



Health and Safety Policy Manual

Issue Status

The version number is indicated by the version number in the header of this document, it identifies the version number of this Health and Safety Policy.

When any part of this Health and Safety Policy is amended, a record is made in the amendment log shown below.

- The Health and Safety Policy can be fully revised and re-issued at the discretion of the senior management team.
- The Health and Safety Policy will be reviewed annually as per standard.

Issue	Amendment	Date	Authorized
1.0	Health and Safety Policy creation	23/11/2016	John Davie Chris Scott

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Health and Safety Policy Statement

One of the essential values that the CCS Group holds is that all adverse events are preventable. Therefore our principal objectives are ensuring the personal health, safety and welfare of all our employees and other parties who may be exposed to risks associated with our activities, and to the protection of the environment. The mainstay of our safety management system is the application of modern risk management techniques

The CCS Group;

- Is committed to the continual improvement of our health, safety and environmental management and performance;
- will not accept anything less than full compliance with all relevant health, safety and environmental legislation;
- requires and expects all levels of management and supervision to actively initiate and pursue ways and means of making the working environment as safe and healthy as possible;
- believes that everyone is jointly responsible for the reduction of adverse events. The Company believes that active participation of all members of staff is essential to maintain the highest standards of Health, Safety and Environmental management;
- will provide and maintain healthy and safe working conditions and a suitable environment for all personnel involved in its activities;
- will appoint competent personnel to assist in meeting our statutory duties;
- employees, visitors and contractors will be given such information, instructions and training as is necessary to enable work activities to be undertaken giving due consideration to health, safety and the environment, this will include employees identifying safe methods of work and changes that affect existing risk assessments;

The CCS Group will carry out an annual review of our safety management system.

John Davie

John Davie

Managing Director

23/11/2016

SAFETY MANAGEMENT SYSTEM (SMS)

The principals contained in the HSE Publication "Managing for Health and Safety" HS(G)65, have been adopted by the CCS Group in the development of our safety management system.

Overview of SMS

This section of the policy document outlines the CCS Group Safety Management System. It demonstrates how safety is an integral part of our business activities and shows how it effectively and adequately controls the risks arising from our activities

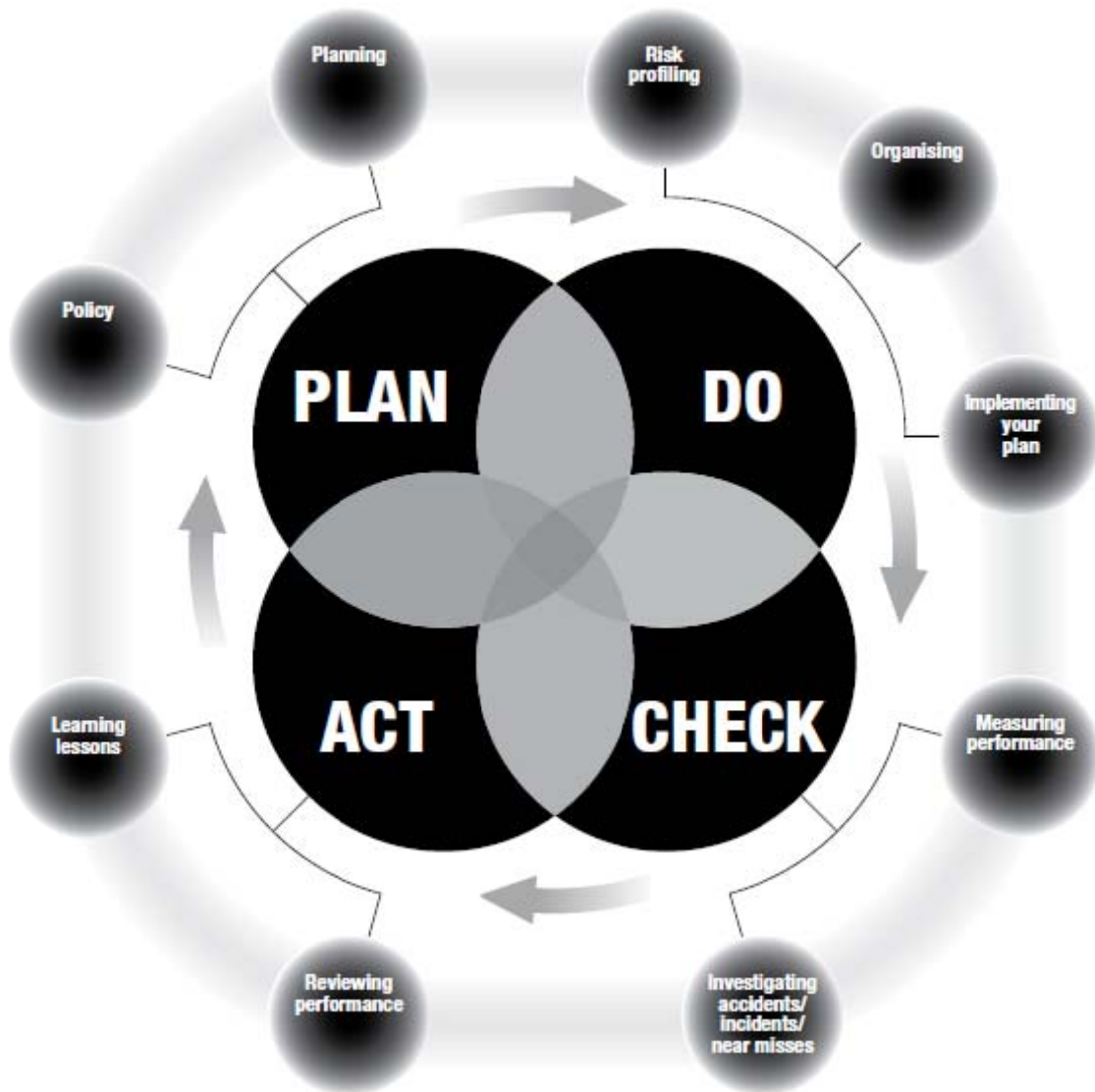
It outlines how the component parts of the Safety Management System in the form of policy, organisational arrangements, procedures and supporting instructions link in with the General Arrangements for Health and Safety demonstrating an interlocking system of protective and preventative measures.

