

Health & Safety Policy

Spirit Solar Ltd (trading as Spirit Energy)



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Policy Amendment History

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Initially Compiled by



HCS Safety Ltd



Introduction

Spirit Energy ("the Company") is fully committed to providing the highest standards of health and safety and have adopted the Safety Management System provided by our Health and Safety Consultants – HCS Safety Ltd to ensure this is achieved.

This Policy has been prepared as required by Section 2(3) of the Health and Safety at Work Etc. Act 1974 and is in three parts. Part 1 (General Statement) affirms the Directors' commitment to the prevention of both accidents and ill-health to employees, non-employees and members of the public and Part 2 (Organisation & Responsibilities) and Part 3 (Arrangements) describe how this is to be achieved.

This policy is published for the benefit of all Company employees, who should ensure they are familiar with the contents. With all employees committed to health and safety, this will ensure that all Company work locations provide a safe and healthy working environment.



1. Part 1 - General Statement of Intent

Spirit Energy is fully committed to encouraging a culture of openness within our workforce with regard to health and safety, not just as a matter of importance, but also an essential part of its responsibilities. Furthermore, it regards the promotion of health and safety as a mutual objective both of management and employees to ensure that practical, achievable safety standards are agreed and maintained by everyone within the organisation.

It is therefore the Company's policy to do all that is reasonably practicable to prevent personal injury and damage to property and to protect everyone from foreseeable risks, including the general public, insofar as they interface with the Company or its activities.

Spirit Energy will:

- provide and maintain a safe and healthy working environment at each of its locations and construction sites in accordance with the relevant statutory requirements;
- provide sufficient information, instruction and training for all its employees, as is necessary for them to conduct their work activities in a safe manner;
- provide and maintain machinery, equipment etc. and systems of work that are safe and without risks to health;
- provide and maintain means of access to and from the workplace that are safe and without risks to health;
- provide and maintain adequate facilities and arrangements for the welfare of its employees whilst at work;
- arrange safe and healthy systems for use, handling, storage and transport of hazardous materials;

Good safety management begins with the commitment of senior management to ensure that the responsibilities and arrangements detailed within this document are carried out fully.

Erica Charles as Managing Director assumes full responsibility for health and safety. She puts in place arrangements for the effective implementation of this policy.

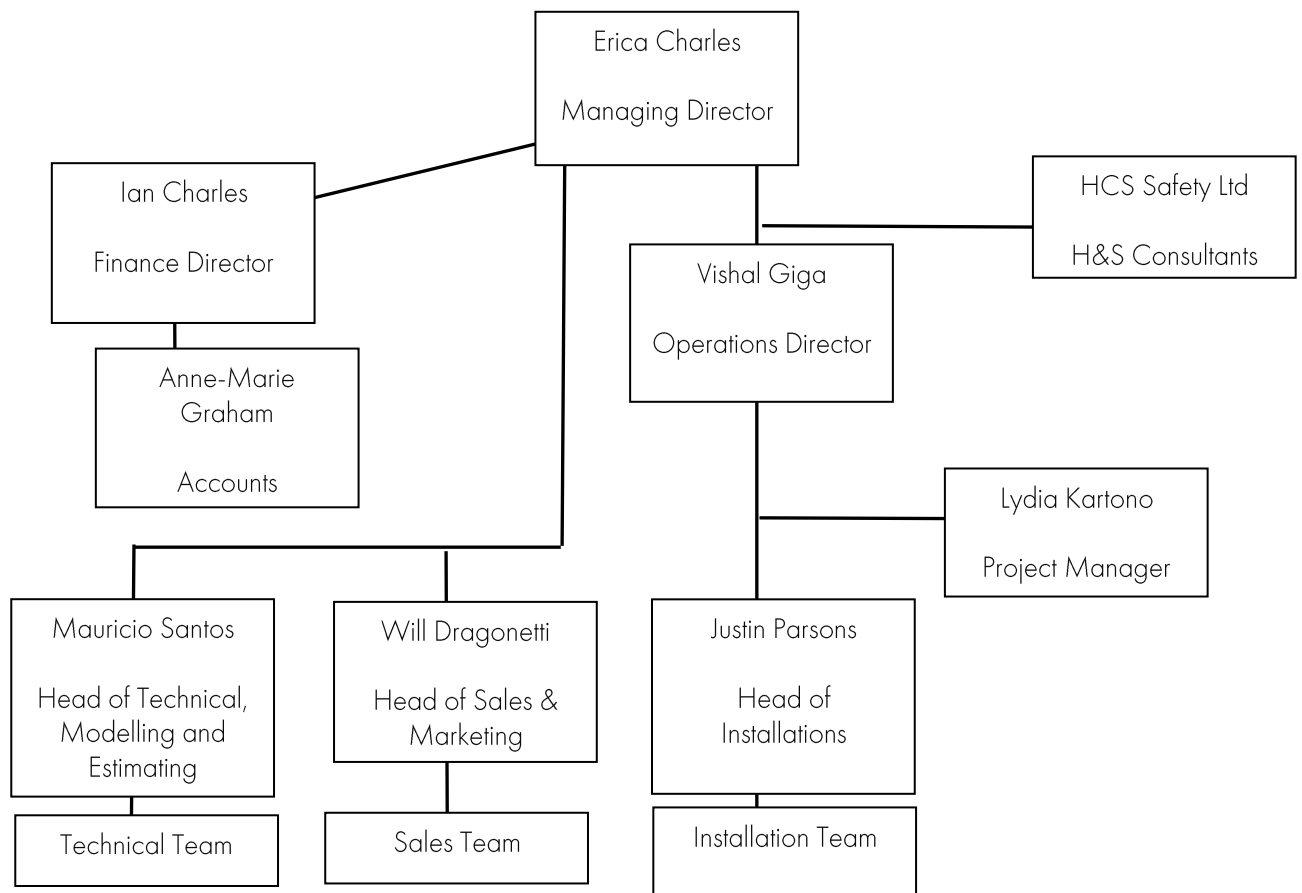
The policy is reviewed at least annually and revised as often as may be appropriate.

| Name | Signature | Position | Date |
|---------------|---|-------------------|-------------------------------|
| Erica Charles |  | Managing Director | 2 nd February 2018 |



2. Part 2 – Organisation & Responsibilities

2.1 Organisation Chart





2.2 Health & Safety Responsibilities

These responsibilities within the policy describe the Company's organisation for health and safety, which aims to ensure management control over health and safety.

Ultimate responsibility for health and safety rests with Erica Charles as Managing Director. Organisation charts demonstrate the unbroken and logical delegation of duties through line management to the installation teams who operate where the hazards arise.

Everyone within the organisation has a significant contribution to make towards accident prevention and are assigned responsibilities as follows:

2.2.1 Managing Director

Erica Charles as the Managing Director is responsible for health and safety throughout Spirit Energy and ensures the effectiveness of the policy.

In particular, she will:

- have full knowledge of all parts of this policy and how it relates to the management system;
- authorise health and safety expenditure;
- implement required training for staff at all levels;
- initiate disciplinary action against staff who do not comply with their duties under this policy or statutory requirements;
- ensure that all employees have knowledge of this policy and that they are updated when any changes are made;
- seek the advice of the safety consultants whenever needed and heed the advice given;
- inform the safety consultants in good time of work that they are required to do;
- consult with the workforce over any changes that may affect health or safety;
- ensure that any contractor appointed or self-employed person working on behalf of the Company, is competent to do the work;
- ensure that plant and machinery used by the company is to a suitable standard;
- keep records as required by legislation and retain documents for the appropriate time periods;
- liaise with the Principal Designer, Principal Contractor and other contractors as required for effective project management and under the requirements of the Construction (Design and Management) Regulations 2015;
- sign and date the general statement and ensure that the policy is reviewed at least annually;
- set a personal example of safe behaviour and acknowledge suggestions for improvement.

