



The Belfry Group Limited

## **Health & Safety Policy**

Revision 1.5  
Wednesday 11<sup>th</sup> March 2009

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# PREFACE

## An Introduction to the Health and Safety Management System

The Health and Safety Policy Manual for Belfry comprises of a number of separate but integrated documents.

The documents collectively set the Rules for Health and Safety within our organisation.

These documents form part of a Corporate Business Management System, which is applicable to all areas of our business, wherever we operate throughout the UK.

This Corporate Business Management system includes Quality and Environmental management.

**Health and Safety Rules** are quite specific and are implemented with equal importance to quality and operational requirements, enabling a consistent approach to over-all business management.

To help us operate as effectively as possible, without producing too much, or duplicating paperwork, and to keep us updated, we have designed the documents in a tiered format, represented by the triangle below, this shows the **hierarchy of the rules** and outlines the Health & Safety Framework.

Belfry Group Limited utilise the services of Aegis Services Limited for all consultancy issues. Our representative is Tim Hudson, who can be contacted on 01772 736522.

## How the Health and Safety Policy and the Key Policies & Procedures Affect Me at Work

The Health and Safety Policy (the framework document for Health and Safety Management) is designed to summarise our system for managing health and safety, providing clear indicators for effective safety management.

It includes a 'statement of commitment' signed by our Managing Director. The 'organisation chart' shows an outline of the organisation structure and the significant text of this document details our 'responsibilities' and provides an overview of the 'arrangements' for best practice health and safety management.

EVERY MEMBER OF OUR TEAM WILL BE ISSUED WITH A COPY OF THE POLICY

Key Policies & Procedures' are documents that individually cover a specific topic. The 'Policy' is the 'Belfry' rule' that relates to a the specific topic (ie risk assessment or inspections). Policies are statements which set out our approach to the individual topics.

They do not tell us 'how to' apply the rule. The 'Key Procedure' is the document that explains 'how to' comply with this rule. ALL line Managers will hold copies of the Key Policies and Procedures.

To help support our team at work we have developed 'Generic assessments'. These are in two main groups:-

1). COSHH, & 2). Risk assessments.

These are designed to support our Mobile Operations team, in addition to providing guidance to Resident Operations in enabling them to produce site specific assessments. All these Generic assessments are available from the Intranet or World Wide Web site.

Of course for those of us who are not directly involved in writing such assessments, but may wish to know more about the process, we have produced guidance literature and booklets which are available to any member of the team. As always if you need advice all you have to do is ASK.

The management team have the responsibility for ensuring that all the necessary Health & Safety information including '**Key Policies & procedures**' are properly communicated.

During team briefings a series of tool box talks will be delivered. Most of the information that makes up this Health & Safety Framework is held by Line Managers.

