

HEALTH AND SAFETY POLICY

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Approved on behalf of Marisco South Ltd and Marisco Electricals Ltd by:



Samuel R Clover



Samuel Woodhams

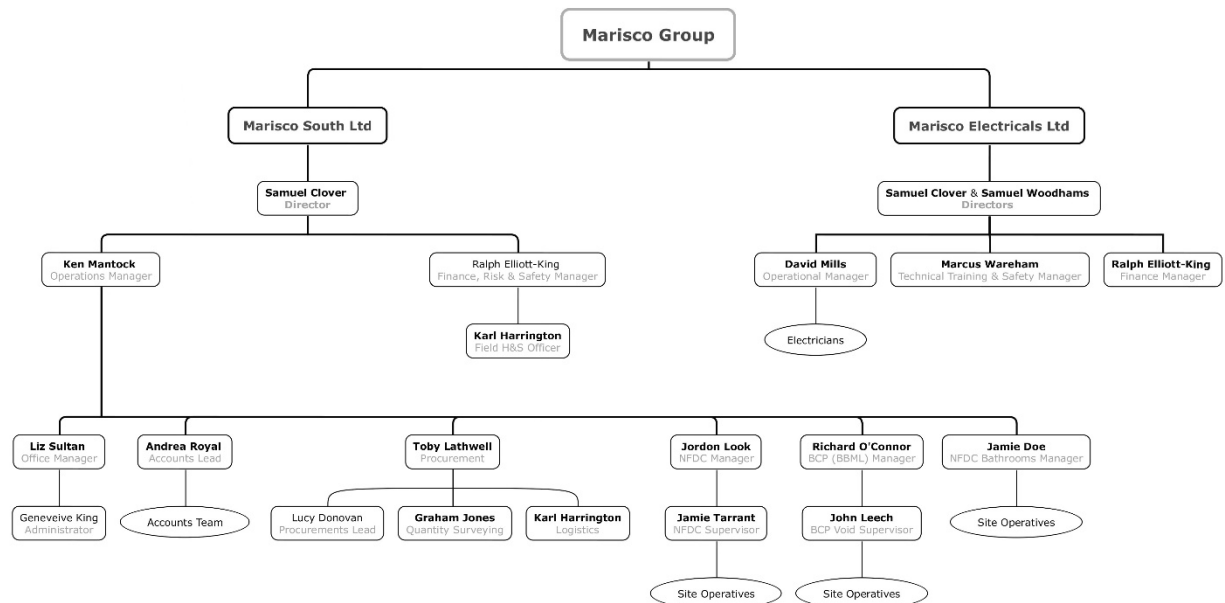
This is a consolidated Joint Company Health and Safety Policy for Marisco South Ltd and Marisco Electricals Ltd (Marisco). Its purpose is to record the measures the directors and senior managers have put in place to ensure the continuing safety of all people present in our workplace, including employees, subcontractors and visitors.

Summary of what this H&S Policy consist of:

1. General Statement of Intent.
2. Organisational Responsibilities.
3. Health and Safety Arrangements:
 - ❑ Risk assessments (RAMS)
 - ❑ Health and Safety training
 - ❑ Monitoring
 - ❑ Contractor selection
 - ❑ Communication & Consultation
 - ❑ Safe systems of work (SSOW)
 - ❑ Fire and emergency procedures
 - ❑ Disciplinary procedures
 - ❑ Accident reporting and investigation
 - ❑ Personal protective equipment (PPE)
 - ❑ First Aid
 - ❑ Visitor safety
 - ❑ Welfare facilities
 - ❑ Environmental considerations
4. Specific considerations relating to Marisco's workplace:
 - ❑ Covid-19 safety
 - ❑ Asbestos in the workplace
 - ❑ Silica and workplace dust
 - ❑ Contaminated waste disposal
 - ❑ Safe use of ladders and hop-ups
 - ❑ Safe use of platforms (scaffolding)
 - ❑ Groundworks safety
 - ❑ Electrical portable tools
 - ❑ Noise and vibration
 - ❑ COSHH
 - ❑ Manual handling
 - ❑ Slips, trips, and falls
 - ❑ Storage and transport of materials
 - ❑ Site fire and other emergency risks
 - ❑ Personal and site welfare
 - ❑ Environmental consideration