2.2.2 Operations Director

Vishal Giga as Operations Director is accountable to the Managing Director for implementing the relevant requirements of the policy within the departments and disciplines for which he is responsible.

In particular, he will:



- ensure compliance with the policy in all activities for which he is responsible;
- ensure that adequate resources are made available for the safe conduct of all work activities for which he is responsible;
- identify health and safety training needs in conjunction with the safety consultants, and ensure that training is implemented and the training matrix is updated;
- ensure that each new member of the workforce receives induction training, including the precautions and procedures appropriate to their specific tasks;
- ensure the provision of adequately trained and competent supervision and personnel to meet the policy requirements;
- implement and monitor the sub-contractor approval process to ensure approvals and insurance are up-to-date and review sub-contractors risk assessments and method statements, to ensure they are suitable and sufficient for the work activities for which they are written;
- give support and encouragement to all staff for whom he is responsible;
- ensure that any subcontractors
- monitor the implementation of the policy in all activities for which they are responsible;
- set a personal example of safe behaviour.

2.2.3 Heads of Department

Heads of Department are accountable to the Managing Director for implementing the relevant requirements of the policy within the departments and disciplines for which they are responsible.

In particular, they will:

- ensure compliance with the policy in all activities for which they are responsible;
- ensure that adequate resources are made available for all activities under their control;
- ensure the provision of adequately trained and competent personnel for all work activities under their control;
- when visiting site, report any non-conformities observed to the site management team to ensure that standards on site are maintained at the high level expected by the Company;
- establish and maintain procedures to ensure that all places, equipment and systems of work are safe and without risks to the health of employees or others who may be affected;
- monitor the content of safety inspection reports and confirm remedial actions taken;
- ensure adequate arrangements for welfare and the provision of first aid;
- ensure that all supervisors and operatives are trained, competent and aware of their duties and responsibilities;
- give support and encouragement to all personnel for whom they are responsible;
- take note of any comments on health and safety matters raised by staff and pass these on to the Directors as appropriate;
- set a personal example of safe behaviour.



2.2.4 Project Manager

Lydia Kartono as Project Manager is accountable to the Operations Director for implementing the policy and relevant health and safety legislation on projects over which she has control.

In particular, she will:

- ensure that adequate resources are made available for the safe conduct of every project under her control;
- ensure that all work activities are adequately supervised by trained and competent persons;
- record, report and ensure that all accidents are investigated and ensure that remedial measures are taken to avoid recurrence;
- ensure that near miss incidents are recorded, reported and investigated as appropriate;
- set a personal example of safe behaviour.

2.2.5 Head of Installations

Justin Parsons as Head of Installations is accountable to the Operations Director for implementing the policy and relevant health and safety legislation on sites over which he has control.

In particular, he will:

- organise site work to fully comply with company policy;
- ensure that risk assessments for all work activities under his control are carried out and where appropriate, ensure that method statements are prepared detailing how the work is to be done safely;
- be familiar with and to observe all regulations applicable to the site process;
- record, report and ensure that all accidents are investigated and ensure that remedial measures are taken to avoid recurrence;
- ensure that near miss incidents are recorded, reported and investigated as appropriate;
- control all site sub-contractors in order to ensure safe and healthy systems of work, low fire risk, proper use of shared facilities and co-operation between companies or allied trades in an unselfish and co-operative manner;
- ensure that personal protective equipment (PPE) needs are assessed and that an adequate supply is available, issued and properly used;
- ensure that the integrity of the site is maintained through good security procedures;
- establish and maintain adequate provisions for first aid in compliance with current legislation;
- accompany any visiting HSE Inspector during their tour of inspection and notify the Operations Director of their arrival to site;
- maintain a good working relationship with any appointed safety representative or safety committee;
- release designated personnel as necessary for safety training;
- ensure that work activities are only carried out by suitable and competent operatives, especially where mechanical equipment is used or installed;
- reprimand or discipline any person who is careless in regard to their own or other's safety;



- encourage and reward those persons who consistently show awareness and attention to safety related matters;
- encourage by example and instruction to subordinates the use of protective equipment where there is a risk to health and safety;
- carry out equipment inspections and conduct toolbox talks as required by Company policies;
- when written or verbal advice is given by safety personnel, to heed that advice;
- set a personal example of safe behaviour.

2.2.6 All Employees

All employees must also comply with the requirements of this policy and cooperate with the Company in its efforts to prevent accidents and ill health.

In particular, they will:

- take reasonable care for the safety of themselves and of any other persons who may be affected by what they do or fail to do at work;
- co-operate with their employers or any other persons in the performance of their statutory duties;
- not misuse or interfere with anything provided in the interests of health, safety or welfare;
- read and comply with the Company health and safety rules;
- behave in a responsible manner at all times;
- develop and demonstrate a personal concern for the health and safety of themselves and others;
- report damage to plant, tools or equipment to their immediate supervisor;
- use only plant, tools and equipment for which they have received training and authorisation;
- use and look after the protective equipment provided and report to their supervisor when it becomes worn or defective;
- ensure that any personal injuries are recorded in the accident book;
- inform their supervisor of any near miss incidents;
- propose to their immediate supervisor ways of eliminating hazards and improving safety at their workplace.

2.2.7 Contractors on Company Premises/Sites

All contractors working on Company premises or on any site where Spirit Energy has been appointed Principal Contractor will at all times cooperate with the Company's rules and procedures.

In particular, they will:

- provide a copy of their health and safety policy and any risk assessments, procedures and method statements relating to the work to be undertaken;
- ensure that their activities are conducted safely, without risk to health, and in accordance with all relevant health and safety legislation;
- ensure all work activities comply with the specific requirements of the Company's Clients, where applicable;



- ensure that all accidents or injuries sustained as a result of their activities are recorded in the accident book and reported to the Company management team;
- ensure that any near-miss incidents are reported to the Company management team;
- provide trained and competent operatives and ensure their attendance at any training course arranged by the Company;
- ensure that their employees are provided with the appropriate personal protective equipment and that it is used as directed;
- cooperate with the health and safety advisor during inspections and audits;
- set a personal example of safe behaviour.

2.2.8 Visitors to Company Premises

The Company management ensures safe access/egress for all visitors to all Company managed premises. In order to ensure their safety and well-being, all visitors to Company premises must:

- sign into the visitor's book and read the Company safety rules;
- not enter any working areas unless accompanied by a Company representative;
- observe at all times Company safety rules and safety procedures;
- wear any personal protective equipment (PPE) as instructed.



3. Part 3 – Health & Safety Arrangements

3.1 Health & Safety Assistance

Spirit Energy has formally appointed HCS Safety Ltd as their competent advisors on matters of Health and Safety under Regulation 7 of the Management of Health and Safety at Work Regulations 1999.

3.1.1 Safety Management System (SMS)

HCS Safety have provided a safety management system (SMS) which consists of a folder containing the elements as listed below.



The SMS is based on the HSE guidance document 'HS(G) 65 – Managing for Health and Safety', and is used to manage and store all health and safety documentation. This is further supported by our members area



of the HCS Safety website, that provides the majority of forms required to maintain our safety management system.

3.1.2 Reviews and Updates

Spirit Energy will undertake an Annual Safety Review with the consultants. The review will be attended by the consultants and at least one member of senior management. The review will involve discussion of the previous year's safety performance, including a check on compliance with the management system, any updates needed for this policy, future training requirements and any other safety or health needs that are relevant.

The Policy will be updated within two weeks of the Annual Safety Review taking place.

Date of last Annual Review: 26th January 2018

Date of last policy update: 29th January 2018

A copy of the Annual Safety Review report will be stored in section 1e of the SMS.