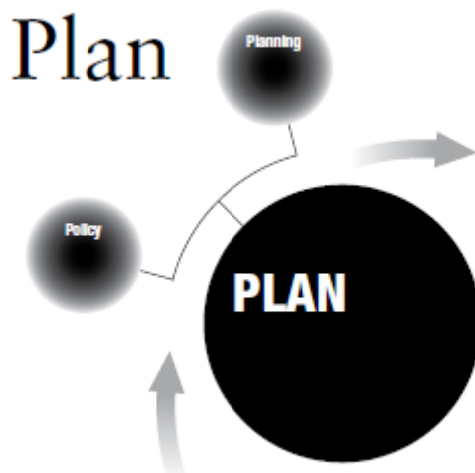
The primary aim is to eliminate the risk whenever reasonably practicable or, where this is not possible, reduce the level of risk as far as reasonably practicable.

Safety is of principal importance in the management of any organisation. However, this system takes forward the best practice and the general principles of good management as the basis for improvement of all safety performance. For this reason, the framework will remain relevant to the CCS Group and will allow flexibility and adaptation in order to manage and control any new or changed risks identified.

The key elements of successful Health and Safety Management are set out below

DIAGRAM 1





Policy

The principles underlying the CCS Group Safety Policy are as follows:

The CCS Group has a duty to control the risks to which its activities inevitably expose its employees, customers, contractors, and the general public. There is recognition that its safety policies and procedures play a positive role in securing the commitment of employees to a wide range of business objectives and support the CCS Group marketing of its services as a responsible company.

Accidents resulting in death, injury, ill-health, property damage or loss to operations represent an unnecessary human and financial loss. Investment in the elimination or reduction of such losses contributes directly to people's wellbeing, job satisfaction as well as profits and, particularly in times of recession or high competition, may represent a better yield than other investments.

Accidents are not inevitable. They are failures of systems. They can be avoided by continued rigorous system design and control.

This Health and Safety Policy demonstrates how it can contribute to business performance by:

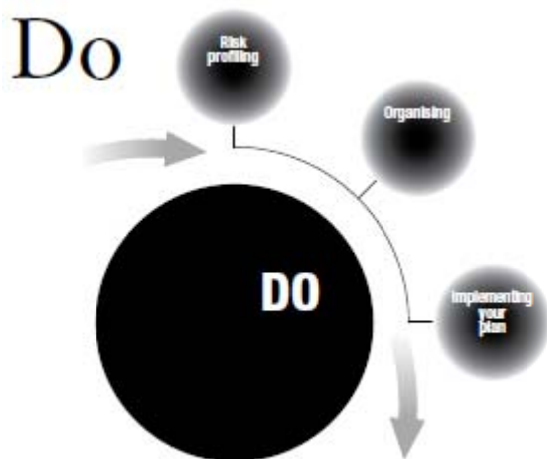
- Ensuring a systematic approach to the identification of risks and the allocation of resources to control them.
- Minimising the financial losses which arise from avoidable unplanned events.
- Recognising that accidents, ill-health and incidents result from failings in management control and are not just the fault of individual employees.
- Recognising that the development of a culture supportive of Health and Safety is necessary to achieve adequate control over risks.
- Supporting initiatives aimed at continuous improvement.

Planning plays an essential part in the effective implementation of the CCS Group Health and Safety policies.

Planning ensures the following:

- Legal requirements, codes of practice and industry standards are always met, usually as a minimum requirement, and very often exceeded.
- The organisation and its processes have the capability to deliver safety performance. This requires provision of adequate resources, including staffing levels and funding.
- Engineering and procurement controls are utilised to identify, eliminate and control risks at source.
- Premises, plant and equipment are fit for purpose by design.
- Performance standards are established progressively after a thorough analysis of the needs of the organisation and of existing and possible future risks.
- Contingency plans and all relevant mitigation measures have been prepared to minimise the impact of accidents and manage recovery.
- Performance measurement, audit and review systems are in place in order to monitor the success of the Safety Management System and provide for continuous improvement.

Through the implementation of the consultation and communication procedures, the CCS Group management team and employees know and understand the safety management system; know the existing established standards; lead people to attain the established standards through training and measurement of performance of self and others; evaluate results and needs; commend and constructively correct performance. Without adequate management control, the accident cause and effect sequence is started and unless controlled in time, leads to loss.



Risk Profiling

The CCS Group apply modern risk management techniques to identify, evaluate and control hazards and risks with a view to eliminate or reduce as far as reasonably practicable.

