

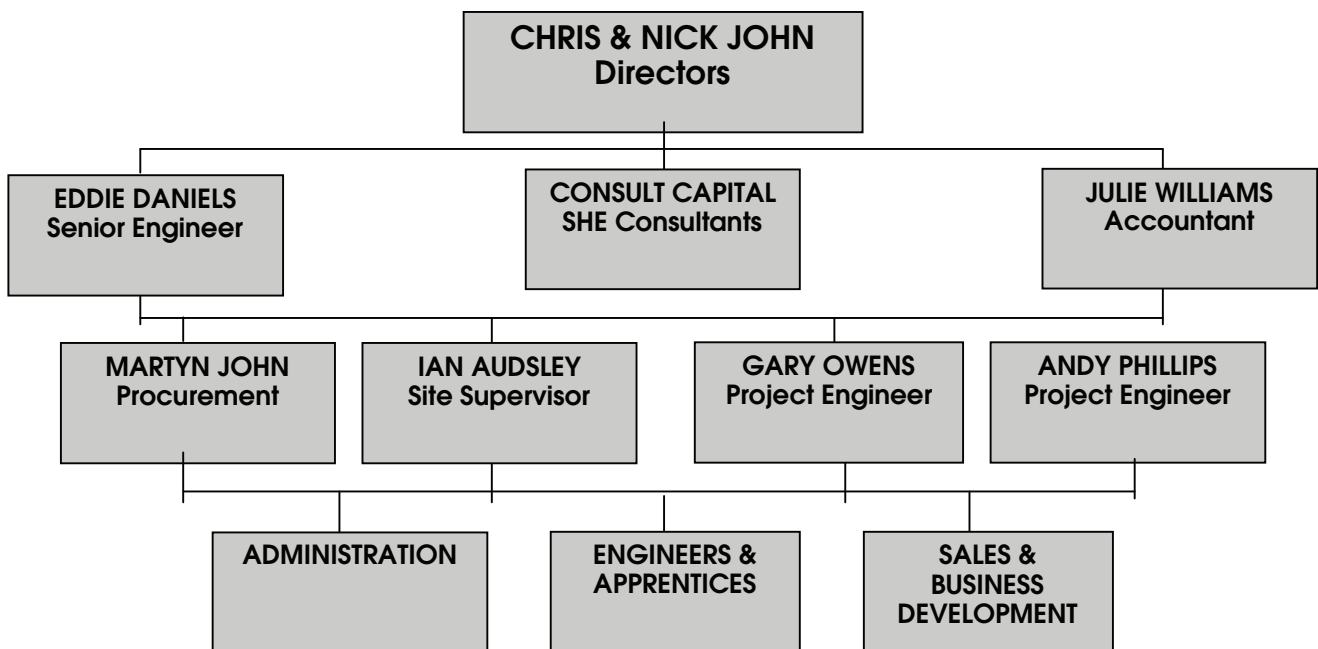
# Riverside Industrial Equipment Ltd.

## Safety, Health & Environmental (SHE) Policy

### Organisation

The ultimate responsibility for SHE lies with the Directors of the company.

The organisation chart identifies the key positions of the people who are accountable to senior management (and hence the Directors) for ensuring that the detailed arrangements for safe working are drawn up, implemented and maintained.



### Directors

The role of the directors is to provide leadership on, and complement, (through supervision), SHE matters and policies.

Specific duties are:

- ❑ To ensure that the SHE policy, organisation and arrangements are reviewed, kept up-to-date, understood by supervisors, and effectively implemented.
- ❑ To set performance standards for SHE.
- ❑ To monitor performance (e.g. by reviewing reports and statistics) and initiate corrective action where necessary.
- ❑ To monitor the work of others and stimulate their interest, involvement and commitment to SHE.
- ❑ To work with all disciplines in reviewing, inspecting and improving work systems with the objective of improving SHE performance.
- ❑ To set up and/or take part in investigations of hazards and incidents where necessary.

### **Supervision (Site Engineers, Site Supervisors)**

It is the job of the Site Engineers and the Site Supervisors to support the Directors in their endeavour to ensure safe-working conditions at all time.

Specific duties are:

- ❑ To instruct each employee as necessary in the avoidance of hazards and in the safe performance of work.
- ❑ To ensure that particular SHE regulations are observed (e.g. the guarding of machinery, wearing of safety equipment and protective clothing, handling of dangerous materials etc.)
- ❑ To ensure those employees under their supervision understand the SHE policy and organisation and comply with the arrangements.
- ❑ To investigate all incidents leading to injury, damage or loss, and report as required to management.
- ❑ In the event of an incident to take any immediate action necessary to deal with the situation.
- ❑ To recommend improvements or changes required to eliminate hazards and remove the causes of accidents, damage and loss.
- ❑ To have continued interest and awareness in SHE by discussions with individuals and with groups of employees.
- ❑ To ensure that employees under their control are available for SHE training when required.
- ❑ To instruct fellow workers as necessary in the avoidance of hazards and in the safe performance of work.
- ❑ To maintain the highest standards of housekeeping within their area of responsibility.