1. GENERAL STATEMENTS OF INTENT

2. ORGANISATION CHART



The company directors of Marisco South Ltd and Marisco Electricals Ltd acknowledge their personal responsibilities to ensure sufficient resources and funds are made available to protect the continuing health and safety of all individuals affected by the work carried out in the workplace.

Marisco employs Ralph Elliott-King to fulfil the H&S advisor. He is a registered technical member of IOSH and a member of the FPA, who holds a NEBOSH National Certificate in Construction Health and Safety (November 2016) and NEBOSH and FPA Fire Risk Management (December 2018).

The Company's main activity is providing property construction and refurbishment services under contract to councils and housing associations. Accordingly, many of our employees spend their time working unsupervised in team of two or three people, on short assignments, in remote locations.

The directors believe the best way to achieve a high standard of health and safety compliance is through a constant, on-going education program to remind all workers of what they should be doing in the workplace, and then relying upon the field-based management team to ensure that best practice is observed.

The director recognises that field managers and supervisors play a pivotal role in ensuring health and safety compliance is achieved in the workplace. Measures and controls have been put in place to ensure all field managers and supervisors: possess the necessary experience and are adequately trained to fulfil their role in this respect; given the managerial authority to discipline and suspend employees and subcontractors who breach company health and safety policies; and finally, their activities are regularly reviewed by higher management to ensure they are fulfilling their role as intended.

3.1 HEALTH AND SAFETY ARRANGEMENTS – RISK ASSESSMENT

The *Management of Health and Safety at Work Regulations 1999* require Marisco to prepare and regularly review documented risk assessments that are suitable and sufficient to identify all the hazards that might exist in the workplace, and then decide what should be done to reduce the risk that someone may be harmed by them.

Encapsulated in the first sentence above, are some key words behind which lay some very important legal obligations Marisco must comply with:

- **“Prepare and regularly review”** – A competent person must consider the different workplaces it operates in and prepare a risk assessment to identify the hazards and evaluate the risks involved for each different place. A competent person will have adequate skill, knowledge, ability, training and experience (SKATE) to prepare a risk assessment.
- **“Documented risk assessments”** – The size of organization requires that all risk assessments are documented, and such records are retained to allow us to review and improve the way we approach promoting health and safety in the work place.
- To be **“suitable and sufficient”**, a risk assessment should:
 - Identify the significant risks and ignore the trivial detail that will not result in harm (a reason for not using generic forms);
 - Identify and prioritise the highest risks and introduce control measures to resolve those first;
 - Identify all those who may be affected by the hazards present;
 - Ensure the risk assessment remains valid with the passage of time and is revised as necessary when conditions change.
- A **“hazard”** is something with the potential to cause harm. It can be:
 - Physical – noise, vibration, electricity
 - Chemical – asbestos, toxins, carcinogens
 - Biological – hepatitis, HIV, leptospirosis

- Psychological – stress, verbal abuse, prejudice
- “Risk” is the likelihood of harm resulting from a hazard. Marisco will use the accepted model that risk is a function of the *probability* a hazard may cause an incident, and the resulting *severity* of the harm that may result.

Our programme of enhanced training for our site managers and supervisors allowed us to progress from a paper-based risk assessment system to our in-house developed PRAM system (Programmed Risk Assessment Module). It is an interactive online system that ensures all the common hazards we encounter in our work are considered and relevant controls put in place to create a safe working environment.