Policy Statement:

The Safety Policy Statement of the organisation goes further than merely meeting legal requirements. It is a positive and credible expression of management commitment to health and safety excellence. The General Arrangements section is a vital, current source of reference for all staff within their location and is an integral component and vehicle to convey the Safety Management System. Every effort is made to ensure that both the Policy and General Arrangements Statements are simple and understandable.

Organisation

The CCS Group is organised to enable its Safety Policy to be translated into effective practices, which will ensure the following:

- Leadership from the top of the organisation is visible and sincere.
- Managers conduct regular safety tours showing their commitment to Health and Safety.
- Managers and Supervisors lead by example by conforming to all Health and Safety requirements.
- Co-operation between individuals so that Health and Safety becomes a collaborative effort.
- Communication of necessary information throughout the company.
- Competence of employees.

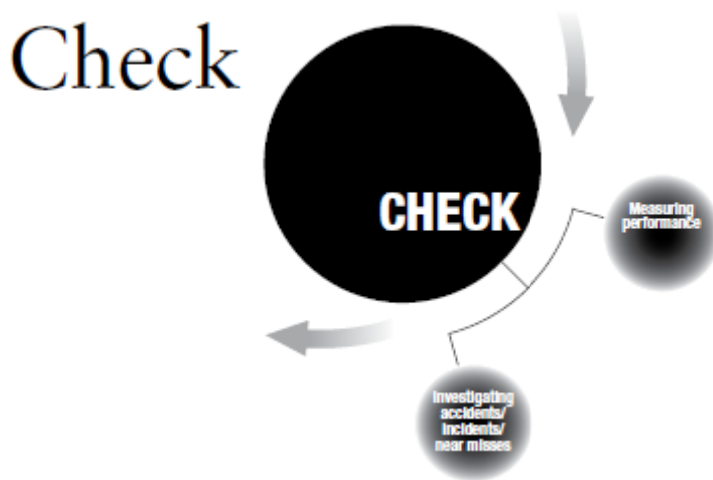
This is demonstrated by the safety structure organisation charts on page **Error! Bookmark not defined.**

Implementing

The implementation of the Safety Management System relies on the co-operation of all personnel, at all levels of the organisation. To assist in achieving this, clear plans and procedures are developed and consulted and people are trained to understand them.

The CCS Group will ensure that employees/contractors only undertake work for which they are competent and are properly trained.

Where a member of staff does not achieve the necessary standard of competence or health, the individual in question does not undertake the duties concerned until they have demonstrated competence or fitness.



Measuring Performance

Measurement is an essential aspect of maintaining and improving Health and Safety performance. Monitoring activities highlight Management commitment to Health and Safety objectives in a pro-active manner which is an essential part of development of the Health and Safety culture. Two types of system are needed ACTIVE and RE-ACTIVE.

Active Systems:

Active monitoring provides essential feedback on performance before an accident, ill-health, incident or near-miss. It involves checking compliance with established performance standards and the achievement of specific objectives. This monitoring is a key element in The CCS Group approach to the achievement of safety excellence. Some examples are:

- Inspection of premises, plant and equipment on a regular basis by Managers or Supervisors to ensure the continued identification and correction of hazards and unsafe acts.
- Health and Safety Advisor checking the quantity and quality of monitoring activities undertaken by Managers and Supervisors.
- Independent external auditor carries out a series of programmed health and safety audits over the full range of operations and locations.

Inspections will be undertaken by people who are trained as competent to identify the relevant hazards and risks and to assess the conditions found. Records will be kept of each inspection with details of both positive and negative findings.

- Safety and Management Inspection

The depth and frequency of active monitoring is determined by the degree of risks associated with the activities being managed.

Re-active Systems:

Re-active systems monitor reported accidents, ill-health, incidents and near-misses.

The results of investigations need to be analysed, recorded and reviewed so as to identify common features and trends which might reveal areas for general and local improvement.

This data also provides valuable input to exercises designed to:

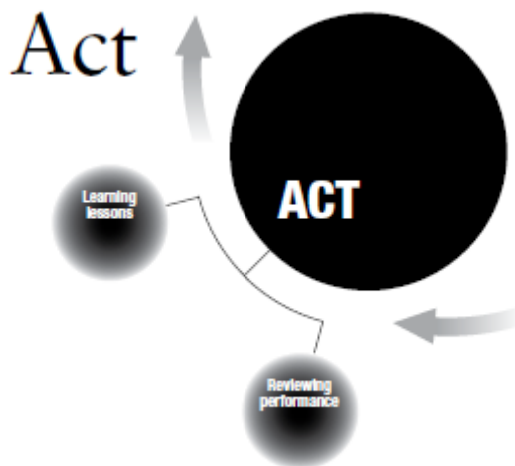
- Assess the risks arising from proposed changes to established standards or methods of working.
- Target safety expenditure.
- Analyse costs of accidental loss.

The detailed reporting of accidents, ill-health, incidents and near-misses is vital to the process of improving safety performance.

Each reported event is recorded and investigated to establish both the immediate circumstances and the underlying organisational causes. Recommendations must then be made on measures to improve the management systems and established performance standards throughout The CCS Group.

Investigation techniques must ensure that all circumstances are considered including human factor issues such as:

- Organisational systems which includes relevant policies, established standards, rules and procedures.
- The designated task including the premises, plant, people and procedures in use and their effect on the incident.
- The employee(s) and sub-contractor(s) including their behaviour, suitability, competence and qualification.
- Adverse Event reporting and investigation



Reviewing Performance

The reviewing process within the CCS Group Safety Management System is based on information from measuring activities (including both active and re-active monitoring) and from auditing activities in which an independent assessment is made of the entire Safety Management System. Reviewing the results of internal and external measuring activities is an ongoing process which is undertaken at various levels within the CCS Group. There is also an annual review of the H&S Policy.