### **All Employees**

Specific duties are:

- ❑ To carry out their work safely in the interest of themselves and other employees.
- ❑ To understand and follow SHE procedures, standards and systems of work.
- ❑ To report unsafe conditions to their supervisor so that corrective action can be taken.
- ❑ To impart knowledge and experience on SHE working practices to other employees.

## General Rules and Information

### Introduction

This section of the policy contains rules covering a wide variety of aspects. They are designed to help maintain and improve our safety performance and must be followed at all times.

**NOTE:** Violation of any SHE rule is considered a serious offence and will be treated accordingly

#### 1. **SHE Progress Meetings**

SHE progress meetings with the Site Engineers, Site Supervisors and SHE consultant will be held quarterly. The purpose of these meetings is to discuss ongoing SHE issues and raise the general awareness of all personnel to SHE and SHE related matters.

The meetings will be chaired by Chris John with minutes of the meetings made available to all staff for information purposes.

#### 2. **Emergencies**

It is the Company's policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimise the risk of fire. This involves compliance with the Company's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Site Supervisors are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

##### **ACTION TO BE TAKEN UPON DISCOVERING A FIRE**

- Do not try to tackle the fire yourself (unless trained to do so)
- Activate the nearest fire alarm to raise the alarm
- Leave the building by the nearest fire exit and proceed to the muster point
- Do not re-enter the building for any purpose until the all clear has been given

##### **ACTION UPON HEARING THE FIRE ALARM**

- Stop working and calmly leave the building by the nearest fire exit
- Go directly to the muster point and await instructions
- Do not leave the muster point until the all clear is given
- Do not re-enter the building for any purpose until the all clear is given

#### 3. **Staff Welfare**

Wherever possible arrangements will be made with the Client and/or Principal Contractor for the use of welfare facilities at sites under their management. As a minimum the following requirements will be adhered to:

- Toilet/washing facilities accessible on site
- Eating/rest facilities accessible on site

Where these facilities are not provided by the Client or Principal contractor, the Company will provide suitable welfare facilities.

4. **First Aid**

Adequate first aid provision will be made at every place of work occupied by the Company.

Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work.

On Project Sites – wherever possible arrangements are made with clients/principal contractors to use their first aid facilities. Where this is not possible, a member of the project team will be nominated as the appointed person for first aid and a first aid box supplied, which will contain adequate supplies for the total number of employees on site.

In the Head Office - the first aid box is located at reception with details of first aiders posted on notice boards.

5. **Reporting of Accidents and Incidents**

All accidents or injuries, however minor MUST be reported to Management at the earliest opportunity.

An entry will be made on the company accident form for each accident caused in or as a result of work carried out by the company and an appropriate investigation will take place.

Any accident that results in personal injury and takes place while working on the Tata site should be reported to the Central Surgery where, after treatment, an injury report form (IR1) will be generated. This form should be given to the relevant site supervisor who should complete and return the form within 7 days.

The requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) will be adhered to at all times with serious accidents and near misses reported to the enforcing authorities within the allotted timescales.

A hazard/near miss report should be completed for all incidents that have potential to cause harm. Appropriate action should be taken by Management as a result of these reports with a copy of this form should be presented to the relevant safety manager/engineer for checking, investigating and instigating any necessary actions.

All accidents/incidents and near misses are reviewed at Safety Meetings.

All accidents that result in lost time or have a potential for civil or criminal action should be reported to the Associate Safety Advisor (Mark Littlejohns) so that a full and detailed investigation can be made.

6. **Fire Fighting Equipment**

Personnel must be familiar with the use of portable fire extinguishers and know the types of fire and extinguishers to be used. Each employee of the company will be trained in the use of fire extinguishers on an annual basis.

7. **Personal Protective Equipment (PPE)**

Protective clothing and equipment is provided when required. In addition to normal issue further protection will be required in some areas e.g. hot metal areas when working in some areas of Corus. The supervisor of the work party will specify this when required.

All employees must sign to state that they have received PPE and wear it as specified by the job method statement and/or safe working procedure.

All equipment should be periodically checked to ensure that it is in good working order with any defect reported to supervision at the earliest opportunity so that a replacement can be arranged.