## How the Health and Safety Documents Fit Into Our Overall Business Management System

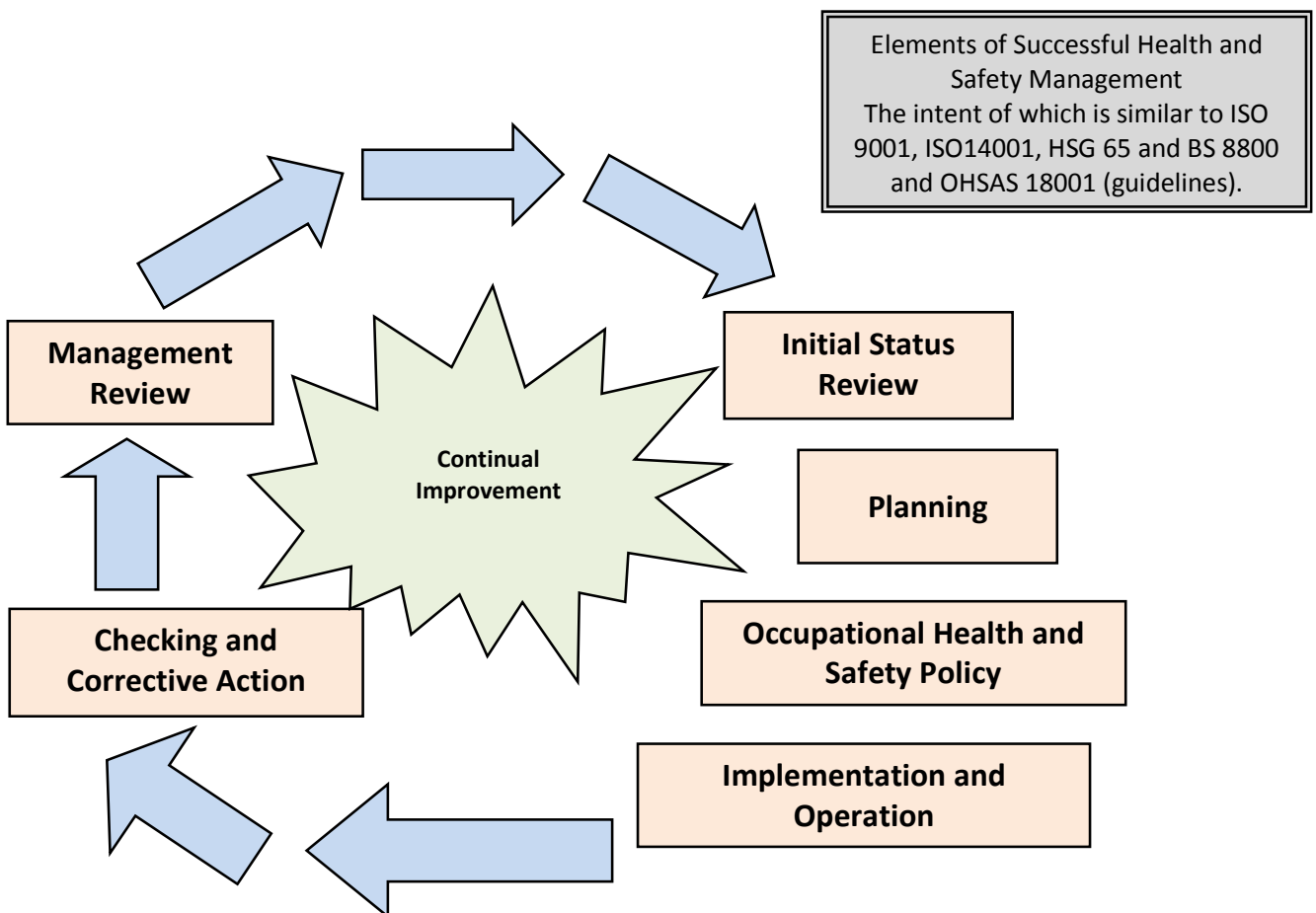
The documents that form part of the Health and Safety Management system have to be kept up to date, ensuring that they accurately reflect current legislation (law) and best industry practice.

To help us keep track of the most important documents they will be issued as 'controlled copies' The issue of controlled documents is already an element of our Quality management system.

In fact the Health and Safety policy and Key policies and procedures will form a section within our Quality manual. We will undertake audits, which combine both Quality management and Health and Safety management – these will measure our compliance with the requirements of the documents

Combining Health and Safety and Quality documents, along with environmental standards provides us with an overall Business management system

### The Figure below Shows the Principle we apply to Managing Health and Safety



# SECTION ONE

## Health and Safety Policy Statement

It is this Company's intention that its work will be carried out in accordance with the relevant statutory provisions and all reasonably practicable measures taken to avoid risks to its employees or others who may be affected by our undertaking.

Management and supervisory staff have the responsibility for implementing the Policy throughout the Company and must ensure that Health & Safety considerations are always given priority in planning and day-to-day supervision of work.

All employees and sub-contractors are expected to co-operate with the Company in carrying out this Policy and must ensure that their own work, so far as is reasonably practicable, is carried out without risk to themselves or others.

The Board of Directors have appointed the Operations Director as having particular responsibility for Health & Safety and to whom reference should be made in the event of any difficulty arising in the implementation of this Policy.