Safety Meetings:

Safety meetings at Senior Management level review key performance indicators, including the following:

- Degree of compliance with established standards and legislation.
- Introduction of standards where inadequate or non-existent.
- Accident, ill-health, incident and near-miss data.

See also safety structure organisation charts. This identifies the safety management and communication structure throughout The CCS Group.

Feedback and reviewing plays an essential part in motivating employees and stimulating changes to policies, planning and organisation which assist delivery of long-term improved performance.

Audit

Auditing and reviewing performance is the final step in the CCS Group Health and Safety management control cycle (see Diagram 1). Reviewing performance constitutes the “feedback loop” and develops the organisation’s ability to manage risks to the fullest possible extent.

Auditing supports monitoring by providing Managers with information on the implementation and effectiveness of plans and established performance standards. It also provides an on-going check on the reliability, efficiency and effectiveness of the arrangements for policy making, organising, planning, implementing, measuring and reviewing performance.

Auditing needs to be fully comprehensive and will examine, over a period of time, all the components of the Health and Safety Management Systems which have been outlined previously.

Audits are carried out by the Health and Safety Advisor. These audits are designed to assess comprehensively the effectiveness of systems implemented by a particular management unit to meet all performance objectives and established standards.

See also, Measurement and Audit.

Organisation Chart

Health and Safety Responsibilities

Safety responsibilities are documented and allocated to Managers, and Supervisors. The clear definition of responsibilities is reinforced by holding individuals accountable. This involves the use of supporting arrangements such as:

- Commendation in recognising good safety practice.
- Disciplinary measures to deal with failure to meet expected standards.
- Encourage near-miss awareness.

Key post safety responsibilities are detailed below

Management take full responsibility for controlling all factors which could lead to ill-health, injury or loss. They provide clear direction and take responsibility for the working environment in which accidents, ill-health and other incidents could occur. This creates a positive atmosphere and encourages a creative learning culture in which the emphasis is on a collective effort to develop and maintain systems of control ensuring a PRO-ACTIVE culture rather than a RE-ACTIVE one.

The CCS Group never expects employees to work in an unsafe manner. It accepts that employees can express their concerns in respect of Health and Safety issues to their Supervisor or Manager without fear of recrimination.

Throughout the organisation participation, commitment and involvement in Health and Safety activities, at all levels, is essential not only to fulfil legal obligations for consultation but also to achieve effective risk control. Combining knowledge and experience is a key aspect of risk control. Participation compliments control in that it encourages the "OWNERSHIP" of Health and Safety policies by employees at all levels and establishes an understanding that The CCS Group as a whole, and those working in it, benefit from good Health and Safety performance.

Health and Safety, after all, is "Everyone's Business".

Managing Director

- Assuming ultimate responsibility for Health and Safety.
- Ensuring that competent persons are employed to assist in carrying out his statutory responsibilities.
- Understanding the main requirements of the Health and Safety at Work Act 1974 and relevant regulations.
- Allocating the necessary resources for Health and Safety.
- Ensuring that the organisational structure is appropriate to manage Health and Safety.
- Ensuring that the same established management standards are applied to Health and Safety as to other management functions.
- Ensuring that Health and Safety is integrated into the management structure.
- Ensuring that equal importance is applied to Health and Safety as to other business functions.

- Setting a good personal example.

Directors

- Understanding the main requirements of the Health and Safety at Work Act 1974 and relevant regulations.
- Reviewing Company performance.
- Ensuring that responsibilities are correctly assigned within the Company.
- Ensuring that adequate resources are made available.
- Ensuring that employees are adequately trained and capable.
- Ensuring the effective implementation of Company policy.
- Reviewing the effectiveness of the policy.
- Providing assurance that risks have been identified and assessed and that effective risk control measures are in place.
- Ensuring the communication of necessary information throughout the organisation.
- Ensuring that employees are properly trained and instructed as to their duties and responsibilities.
- Making recommendations for improving performance.
- Allocating the necessary resources within their control.
- Ensuring agreed reporting procedures are followed in the event of any Adverse Events or dangerous occurrences involving employees or Company equipment.
- Monitoring of contractors.
- Controlling the implementation of the Safety Management System.
- Reviewing the performance of the Safety Management System to ensure its continuity, suitability and effectiveness.
- Ensuring the retention of competence of their staff.
- Keeping relevant documentation.
- Ensuring all plant and equipment utilised for the operations under their control is maintained in a safe working condition and any noted defects are reported to responsible persons immediately or as soon as practicable.
- Ensuring all work involving their department is carried out in accordance with the specified safe working procedures.
- Ensuring appropriate supervision, instruction and advice is provided to employees to reduce any health and safety risk from the tasks they perform.
- Ensuring that first aiders are trained and cover is provided.
- Ensuring specified personal protective equipment is made available and utilised by employees as stipulated.
- Setting a good personal example.

