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# Icom Holdings Ltd and Subsidiary Companies

## Health and Safety Policy

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**RECORD OF POLICY REVIEWS**

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## **HEALTH AND SAFETY POLICY STATEMENT**

### **1. Introduction**

This document contains the Policy Statement of **Icom Holdings Ltd**, of Unit 11 2M Trade Park, Beddow Way, Aylesford, Maidstone, Kent, ME20 7BT. It has been prepared after due consultation with those involved in its operation, and has the full backing and authority of the Directors.

### **2. General Statement**

2.1 It is our policy to perform work in the safest practicable manner, consistent with good practice. The health, safety and welfare of our employees and all those likely to be affected by our operations is the responsibility of management, and as a priority it ranks equally with our business objectives. Adequate resources will be made available to ensure the success of this policy.

2.2 It is the duty of management to provide safe systems of work and do everything practicable to prevent injury and ill health by controlling the risks arising out of our work activities. Equally it is the duty of each employee to exercise personal responsibility for his or her own safety and that of others and co-operate with his or her employer in matters of health, safety and welfare.

2.3 The company will provide and maintain safe plant and equipment and ensure the safe handling and use of hazardous substances. Management will provide the necessary information, instruction and training and will ensure the competence of all employees and contractors.

2.4 All employees are to be aware that, in the event of any conflict between the demands of business and safety, they will receive management support if they reasonably choose the safety of employees or third parties as the priority.

2.5 It is our policy to adhere completely to the requirements of the Health and Safety at Work etc. Act 1974; the Electricity at Work Regulations 1989, the Management of Health and Safety at Work Regulations 1999; the Construction Regulations and all other Acts, Regulations and Codes of Practice, which affect our operations.

2.6 The attention of all employees is directed to this Safety Policy and its Appendices. Any revisions will be incorporated when necessary, and these will also be brought to the attention of all personnel.

Signed .....

Dated 06/04/2011

John Donoghue  
Managing Director

## ORGANISATION

### 3. Responsibility

3.1 Each Director and Manager is individually responsible for promoting health and safety in the Company. The day to day management of health and safety on premises, sites and elsewhere is delegated to the persons in charge of the work in accordance with our management structure which is set out at Appendix 1 in this Policy Statement. The responsibility for safe conduct of work cannot be delegated to others.

3.2 John Donoghue, the Managing Director, has overall responsibility for health and safety in the Company. Where difficulties arise in the maintenance of safe working conditions, or practices, reference must be made to the Managing Director via the line Managers, who has responsibility for ensuring that sufficient authority is given to enable safe conditions and practices to be maintained.

3.3 It is the responsibility of all our employees to use machinery, equipment, transport, hazardous substances and safety equipment in accordance with the training and instructions given.

3.4 Employees must inform the Managing Director or the Health and Safety Co-ordinator of any dangerous situations or shortcomings in the Company's health and safety arrangements so that any necessary remedial action may be taken.

3.5 The specific responsibilities of all levels of management are set out in Appendix 2 attached to this Policy Statement.

### 4. Health and safety advice

4.1 In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, the Company has appointed Steve Brown, Project Manager, as the Company's Health and Safety Co-ordinator. He is nominated as competent person for the purpose of assisting the Company to undertake necessary measures to ensure compliance with statutory provisions.

4.2 In order to obtain specialist advice and up to date information on all health and safety matters, the Company has retained the services of Hascom Network Limited as external health and safety advisors. The Company has access to a telephone health and safety advice line and receives monthly written information and advice through Hascom Network on current health and safety matters.

The Hascom Network Risk Assessment Manager covering Risk Assessment, COSHH Assessment and files of general health and safety information are maintained in the Office by Steve Brown, and are available for all employees to use.

4.3 Any employee who is in doubt about safe working practices and procedures should contact the Managing Director or Health and Safety Co-ordinator for advice.