The operation of this Policy will be monitored by the management and staff of the Company. To assist them in this respect, the Company have appointed a Health & Safety Manager who will maintain the Health & Safety Policy and Procedures, visit sites and workplaces and to give advice on the requirements of the relevant statutory provisions and safety matters generally.

This Statement of Company Policy will be displayed prominently at all resident manned sites, and offices.

The organisation and arrangements to implement this Policy will also be available at our manned sites and offices for reference by any employee as required.

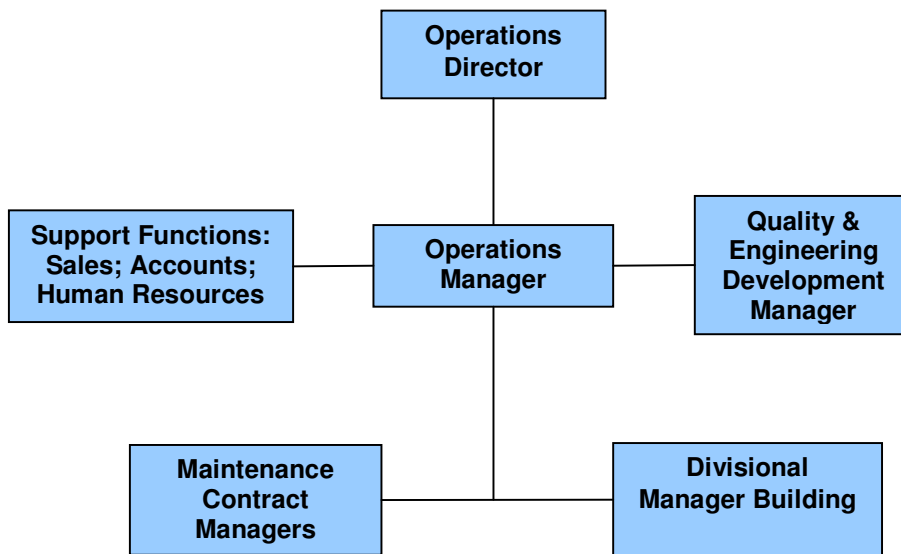


**Keith Rimmer**  
**Operations Director**  
**11<sup>th</sup> March 2009**

# SECTION TWO

**Belfry Group Limited**

**Organisation Structure**



# SECTION THREE

## ALL EMPLOYEES RESPONSIBILITIES

ALL EMPLOYEES WHILE AT WORK ARE REQUIRED TO:-

- Take reasonable care for their own health and safety and of other persons who may be affected by their acts or omissions.
- Co-operate with their employer (or any other person) in enabling their compliance with the requirements and duties under placed on them by the relevant legislation. [From Health and Safety at Work Act, 1974]
- Familiarise themselves with the company Health and Safety Policy framework and the relevant rules relating to their specific job.
- Comply with the Company and client safety rules and legislation at all times.
- Use safety equipment, safety devices and protective clothing as appropriate and when required to do so. Report any defects in respect of these provisions.
- Report all accidents, dangerous occurrences, hazards and near miss events.
- Comply with any other measures in relation to their safety and welfare at work.

# **SPECIFIC MANAGEMENT TEAM RESPONSIBILITIES**

(ADDITIONAL TO THOSE OF ALL EMPLOYEES)

## **GENERAL**

To actively encourage everyday awareness of Health and Safety in the work place and to ensure, so far as is reasonably practicable, compliance with this Health and Safety policy framework by all staff, contractors, visitors and members of the public whilst at our place/s of work. To provide through the arrangements outlined in this safety policy framework a safe working environment, which meets legislative and company safety requirements, including the related requirements of our clients.