Personnel within the Company will stay up to date on matters of health and safety by receiving a monthly newsletter from the consultants and attending an Annual Safety Forum with other member clients. In addition to these mandatory updates, seminars are available to Company personnel throughout the year, along with other training. A suitable member of staff will attend any seminars deemed appropriate.

Newsletters will either be distributed to Company personnel or displayed on noticeboards. They can also be stored in section 1c of the SMS and dates for the seminars and Annual Safety Forum can be stored in section 1d of the SMS.

3.2 Risk Assessments and Method Statements

The Company ensures that risk assessments are carried out for tasks that involve significant risks to employees or others. Any self-employed personnel working on the Company's behalf will be required to work in accordance with these risk assessments. Sub-contractors are responsible for carrying out their own risk assessments, and these will be reviewed and approved prior to them being permitted to start work.

The person within Spirit Energy responsible for ensuring that risk assessments are carried out to a suitable and sufficient standard and are updated on a regular basis is Vishal Giga.

The Company requires the information in risk assessments to enable the coordination of other contractors.

The following procedure will be used to write risk assessments:

- identify hazards and who is affected;
- evaluate risks taking into account the likelihood and severity;
- control the risk using the principles of prevention (see below);
- monitor the effectiveness of the control measures;
- review periodically and as necessary.

Method statements may be required in addition to risk assessments. These method statements outline the safe working procedures and will include the control measures detailed in the risk assessments.



Methods of controlling risk will follow the principles of prevention as follows:

- avoiding risks at source;
- evaluating those risks which cannot be avoided;
- combating risks at source;
- adapting the work to the individual, especially with regard to the design of workplaces, and the choice of work equipment;
- adapting to technical progress;
- replacing the dangerous by the non-dangerous or less dangerous;
- developing a coherent overall prevention policy, which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;
- giving collective protective measures priority over individual protective measures;
- giving appropriate instructions to employees.

Risk assessments and method statements (RAMS) will be communicated to all personnel by means of toolbox talks and by distributing copies to individuals. Each of the relevant personnel will sign to confirm that they understand the contents of the RAMS and confirm that they will be working in accordance with it.

3.3 Health Surveillance

It is the aim of Spirit Energy that all employees are able to carry out their working duties without risks to their health. In order to monitor the effectiveness of health protection systems surveillance will be undertaken.

All members of the Company's installation team will be provided with a questionnaire which should be completed and returned to the office.

All answers provided in the questionnaire will be held in confidence under the requirements of the current data protection regulations.

Any issues identified during the surveillance process will be discussed with the employee in question and Erica Charles. Appropriate action will be taken to protect employees from further risk and where appropriate to arrange support services and medical care.

Completed health surveillance forms will be retained and stored separately for confidentiality.

3.4 Training

The Company recognises the importance of providing all its employees with adequate health and safety training.

On recruitment, all personnel are assessed for their individual training needs. Information and certification is obtained for previous training, and any further training required is identified and recorded on the training matrix. The training matrix is maintained regularly to ensure that it is kept up to date and is stored in section 3a of the SMS along with the certificates. The training matrix is maintained by Vishal Giga.



All personnel will be required to attend a safety induction prior to starting work for or on behalf of the Company. Induction training into the Company will include:

- the Company's health and safety policy;
- procedures for reporting of accidents and near misses;
- risk assessments and safe methods of work;
- first aid arrangements;
- sources of health and safety information;
- correct use of personal protective equipment where provided;
- the role and function of the company health and safety consultant;
- the consultation procedures.

Safety Awareness Training

The company has adopted the CITB Site Safety Plus scheme for the provision of safety awareness training for employees at all levels:

- 1-day Health and Safety Awareness for Operatives;
- 2-day Site Supervisors Safety Training Scheme for Supervisors;
- 5-day Site Management Safety Training Scheme for Managers;
- 1-day Directors Role for Health and Safety.

Specialist Training

Specific training will be given to those who require it. This may include:

- Emergency First Aid at Work;
- Manual Handling;
- Scaffold Inspection;
- Asbestos Awareness (UKATA or equivalent);
- PASMA scaffold tower training;
- Working at Height.

3.5 Consultation and Communication

The Company will ensure that it takes a proactive role to promote the content, guidance and benefits of this policy by communicating the contents and responsibilities at induction.

The Company will encourage feedback from employees and third parties with regard to the measures enforced and the reasoning behind this policy and safe working practices.



Consultation with the work force is a responsibility of Erica Charles and all Heads of Department. All employees are encouraged to feedback on any health and safety issues they may have and where they believe the Company can improve on the current procedures. During the communication and consultation processes, particular emphasis will be placed on:

- the company's commitment to health and safety;
- feedback on risk assessments/method statements;
- health & safety training requirements;
- the responsibilities of employees to co-operate and work safely;
- the contents of this policy, such as safe working procedures, etc;
- any specific site-based issues.

The Heads of Department will record any issues raised on the Company inspection report form and these will be discussed during quarterly management meetings and any actions taken will be relayed back to the employee.

The company holds a quarterly management meeting. This is attended by the Managing Director, Operations Director and Head of Installations.

Safety committee meeting minutes are held within section 3b of the SMS.

3.6 CDM Project Management

Under the requirements of the Construction (Design & Management) Regulations 2015, Spirit Energy, will take on the duties of Designer, Principal Contractor and Contractor. For work on Company premises, we may also take on the duties of the Client. The following summarises these duties.

3.6.1 Duties as a Designer under CDM 2015

When undertaking the role of Designer under the Construction (Design and Management) Regulations 2015, the Company will comply with its duties under Regulations 8, 9 and 10 as follows.

Project specific details will be found in the Company's contributions to Pre-Construction Information and Health and Safety Files, the nature of which will vary depending on the project.

Regulation 8 Duties

The Company will:

- only accept an appointment if they possess the necessary skills, experience, training and organisational capacity to carry out the work safely;
- only appoint Designers or Contractors who possess the necessary skills, experience, training and organisational capacity to carry out the work safely;
- provide the necessary evidence to prove their abilities as above when requested by those that may appoint them;
- cooperate with others involved in all projects in order to promote health and safety standards;



- inform their workforce and all others on site of the need to report to site management anything which is likely to endanger their own health or safety or that of others;
- ensure that information is provided in a comprehensible form and as soon as is practicable.

Regulation 9 Duties

The Company will:

- not begin work on any project unless satisfied that the Client is aware of their duties;
- take into account both the Pre-Construction Information and the general principles of prevention, as set out in the Management of Health & Safety at Work Regulations 1999, when efforts are made to eliminate and reduce risks that may be created by their designs;
- consider the future safety and health of those involved in constructing, maintaining and using the buildings over which they have an influence through their designs;
- provide information to the Principal Designer concerning the residual risk where the Company is unable to eliminate risks;
- provide information on residual risks for the Health & Safety File;
- along with designs, provide sufficient information to assist the Client, other Designers and Contractors to comply with their own duties under CDM;
- ensure that should they ever require engaging the services of another Designer from outside the UK to work on their behalf that that Designer will comply with the duties specified above.

3.6.2 Duties as Principal Contractor under CDM 2015

On projects with more than one contractor, we may be appointed by the Client to undertake the role of Principal Contractor under the Construction (Design & Management) Regulations 2015.

Spirit Energy will comply with their duties as Principal Contractor under Regulations 8, 13 and 14 as follows. Project specific details on how these duties will be achieved will be found within their Construction Phase Plans.

Regulation 8 duties

The Company will:

- only accept an appointment if they possess the necessary skills, experience, training and organisational capacity to carry out the work safely;
- not appoint a Designer or Contractor unless they have the necessary skills, experience, training and organisational capacity to carry out work safely;
- cooperate with others involved in all projects in order to promote health and safety standards;
- inform their workforce and all others on site of the need to report to site management anything which is likely to endanger their own health or safety or that of others;
- ensure that information is provided in a comprehensible form and as soon as is practicable;
- undertake the duties of the Client where they are a Domestic Client, in collaboration with the Designer or Principal Designer.