Marisco will observe the HSE’s [five steps](#) approach to controlling risk in the workplace (IDERR):

1. Identify the hazards;
2. Decide who might be harmed and how;
3. Evaluate the risks and decide on precautions;
4. Record the significant findings; and
5. Review the assessment and update if necessary.

3.2 HEALTH AND SAFETY ARRANGEMENTS – HEALTH & SAFETY TRAINING

We recognise the importance of ensuring our operatives, both employed and sub-contractors, receive appropriate training to equip them with the skills and knowledge they need to carry out their work safely.

We review the training needs of the company’s operatives in January and plan to commission the appropriate training required to maintain standards over the course of the ensuing year.

We employ people with many years of experience of working in the trade under strict health and safety policies. Most of our training needs consist of organising updates and refresher courses to remind our workers of recommended safe working practices on the following key health and safety subjects:

- | | |
|---------------------------------------|---------------------------------------|
| ▣ Asbestos in the workplace | ▣ COSHH |
| ▣ Silica and workplace dust | ▣ Manual handling |
| ▣ Contaminated waste disposal | ▣ Slips, trips, and falls |
| ▣ Safe use of ladders and hop-ups | ▣ Storage and transport of materials |
| ▣ Safe use of platforms (scaffolding) | ▣ Site fire and other emergency risks |
| ▣ Groundworks safety | ▣ Personal and site welfare |
| ▣ Electrical portable tools | ▣ Environmental consideration |
| ▣ Noise and vibration | |

The directors, field managers and trades personnel are required to undertake an ongoing cycle of internal and external training on the above subjects, which is amended to reflect current thinking on best practices and key safety issues as they arise.

3.3 HEALTH AND SAFETY ARRANGEMENTS – MONITORING

The directors understand they have an obligation to review and revise the resources they make available to ensure the continuing safety of those affected by the work the company undertakes.

Whilst the size of our operation restricts what can be reasonably and practicably achieved in respect of recording, analysing and responding to events in the workplace to improve health and safety, our level of organisation does allow us a modest ability to monitor our effective compliance on such matters.

During the year the directors and senior management will continue to review the progress made against targets set for the health and safety program they put in place last year. Areas to be considered will include:

- A review of the health and safety training programme;
- A review of the accident and reported near misses in the period. We have now experienced two potentially fatal accidents both of which were caused by human errors that cannot be eliminated, it was the immediate first aid that saved both casualties highlighting the need to keep high levels of qualified first aiders in the company;
- A review of the staff consultation meeting minutes; and
- A review of the site H&S audit reports.

The purpose of senior management monitoring the level of health and safety compliance, is to ensure every reasonable and practicable step is taken to effectively communicate the safe working principals everyone is expected to adhere to, in order to create and preserve a safe working environment.

3.4 HEALTH AND SAFETY ARRANGEMENTS – CONTRACTOR SELECTION

It is important the Company has an effective and documented vetting system to examine every contractor has a credible knowledge of health and safety best practice to match our own and will exercise it when working on our assignments.

This requirement will be fulfilled by asking each worker to complete a written induction questionnaire under the guidance of an approved Marisco manager to ensure they have the required level of understanding of general health and safety best practise and an appreciation of any specific site rules before they begin working on site.

Maintaining appropriate insurance coverage is an essential part of health and safety. Our insurance underwriters specifically require Marisco to only engage bona-fide contractors who have provided written proof:

- They carry a minimum £5m Public and Product Liability cover, or £10m for clients that require this level of insurance;
- They carry a minimum of £10m employer's liability insurance if they directly employ workers or if engage labour-only, self-employed workers;
- They carry a minimum of £1m professional indemnity insurance where their work involves a design element as part of the service they are to deliver; and
- Their policy has an 'Indemnity to Principals' clause.

For our purposes, the definition of a labour-only subcontractor is an individual who has been verified under the HMRC CIS, who satisfies the employment status of being self-employed, and who also carries a minimum of £5M public liability insurance cover, or £10m if they are to work on projects for clients that require the higher coverage.