## **OPERATIONS DIRECTOR**

Assuming ultimate responsibility for Health and Safety within the business  
Ensuring that equal importance is applied to Health and Safety as to other business functions  
Ensuring that adequate resources are made available for Health and Safety issues throughout the business

## **OPERATIONS MANAGER**

Acknowledging delegated responsibility for integrating Health and Safety into business functions  
Appreciating the main requirements of legislation which apply to the business  
Chair the Health and Safety consultation group and provide advice to all Belfry personnel  
Preparing and issuing regular bulletins regarding Health and Safety at work

## **LINE MANAGERS**

Acknowledging their responsibility for integrating Health and Safety into business functions  
Enabling this policy framework to be effectively implemented  
Setting and monitoring personal objectives for their direct reports  
The control and monitoring of contractor activities, including agency staff  
Ensuring their staff are adequately trained and competent to undertake their duties  
Investigate accidents and incidents as appropriate  
Ensuring adequate means of communicating Health and Safety issues to their team are implemented  
Undertaking monthly meetings with direct reports and the members of their teams  
Monitoring performance and acting on feedback relating to Health and Safety issues  
Encouraging co-operation and communication amongst members of the team and clients

## **QUALITY and ENGINEERING DEVELOPMENT MANAGER**

Maintaining the corporate safety management system documentation  
Reviewing and revising the Health and Safety policy framework documents  
Audit the extent of compliance with the requirements of legislation and policy, by means of a programme of site inspections and internal office audits  
Arranging specific Health and Safety training  
Maintaining a register of Health and Safety competencies  
Maintaining a record of documents issued under the Quality management system  
Referencing and integrating the Health and Safety Policy into the Quality Manual  
Undertaking audits of documents issued.  
Maintaining a register of technical competencies for personnel within The Belfry Group

# SECTION FOUR

## THE POLICY FRAMEWORK ARRANGEMENTS

Note:

Please note that Comprehensive details and information regarding the specific practical implementation of these general arrangements, and any further advice, can be obtained from the Health and Safety Manager.

### **1. RISK ASSESSMENT**

The process of Risk Assessment is undertaken to analyse the risks inherent within a particular operation, this would include the risks associated with the plant, the location, the product or substance and the work process. The assessment takes account of those who are actually doing the task, how frequently the task is undertaken, and others that may be affected by the task. Some Legislation requires assessments to be carried in specific areas i.e. COSHH, Display Screen equipment, and manual handling. The objective of all risk assessment is to eliminate significant risks and or establish safe systems of work that encompass the necessary risk control measures to reduce the exposure to the risk to as low as reasonably practicable. Belfry have implemented a procedure for the process of risk assessment which includes the requirements of specific legislation. In addition to this and to support our operations team in its day to day activities we have compiled an inventory of Operational Policy generic assessments. These generic assessments identify the hazards, associated risks and control measures that are necessary in order to establish a safe system of work in relation to the particular subject. All these risk assessments are recorded centrally and available to all members of our team. The assessments are regularly reviewed and updated as appropriate.

### **2. SAFE SYSTEMS OF WORK**

Through the arrangements implemented with the intent of this document Belfry will provide, so far as is reasonably practicable, a working environment including the plant and equipment, working practices and substances for use at work, that is safe and without risks to health. The application of safe working practices will be routinely extended to all our sub contractors, where the arrangements for managing these contractors will require the submission and review of risk assessments and detailed definition of the safe systems of work to be adopted. A system of Permits and Authorities to work will be implemented as appropriate, with due consideration for existing client systems and client requirements. Only competent and authorised personnel will issue and subsequently cancel permits to work. Belfry will monitor the effectiveness of the arrangements in practice, identifying any areas for development. Observation of tasks will provide feedback on competence, clarity of task instructions, adequacy and safety of equipment, and use of the correct material in a safe Way.

### **3. PLANNED INSPECTIONS**

Inspections of the workplace and working practices help to reduce the potential for accidents. Belfry has implemented a procedure to address the specific requirements of undertaking planned inspections. Outlining the areas and topics that should be covered, obviously different tasks and locations warrant different frequencies of inspection; our Managers have guidelines on inspection frequency however they will determine the most effective use of this safety management tool in relation to the specific factors of the actual task and location.

