of fixtures and fittings, and seek assistance when required. When the work is allocated the Company will take into account the number of operatives required to support lengths of trunking. Operatives to be aware of their own capabilities and seek assistance if required. Handling equipment will be used on large heavy lengths.

Company's Representative in assessing the activity will select suitably sized trunking for the job. Operatives should ensure that the fixing and building structure is sound. Operatives shall ensure that trunking and trays are not overloaded.

#### **4.32 Cable Pulling**

Work will be planned for safe access, other services and route. Manufacturer's cable pulling guidelines will be followed. Cable drum will be secured and monitored for a controlled cable delivery. Edge protection may be necessary to ensure smooth and controlled cable delivery. Close supervision will be required to ensure that the cable is not over-stressed. Gloves and foot protection will be used where necessary. Any equipment required will be in date for servicing and statutory inspections.

- ) Operatives should ensure that all cables in the process of being installed are not left trailing in walkways or hanging from ceilings which could cause persons to trip snag or suffer injury. Areas of work to be cordoned off with barriers and 'Men at Work' signs clearly posted. Agreement with the Client / room occupants to isolate areas of work – where possible.

#### **4.33 Fibre Terminating**

Shards of bare fibre are to be placed in to a fibre disposal bin e.g. CINBIN when cutting the fibre and disposed of by incineration. Fibre waste is not to be placed into site waste containers, it should be disposed of in accordance with the local Authority's guidelines – a phone call to the local council should confirm this. Manufacturers' instructions should be followed when loading the connectors with glue. Laser equipment used for testing fibres – in the equipment room, access is to be restricted while laser is in use. At the room end the fibre is to be parked and capped. Operatives to have passed a recognised training course on fibre terminating techniques.

#### **4.34 Design of Trunking Route**

A trunking survey may be necessary. This should decide the best possible routing. The site's asbestos register is to be consulted for the planned route. Other services and hazards will need to be identified and avoided by re-routing the trunking where possible. Trunking routing should consider building occupants: access and egress routes; inconvenience during installation; sources of EMI and where possible, design out any anticipated hazards. Trunking routing should also consider manual handling, method of installation and the positioning of the trunking for the installer.

#### **4.35 Portable Electrical Tools**

Where possible battery operated tools will be used. All portable electrical tools must be powered via a 110 volt isolation transformer or be battery operated. A residual current device must be fitted at power source if tools are used which can only operate via 240 volts.

- ) All tools and equipment, including portable and other electrical equipment and its leads, brought onto the Client's site may be subject to examination. They must be suitable for their intended purpose, properly guarded, defect free and properly used. They must be shown to be within a formal inspection, test, repair and record keeping scheme and must bear control labels which verify this.

#### **4.36 Man Made Mineral Fibres (MMMMF)**

MMMMF includes mineral wool, ceramic fibres, special purpose fibres and continuous filament fibres, most commonly known as glass wool, rock wool and fibreglass. PPE for operatives to include dust masks, gloves and overalls. To reduce skin irritation exposed skin should be covered. Where substantial amounts of MMMMF is encountered, respiratory protective equipment should be used. All field engineers will attend a recognised training course in asbestos awareness.

#### **4.37 Working Near or Over Water**

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

- J All operatives will have suitable training and instruction before working near or over water.
- J Before carrying out any work near or over water a risk assessment of the work to be undertaken will be conducted. The risk assessment will take into account weather conditions and other aspects of the environment to ensure the safety of personnel and identify the measures required to protect persons working near or over water, including a safe system of work.
- J Appropriate rescue equipment must be provided for the location, taking into account any reasonably foreseeable changes that may occur (e.g. tides or spate rivers).
- J Whenever possible, entry into the water shall be prevented by physical barriers.
- J The requirement for use of PPE / PFPE (including life jacket, safety harness or combined harness / lifejacket, high-visibility clothing) will be determined via risk assessment. All employees will wear specified PPE / PFPE as specified. Appropriate training will be given in its use and maintenance.
- J Where the requirement for use of safety harnesses is identified, these shall be attached to suitable anchor points. All safety harnesses/man anchor systems shall be tested, certified and checked 'in date' for inspection prior to use.
- J All life jackets and buoyancy aids provided conform to the appropriate BS EN standard (393, 395, 396 or 399).
- J Lifebuoys and or throw lines will be available where there is a possibility of operatives being carried away by the water.
- J A rescue boat manned by competent operatives will be available whenever work is undertaken over or adjacent to deep, tidal or fast flowing water and when identified in the risk assessment.
- J A means of raising the alarm will be provided.
- J Where necessary, the surface of water will be illuminated at night.
- J All personnel will be accounted for at all times.