Regulation 13 Duties

The Company will:

- plan, manage, monitor and coordinate the construction phase to ensure that, so far as is reasonably practicable, construction work is carried out without risks to health or safety;
- take into account the General Principles of Prevention when making decisions regarding the design, technical and organisational aspects of a project, when estimating time required and when programming work;
- organise cooperation between contractors (including successive contractors on the same construction site);
- coordinate implementation by the contractors of applicable legal requirements for health and safety;
- ensure that employers and self-employed persons apply the general principles of prevention when undertaking their work;
- ensure that employers and self-employed persons follow the construction phase plan;
- provide a suitable site induction;
- take the necessary steps to prevent access by unauthorised persons to the construction site;
- provide suitable and sufficient welfare facilities throughout the construction phase;
- liaise with the Principal Designer for the duration of his/her appointment and share information with the Principal Designer relevant to the planning, management and monitoring of the pre-construction phase, as well as the coordination of health and safety matters during the pre-construction phase.

Regulation 14 Duties

The Company will:

- make the necessary arrangements for cooperation between themselves and all others involved in the work;
- make the necessary arrangements to consult with the workforce on site in good time;
- provide the facilities necessary to enable workers to take copies of relevant information.

3.6.3 Duties as a Contractor under CDM 2015

When undertaking the role of Contractor under the Construction (Design & Management) Regulations 2015 Spirit Energy will comply with their duties under Regulations 8 and 15 as follows.

For all projects

The Company will:

- only accept an appointment if they possess the necessary skills, experience, training and organisational capacity to carry out the work safely;
- only undertake construction work once they are satisfied that the client is aware of their duties;
- plan, manage and monitor their work and that of others under their control to ensure that, so far as is reasonably practicable, it is carried out without risks to health and safety;



- not appoint a designer or contractor unless they have the necessary skills, experience, training and organisational capacity to carry out work safely;
- not employ a person unless that person has, or is in the process of obtaining, the necessary skills, knowledge, training and experience to carry out tasks safely;
- provide their workforce with appropriate supervision, instructions and information. This information will include a suitable site induction, (where not already provided), procedures to be followed in the event of serious and imminent danger and any other necessary information on risks to health and safety;
- ensure that information is provided in a comprehensible form and as soon as is practicable;
- cooperate with others involved in all projects in order to promote health and safety standards;
- inform the workforce of the need to report to site management anything which is likely to endanger their own health or safety or that of others;
- not begin work unless reasonable steps have been taken to prevent access by unauthorised persons to the site;
- be satisfied that welfare facilities are provided as required under Schedule 2 of the Regulations.

For multiple contractor projects where the Company is NOT Principal Contractor

The Company will:

- comply with any directions given by the Principal Designer or the Principal Contractor;
- adhere to relevant parts of the Construction Phase Plan.

For projects when the Company is the only contractor

The Company will:

- take account of the general principles of prevention when design, technical and organisational aspects are being decided in order to plan the various items or stages of work, as well as when estimating the period of time required to complete the work or work stages;
- draw up or make arrangements for a Construction Phase Plan to be drawn up, as soon as is practicable prior to setting up a construction site;
- undertake the duties of the Client where they are a Domestic Client, in collaboration with the Designer or Principal Designer.

3.7 Management of Contractors

Spirit Energy acknowledges its duty to control, coordinate and monitor the activities of all other contractors under their control. Specialist subcontract companies will be engaged by the Company as and when required. These organisations will be required to pass the core criteria for demonstrating competence as set out in PAS 91:2013.

The Company will satisfy themselves that contractors are competent (sufficient skills, knowledge and experience) to do the job safely and without risks to health and safety. To achieve this the contractor will need complete a health and safety questionnaire before they are considered for work on the Company's behalf. A



health and safety appraisal of the contractor's procedures and health and safety documentation will then be carried out, which in some cases may involve an audit of the contractor. Alternatively, if the contractor can demonstrate that they hold an accreditation with a member of the Safety Schemes in Procurement Forum (SSIP), this will exempt them from the health and safety part of the questionnaire.

All contractors will attend a pre-start meeting to a prepared agenda and minutes of the meeting taken. Work instructions will then be issued and a plan of work detailing the frequency of co-ordination meetings, tool-box talks, etc.

All contractors are expected to cooperate fully on health and safety issues and conform to specific rules and procedures. The Operations Director ensures the exchange of information necessary for the safe coordination of work activities.

Any designers employed by the Company, or on the Company's behalf, will be subject to the same contractor appraisal procedure as above.

3.7.1 Self-Employed Labour

The Company will ensure the competence of self-employed subcontractors by ensuring the following:

- each self-employed subcontractor engaged to work on site on behalf of the Company must hold a current CSCS/ECS card or an equivalent at an appropriate level and have the appropriate experience necessary to carry out the work. This will be established by the Operations Director/Head of Installation before allowing the worker to start on site;
- each self-employed subcontractor will be assessed by the Head of Installations during the first 2 weeks to see if they are a suitable worker. The findings will be discussed with the Operations Director before a final decision is made as to whether to continue with the engagement;
- self-employed subcontractors are expected to comply with all requirements of this policy when working on behalf of Company.

Self-employed subcontract labour will be expected to work to the Company risk assessment/method statement when working on the Company's behalf.

3.8 Work Activities

During the course of its operations, Spirit Energy carries out various work activities which could expose Company personnel to significant risks if not controlled. The Company, as stated previously, will ensure that risk assessments are carried out for all significant risks and that, where required, method statements are prepared and communicated to all relevant personnel. The following are the more significant work activities carried out by the Company.

3.8.1 Working with Electricity

Work with electricity will be carried out in accordance with the latest edition of the IEE Wiring Regulations and the HSE document: HS(G) 85 – Electricity at Work: Safe Working Practices.

Planning of the work is essential and will consider the management, supervision, implementation and completion of the work. Following this a site-specific method statement and risk assessment will be prepared. This will include



- the work to be done;
- the hazards of the system or equipment to be worked on and the risks associated with the work;
- the people doing the work, their competence and the level of supervision necessary;
- the precautions to be taken and the system of work to be employed;
- the possibility that the nature of the work may change, e.g. a testing job may turn into fault finding.

The Operations Director will ensure that adequate information is available about the electrical system and the work to be carried out. Where work is to be carried out on newly constructed electrical systems (or newly installed equipment), drawings and schedules relating to the design should be available and provided to the electricians prior to the work, where possible.

Records in the form of drawings and/or schedules will be provided to the Client and kept for all but the most basic of installations.

3.8.2 Working with Power Tools

The person within the Company with responsibility to oversee the safety of tools is the Head of Installations; however, the installers must ensure the safe use, care and maintenance of their own equipment. Records of regular inspections of tools and other work equipment including access equipment are to be found in section 5c of the SMS.

Electrical Tools

Only trained and competent personnel will be permitted to operate power tools. The policy of the Company for the provision and use of power tools is to ensure

- only battery powered or 110v electrical tools to be permitted for use on site;
- all tools will be inspected before use, and regularly whilst in use;
- all electrical tools will be tested and examined by a competent person, every 6 months, who will issue a certificate of safety;
- the Operations Director is responsible for ensuring that portable appliance testing is carried out on a regular basis. Records of PA testing will be kept in section 5c of the SMS.

Hand Tools

Individual engineers are responsible for ensuring that their hand tools are kept in good order. They will ensure that

- tools will always be kept in good working condition;
- tools will be kept clean and ready for use and stored appropriately in toolboxes or racks with cutting edges protected;
- tools will be checked frequently to ensure that handles are secure, and guards and covers are in place.