Supervisors

Supervisors are responsible for: -

- Ensuring that risk assessments are available for all activities within their area of responsibility and are communicated to all relevant employees.
- Ensuring that employees are supplied adequate information relating to Health and Safety.
- Ensuring that employees are adequately trained, instructed and informed.
- Providing a suitable level of supervision.
- Understanding the Company policy and procedures.
- Allocating work in accordance with employees' level of training.
- Ensuring that defective equipment is taken out of use.
- Reporting defective equipment.
- Encouraging employees to report defects and suggest improvements.
- Ensuring that correct safe working instructions are adhered to.
- Carrying out regular inspections of the workplace.
- Reporting accidents and near-misses.
- Assisting with investigations of adverse events.
- Setting a good personal example.

Employees

All employees have a duty under the Health and Safety at Work etc. Act 1974 "to take reasonable care for their own health and safety and to co-operate with their employer, so far as is necessary, to enable the employer to comply with his statutory obligations".

Therefore, all employees must:

- Work in accordance with Company procedures.
- Report defective equipment and dangerous situations.
- Use safety equipment provided.
- Avoid horseplay which could result in injury.
- Comply with Management requests and instructions.
- Not use defective equipment.
- Not misuse equipment.
- Not damage equipment.
- Exercise reasonable care towards himself and others.
- Not undertake tasks that they are not trained for.
- Seek information if uncertain of the risks involved in any job.
- Avoid improvising or taking shortcuts which would entail unauthorised and unnecessary risk.
- Promptly report all accidents, near-misses and dangerous occurrences.

Health and Safety Advisor

Health and Safety Advisor is responsible for: -

- Understanding the main requirements of the Health and Safety at Work Act 1974 and legislation applicable to Company operations.

- Advising Directors on the implementation of Company Health and Safety policy.
- Ensuring that risk assessments, COSHH and other Health and Safety information is available to staff.
- Monitoring/analysing accident trends.
- Joint investigation of Adverse Events with Management.
- Assisting in the preparation of safe systems of work.
- Reviewing and revising Company policy.
- Reviewing new legislation and guidance, advising Management on its impact.
- Assisting in the auditing process.
- Conducting safety inspections.
- Developing and suggesting Health and Safety initiatives.

GENERAL ARRANGEMENTS

The following section is designed to show the CCS Group General Arrangements as well as the way that the Safety Management System has been developed in accordance with HS(G)65 "Managing for Health and Safety".

The General Arrangements are designed for ease of use and understanding by all members of staff, contractors and any other relevant person(s) and form the principal documents conveying the Safety Management System to all staff at all levels throughout the organisation.

Specific arrangements are supplemented by a more detailed documented procedure and are identified by the document number in (brackets) after the subject heading.

Managing Safety

Definition of Safety:

The CCS Group defines safety as the avoidance of death, injury or poor health to its employees, customers, contractors and the general public caused by occupational accidents, incidents or hazards. Safety also includes the avoidance of damage to property. Environmental issues are managed by a separate policy and management system.

Duty of Staff:

Whilst overall responsibility for implementation of this policy clearly lies with every Director, success will only be achieved with the full and willing co-operation of all members of staff. It is the legal duty of all employees to act responsibly at all times and to ensure they do all they can to prevent injury to themselves and colleagues and to minimise loss.

When visiting a client's site for any reason, all The CCS Group staff will report to the site manager/person in charge to obtain permission to enter. This may include receiving the Clients site induction or site rules. All information received must be complied with.

Risk Identification Management and Review

The CCS Group will diligently identify hazards and assess the risks associated with these, implement adequate means to control these risks and seek to eliminate or reduce these risks where reasonable means exist.

All Directors and Supervisors have a responsibility for ensuring that any necessary risk assessments have been carried out for the activities under their control.

Specific legislation requires detailed assessments to be carried out (manual handling, COSHH, fire, etc.). These assessments will be managed by the Health and Safety Advisor, and may lead to documented procedures to ensure that the risks are controlled to an acceptable level.

The Health and Safety Advisor is the source of expert advice on the need for and conducting of risk assessments. The Director responsible for interface with customers, contractors or other parties, identifies where joint risk assessments need to be undertaken. A competent assessor and at least

one employee skilled in the job to be assessed is the minimum requirement for a risk assessment team.

The findings of assessments are communicated to all employees, contractors and customers affected by them.

The risk assessments will be reviewed regularly at intervals at least as frequent as those required by legislation, in the event of an adverse event and when any changes take place which affect the risks or controls in place.

All risk assessments shall be recorded and these records retained and made available for inspection and examination. All risk assessments are also briefed to all employees via the tool box talk process.

Safe Systems of Work

Directors and Supervisors within The CCS Group will ensure that safe systems of work are designed and implemented to protect the health and safety of employees and others who can be affected. These systems shall be designed to reflect the risks associated with given activities and comply fully with all relevant rules, regulations and codes of practice.

Directors and Supervisors who introduce new work systems into The CCS Group will ensure that they are properly explained to their staff and any others who might be affected. Directors have a responsibility, when systems of work are cross-functional and also may include external contractors or third parties, to ensure that there is a clear understanding of the working arrangements between the functions concerned.

At no time should excessive productivity demand lead to unsafe practices or disregard to established safety standards, The CCS Group instruction or legal requirements. Any employees questioning the safety of working systems will be given a fair hearing and will not face recriminations.

Systems of work will include the requirement that staff are assessed as competent before being authorised to undertake their duties.

Safe systems of work will be regularly reviewed to ensure they are valid especially when changes in procedures, equipment, processes or substances are introduced.

Personal Protective Equipment

Directors and Supervisors in charge of staff ensure that the risks to health and safety present in the workplace are adequately assessed and appropriate precautions identified. Where personal protective equipment is identified as a last resort, details are shown on the risk assessment and method statement for the task involved.