**Safety helmets** - It is mandatory that safety helmets be worn in all hard-hat designated areas.

**Eye Protection** - Each employee will be issued with eye protection and must wear it whenever there is a risk to their eyes from work activities.

**Hand Protection** - Gloves should be worn to prevent hand injuries.

**Safety Footwear** - The wearing of safety boots is mandatory for all works in production or workshop areas.

**Respiratory Protection** - Whenever there is a potential for exposure to a harmful atmosphere, dust masks will be provided which must be worn.

**Hearing Protection** - Some areas you will be required to work will display mandatory hearing protection signs. Where these are observed the wearing of suitable and sufficient ear defenders is required.

### **Any defects or malfunctions of PPE must be reported to your Supervisor**

A stock of PPE will be held at all work locations.

#### **8. Hazardous Substances (COSHH)**

The requirements of the COSHH regulations will be adhered to at all times, with an assessment carried out for every chemical used by the company and the necessary precautions taken as a result of this assessment. The Director will be responsible for keeping a record of all completed assessments along with a copy of the material safety Data Sheet (MSDS) for that product.

Asbestos is a substance that is particularly hazardous to health. The company will undertake an asbestos survey of the areas where work is undertaken and identify all potential sources of asbestos. No work should be carried out that might disturb this material.

The company will identify persons who are at risk from biological hazards and will ensure that appropriate vaccinations and health surveillance is undertaken.

#### **9. Housekeeping and the Environment**

A clean and tidy work area is a safer working area. General rules that should be followed by all:

- Put out waste material for disposal, regularly, in the correct receptacle.
- Ensure containers of chemicals for disposal are labelled with the names(s) of the chemical(s), are sound and suitable for the purpose and placed in the recognised pick-up area.
- Clean up spillages immediately.
- Keep walkways/stairways clear of trip hazards and obstructions, such as containers, tools, hoses etc.
- When working in someone else's area, make sure that when the job's finished, the area is left clean and tidy.
- It is the responsibility of every employee to help keep clean the mess room, changing room and toilet facilities.

The company will register with the Environmental Agency for the disposal of hazardous waste (CFC's) and will provide registration details to approved, licensed contractors whenever such waste is disposed of. Waste transfer notes should be retained for ALL waste that is disposed of by the company.

#### **10. Safe Work Procedures**

Where these exist, they must be followed without exception.

#### **11. Electrical Isolation**

When working on electrical and/or electrically driven equipment, there are set procedures to ensure the safety of personnel by the correct isolation of plant before the work commences. These procedures must be adhered to.

#### **12. Machinery, Tools and Work Equipment**

General rules:

- ❑ Machinery must have all guards in place before being operated
- ❑ Moving machinery and process equipment in service must be shut down before adjustments or repairs are made. If this cannot be done the Supervisor must:
  - Determine for each item of such equipment what jobs can safely be performed and list them. Only those jobs listed will be carried out.
  - Detail any safety precautions that are to be taken.
- ❑ Only approved tools and hand tools may be used.
- ❑ Tools, materials or equipment must not be intentionally dropped or thrown from any elevated area unless adequate precautions have been taken to ensure that no injury to persons or damage to equipment will occur.
- ❑ Employees must familiarise themselves with the safe working load or operation of any equipment they might be called upon to use in their particular job.
- ❑ Lifting equipment/tackle needs to be inspected at designated regular intervals. Only equipment that has been checked and passed suitable for use can be used for lifting operations.

All work equipment (including electrical equipment) used at work, as part of the Company's undertaking will comply with the Provision and Use of Work Equipment Regulations (PUWER).

Before new equipment is introduced into the working environment, an assessment will be made by the site manager in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturer's guidance and industry best practice. Any maintenance/inspections undertaken on company equipment will be formally recorded with a hard copy left on file.

If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your Supervisor.

13. **Working at Height**

Care should always be taken when working at height. The law requires specific precautions to be taken whenever there is potential for a person to fall a distance that is liable to cause injury.

**Scaffolding** - can only be erected and modified by approved scaffold contractors. Employees must not interfere with, or alter any scaffold that has been erected on their behalf. The approved scaffold contractor must carry out all alterations.

**Tower Scaffolding** - Tower scaffolding can be erected by individuals who have attended a PASMA course or an equivalent.

Ladders - should be in sound condition and secured in a position to prevent them from slipping or falling. No work should be undertaken from ladders with the exception of 'one-handed' activities.

**Mobile Elevated Work Platforms (MEWPs)** - IF MEWPs are required they will be hired from a suitable plant hire company. All persons who use MEWPs should be trained (IPAF course) and authorised to do so and follow the site procedure for use of MEWPs that can be located in the site safety procedures manual.