Personnel are required to report any defects to the Head of Installations and not to use any items that are in poor condition.



Use of Abrasive Wheels

Abrasive wheels are used by the Company on occasions and can be particularly hazardous. For this reason, only persons trained in the mounting and use of abrasive wheels will be permitted to use them on site. Discs will be kept in a safe place and discarded as soon as they begin to show signs of excessive wear or unevenness of edge.

PPE will be provided and worn by those using abrasive wheels. If following risk assessment, others who have to work in the vicinity may be at risk from flying debris, then screens will be considered, or PPE provided to those working in the area. Eye protection to be worn must comply with BSEN 166B.

Dust will be controlled, wherever possible, by damping down the cutting operation. Most disc cutters are fitted with hose attachments and if they are fitted, they should be used. Where water suppression is not an option, then vacuum systems will be used. Dust masks to a suitable standard (FFP3) will always be worn in order to reduce the risk of silicosis.

3.8.3 Lifting Operations

Spirit Energy may use mobile cranes for certain tasks. All lifting operations will be carried out in accordance with the Lifting Operations and Lifting Equipment Regulations 1998.

Each crane operation will be treated as unique and will be planned on an individual basis. The Company may be responsible for managing lifting operations or may engage the services of a competent contractor for lifting operations. This will be clearly established before the project begins. In either case, a lifting plan will be drawn up by a competent person (The Appointed Person) for each individual lift.

Items to be considered in the writing of a lifting plan will include the following broad categories:

- the load to be lifted;
- the equipment required;
- the environment in which the lift will take place;
- the competencies of the personnel involved.

If the author of the Lifting Plan cannot be on site to control the operation, a Lift Supervisor will undertake the role of ensuring that the lift is carried out in accordance with the plan.

3.8.4 Work at Height

The Work at Height Regulations 2005 require a risk assessment to be carried out prior to starting any work at height. If, as a result of the assessment, there is no alternative to working at height, then suitable work equipment will be selected, taking into account the nature of the work. The Company, therefore, may use various different methods to achieve this.

Scaffolding

In the event scaffolding is provided for use by the Company personnel, then checks will be made to ensure the scaffold has been erected by a competent organisation and that the scaffold has been regularly inspected and that the scaffold register is up to date. Authorisation from the Operations Director must be gained before using any scaffold.



Wherever possible, scaffolds will be erected in accordance with NASC guidance TG20:13, which provide compliant scaffolds designed in accordance with BS EN 12811-1 Temporary Works Equipment – Scaffolds. Compliance sheets will be held on site, for the type of scaffold provided, to ensure the Site Manager can inspect the scaffold in accordance with the relevant compliance sheet.

Any scaffolds that cannot be erected in accordance with TG20:13 compliance sheets, will require a bespoke design. No one will be permitted to access the scaffold, until a copy of the design is provided to site and an initial check has been made to ensure compliance.

A competent person should regularly inspect the scaffold in order to comply with the Work at Height Regulations 2005. This inspection will take place:

- following completion of any section of scaffold;
- following any event likely to have affected the stability of the scaffold structure, such as severe weather or being struck by plant;
- following any addition or adaptation;
- no more than every 7 days.

Mobile access towers

For short term working at height and where scaffolding is not practicable, then mobile access towers will be considered to provide a safe place of work.

The Head of Installations will ensure that the manufacturers' instruction manual is provided which explains the erection sequence, including any bracing requirements. If the tower has been hired, the hirer has a duty to provide this information. This information will be passed on to the person erecting the tower, as this will differ slightly depending on the manufacturer.

Mobile access towers will only be erected following a safe method of work and by a competent person who is trained to the standards required by the Prefabricated Access Suppliers' and Manufacturers' Association (PASMA).

Mobile elevated work platforms (MEWP's)

The selection of mobile elevated work platforms (MEWP's) will be the responsibility of the Operations Director, who will ensure that it is suitable for its purpose and that the work area, ground conditions, overhead obstructions and public safety have been considered prior to it starting work.

Only authorised persons will be permitted to operate MEWP's. Authorisation will only be given to operatives in possession of a certificate of training achievement issued by the International Powered Access Federation (IPAF) or equivalent certificate issued by a recognised training authority.

Other access equipment

When work at height is to be carried out from any other form of access equipment, a risk assessment will be carried out to determine the most suitable. The risk assessment for the work will state what access equipment is to be used. Risk assessments are to be found in section 4a of the SMS. Access equipment for working at height will include



- podium steps;
- proprietary hop ups;
- step ladders.

The task risk assessment will state what has been deemed to be the most suitable equipment for the job. Wherever possible, falls will be prevented by the use of working platforms with handrails.

3.8.5 Roof Work

All roof work is carried out at height and therefore, the **Work at Height** section above will apply and will cover access to and from the roof area. However, additional hazards may need to be considered when working on roofs. Because roof work involves work at height, Spirit Energy will ensure that preventing or minimising risk is considered during the planning phase of the work.

A detailed method statement will be prepared prior to the start of any roof work and will include the working positions, access routes to the roof and on the roof, and will also detail

- how falls are to be prevented, or where this is not possible, minimised;
- how falling materials are to be prevented and controlled, providing protection to both workers and members of the public;
- how risks to health will be controlled;
- how other risks identified at planning and survey stages are to be controlled, e.g. handling hot bitumen;
- what equipment will be needed;
- what competence and/or training is needed;
- who will supervise and check that the control measures are effective.

Fragile roofs

Wherever possible, work on fragile roofs will be avoided. If this is not possible, then precautions will be put into place to prevent a fall or minimise the distance or consequences. This will apply to all roof work activities.

The hierarchy for work on fragile roofs is:

- work from underneath the roof using a suitable work platform;
- where this is not possible, a MEWP will be considered so that installers can work from within the MEWP basket without standing on the fragile roof;
- if access onto the fragile roof cannot be avoided, perimeter edge protection will be installed, and staging used to spread the load. If all the work and access is on staging or platforms that are fitted with guard rails, safety nets must be installed underneath the roof or a harness system used; and
- where harnesses will be used only as a last resort and on the condition that adequate anchorage points are available.

A detailed rescue plan will be prepared on all occasions when working on roofs and will be included as part of the site-specific method statement.



3.8.6 Working in Occupied Premises

The Client/building occupier will be consulted prior to any work activity to ensure that all operatives are fully aware of their emergency arrangements, any specific procedures they will have to adhere to while on the premises, and any areas that require specific authorisation. Any hazardous work activities on the premises that may affect the work force will be highlighted during this consultation.

Access/egress routes will be agreed with the Client/building occupier prior to the works and will be maintained at all times to ensure safe passage to all work areas for people and materials, is always provided.

Good communication between workforce and the Client/building occupier is essential and will be maintained at all times, to ensure that when work activities interface with the Client/building occupier operations, hazards are identified, and risks minimised.

Client/building occupiers will be kept informed throughout the work, of all activities and where they might affect them, and what precautions will be taken.

3.8.7 Housekeeping

Good housekeeping is essential in reducing slips, trips and falls at any work location. All work activities will be carefully planned to ensure the work areas are not overcrowded with people, machinery and tools, etc. The need for good housekeeping will be included in risk assessments and may include the management of people, tools, trailing leads, waste, etc.

All work areas will be regularly tidied up during the course of the works to prevent any build-up of debris, clutter, etc.

It is the responsibility of all personnel to keep their work area tidy and orderly throughout the work period, and this is emphasised during the Company induction.

The Head of Installations will ensure that arrangements are in place for the removal of accumulated waste in bins, skips, etc., and also to ensure that provision is made for safe and defined stacking of materials and storage of equipment.