Arrangements are made to:

- Ensure employees know how to wear correctly, maintain, report defects in and obtain replacements of personal protective equipment.
- Carry out checks to ensure personal protective equipment is being worn correctly and that it is in good condition.
- Provide appropriate facilities to keep personal protective equipment in good condition when not in use.

Directors and Supervisors will set personal examples in the use of personal protective equipment and regularly monitor whether personal protective equipment is of the right type, is being worn correctly and is in good condition.

Employees are responsible to maintain and wear the supplied protective equipment in accordance with Company policy, procedures and work instructions, and to report defective and inappropriate protective equipment.

Managing Changes to The CCS Group Organisation

The CCS Group ensures that the risks associated with any change to existing equipment plant, organisation and working practices are assessed and controlled so that the change does not increase risks to safety. In all cases, before the change is authorised the safety implications shall be evaluated for all stages involved (including planning and implementation) and for the outcome of the change.

All organisational changes will be planned, undertaken and implemented in accordance with company procedures. These may include:

- Any changes to the safety responsibility structure of the organisation.
- Any changes to the required competencies of posts which are significant to the operation of the Safety Management System.
- Changes to the Safety Management System, including changes in safety policy, established standards, aims, objectives or priorities.
- Significant changes to the service provided or methods of working employed by the Company.
- Changes required following an accident or near-miss, or as a result of a safety audit.
- Changes to the process employed for the selection and monitoring of contractors and suppliers.
- Changes and additions to criteria set out in statutory legislation.

Compliance to these duties is measured through audit and compliance checks. Currently organisation change is audited by the Health and Safety Advisor.

Consultation

It is recognised that The CCS Group Safety Policy cannot be achieved solely by the commitment of Management but requires the commitment, support and co-operation of all employees within the organisation.

The CCS Group will consult with all employees with regard to:

- Development of Health and Safety Procedures.
- The introduction of any measure that will affect the Health and Safety of employees.
- The provision of relevant information as required under Health and Safety legislation.
- The Health and Safety implications of the introduction of new work practices and technologies into the workplace.

Directors are responsible for ensuring that they communicate the consultation subject with their respective employees and to return the completed feedback form within the correct time limits.

Communication:

Effective internal communication systems are an essential part of the CCS Group organisation. They ensure that all appropriate information reaches those to whom it is relevant. Examples are listed below:

- IT System.
- Team briefings.
- Document control.
- Documented safety management system.
- Performance reports, statistical analysis,
- Safety bulletins.
- Details of incoming legislation.
- Health hazard warnings.
- Feedback.

Induction and Orientation on Change of Post

The CCS Group is committed to providing a full induction programme to all new employees.

Directors are responsible for the delivery of such induction and orientation.

Directors will retain the records indicating a successful compliance of the induction course.

Safety Management Inspections

It is The CCS Group policy to implement a programme of planned Health and Safety inspections which will be carried out by Directors, and Supervisors covering each location and activity for which they are responsible. Sub-standard conditions and acts which are identified will be prioritised according to the degree of risk and suitable follow up action will be taken.

The inspection process is a quantitative system that allows a compliance score to be produced so that improvements can be measured.

A series of planned, unannounced Health and Safety inspections will be carried out or arranged by the Health and Safety Advisor.

The Health and Safety Advisor will analyse the results of the inspections to identify any sub-standard trends and produce a report for the Directors.

Fire Safety

The CCS Group will ensure that it has appropriate arrangements to manage fire risks pro-actively. This will be achieved through the application of risk assessment and risk control supported by adequate reporting procedures and shall take account of legislative requirements and industry standards.

Professional advice on fire safety matters, including interpretation of standards, is the responsibility of the Health and Safety Advisor.

The Health and Safety Advisor is responsible to ensure that formal fire risk assessments are carried out for all buildings and structures within the control of the company. Reports from these assessments will be distributed to the Directors and Management

Fire training will be provided to all staff. Managers are responsible to ensure that this is achieved and recorded. All CCS Group staff receive fire safety training as part of the induction process. All the training is assessed and auditable records maintained.

Training and Competence

The CCS Group will ensure that employees/contractors only undertake work for which they are competent and are properly trained. The physical health of employees is continuously monitored via sickness records, and observation/vigilance by their Supervisors. This includes compliance with relevant drugs and alcohol requirements.

All Managers and Supervisors are instructed, wherever necessary, to note the condition and health of employees/contractors, especially immediately prior to their commencing duty. If in the opinion of the Manager or Supervisor the individual is unfit for duty, then the appropriate action will be taken in accordance with Company procedures (whenever possible a second opinion will be sought to support actions) and the employee/contractor will not be allowed to take up duty.

Where a member of staff does not achieve the necessary standard of competence or health, the individual in question does not undertake the duties concerned until they have demonstrated competence or fitness.

The CCS Group will ensure that all employees are competent to carry out their duties. The requirements of each position shall be identified and recorded and suitable assessment procedures implemented to ensure competence is maintained. Training needs analysis shall be identified by various methods which may include:

- Analysis of responsibilities against an individual's competency
- Risk Assessment controls
- Statutory requirements
- Ensuring recruitment and placement procedures which ensure that employees (including those at all levels of management) have the necessary abilities for their jobs or can acquire them through training and experience.
- Having systems to identify Health and Safety training needs arising from changes in staff, plant, processes or working practices.
- Ensuring arrangements are in place to identify competent cover for staff absences. Proper supervision and on-the-job coaching ensures the maintenance and development of competence.
- Ensuring minimum levels of competence are achieved by Managers, Supervisors and other employees.
- Continuous assessment of competence levels by Supervisors and Managers.