#### **4. TRAINING AND COMPETENCY**

Belfry recognises the importance of competent people in enabling consistency and proficiency in the delivery of our service. The maintenance of knowledge to ensure work is undertaken in compliance with the standards for safety, quality and environmental management is a key element of the integrated management system. Corporate Induction training is provided to new starters in addition to the information and instruction delivered in relation to specific sites or contracts. Temporary members of staff are provided with suitable and sufficient information in relation to their duties. Training needs analysis is undertaken for the members of the team and specific training is arranged and delivered as appropriate. The records of training undertaken and of the competence of new starters and existing employees are recorded in the training database which is subject to audit.

#### **5. ACCIDENT / INCIDENT REPORTING AND INVESTIGATION**

Belfry require the reporting of ALL accident, incident, Hazards and Near Misses events to the central reporting point at the Warrington head office location. In addition to the reporting process ALL events are subject to investigation, the extent and degree of this investigation is determined by the actual nature of the circumstances, the Health and Safety Manager will assist local managers in the investigation process. All investigations lead by the Health and Safety Manager will be documented in a standard report format and circulated to relevant managers. Analysis of the reported incidents will take place at suitable intervals; trends will be determined to enable adjustments to be made in the appropriate area of the management system. The recommendations made as a result of investigations will be subject to follow up action and form part of the program of key performance indicators.

The following RIDDOR reportable incidents will be advised immediately to the HSE:-

- Accident resulting in death
- Accident resulting in major injury
- Three day injuries
- Work related diseases
- Dangerous occurrences

The established procedure for RIDDOR reporting and Investigation is as follows:-

- Details of Incidents reported to the Incident Contact Centre (ICC)
- Report form F2508 completed by ICC
- Copy of F2508 received from ICC with covering letter
- Any errors or omissions corrected and advised to ICC
- Accident Book completed where appropriate (Details retained for at least 3 years)
- Details / circumstances analysed to determine:-
  1. The need for additional Safety Procedures
  2. The need for additional Safety Training
  3. The need for additional / improved PPE

#### **6. SAFETY MEETINGS and BRIEFINGS**

A structure of senior managers meetings, safety consultation group (safety committee) meetings and departmental safety meetings has been implemented to provide forums for the discussion of related issues, including key performance indicators and updates on legislation or company policy. The designed structure of these meetings and the company culture is to encourage and enable the free flow of information. There is no

limit on the frequency of these meetings or briefings. Team briefings enable the managers / supervisors to deliver short and to the point bulletins, using the 'tool box talk' style delivery and the use of video media where appropriate. Suggestions on Health and Safety related issues are again encouraged at these local level briefings where a less formal approach often generates useful information.

These briefings include:-

- Control of Substances Hazardous to Health (COSHH)
- Manual Handling

The **COSHH** briefing highlights the following essential requirements:-

- COSHH assessments must be carried out with the aim of eliminating or reducing exposure to hazardous substances.
- Operatives must assess the risk involved, before using any substance which carries a hazard warning label.
- Hazardous substances must only be used as directed, following the necessary safety precautions and utilising the appropriate PPE as required.
- Avoid all unnecessary contact with hazardous substances.

And outlines the precautions to be taken when the use of hazardous substances cannot be eliminated:-

- Store hazardous substances in suitable containers, ensuring only the required amount is used and lids are replaced when not in use.
- Always read the labels on containers. If there is no label do not use.
- Be aware of the correct precautions and control measures contained in the Safety Data Sheet.
- Establish where the first aid and washing facilities are on site.
- Always wash hands after use and do not eat or drink when handling hazardous substances.
- Ensure there is adequate ventilation when using hazardous substances.
- Never mix hazardous substances, unless you are sure you know what you are doing.
- Never expose other employees, clients or members of the public, to fumes, dust, gas or any other dangers from hazardous substances.
- Be aware that if a dust, fume or vapour causes you to cough, catch your breath, or gives you a headache then it is a Substance Hazardous to Health.
- Do not store hazardous substances above head height.
- Always clean up any spillages and dispose of hazardous waste properly.