## 5. Consultation

5.1 In compliance with the Health and Safety (Consultation with Employees) Regulations 1996, it is company policy to consult with all employees on matters, which affect their health and safety. Health and safety is discussed as an agenda item at the engineers meetings

5.2 Management will always consider suggestions or comments on ways in which our health and safety performance can be improved. Any such suggestions should be made to the Health and Safety Co-ordinator

## ARRANGEMENTS

### 6. Safety policy monitoring and review

6.1 The Health and Safety at Work etc. Act 1974 requires the Company to monitor the effectiveness of this Policy in terms of the use made of it by both management and work force. Review of the safety performance of the Company and the functioning of the Policy is the task of the Managing Director in liaison with the Health and Safety Co-ordinator. Annually, they will review the contents of the Policy Statement in liaison with others as necessary, and indicate ways in which our safety performance can be improved.

6.2 Project Manager, Foreman or Nominated Engineers in charge of the work may attend site meetings with clients' or other contractors' representatives where health, safety and welfare may be considered. Discussions could include their safety policies, risk assessments, working practices, safety performance or any other related matters covered by legislation.

6.3 The Project Manager, Foreman or Nominated Engineer responsible for the work will monitor health and safety standards on our sites to ensure compliance with this policy, current legislation and guidance. The frequency of site monitoring will depend on the size of the contract and the foreseen hazards. Where appropriate written reports will be completed and forwarded to the Managing Director to assist in the evaluation of company performance the annual policy review.

### 7. Training and information

7.1 It is the responsibility of the Health and Safety Co-ordinator to review the training needs at all levels within the Company at regular intervals. Suitable information, instruction and training will always be provided upon the introduction of new technology or working methods. He will ensure records of all health and safety training provided to employees are maintained.

7.2 Hascom Network will advise on safety training needs upon request. Safety training will be given to all employees as necessary.

7.3 The Project Manager, Foreman or Nominated Engineer responsible for the work will ensure employees, contractors and sub-contractors have the necessary competency to carry out work for which they are engaged. They will also carry out formal vetting of contracting firms to establish competency in health and safety.

7.4 The Managing Director will ensure that all new employees and apprentices are provided with suitable induction training to ensure that they have sufficient information and instruction to comply with the Company's health and safety policy and procedures.

7.5 The Project Manager, Foreman or Nominated Engineer responsible for the work will provide new employees and those transferring from job to job with suitable site induction training before putting the person to work. Induction training will always include:

- First Aid arrangements
- Welfare facilities
- Fire & emergency procedures
- Any specific site hazards
- Site health and safety rules
- Significant findings from relevant risk assessments

7.6 The Managing Director will carry out induction training required for young persons. He will ensure that the Project Manager, Foreman or Nominated Engineer in charge of the work is made aware of the necessary training and level of supervision required for young persons, as detailed in the Management of Health and Safety at Work Regulations 1999.

7.7 The company recognises that there is an increasing prevalence of non-English speaking workers in the UK and that this may have an effect on their and other's health and safety. This may particularly include the provision of adequate information and instruction. The company undertakes to ensure that suitable measures will be put in place to ensure that all relevant information and instruction is interpreted, both verbally and where appropriate in writing for any non-English speaking workers or contractor whose services the company may employ. The Foreman or Nominated Engineer in charge of the work will ensure that suitable arrangements are put in place where necessary.

## 8. Accidents

8.1 **Accident** details, however trivial they may appear to be, must always be entered in the Accident Book, which is held by Sally Murphy in the company accounts office.

8.2 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (**RIDDOR**), require specified injury accidents, dangerous occurrences, diseases and conditions to be reported to the Health and Safety Executive (HSE). The Health and Safety Co-coordinators nominated as the "responsible person" in accordance with the Regulations to make these reports.

8.3 The Foreman or Nominated Engineer in charge of the work must report all injury accidents or dangerous occurrences to Sally Murphy by the quickest possible means.