Directors will determine the training needs. This will include induction training, personal safety training and examination, fire drills, and emergency procedures.

Continual competency assessments are used to ensure that all employees are monitored to ensure that they retain the necessary skills to carry out their duties safely.

Where risk assessments reveal inadequacies in training specifications, Managers will ensure in consultation with the Health and Safety Advisor that the training course content is altered accordingly.

The CCS Group employs a professional health and safety advisor who may "buy in" external professional health and safety specialists, and training personnel where and when thought necessary.

Permit to Work Procedures

The use of Permit to Work (PTW) systems will be based on the findings of the Company risk assessment process and client requirements.

All activities carried out under PTW systems are risk assessed, planned and documented prior to taking place. These include:

- Working at Height

A pre-planned meeting and/or pre-work briefing will take place before activities are carried out. The person issuing the PTW must ensure that the person receiving it fully understands the limits of work contained within the permit.

All staff required to operate PTW systems will be certified as competent after training, if necessary, and continually re-assessed.

Preventative Maintenance

The CCS Group will identify the requirement for and implement a programme of preventative maintenance for its plant and equipment. The programme will incorporate any statutory requirements and industry standards and will ensure that frequencies for inspection and maintenance are laid down and followed and that competent people are identified along with the necessary reporting and monitoring arrangements.

The maintenance schedules specify the frequency and periods at which planned maintenance is undertaken. It is the responsibility of the Director to ensure plant and equipment is maintained at the intervals laid down. This is done through a programme of maintenance standards audits.

All statutory and mandatory inspections/maintenance (e.g. safe load indicator, lifting equipment exams) are carried out within the stipulated timescale. Items of plant that become overdue for statutory/mandatory inspections/maintenance are withdrawn from service until the required work is satisfactorily completed.

Adverse Event Reporting and Investigation

It is The CCS Group policy that all accidents, near-misses, and uncontrolled fires arising from work activities will be reported in accordance with statutory requirements and any contractual obligation with clients. They will be thoroughly investigated to determine the basis and underlying causes so that preventative measures may be introduced.

The results of investigations shall be analysed and reviewed so as to identify common features and trends that might reveal areas for general improvement.

This applies to the reporting and investigation of:

- Any accident involving personal injury whilst at work, including accidents in company vehicles.
- A near-miss.
- Fire (uncontrolled or unauthorised).

The procedure applies to all employees and any other contractor working for the Company. It also applies to any visitors or members of the public on Company premises or affected by work being undertaken by the Company.

The incident reporting system requires the injured party and/or their manager to estimate the likelihood of the incident re-occurring and also the potential severity of the incident. This allows identification of high potential incidents even though the actual outcome may have been minor.

The Director will be the sole RIDDOR statutory reporting point for the company.

First Aid

First aid kits are located in each vehicle.

A number of employees have undergone relevant training and certification as first aiders, and their names and locations are published.

The Health and Safety Advisor is responsible for provision of first aid training and refresher training as appropriate to the period of validity of first aid certificates.

Company Vehicle Drivers

The CCS Group have a legal obligation to identify the risks to its company vehicle drivers and anyone else, for example members of the public, who may be affected by their driving, and to take appropriate action to counter these risks.

The CCS Group has conducted a risk assessment to help them fulfil this legal obligation, this procedure shall apply to all The CCS Group personnel allocated with a company vehicle. There are two main areas within the procedure:

- a) Safe Driver: this addresses the competency and authority of the driver

Employees must not drive or operate any vehicle for which they do not hold an appropriate driving license or permit

All drivers are encouraged to drive safely and courteously

Employees must not carry unauthorised passengers or unauthorised loads and must not overload vehicles beyond the stated capacity

Employees must not drive or operate vehicles whilst suffering from a medical condition or illness that may affect their driving or operating ability.

- b) Safe Vehicle: this addresses the selection and maintenance of the vehicles

Employees must carry out daily checks of their vehicles prior to use and in conjunction with the laid down checking procedure.

No employee will operate any Plant, Vehicle or Equipment whilst under the influence of alcohol or drugs (unless medically prescribed)

Driving licences will be checked on an annual basis

Control of Substances Hazardous to Health

The CCS Group will ensure, so far as is reasonably practicable, that the risks to health from the use of hazardous substances will be managed in compliance with appropriate regulations and Approved Codes of Practice.

Management of the risks will be undertaken in such a way as to prevent injury or ill-health to employees, tenants, visitors, contractors and others who may be affected by the activities of the company.

Initial hazards and controls will be identified using the company risk assessment procedure, and where a significant risk is identified, a detailed COSHH assessment will be carried out.

Alcohol and Substance Misuse

The Company has developed this Policy as a positive strategy for tackling alcohol and substance related problems at work. Substances are defined as drugs, both prescribed and non-prescribed, and solvents.

Due to the varied nature of our work activities within the construction environment and on other occupiers premises it is not permissible for any employee or sub-contractor's employee under the company's control to be under the influence of alcohol or drugs while at work.