The definition of a bona-fide contractor is any other kind of entity that will provide workers on our sites other than a labour-only subcontractor.

To avoid compromising the tax employment status of a labour-only worker, such individuals can only be engaged for specific jobs on an intermittent basis.

3.5 HEALTH AND SAFETY ARRANGEMENTS – COMMUNICATION & CONSULTATION

An essential part of any successful health and safety management system is effective two-way communication across all levels of staffing.

Clear instructions on what workers are expected to do with respect to health and safety must flow down from the top of the management chain and out to every worker in the field.

Likewise, every worker should have the opportunity to feedback to management what isn't working at grass-root levels and be able to voice their ideas on how health and safety could be improved with their valuable insight into how these issue impact on their day-to-day experience.

The Company places a great deal of reliance on the field managers to constantly enforcing health and safety best practice by explaining what workers should be doing in the work place as they complete their daily rounds of all sites.

All workers are expected to undertake a series of online interactive training modules on the key health and safety matters that have relevance to our working environment. The company also prints health and safety notices on the back of various documents distributed to workers, such as monthly timesheets and pay slips, to remind people of health and safety matters.

The Company holds a series of monthly staff health and safety consultation meetings where any employee can either attend and ask a question or send in a written request for

consideration at the meeting by the management. The minutes of each meeting are available on the Marisco One Drive.

3.6 HEALTH AND SAFETY ARRANGEMENTS – SAFE SYSTEMS OF WORKS

The Company relies upon the *PRAM* (Planning, Risk Assessment Management) system software to create a bespoke *Site Safety File* (SSF) reflecting the specific work and significant risks to be found on each construction site. The SSF is a collection of site safety and works planning documentation that will be kept on site for the duration of the project and returned to Head Office upon completion. All workers (employees and contractors) must read and sign before commencing work.

We are building a portfolio of more specific safe systems of work for some of the higher-risk work we are starting to undertake and ensuring our workers adhere to them when appropriate.

The Company operates a mandatory work permit system for all:

- Hot works.
- All NNNL asbestos removal or disturbance of known deposits.
- All maintenance tasks carried out on designated fire doors.
- All fire-stopping work.
- Removal of fireplaces.

3.7 HEALTH AND SAFETY ARRANGEMENTS – DISCIPLINARY PROCEDURES

Far too many accidents in the workplace are caused by workers ignoring the health and safety policies put in place by management. Any health and safety system will fail if the workers do not comply with the safe working rules laid down by management.

Whilst the Company acknowledges that promoting good health and safety compliance comes from constant and effective learning and education initiatives, overseen by an effective management structure able to enforce it, there comes a point where an individual worker's failure to adhere to management instructions on health and safety matters must be dealt with through the Company's disciplinary procedures.

Workers who regularly reported for infringement of minor our health and safety policies are required to undergo remedial health and safety training to re-educate their approach to safety in the workplace. If a worker continues to ignore health and safety procedures after retraining, they become subject to our Competency Review Policy that will most likely result in dismissal.

H&S infringements include not wearing appropriate PPE and RPE (e.g. safety boots, masks, goggles) when the SSF risk assessments indicate they must be worn; failing to sign the SSF Compliance Declaration Schedule or individual risk assessments for key, high-risk tasks; using portable electric tools onsite that have not been PAT tested in accordance with the Company's policy (230 volts monthly and 110v every 3 months); and not signing on arriving on site, and signing out when leaving (even for short periods such as breaks or visits to the wholesaler).

The following infringements of health and safety compliance will be considered a serious breach of health and safety compliance, which will automatically result in disciplinary action:

1. A person knowingly falsifying health and safety records for any reason.
2. Any person in authority attempting to coerce another worker into performing an unsafe practice that would be considered by a '*reasonable person*' to be contrary to the Company's health and safety policy.
3. Any person who fails to fully comply with the 'safe system of works' for the removal or disturbance of asbestos-containing materials (ACM), hot-works, working on fire doors, or fire-stopping.
4. Reckless driving of a Company vehicle or driving vehicles or operating plant and machinery whilst under the influence of alcohol or drugs.