8.4 Sally Murphy will hold **documentation** for accidents, dangerous occurrences and identifiable diseases and conditions. Copies of all notifications made on behalf of the Company will be kept for record purposes.

8.5 The Health and Safety Co-ordinator will carry out **investigations** of serious accidents and dangerous occurrences. Where appropriate the Company health and safety consultants will be engaged to carry out an independent investigation.

## 9. Welfare and First-Aid Facilities

9.1 Welfare and sanitary facilities provided at the company's premises are to the standards required under the Workplace (Health, Safety and Welfare) Regulations 1992. On sites the relevant Manager responsible for the job will ensure that adequate facilities are available and, where necessary, will make arrangements for our employees to use the client's or principal contractors facilities.

9.2 To comply with the Health and Safety (First-Aid) Regulations 1981, the Health and Safety Co-ordinator will supply the office premises and company vehicles with adequate first-aid equipment.

9.3 The Projects Manager, Foreman or Nominated Engineer responsible for the job will make arrangements for site facilities to be shared with the client or principal contractor as appropriate.

9.4 Where facilities cannot be shared with the client or principal contractor the Projects Manager, Foreman or Nominated Engineer responsible for the job will provide adequate first aid equipment to site.

9.5 The names of those persons trained and certified in first-aid will be displayed within the Office.

9.6 In the absence of trained first-aid personnel the company will nominate an 'appointed person' Bradford Rogers to take charge of the first-aid equipment and facilities, to replace missing or defective items and to summon assistance if required.

9.7 The arrangements for nominated 'appointed persons' for the purposes of the regulations are as follows: -

- Sally Murphy is the 'appointed person' for the Office facilities.
- The Foreman or Nominated Engineer on sites where first-aid facilities are not shared with either the client or principal contractor.
- The driver will carry out this function in any of the company vans.

## 10. Safety Rules.

10.1 The Company safety rules are designed to provide basic guidance for safe operating practices and procedures that form the Company Policy, and must be strictly adhered to by all employees. Wilful disregard by any employee of any Company safety rules may be considered sufficient cause for immediate dismissal.

10.2 Safety rules and advice covering specific work areas and/or systems of work will be attached as Appendices to this policy statement as follows: -

Appendix 1	Company health and safety management structure
Appendix 2	Responsibilities
Appendix 3	Company Safety Rules
Appendix 4	Office Safety Rules

## 11. Work Equipment

11.1 The Company will ensure that all tools and equipment provided for use at work will comply with the requirements of the Provision and Use of Work Equipment Regulations 1998.

11.2 The Project Manager, Foreman or Nominated Engineer responsible for the work will ensure that all users of products and articles supplied or hired for use at work are provided with relevant information which may be provided by a manufacturer/supplier in order to comply with their obligations under Section 6 of the Health and Safety at Work etc. Act 1974.

11.3 It is the responsibility of the Project Manager, Foreman or Nominated Engineer responsible for the work to ensure all work equipment hired or purchased for use by our employees is suitable for the purpose for which it is to be used.

11.4 The Project Manager, Foreman or Nominated Engineer responsible for the work will ensure the users of new plant and equipment provided by the company will be given sufficient instruction, information and training in order that any such plant or equipment may be used safely.

11.5 Where tools or equipment are issued to employees for their personal use, those employees are responsible for ensuring that the item is kept in good working order and that any defects are reported to the Project Manager, Foreman or Nominated Engineer in charge of the work.

11.6 The Operations Manager will ensure that all portable and transportable electrical equipment is maintained, tested and inspected in accordance with HSE guidance HSG 107 "*Maintaining portable and transportable electrical equipment*". He will also ensure that adequate records of formal inspection and testing are kept.

11.7 Portable and transportable electrical equipment are described as any electrical equipment, which can potentially result in a risk of fatal electric shock (i.e. more than 50v ac or 120v dc). Such equipment is not part of a fixed installation but is, or is intended to be, connected to a fixed installation or generator by means of a flexible cable and either a plug or socket or a spur box, or similar means.