3.9 Accidents

Spirit Energy aspires to maintaining a healthy and safe working environment for all of our employees. All reasonable steps are taken to ensure staff are made aware of their responsibility for good working practices and accident prevention. However, the Company recognises that incidents may occur that could result in injury or material damage.

Accident reporting is not only a legal requirement but also a necessity to ensure a safer future working environment for all employees, customers and visitors to the organisation.

To this end, by enforcing the measures in this policy, the Company encourages positive participation in safe working practices in order to prevent accidents happening in the first place.

All accidents, no matter how small, will be recorded in the accident book, and the Operations Director and Erica Charles will be informed as soon as possible after the incident.



The office number is 0118 951 4490.

Specified injuries or fatalities must be reported to the HSE immediately and should be notified by phone on 0345 300 9923.

Situations where the injured person is unable to carry out their normal work for 7 days or more must be reported to the HSE within 15 days of the injury being sustained via the internet at www.hse.gov.uk. If unsure whether the accident is reportable or not, contact HCS Safety immediately for advice.

Erica Charles is responsible for informing the HSE of all reportable incidents and for informing HCS Safety of any serious accidents.

Accidents that are reportable under RIDDOR will be investigated by HCS Safety and a report produced. This service forms part of the member services agreement and there is no additional charge for accident investigations that are reportable under RIDDOR.

Information on accidents that have occurred is to be found in section 5d of the SMS. This information must not contain personal details of those involved.

Accidents will be discussed at regular safety meetings and publicised to other employees if appropriate so that others can learn from these events.

On the following page is an outline of what injuries and dangerous occurrences are reportable under RIDDOR.



| Reportable Injuries/Diseases | Dangerous Occurrences |
|---|--|
| <p>Deaths</p> <p>All deaths to workers and non-workers must be reported if they arise from a work-related accident, including an act of physical violence to a worker. Suicides are not reportable, as the death does not result from a work-related accident. Specified injuries to workers are:</p> <ul style="list-style-type: none"> – a fracture, other than to fingers, thumbs and toes; – amputation of an arm, hand, finger, thumb, leg, foot or toe; – permanent loss of sight or reduction of sight; – crush injuries leading to internal organ damage; – serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs); – scalpings (separation of skin from the head) which require hospital treatment; – unconsciousness caused by head injury or asphyxia; – any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours. <p>Over-seven-day injuries to workers</p> <p>This is where an employee, or self-employed person, is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident).</p> <p>Reportable occupational diseases</p> <ul style="list-style-type: none"> – carpal tunnel syndrome; – severe cramp of the hand or forearm; – occupational dermatitis; – hand-arm vibration syndrome; – occupational asthma; – tendonitis or tenosynovitis of the hand or forearm; – any occupational cancer; – any disease attributed to an occupational exposure to a biological agent. | <p>Dangerous occurrences</p> <p>Dangerous occurrences are certain, specified 'near-miss' events (incidents with the potential to cause harm.) Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces. For example:</p> <ul style="list-style-type: none"> – the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment; – plant or equipment coming into contact with overhead power lines; – explosions or fires causing work to be stopped for more than 24 hours; – the complete or partial collapse (including falling, buckling or overturning) of: <ul style="list-style-type: none"> a) a substantial part of any scaffold more than 5 metres in height; b) any supporting part of any slung or suspended scaffold which causes a working platform to fall (whether or not in use); or c) any part of any scaffold in circumstances such that there would be a significant risk of drowning to a person falling from the scaffold. – structural collapse - The collapse or partial collapse of any building involving over 5 tonnes of material, or a collapse of any false-work; – failure of a pressure vessel; – electrical incidents causing explosion or fire. Any explosion or fire caused by an electrical short circuit or overload (including those resulting from accidental damage to the electrical plant) which either: <ul style="list-style-type: none"> a) results in the stoppage of the plant involved for more than 24 hours; or b) causes a significant risk of death. – explosion or fire - Any unintentional explosion or fire in any plant or premises which results in the stoppage of that plant, or the suspension of normal work in those premises, for more than 24 hours. |



3.10 Fire

The fire risk assessment for the company premises is kept in the company office and is accessible by all staff. Erica Charles is responsible for ensuring that a sufficient number of trained staff are available within the building to manage the situation in the event of a fire. This will include the testing of evacuation procedures and logging of any comments arising from the evacuation drill.

Information regarding the identity of the fire wardens and the position of fire extinguishers and routes of escape is to be found on the safety notice board.

Employees working on external sites will be made aware of the fire plan for that location at the time of their induction. Any work carried out that increases the risk of fire should have a fire extinguisher nearby and is likely to require a hot works permit.

All personnel working on external site locations will co-operate with the Principal Contractor/Client on all matters of fire management. These will include participating in fire drills, signing in and out of site and informing the site manager/client's representative if any fire equipment or signage is required to be removed as part of preparation work.

3.11 Health Risk Management

Spirit Energy is fully aware of the responsibility for ensuring that health risks are identified and controlled to protect employees whilst working for the Company. The policy for managing these risks are as follows:

3.11.1 Asbestos

Asbestos is a fibrous mineral that can cause fatal lung diseases if inhaled. It was used extensively in buildings up to the early 1980's; it may have been used in buildings up to as late as 1999. The material cannot be easily identified by appearance only and is often concealed by other materials or coatings.

The company premises were built before 2000, and there is asbestos known to be present in the building. An asbestos survey has been carried out and a register is provided and made available to any contractor working on Company premises. Employees are made aware of the location of the asbestos and any 'no go' areas during the Company induction.

When working on refurbishment projects, or within buildings built prior to 2000, then Company personnel are instructed to request the asbestos register and carry out a risk assessment before work starts. It is important to be aware of the potential presence of asbestos and the Company ensures that all personnel who could carry out work where asbestos may be present, have received Asbestos Awareness training.

If asbestos is known to be present and has the potential to be disturbed by the work activity, then this will be referred back to the Principal Contractor or Client who will make arrangements to have a refurbishment/demolition survey and if required, the asbestos removed.

Spirit Energy will not be carrying out non-licensed work with asbestos.












3.11.2 Hazardous Substances (COSHH)

Company employees will be required to use a variety of manufactured chemicals during the course of their work activities. Material safety data sheets (MSDS) will be obtained and COSHH assessments will be provided for all of these whether manufactured or created as part of a process or activity.

These COSHH assessments will be provided to all users of hazardous substances to inform them of hazards and how to use, handle and store them safely. Where information is available in the document EH40, the Workplace Exposure Limits (WEL) will be stated on the COSHH assessment. This information will be communicated to all relevant personnel, including the control measures required to use the substance safely.

COSHH assessments and material safety data sheets will be stored in section 4b of the SMS and provided to the employees as part of a safety information pack.

Hazard warning markings on containers must also be heeded. An explanation of the common warning signs follows:

| | | | | | |
|---|--|---|--|---|--|
|  | Acute toxicity, Very toxic (fatal), Toxic etc. |  | Harmful skin irritation, serious eye irritation. |  | Harmful to the environment. |
|  | Gasses under pressure. |  | Explosive, self-reactive, organic peroxide. |  | Oxidising gases, oxidising liquids, oxidising solids. |
|  | Corrosive (causes severe skin burns and eye damage), serious eye damage. |  | Respiratory sensitizer, mutagen, carcinogen, reproductive toxicity, systemic target organ toxicity, aspiration hazard. |  | Flammable gasses, flammable liquids, flammable solids, flammable aerosols, organic peroxides, self-reactive, pyrophoric, self-heating, contact with water emits flammable gas. |

3.11.3 Noise

Excessive noise can cause permanent damage to hearing. The damage is often gradual and is always irreversible. Even a small amount of hearing loss can have a debilitating effect on a person's quality of life.

Where noise levels exceed the exposure limits, personnel must wear their hearing protection. They will be provided with the protection that is the most comfortable to them and will be shown how they are to be worn correctly to ensure their effectiveness.