3.8 HEALTH AND SAFETY ARRANGEMENTS – ACCIDENT REPORTING AND INVESTIGATION

The Company requires all staff and subcontractors to report all injuries and near-misses that occur in the workplace to management as soon as possible on the day the incident occurs.

Please complete the [Marisco Accident Report](#) form and ensure it is received by one of the directors as soon as possible on the same day the accident or near miss occurred.

Failure to report certain kinds of accidents and near misses defined by RIDDOR can have severe repercussions to all those involved, so please make every effort to report an incident as promptly as possible.

Management will then investigate the incident and decide if it is necessary to make an appropriate [report](#) to the HSE.

To learn more about reporting accidents at work, read the following HSE [Leaflet](#).

The Company acknowledges the importance of monitoring the number and nature of accidents and near misses as they may highlight areas in which our health and safety practices may need improving.

3.9 HEALTH AND SAFETY ARRANGEMENTS – PERSONAL PROTECTIVE EQUIPMENT (PPE) AND RESPIRATORY PROTECTION EQUIPMENT (RPE)

The wearing of face masks to protect workers from inhaling harmful asbestos, silica and other workplace dust is mandatory if the risk assessments indicate appropriate *Respiratory Protective Equipment* (RPE) should be worn.

Beards and stubble: It has been shown that the performance of half-face masks that depend on the apron of the mask making an effective seal against the wearer's skin, is unacceptably degraded when wearers have facial hair. Unless a worker with a beard or visible stubble is

using a positive-air-pressure, full-face mask, they should not work in any workplace that exposes them to harmful silica and other construction site dust. The 3M positive-air RPE the company uses was originally recommended by 3M for use in removing NNNL asbestos-containing materials (ACM) following existing HSE guidance. 3M has since developed new positive-air-pressured RPE designed for ACM removal, and as a result withdrawn the previous asbestos rating for our existing equipment for use with asbestos. In future, only clean-shaven operatives wearing appropriate and approved RPE for working with asbestos can undertake such work.

The general policy regarding PPE is that workers should always wear steel-capped safety boots, long protective trousers, hard hats, and Hi-Viz vests when the risk assessments in SSF indicate they are required.

Protective gloves, eyeglasses, noise defenders and disposable masks are to be worn during all grinding and cutting activities. Protective gloves, eyeglasses, and face masks are to be worn when mixing plaster, grouting, cement, and similar powder-based substances.

The above general guide on wearing PPE can be augmented or down-graded by the specific provisions stipulated in the CDM Plan and SSF risk assessments at each site.

For example, the risk assessment for the general property maintenance work we often undertake within domestic properties may conclude the wearing of hard hats and Hi-Viz vests can be safely dispensed with ... likewise ... operatives would not be expected to put on full PPE to change a light bulb in an occupied domestic property.

Although a degree of common sense applies, operatives must always adhere to the specific PPE recommendations given in the CDM Plan and risk assessment ... or the manufacturer's PPE wearing recommendations given in respect of the safe use of tools, plant and machinery given in the operational guide manuals.

The Company will meet the cost of any reasonable request from a worker to provide any personal protective equipment and train them on its proper use if it reduces the risk that person might sustain any harm from the activities they undertake in the workplace.

The Company will provide approved personal protective equipment to employees without charge.

Staff can requisition PPE by downloading and completing this [form](#).

3.10 HEALTH AND SAFETY ARRANGEMENTS – FIRST AID COVER

The Company continuously reviews the number of trained First Aiders it has on duty during the working day to ensure adequate cover is maintained.

Due to the nature of our business, the workforce is often located at remote locations that can change during the day. The Company operates a policy where it will sponsor any employee

who is willing to qualify for Emergency First Aid at Work to increase the overall available first aid cover at its construction sites.