11.8 Operations Manager will ensure that all work equipment is properly maintained and that records of servicing, inspection, and statutory tests and/or examinations are available. Examples of records required are:

- Ladders and access equipment maintenance
- Statutory examination/test of lifting equipment.

The Operations Manager is responsible for the calibration of test equipment.

11.9 **Statutory inspection results** must be recorded for scaffolding, including mobile towers, in excess of 2m in height erected for seven days or more. The responsibility for ensuring that the inspections are carried out and recorded rests with the Project Manager, Foreman or Nominated Engineer.

## **12. General hazards, risk assessment and controls.**

12.1 The Management of Health and Safety at Work Regulations 1999 and other Regulations require that risk assessments are carried out by employers and that the significant findings from the assessments are brought to the attention of those at risk.

12.2 The Company will use the Hascom Risk Assessment Manager system to assist in the control of common hazards associated with work activities

12.3 The Project Manager, Foreman or Nominated Engineer responsible for the work will carry out an ongoing assessment of the risks as required by the Regulations. Where significant risks have been identified on work to be carried out by the Company a written generic assessment will be available.

12.4 The Project Manager, Foreman or Nominated Engineer responsible for the work will make the assessment site-specific, taking into account local risk factors. When appropriate, risk assessments will consider additional risks to any young person who may be employed.

12.5 Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or its significant findings, together with details of the method of work to be followed if appropriate.

12.6 The Health and Safety Co-ordinator will review generic risk assessments made and kept by the Company at annual intervals or whenever it is suspected that they may no longer be valid.

12.7 Training will be given to employees where a need is identified by the risk assessment. Employees will be made aware of the findings of the assessments and the required control measures.

12.8 Any necessary plant, equipment, monitoring, hygiene and welfare facilities, and protective clothing and equipment specified in the risk assessment must be present at the relevant location before the task is carried out.

12.9 Risk assessments will always be taken into account when negotiating, or tendering for work.

12.10 Risk assessments may identify the need for medical examinations, or health surveillance. Whenever this is the case the records of any health surveillance, medical or other individual health record which may be required will be kept securely in personnel files held by the Company, and will be kept for 40 years after the date of the last entry as required by law.

## **13. Office work and display screen equipment.**

13.1 The Health and Safety Co-ordinator is responsible for risk assessments of office work, including those for display screen equipment in the Office.

13.2 The Health and Safety Co-ordinator will carry out an annual health and safety audit of the company's office premises.

## 14. Manual handling operations

14.1 All manual handling operations having a risk of injury which are carried out by Company employees will be identified and recorded by the Project Manager, Foreman or Nominated Engineer responsible for the work. The Hascom Risk Manager system contains information on manual handling and generic assessments. Where these operations cannot be avoided, specific assessments will be made and procedures developed to minimise the risks. Selection of appropriately capable staff will then take place, followed by any necessary training, information and instruction. All employees are encouraged to discuss potential manual handling problems not so identified with the person in charge of the work, together with any work involving repetitive motion.

14.2 All employees will be issued with HSE leaflet INDG 143 "*Manual Handling - a short guide for employers*" on induction which gives basic guidance on manual handling techniques.

## 15. Personal protective equipment.

15.1 The provision of personal protective equipment (PPE) is only acceptable when the hazard cannot be controlled by other means. An assessment will be carried out by Project Manager, Foreman or Nominated Engineer in charge of the work to ensure that any PPE provided is suitable and provides adequate protection against any hazard identified.

15.2 The Project Manager, Foreman or Nominated Engineer in charge of the work will ensure that employees are given sufficient training, which will include the selection, use and maintenance of personal protective clothing and equipment where it is required.

15.3 The Site Foreman or Nominated Engineer in charge of the work will ensure that suitable arrangements are provided for the storage of PPE.