Therefore, every employee shall not:

- Perform any work or attend a site while under the influence of alcohol or any controlled substance.
- Misuse legitimate drugs or possess, use, distribute or sell illicit or unprescribed controlled substances whilst carrying out company business or on contracting site premises.
- Possess, use, distribute or sell alcoholic beverages on any company premises or company site premises

All employees are responsible to inform their Supervisor/manager of any prescribed drugs that may affect their ability to drive or operate plant and equipment.

As part of its Safety Management System, The CCS Group reserve the right to introduce testing for alcohol and substance misuse as standard procedure for the following:

- Post incident and accident testing;
- On reasonable suspicion.

By implementing this Policy, the Company intends to take positive action to ensure the safety of employees. The Company also seeks to prevent alcohol and/or substance related problems developing and to help those affected, so far as is reasonably practicable.

In line with the Company's established protocol regarding the treatment of an employee experiencing alcohol or substance use/misuse problems, help and encouragement will be given to employees who recognise that they have a problem and are seeking help.

This Policy is not intended to intrude upon the privacy of individuals, particularly in health matters, where a medical condition does not affect conduct or performance at work.

Working at Height RA 001

Working at height is considered the companies most significant hazard and as such a separate procedure has been developed. This procedure follows the guidance supplied in the HSE guidance and ensures that:

- all work at height is properly planned and organised;
- all work at height takes account of weather conditions that could endanger health and safety;
- those involved in work at height are trained and competent;
- the place where work at height is done is safe;
- equipment for work at height is appropriately inspected;
- the risks from fragile surfaces are properly controlled; and
- the risks from falling objects are properly controlled

Powered plant and Equipment

Plant and equipment must only be used by persons who have received the appropriate training, and are authorised by the company to do so. Equipment includes; scissor lifts, mewps scaffolding etc.

Powered mobile plant such as scissor lifts and elevating platforms must receive a pre use check before being used by the operator.

Maintenance can only be carried out by persons who have received the appropriate training and are authorised by the company.

Welfare Facilities

The CCS Group will ensure that welfare facilities are provided.

Smoking is prohibited in all areas of the workplace and is contained to the designated smoking area of the organisations premises. Smoking areas must at all times be kept clear of waste build up and combustible materials.

The Use of Ladders, Stepladders And Trestles

CCS Group will ensure that all work at height is adequately planned. We also recognise that there is a statutory requirement to ensure that alternative working platforms are provided for all work which cannot safely be done from the ground or from part of a building. A working platform is inherently safer than a ladder and should be provided wherever reasonably practicable. Where ladders, stepladders or trestles are to be used they must be used only after completion of the specific risk assessment and only for short periods of time.

Ladders

Where ladders are to be used:

- They must be used as a workplace only on the authorisation of the Supervisor i.e. for low risk, short term, light duty work, and where the use of a safer option is not reasonably practicable.
- They must be regularly inspected and be in good condition.
- They must be adequately footed and secured whilst in use - if the ladder cannot be secured at the top a second person should foot the ladder until the user has returned to the bottom.
- They must be angled at 75 degrees.
- They must project 1.05 metres above any landing point.

Step Ladders

Where stepladders are to be used

- Only heavy duty industrial step ladders are to be used.
- They must be used by only one person at a time.
- Neither the top tread nor the back support are to be used as a foot support.
- They should be spread to their fullest extent and properly levelled for stability at right angles to the work.
- The work should never involve over reaching nor should they be subjected to any degree of side loading.
- They must only be used for short duration low risk activities.

Trestles

Where trestles are to be used

- Trestles are made with swing backs similar to step ladders but both halves have heavy cross bearers to support a working platform. Platforms should be of lightweight staging.
- Access to platforms should be by means of a step ladder.
- They must only be used when use of a scaffold Tower, MEWP or workmate is not reasonably practicable

Access Platforms

CCS Group will ensure that safe access is provided for any work that requires working at height. This may include, MEWPS or Tower Scaffold.

In situations where the scaffolding is provided for our use by another (i.e. main contractor) we will still have a responsibility to inspect the scaffold prior to use and ensure that it is safe for our intended purposes. The Contract Supervisor will be responsible for this action.

Sub - Contractors

It is Company Policy only to engage Sub-Contractors that work within the confines of the Health & Safety at Work Act and associated regulations. All Sub-Contractors will be made aware of the Company Safety Policy and must abide by the rules contained therein. Failure to comply will be reported to Senior Management for appropriate action.

- All Sub-Contractors will be expected to work, at least, to the standard set by the CCS Group
- All sub-contractors will be required to supply site/task specific risk assessments and safety method statements prior to work commencing.
- Any accident involving a Sub-Contractor that causes absence from work after the end of a particular shift must be reported to the CCS Group and recorded in the site Accident Book.
- Only trained and competent workers shall be set to work on our contracts. Evidence in the form of records or employer's declaration will be required for inclusion in the Health and Safety Plan.
- Copy of the Rules and conditions for Sub-Contractors will be forwarded to the Sub-Contractor and the signed declaration returned before work can start on site.
- All Sub-Contractors will supply, and ensure the wearing of, protective equipment when the need exists and abide by the site rule regarding the wearing of PPE whilst on site.
- Sub-Contractors and their employees will ensure that all equipment, plant, machinery and apparatus brought onto, or used on, the Company's premises or sites are safe and without risks to health and safety and have been maintained and inspected.
- The Company will retain the right to stop any operation, erection, or the action of any of the Sub-Contractors employees if it is considered that there is a hazard to the safety or health of employees or others. The Company will not accept responsibility for any increased costs arising out of such actions.