Exposure Limit Values:



- lower exposure action values are, 80dB(A) or peak sound pressure of 135 dB(C);
- upper exposure action values are, 85dB(A) or peak sound pressure of 137 dB(C);
- daily/weekly exposure limit values are, 87dB(A) or peak sound pressure of 140 dB(C).

If the noise levels are excessive and for long periods of time, then noise assessments may need to be carried out. As a guide:

if conversation at 2 metres is possible but challenging, the noise level is probably 80 dB or more. Assessment will be required if noise level is like this for more than about six hours per day in total.

if employees are exposed to noise which makes it necessary to shout to talk to someone 2 metres away, the noise level is probably 85 dB or more. Assessment will be required if noise level is like this for more than about two hours per day in total.

if employees are exposed to noise which makes it necessary to shout to talk to someone 1 metres away, the noise level is probably 90 dB or more. Assessment will be required if noise level is like this for any length of time.

At 85 dB(A), employers are required to provide hearing protection and to attempt to reduce noise levels.

When selecting work equipment, the information on the noise (and vibration) output of the machine will be sought from the manufacturer or hire company. Quieter machines will be selected over inferior equipment.

Employees will be provided with noise awareness training, and this will include:

- how the ears work and how damage occurs;
- action levels and time limits;
- choosing ear defenders;
- estimating noise levels.

3.11.4 Vibration

Hand - Arm Vibration Syndrome (HAVS) is a disorder which affects the blood vessels, nerves, muscles and joints of the hand, wrist and arm. The syndrome can become severely disabling if ignored. A common form of HAVS is Vibration White Finger (VWF) which can result from the transmission of vibration from a vibrating implement (such as impact drills) to the hands, occurring as a result of medium to long term exposure. This condition is not treatable and therefore results in a permanent potentially life changing condition.

Exposure is measured on a points system (see below). If the daily exposure exceeds 100 points (the Exposure Action value), the Company will endeavour to reduce exposure, keep records of exposure and carry out health monitoring for those affected.

Tools and machinery varies enormously in vibration magnitude, depending on the quality, design and how well maintained it is. This means that the tool will need to be assessed to give the time duration that they can be used.

If using hired equipment, information on vibration magnitude will be sought from the hire company, and the table below used to determine safe exposure times for employees.



In all cases, vibration exposure will be minimised so far as is reasonably practicable.

| | | | | | | | | | | | |
|--|-----|-----|-----|------|------|------|------|------|------|------|------|
| Vibration Magnitude m/s ² | 40 | 800 | | | | | | | | | |
| | 30 | 450 | 900 | | | | | | | | |
| | 25 | 315 | 625 | 1250 | | | | | | | |
| | 20 | 200 | 400 | 800 | | | | | | | |
| | 19 | 180 | 360 | 720 | 1450 | | | | | | |
| | 18 | 160 | 325 | 650 | 1300 | | | | | | |
| | 17 | 145 | 290 | 580 | 1150 | | | | | | |
| | 16 | 130 | 255 | 510 | 1000 | | | | | | |
| | 15 | 115 | 225 | 450 | 900 | 1350 | | | | | |
| | 14 | 98 | 195 | 390 | 785 | 1200 | | | | | |
| | 13 | 85 | 170 | 340 | 675 | 1000 | 1350 | | | | |
| | 12 | 72 | 145 | 290 | 575 | 865 | 1150 | 1450 | | | |
| | 11 | 61 | 120 | 240 | 485 | 725 | 970 | 1200 | 1450 | | |
| | 10 | 50 | 100 | 200 | 400 | 600 | 800 | 1000 | 1200 | | |
| | 9 | 41 | 81 | 160 | 325 | 485 | 650 | 810 | 970 | 1300 | |
| | 8 | 32 | 64 | 130 | 255 | 385 | 510 | 640 | 770 | 1000 | 1200 |
| | 7 | 25 | 49 | 98 | 195 | 295 | 390 | 490 | 590 | 785 | 865 |
| | 6 | 18 | 36 | 72 | 145 | 215 | 290 | 360 | 430 | 575 | 720 |
| | 5.5 | 15 | 30 | 61 | 120 | 180 | 240 | 305 | 365 | 485 | 605 |
| | 5 | 13 | 25 | 50 | 100 | 150 | 200 | 250 | 300 | 400 | 500 |
| | 4.5 | 10 | 20 | 41 | 81 | 120 | 160 | 205 | 245 | 325 | 405 |
| | 4 | 8 | 16 | 32 | 64 | 96 | 130 | 160 | 190 | 255 | 320 |
| | 3.5 | 6 | 12 | 25 | 49 | 74 | 98 | 125 | 145 | 195 | 245 |
| | 3 | 5 | 9 | 18 | 36 | 54 | 72 | 90 | 110 | 145 | 180 |



| | | | | | | | | | | | |
|--|-----|---------------------|-----|----|----|----|----|----|----|-----|-----|
| | 2.5 | 3 | 6 | 13 | 25 | 38 | 50 | 63 | 75 | 100 | 125 |
| | 2 | 2 | 4 | 8 | 16 | 24 | 32 | 40 | 48 | 64 | 80 |
| | 1.5 | 1 | 2 | 5 | 9 | 14 | 18 | 23 | 27 | 36 | 45 |
| | 1 | 1 | 1 | 2 | 4 | 6 | 8 | 10 | 12 | 16 | 20 |
| | | 15m | 30m | 1h | 2h | 3h | 4h | 5h | 6h | 8h | 10h |
| | | Daily exposure time | | | | | | | | | |

3.11.5 Manual Handling

All installations involve lifting and handling to some extent. Although mechanical equipment should be used whenever practicable, some of the work will inevitably continue to be carried out manually. The risk of injury can be greatly reduced by a knowledge and application of correct lifting and handling techniques.

The Company will take steps to reduce risks by carrying out the following:

- highlighting the specification of heavy items at pre-contract stage if possible;
- the provision of mechanical means will be arranged as part of the site planning process. If at all possible, materials must be loaded out mechanically, and trolleys provided to transport materials to their place of use;
- making maximum use of mechanical handling aids, including:
 - forklifts;
 - pallet trucks;
 - sack trucks;
 - barrow hoists.
- providing training to staff in safe handling techniques.

If manual handling cannot be avoided, an assessment must be made and included with the risk assessment for the task.

3.11.6 Silica

Silica is otherwise known as quartz, the principal component of sand. It is an ingredient in many building products. The products and processes that would cause most concern for the Company's work activities, include:

- bricks – when drilling/chasing out;
- blocks – when drilling/chasing out;
- mortars – when chasing out;
- ceramic tiles – when drilling.



When these products are cut, a mixture of inhalable (larger) and respirable (smaller) particles is released. Respirable crystalline silica dust is responsible for causing or increasing the risk of a number of serious lung diseases including:

- silicosis;
- COPD (chronic obstructive pulmonary disease);
- tuberculosis;
- lung cancer.

The Workplace Exposure Limit for Silica dust is 0.1 mg per m³ over an 8-hour period. In order to reduce exposure below this limit, the Company will ensure the following precautions are taken:

- avoid producing the dust – at design stage, consider the use of alternative or pre-cut materials;
- reduce the dust at source – by wetting down the cutting operation or by using suitable on-tool extraction equipment;
- issue the correct RPE – (Filtering Face-piece Particulate) FFP3 masks will filter out 95% of the particulate;
- make sure it is worn – by providing training and supervision;
- make sure it works properly – by fit testing individuals.

3.12 Welfare

As an employer, Spirit Energy is required to ensure that welfare facilities exist for the use of their employees. It is the employer's duty under both Section 2(2) e of the Health and Safety at Work Act and under Construction (Design & Management) Regulations 2015/The Workplace (Health, Safety & Welfare) Regulations 1992 to ensure that work is not carried out in the absence of these facilities.