## 16. Control of substances hazardous to health (COSHH).

16.1 It is the policy of the company to adhere to the principles of good practice for the control of exposure to substances hazardous to health as set out in Schedule 2 of the Control of Substances Hazardous to Health Regulations 2002 (as amended). Namely:

- design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- take into account all relevant routes of exposure (inhalation, skin absorption and ingestion) when developing control measure
- control exposure by measures that are proportionate to the health risk
- choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- check and review regularly all elements of control measures for their continuing effectiveness
- inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures developed to minimise the risks

- ensure that the introduction of control measures does not increase the overall risk to health and safety

16.2 Information on materials used in the Company's work will be obtained from the manufacturer or supplier, or from the client, as appropriate. The Company makes use of the Hascom Risk Assessment Manager system to provide generic assessments for all substances likely to be used by employees whilst at work. Monitoring of the working atmosphere may be required and will be indicated on the relevant COSHH assessment. The Health and Safety Co-ordinator will produce COSHH assessments for the Company's work with applicable substances. He will review them annually at the time of the Policy review, or whenever it is suspected that they may no longer be valid. The Project Manager, Foreman or Nominated Engineer responsible for the work will then make the assessments site-specific.

16.3 The implementation of control measures for hazardous substances used at work will be considered in the following order of precedence:

- **Hazard elimination** using alternative working methods
- **Substitution replace** substance with a none or less hazardous substance
- **Segregation automation** or enclosure of process/operator
- **Use of procedures** use of engineering controls and other safe systems of work e.g. mechanical ventilation
- **Use of warning systems** warning notices, proper labelling of containers and instructions
- **Use of Personal Protective Equipment** must be adequate and used as last resort if other controls are impractical or cannot be implemented

16.4 Any necessary work with new materials or substances rated as hazardous must not commence until the necessary information has been obtained, or the material has been analysed, and an assessment made of the risks involved in the operation. Where appropriate, clients and others likely to be affected by the work will be provided with a copy of the assessment and/or its significant findings, together with details of the method of work to be followed.

16.5 The following general precautions apply to the use, handling and transport of all substances. Specific precautions are detailed in the written assessments for specific materials and other substances likely to be encountered in the work environment.

- Protective clothing and equipment will be used to prevent the contact of hazardous substances with the eyes, skin and mucous membranes.
- Adequate ventilation or respiratory protective equipment will be provided as appropriate to prevent inhalation of hazardous dusts, gases or vapours.
- Hazardous substances should not be used in areas where food is being eaten.
- Good personal hygiene practices must be observed.
- Facilities for washing, cleaning and protecting the skin must be available including suitable cleansers and barrier creams.
- Chemical products and materials are to be stored in ventilated areas away from temperature and environmental extremes.
- Spillages must be cleaned up immediately, and waste and used containers disposed of properly.
- Read the data sheet, container labels and detailed health and safety information before using any chemical products.

## 17. Fire precautions.

17.1 The Health and Safety Co-ordinator is responsible for fire and emergency precautions and assessments in the Company office. He will ensure that all reasonable steps have been taken to comply with the Regulatory Reform (Fire Safety) Order 2005. This will include:

- identification of potential fire hazards in the premises
- identification of people who may be at risk
- evaluation of the risk
- production of a written fire-emergency plan to remove, reduce or control the risks
- ensuring an adequate means of escape in the event of a fire
- ensuring that escape routes are kept clear
- sufficient fire fighting appliances are available and properly maintained
- an adequate means of warning in the case of a fire is available
- provide suitable information, instruction and training to staff
- review the assessment annually or when conditions change and revise as necessary.

17.2 The Project Manager, Foreman or Nominated Engineer responsible for the work will ensure that adequate fire fighting equipment is available on site. He/she will liaise with the client or Principal Contractor to ensure that adequate fire and emergency procedures are in place before the start of the contract.