The **MANUAL HANDLING** briefing serves as a reminder to operatives to observe the following control measures:-

- Eliminate hazardous manual handling as far as reasonably practicable, for example by using mechanical handling.
- Make a suitable and sufficient assessment of any hazardous manual handling operation which cannot be avoided.

Where manual handling cannot be avoided, the following measures are described in order to minimise the risk of injury:-

- Assess the properties of the load (bulk, weight etc) and if necessary make a trial lift, by raising the load by a few inches.
- Determine whether assistance is required to handle the load.
- Wear suitable clothing and PPE, such as gloves and safety boots, to protect against cuts or crushed toes etc.

- Ensure there is sufficient space, suitable lighting and a clear route to enable movement of the load.
- Do not carry a load which will obscure your vision.
- Where possible, move the load in stages
- Always adopt a good handling technique (which is described in full).

## **7. PERSONAL PROTECTIVE EQUIPMENT**

The requirement for using PPE will always be considered at the last resort control measure and never as the first option. Engineering controls, administrative and work practice controls will be thoroughly evaluated prior to considering the use of PPE. Belfry has developed a procedure regarding the assessment and selection of PPE in addition to an approved list of standard items of PPE (such as Safety helmets and gloves). When PPE is issued the users will receive adequate information instruction and training in the use and maintenance of that PPE and the limitations to its use. The arrangements established for the procurement of PPE are subject to review as appropriate.

## **8. EMERGENCY PREPAREDNESS**

Planning for foreseeable emergency situations in order to mitigate their effects is an important part of the Health and Safety policy framework.

The arrangements for such emergencies as fire and bomb threat will be determined for each working location by the site or contract manager/supervisor (this will often involve the adoption of the Clients procedures). When the extent of Belfry's responsibility in relation to such emergency events has been clarified, appropriate local arrangements, both procedural and in respect of information instruction and training will be promptly developed and implemented. The action to be taken in the event of a fire or on suspecting a fire is included as a standard item within the corporate induction process. Planning for system failure and or power failure where critical information may be affected is again a consideration for the respective manager to address. A strategy to maintain the integrity of that system or to 'back up' the information will be determined having given due consideration to the likelihood and severity of the event. Site managers must be particularly mindful of the potential impact of failures of mechanical and electrical components or systems in respect of a clients primary business operation. Fire systems and fire-fighting equipment must be regularly inspected and tested. Necessary documentation must be maintained to meet the requirements of the Fire Certificates and relevant legislation. Areas requiring corrective action will be dealt with promptly.

## **9. FIRST AID**

Appropriate First Aid facilities are provided at all locations and in all company vehicles. Trained First Aid Assistance is provided commensurate with the requirements of the particular location taking into account the nature of the work undertaken at that location. The requirements regarding first aid arrangements and provisions are specifically addressed in a Belfry procedure, which identifies responsibilities and provides guidance.

## **10. PLANT AND EQUIPMENT**

Belfry have put in place appropriate procedures to enable the control and maintenance of equipment, plant, and infrastructure so as to meet company standards and legislative requirements e.g. Electricity at work, pressure vessels, lifting equipment and work equipment regulations etc., these arrangements include the strategy for preventative maintenance. Specific Contracts will have systems implemented to adequately address the requirements relating to the plant and equipment particular to that location and contract. Belfry will, so far as is reasonably practicable, ensure that Hired plant or equipment is safe for use and where appropriate will obtain test and examination certificates. Only those people that are competent to do so will be authorised to use such hired equipment

## **11. ACCOMMODATION**

The accommodation provided for members of the Belfry team will, so far as is reasonably practicable, ensure that safety, welfare and working environmental conditions that are suitable for the tasks required to be performed or function the accommodation is designed for. Adequate arrangements will be put in place to protect people from the effects of passive smoking at work and for the provision of suitable rest facilities.