The Regulations require the following facilities to be in place and maintained in a reasonable state:

- sanitary conveniences;
- chairs with backs;
- washing facilities;
- drinking water;
- facilities for rest and preparing food;
- changing rooms with lockers.

Our workers are expected to play their part in keeping the welfare facilities tidy and will report any defects with the facilities (such as malfunctioning water heaters or blocked toilets) to the site manager and Justin Parsons as soon as possible.

For transient sites, arrangements will be made to use either the Clients facilities, or to make use of local public facilities or the facilities of local businesses. Agreement will be sought from the Client or provider of the facilities, prior to the start of the work. Notwithstanding, handwipes and sanitisers will be provided to all vans as a minimum, but this will be determined as a result of risk assessment. For personnel who work with particularly hazardous substances, then hand cleansers, soaps, water and paper towels will be provided.



3.13 First Aid

The name of the first aiders within the office is displayed on the safety notice board. The first aiders will regularly check and replenish the first aid boxes when required. They will also be responsible for ensuring that accidents are recorded in the accident book and reported to Erica Charles. First Aid information can be found on display on the safety notice board.

A qualified first aider is required to be present on all sites. This would usually be an employee of the premises. If no employees of the Company are present on site who has received first aid training, then the Operations Director must ensure that a qualified first aider is present on the site. The location of any first aid equipment should be brought to the attention of all site workers by the site manager at the time of their site induction.

Where the Company provides a first aider it will be that individual's responsibility to ensure that first aid boxes are checked regularly and replenished as necessary.

3.14 Personal Protective Equipment (PPE)

Following risk assessment there will be times where not all risks can be avoided. These are dealt with by the provision of personal protective equipment (PPE). The Company will ensure that suitable PPE is provided to their employees who may be exposed to a risk to their health and safety while at work.

PPE must be:

- of a standard that will adequately protect the person from the risks;
- replaced when worn out;
- properly looked after by the person using it;
- compatible with other PPE, if more than one item is required;
- regarded as the last resort in risk control.

Different standards of basic site PPE are required by different Principal Contractors. The Company will comply with these requirements.

3.15 Drugs & Alcohol

The Company regards the promotion of health and safety matters as a mutual objective of both management and employees. The effective management of drug and alcohol abuse is an important part of this.

It is the policy of Spirit Energy:

- to comply with all current legislation, in particular the Health & Safety at Work etc. Act 1974, the Misuse of Drugs Act 1971, and the Transport and Works Act 1992;
- to not knowingly permit any employee of the Company, contractors and self-employed working on the Company's behalf, to report for work or attend work premises under the influence of alcohol or drugs, nor to consume these whilst on duty or on the premises;
- to implement control measures to prevent, as far as reasonably practicable, such people reporting for work or attending work premises when affected by drugs or excess alcohol or consuming drugs or alcohol at work.



These measures may include pre-employment, post incident and unannounced random drugs and alcohol screening:

- to provide a positive approach to those persons seeking help or guidance in overcoming alcohol and/or drug related problems, but only where these problems are raised at any time prior to being selected for random testing;
- not to knowingly employ or retain any person, directly or indirectly, who has been justifiably dismissed by any employer for drug and/or alcohol related offences within the previous 12 months;
- to take suitable action, usually dismissal or termination of contract, against anyone testing positive to alcohol or drugs in breach of this policy.

Any person found to have tested positive after any drug or alcohol test will be immediately suspended from the work in which they are engaged, pending a full investigation.

Any person, testing positive for drugs or excess alcohol, or refusing to take a test, face sanctions up to and including termination of contract.

3.16 Lone Working

Spirit Energy will ensure, so far as is reasonably practicable, that employees who are required to work at home or alone or unsupervised for significant periods of time, are protected from risks to their health and safety. Measures will also be adopted to protect anyone else affected by solitary working.

Working alone can be a significant risk factor. The Company will either entirely remove the risks from these hazards or, where complete elimination is not possible, to reduce them to an acceptable level.

Risk assessments for working alone will be carried out in accordance with the Management of Health and Safety at Work Regulations 1999. This will include the identification of hazards from, for example, means of access and/or egress, plant, machinery, goods, substances, environment and atmosphere, etc.

Particular consideration will be given to

- the remoteness or isolation of workplaces;
- any problems of communication;
- the possibility of interference, such as violence or criminal activity from other persons;
- the nature of injury or damage to health and anticipated "worst case" scenario.

All personnel will be given all necessary information, instruction, training and supervision to enable them to recognise the hazards and appreciate the risks involved with working alone. All personnel will be required to follow the safe working procedures devised which will include the provision of first aid, communication procedures and awareness of emergency procedures. All personnel are required to co-operate with these efforts to ensure safe working and to report any concerns to management.

3.17 Office Safety

The Company is fully aware that accidents can happen in the office, as well as at external locations or sites, and will endeavour to reduce the risk of such an accident by the following means:



- waste paper bins and packing materials will be removed daily;
- cables will be managed to defined routes, so that they do not present a trip hazard or an over-load to a circuit;
- training will be provided to employees in the correct use of fire extinguishers, where required;
- the Company will check lighting levels to ensure they are suitable for the tasks being undertaken. The lighting will be regularly cleaned to ensure efficiency;
- shelving and storage areas will be provided to reduce the possibility for stretching and/or awkward lifting;
- cleaning chemicals will be kept away from foodstuffs in the kitchen area.

3.17.1 Display Screen Equipment

The Company complies with the provision of the Display Screen Equipment Regulations 1992 by ensuring the following:

- workstations will be analysed and assessed to reduce risks to health. Records of DSE assessments can be found in section 4e of the SMS;
- workstations will comply with the requirements of schedule 1 of the regulations in relation to the equipment used. This will include the desk, chair, screen and other relevant items;
- the daily work routine of users allows for breaks away from the screen and/or changes in activity;
- eye and eyesight tests carried out by a competent person are provided on a regular basis, for employees who use display screen equipment;
- if deemed appropriate by the person carrying out the tests, corrective visual appliances will be provided by the company, if this is required under the regulations;
- training in the use of display screen equipment will be provided to users.

3.17.2 New and Expectant Mothers

Spirit Energy will assess specific risks for new and expectant mothers in the work place, to comply with Regulations 16, 17 and 18 of the Management of Health and Safety Regulations 1999. These risks can be from any process, working conditions, or physical, biological or chemical agents.

Consideration will be given to:

- lifting/carrying of heavy loads;
- standing or sitting for long lengths of time;
- exposure to infectious diseases;
- work-related stress;
- workstations and posture;
- threat of violence in the workplace;
- long working hours;
- excessively noisy workplaces.

The Company will regularly monitor and review any assessment made to take into account possible risks that may occur at different stages of pregnancy.



The Company will also take into account, during the specific risk assessment, any medical advice from the new and expectant mothers GP or midwife about their health and make reasonable adjustments to their working conditions accordingly.



4. Safety Policy Communication

It is the duty of every employer to prepare and update as necessary a policy for health, safety and welfare. It is also a duty for employers to communicate this policy to their employees.

For the purposes of ensuring safety, both employees and sub-contractors will be expected to read, understand and adhere to this policy.

It is important that you read through the policy carefully, as it will contain important information on company safety procedures and safe systems of work. It also contains responsibilities that you must undertake and comply with.

If you have any questions about the safety policy, please ask Vishal Giga. If you have any suggestions as to how safety could be improved for this company, please pass these on also.

After you have read through this safety policy, please detach this sheet, sign and date it and pass it back to Vishal Giga.

Spirit Energy Health & Safety Policy

| | |
|--------------------|--|
| Name: | |
| Date: | |
| Occupation: | |
| Signature: | |