## 18. Arrangements for Special Hazards.

18.1 There are a number of special hazards, which have potentially serious consequences, and which have been identified as 'high risk' in the Company's risk assessments. This section of the policy identifies these hazards and is in addition to normal risk assessment procedures in Section 12. They include:

- \* Work with asbestos-containing products
- \* Work in noisy areas
- \* Working with vibratory equipment
- \* Mobile Elevating Working Platforms
- \* Work at height and work on flat roofs
- \* Use of mobile scaffolding towers
- \* Use of ladders and steps
- \* Work on live electrical systems
- \* Lone working
- \* Working in confined spaces
- \* Work with fibre optics or lasers
- \* Work in hospitals
- \* Work on school premises

18.2 These activities will require a specific risk assessment to be made prior to the commencement of work. The relevant Project Manager, Foreman or Nominated Engineer will have the responsibility for making these specific risk assessments. Further information on standard precautions is given below.

18.3 The client may operate a 'permit to work' system to govern our activities in situations where our work interfaces with his operations. This will need to be considered when we are carrying out risk assessments.

18.4 All those to be involved in the work will be made aware of the control measures for the identified risks and any procedures to be followed.

18.5 Asbestos. **At the pre-tender stage of the contract the Manager responsible for the work will make specific enquiries to the client as to the presence of asbestos.** When asbestos is suspected or known to be in any material to be handled by our employees, **work is not to be undertaken until a sample has been analysed, an assessment carried out and appropriate control measures put in hand.** Any employee discovering material that is suspected of containing asbestos is to stop work immediately and inform the Manager in charge of the contract. All employees involved in site work will be issued with a copy of pocket card issued by the HSE, INDG 418 "Asbestos Kills", at induction

18.6 Noise at work is subject to the Control of Noise at Work Regulations 2005. Noise assessments will be made as required by the Regulations when the noise action levels are likely to be reached. As voice & data cabling engineers noise is not normally an issue when carrying our type of work. It is not considered that noise levels will exceed the lower action level during a normal working day. Where excessive noise levels are encountered, they are usually either of short duration or client generated. We have never undertaken work that has necessitated detailed noise assessment however our employees are issued with suitable hearing protection to BS EN 352-1 and noise is considered when carrying out any risk assessment for work being undertaken. Instructions for safeguarding hearing will be given to employees as appropriate by the Project Manager responsible for the site.

18.7 Hand arm vibration (HAV) is not normally a significant hazard in work undertaken by this company. Hand-held power tools are used for short duration during installation and maintenance work and only for a small proportion of working hours. Hammer action drills are used, but for less than 30 minutes in any one-day. It is considered that the action level is not likely to be approached during normal work activity. A specific risk assessment will be carried out by the appropriate Project Manager should the occasion arise where there is a known or suspected hazard arising from using power tools.

18.8 Mobile Elevating Working Platforms (MEWPs) may only be operated by suitably trained and competent persons. Manufacturer's instructions must always be followed. MEWPs must have been subject to a thorough examination during the previous six months, and must be inspected at least every seven days while in use. Before use the ground upon which a MEWP is to operate must be checked for suitability. MEWPs are not to be used in the vicinity of overhead electric lines.

18.9 Work at height and work on flat roofs will only be carried out where it is not reasonably practicable to carry out the work otherwise than at height. Specific risk assessments will be carried out for all such work and will only be undertaken by competent people. The work must be properly planned and supervised to ensure that it is carried out in a safe manner. Work equipment enabling work at height to be carried out will always be selected on the basis that collective protection measures will be given priority over personal protection measures and account will be taken of any other relevant factors that may affect safety such as the location of the work, ease of access, consequences of a potential fall, the duration and frequency of use, emergency rescue/evacuation and any additional risks posed by the selection of a particular item of work equipment. Edge protection will always be provided where practicable when there is a risk of personal injury as a result of falling. Where it is not reasonably practicable to provide edge protection, other collective protective measures such as soft landing systems will be used. Finally, where these are not practicable personal fall arrest and or restraint equipment must be used. The advice of site supervisor/site manager should be obtained before work starts if there is any doubt about the precautions required in particular circumstances. Roof work will be carried out in accordance with the guidance contained in HSG 33 – *Health and Safety in Roofwork*.