## **12. CONTROL OF CONTRACTORS**

The proper selection and control when utilising the services of contractors is essential in enabling the maintenance of a safe working environment and reducing the potential for accidental losses. Belfry maintains an approved list of contractors who have undergone pre-qualification in relation to their ability to provide services which meet the requirements of statutory provision and corporate standards of Health, Safety and Quality. For larger project works Belfry have implemented specific control measures which enable the 'project' manager to detail and address Health and Safety requirements prior to, during and on completion of the works. The provision of the appropriate risk assessments and method statements are one element of this process. For all works involving the use of contracted services the relevant Belfry Manager is responsible for ensuring the competence of those people undertaking the work.

All the arrangements regarding contractors will be subject to monitoring and audit activities

## **13. HIRING AND PLACEMENT**

Belfry has put in place procedures to enable effective control over recruitment for either permanent or temporary personnel including those personnel in respect of 'TUPE' The process is designed to identify the specific requirements of individual posts (including the technical skills and personal qualities) and consider these in the recruitment process. A human resources Manager monitors all issues in relation to recruitment.

## **14. MANAGEMENT OF WORKING TIME**

Suitable and adequate systems for the monitoring of hours worked have been established. Individual members of the team are advised about the provision of the statutory provision and agreements regarding working hours are filed on individual personnel records.

## **15. DRUGS AND ALCOHOL**

Systems of 'Due Diligence' are implemented to ensure, so far as is reasonably practicable, employees do not report for, or carry out work whilst under the influence of alcohol and/or drugs. Where it is necessary formal medical screening arrangements can be put in place.

## **16. COMMUNICATION AND PUBLICATIONS**

- Suitable publications are obtained on subscription to support the provision of up to date information provided to employees, clients and contractors.
- An electronic database of health and safety information is maintained to provide a comprehensive source of statutory information.
- Notice boards are utilised to display fundamental health and safety information.
- The Health and Safety Manager maintains a library of safety information.
- Internal publications will advise personnel of changes to legislation and new or amendments to corporate policy.

All personnel will have access to the corporate policy framework and the related procedures and guidance information.

#### **17. CONSTRUCTION AND CDM RELATED PROJECTS**

The personnel involved in the various aspects of project work shall be appropriately competent to undertake that function, the organisation may adopt the roles of designer, CDM Co-ordinator and principle contractor dependant on the nature of the work). Records of notifications to the enforcing authority and details of ALL such projects will be held with the project file and Health & Safety Manager.

#### **18. ASSISTANCE AND ADVICE**

The Health and Safety Manager provides a consultancy service to all members of the team. The master documents and electronic database of internal information to support the policy framework are maintained by the Health and Safety Manager.

#### **19. PROCUREMENT**

All goods and services will be obtained to meet the requirements of the applicable legislation COSHH, CHIP, CDM regulations etc. and the Quality Management System. A list of approved suppliers and contractors has been established within the arrangements of the business management system. These arrangements are subject to review and audit on a frequent basis.

#### **20. MONITORING AND KEY PERFORMANCE INDICATORS**

The measurement of performance against the health and safety standards that have been established is an essential tool in the ongoing development and enhancement of our Health and Safety management system. Safety tours, inspections and direct observation and audits are all elements of this process; these are proactive indicators which are used to gauge the effectiveness and application of safe systems of work, of the process of risk assessment and issue of permits etc. Reactive measures are also used such as accident reports, and the occurrence of other incidents such as near miss and ill health reports. The information is reviewed and trends analysed to determine where system deficiencies exist. The correct course of corrective action will be identified and appropriate measure taken. Performance indicators from monitoring activities are produced and issued within the business.

#### **21. AUDIT**

In addition to our ongoing monitoring through inspections and tours Belfry have put in place a procedure to address the specific requirements relating to Health and Safety audits, this procedure is in addition to existing arrangements within the quality management system. These audits will be tailored to enable a critical and in depth appraisal of all the elements of the health and safety management system. Reports and any corrective actions generated from audits will be communicated to all relevant personnel and the appropriate actions implemented.

#### **22. POLICY AND MANAGEMENT REVIEW**

This policy will be subject to formal annual review in addition to amendment at interim periods. The arrangements outlined will be reviewed on an ongoing basis. The performance of the health and safety management system general arrangements and the performance of individual elements, which will include the results of auditing, will form part of the overall management review.