14. **Welding Operations**

Welding generators must be situated outside buildings: if this is not possible the exhaust fumes must be vented to the outside atmosphere. Welding leads and connections must be in good condition and the welding return lead must be within 1.5m of the welding location. Welding screens must always be erected to prevent passers by from arc eye, and eye protection should always be worn when clipping slag from the weld.

15. **Burning Operations**

Burning gear should be inspected daily to ensure that oxygen or fuel gas leaks do not occur. Flash back arrestors should always be fitted to burning gear and the cylinders must not be allowed to be free standing so should be placed in suitable trolleys or tied to prevent from falling.

All persons using burning gear MUST wear eye protection.

16. **Manual Handling**

The requirements of the Manual Handling Operations Regulations will be adhered to at all times.

Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by:

- Reducing weights
- Reducing the frequency of manual handling
- The use of additional manpower
- Through the provision of suitable equipment to assist in the operation
- The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

The site engineers will be responsible for keeping a record of all completed assessments at the work location.

REMEMBER – AVOID UNNECESSARY LIFTING AND CARRYING. IF IN DOUBT WITH ANY LOAD, GET HELP!

17. **Company Vehicles**

All company vehicles will be maintained to MOT standards. It is the responsibility of the drivers of these vehicles to inspect them for obvious defects prior to use and report concerns to Supervision.

National speed limits should be observed at all times when travelling in the companies vehicles.

The use of mobile phones when driving is prohibited.

18. **General Safety Rules**

All employees must:

- Eliminate unsafe practices.
- Clear up their work area and keep it tidy.
- Build safety into every step of the job.
- Wear personal clothing that is safe and proper for the job.
- Keep to designated areas.
- Keep to recognised route ways for access and egress to /from the place of work.

NOTE: The primary responsibility for personal safety lies with the individual, and the effectiveness of the accident prevention programme depends on the wholehearted co-operation of every employee. All individual actions must constantly reflect safety awareness and personnel should always work with the safety of themselves and their fellow employees in mind.

19. **Co-operation and Co-ordination**

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Clients site procedures and specific instructions will be followed at all times.

Before commencing work, the site supervisor will attend any site meetings or inform other trades working in the direct vicinity of the activities of the company of the specific risks and requirements of the work being undertaken.

20. **Risk Assessments**

All activities that are undertaken by the company should be risk assessed. The company will train selective individuals to complete this work and the contents of the risk assessments will be communicated to all affected parties.

For certain activities that are seen to present a significant risk a separate job method statement (JMS) will be developed. Where these or any other procedures exist, they must be followed without exception.

All risk assessments and safe working procedures should be stored in a location where they are accessible to all affected staff. They will be reviewed at least annually. Risk assessments and JMSs will take into account the particular needs of young persons, disabled persons and pregnant workers.

Separate Risk Assessment Procedure can be found in the company Safe Working Procedures Manual.

The persons responsible for the development, issue and control of risk assessments and JMSs are the Site Supervisors/Managers.

21. **Policy Review**

This policy will be kept up to date, particularly as the business changes in nature and size. To ensure this, the policy and the way in which it has implemented will be reviewed every year. In addition, reviews of risk and COSHH assessments and site safety inspections etc. will take place from time to time.

22. **Communication/Consultation**

In order to meet the legal requirements of the Safety Representatives and Safety committees Regulations and the Health and Safety (Consultation with Employees) Regulations, the Company will communicate and consult with all employees on the following issues:

- The content of this policy
- Any rules specific to a site or job
- Changes in legislation or working best practice
- The planning of Health and Safety training
- The introduction or alteration of new work equipment or technology

This communication and consultation will take place directly with the employees via regular safety meeting, tool-box talks, e-mails and memos posted on the staff notice board.

23. **Training**

All employees are given training appropriate to their responsibilities in accordance with the Management of Health and Safety at Work Regulations. Training will be provided for the following situations:

- Induction training for new employees (Health and Safety awareness, company procedures etc.)
- The introduction or modification of new/existing machinery or technology
- A change in employee position/work activity or responsibility

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the company will be formally recorded with a hard copy kept on file.

A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

24. **Monitoring**

The requirements of the Safety, Health and Environmental policy shall be reviewed at least annually and re-issued whenever there are significant changes.

The contents of the policy and the associated work activities shall be formally monitored by various individuals at set intervals in line with the company audit/inspection policy.

In all cases an audit/inspection report should be produced and filed, the significant findings of which should be brought to the quarterly SHE meeting.

It is the responsibility of the Joint Directors to ensure that these monitoring activities are undertaken.