It is the policy of the company to issue all workers who attend remote sites with their own personal first aid kit.

3.11 Employees will be encouraged by toolbox talks and circulars to prepare for an injury at work

Despite our best efforts, accidents will happen. It is therefore in everyone's interest to plan for that eventuality.

If it is a minor injury, such as a cut, it may be dealt with by the casualty or someone with enough common sense to open the first aid kit we issue to all employees and apply a suitable dressing after washing the wound with clean water.

Our policy includes prompting our employees at least once a year to inspect their first aid kit to ensure all the contents remain in date and are regularly [restocked](#). We also will circulate reminders to staff to make sure they know what dressings and plasters are in their kit so they can deal with minor injuries more effectively.

If a more serious injury occurs at a remote site, the employees on the scene will often be faced with crucial decisions to make under surprisingly stressful circumstances.

Our policy is to use toolbox talks and circulars to prepare all our staff to deal with such situations, which promotes the adoption of the following procedure:

- Staff should first check that they and the casualty are not in any danger. Fire, drowning, electrocution, being overcome by dangerous gases, being crushed by falling masonry or being hit by vehicles are only some of the dangers that may often influence the actions that should be taken. The first priority is to remain safe from further harm, and if that means moving a casualty from a dangerous situation, then staff should do so.
- Staff's next priority will be to decide to either call for assistance from a Marisco first aider, who are listed on our telephone directory, or if the severity of the injury warrants it ... calling the emergency services by dialling 999 or 112 straight away. If in doubt as to which one to call first, choose the emergency services. One can always ask someone to call a first aider to assist while another is on the telephone to the emergency services. With serious accidents, seconds count. Furthermore, the emergency services operators are trained to assess the nature of the emergency and they will talk you through what should be done, including administering essential first aid, until the emergency responders arrive on site.
- In any event, all staff should try to remain calm and reassure the casualty that help is on its way until it arrives. After the emergency services have arrived and the emergency element is dealt with, those staff directly involved in the incident must report to head office where arrangements will be made to take written statements of what has happened.

We encourage staff to take the voluntary Citation first aid training available on Atlas, and to read the latest NHS first aid [guide](#). One day you may be faced with being the only one available to treat a severely injured casualty and the chances are it won't be at work and it may involve a family member. What one reads today ... may save a person's life you care about tomorrow.

3.12 HEALTH AND SAFETY ARRANGEMENTS – VISITOR SAFETY

All employees are briefed on the importance of assuring the safety of ALL visitors when they enter any of our construction sites.

Unless the visitor has a legal right of entry (e.g. enforcement officers, police, etc) visitors must make a prior appointment and a site manager or site supervisor must be present to ensure all works are suspended and the site is made safe before escorting them around the premises or grounds. The visitors must sign-in upon arrival, and sign-out when leaving.

The head office is a medium unit consisting of a storage area, meeting room and welfare facilities downstairs with offices upstairs. The perceived risks based on regular risk assessments to any visitor's health and safety is small and easily managed by the person who is receiving them.

3.14 HEALTH AND SAFETY ARRANGEMENTS – WELFARE FACILITIES

The Workplace (Health, Safety and Welfare) Regulations 1992 sets out in more detail the legal obligation for Marisco to provide, so far as is reasonably practicable, adequate and appropriate welfare facilities at work.

This would include washing, toilet, rest and changing facilities, and somewhere clean to eat and drink during breaks.

Remote working

Most of our work at remotes sites are of short duration and basic welfare facilities are accessible and functional.

The Company will hire adequate and appropriate welfare facilities and put them on site when they would otherwise be unavailable.

Bottled drinking water will always be provided where fresh, drinkable tap water is not available.

3.15 HEALTH AND SAFETY ARRANGEMENTS – ENVIRONMENTAL CONSIDERATIONS

We acknowledge our corporate responsibility to conduct the way we operate as a business to promote a safer, cleaner and sustainable environment. This includes engaging with our staff, suppliers and clients at every level through improved communication, understanding and education to work towards:

- Reducing noise pollution;
- Reducing air pollution;
- Reducing water and land pollution; and
- Protecting the ecological balance of the communities we work within. Even as a relatively small organisation with the limitations our size therefore imposes, it is still possible to make a positive contribution to protecting and improving the environment in which we work. Our general policy therefore is to:
 - Increase the awareness in our staff of both the positive and negative impact on the environment they cause as a result of the simple, and seemingly innocuous, choices they make every day in the workplace, such as saving the energy we consume by switching off appliances that are not needed during the working day and overnight;
 - Make better use of emerging new technologies, products and services that give rise to more efficient use of the resources available to us all, starting with such simple steps as replacing tungsten light bulbs with their energy-saving LED counterparts;
 - Reduce the amount of polluting waste we produce by always looking to make more efficient use of the materials we must consume in the course of running our business, as well as replacing the traditional materials we have relied upon in the past, with alternatives that have less of a negative impact on the environment;

Our Policy on waste disposal

The process of property refurbishment will inevitably generate a considerable amount of waste destined to be removed to landfill waste-disposal sites.

We will do all we can, in so far as it is reasonably practicable, to reduce and recycle that waste, thereby protecting the environment.

The same commitment will be expected to be shown by contractors working for the Company.

The Company therefore seeks to comply with all relevant environmental legislation and regulation. It also aims to establish higher standards of environmental performance including waste management where these are practicable and appropriate.

The Company employees are required to carry out their duties with concern for the environment. All Company employees must adhere to the aims and objectives of the Policy.

In the event of an environmental accident or incident at work, it is a Company requirement that the details are promptly and properly reported to the environmental officer who will investigate and take prompt action to make good any damage and avoid recurrence.

All contractors working on behalf of the Company are required to adopt environmental standards fully consistent with those of the Company and they are expected to achieve comparable levels of performance.

Specific Environmental Policy Objectives

In accordance with our stated aims, the following objectives form the framework for the practices to be observed to implement the Company's Environmental Policy:

1. Compliance with current environmental legislation and Government Regulations.
2. Swift response to accidents or incidents that have the potential to threaten the environment.
3. The provision of advice on the safe handling of the materials and substances used in the workplace, including transportation, storage and disposal.
4. The disposal of any waste products in ways that show concern for the environment using only our trained in-house waste removal teams, or registered and licensed carriers, to responsibly dispose of waste, and to recycle wherever possible.
5. To encourage the development of products, processes and only buy equipment and vehicles with concern for the future of the environment.
6. To communicate freely on environmental matters with government officials, employees, customers and members of the public.
7. To provide training for all employees, as appropriate, to enable them to carry out their job functions in a manner that shows care for the environment.
8. To carry out environmental audits when required.
9. To promote environmental principles by sharing experience with regulatory bodies, other companies, employees and members of the public.
10. In implementing this Environmental Policy Statement, the Company will focus on action to conserve resources and energy, to minimise emissions into air or water and onto land and to increase recycling rates.
11. The Company will also seek to influence legislative developments and improve public understanding of environmental matters concerning the construction and refurbishment business, through its consultancy division.

Further Reading:

More information is published on the Atlas system.

You can access the following publications on www.mariscosouth.co.uk:

- CDM Regulations
- Working with and removing asbestos in the workplace
- Working at Height
- Lone Worker
- Managing Stress at Work
- Bullying and Harassment in the Workplace
- Corporate Responsibility and Sustainability
- Anti-bribery and Ethical Business
- General Data Protection Regulations (GDPR)
- Equal Opportunities and Diversity Policy
- Modern Salary Policy
- Environmental Policy
- Quality Assurance Policy
- Business Continuity Policy