18.10 Podium steps are only to be erected, altered, or dismantled by competent persons and in accordance with the manufacturer's instructions. The user must inspect all towers after they have been erected or adapted to ensure that they are suitable for the work to be carried out.

18.11 Mobile Scaffold Towers, are only to be erected, altered, or dismantled by competent persons and in accordance with the manufacturer's instructions. The Foreman or Nominated Engineer must inspect all towers before first use to ensure that they are suitable for the work to be carried out. Where towers are erected and remain in place for more than seven days they must be inspected by the Foreman or Nominated Engineer and the results must be recorded. Mobile towers are not to be used in the vicinity of overhead electric lines.

18.12 Ladders and Step Ladders will only be used as working platforms for short term, light work where other access equipment is not suitable or available. Steps and ladders will be used in accordance with the guidance contained in HSE Guidance *HSG 150 – Health and Safety in Construction*, and will only be used after the risks and suitability for the operation have been assessed.

18.13 Live electrical work will not be allowed in any circumstances without the direct authorisation of the Managing Director. The circumstances for live work will be assessed using HSE Guidance - *HS(G) 85 - Electricity at work- safe working practices*. A written safe system of work will be produced before the work starts. All electrical systems must be proved dead before work starts. NO assumptions about the state of any system are to be made without positive verification - **all circuits must therefore be assumed to be live unless it is established they are dead.**

18.14 Lone working will only be allowed after a risk assessment has been carried out to assess the nature of the work, the workplace and the specific risks to the lone worker. Where it is not possible for the work to be done safely by one person, arrangements will be made to provide back up and assistance. All employees who work alone will be given instruction and training on recognising the risks, the precautions to be taken and the procedure for requesting assistance. Lone working will not be allowed where there is any significant risk of exposure to live conductors.

18.15 Confined spaces such as ducts, risers and some plant rooms and lofts where there could be excessive heat or poor ventilation, are not to be entered until a risk assessment has been carried out. A safe system of work is established and brought to the attention of every person likely to enter. The safe system must consider the need for atmospheric monitoring and the provision of emergency evacuation apparatus where appropriate. HSE Approved Code of Practice - "L101 Safe work in confined spaces" is to be used to assist in risk assessment and evolving safe systems of work.

18.16 All operatives working with fibre optics and lasers must be fully aware of the hazards and the precautionary measures to be taken to reduce the risks. Written risk assessments will be available on site and suitable personal protective equipment will be issued to protect the hands and eyes of operatives handling fibres. Site induction training will include the preventative and precautionary measures detailed in the risk assessments.

18.17 Work in Hospitals is to be carried out in strict accordance with risk assessments, safety plans and hospital rules. Hospital rules relating to the use of mobile phones and other equipment will be observed at all times. Where our work can effect the functioning of the hospital, the client's requirements are to be complied with, and their permit to work system will be followed. Priority must be given to hospital work, restrictions on access are to be respected, and a co-operative and polite attitude is to be maintained.

18.18 Work in schools is to be carried out in strict accordance with risk assessments, safety plans and school rules. No work is to commence until the Liaison officer for the school has been contacted and the content and sequence of work has been agreed. Where work is other than of short duration, regular liaison meetings are to be programmed with the school liaison officer to co-ordinate the work. All work is to be carried out bearing in mind the additional risks, which exist by virtue of pupils' immaturity and lack of understanding. In particular all work is to be carried out in a tidy and workmanlike manner and no incomplete work or any equipment is to be left unattended at any time.

## 19. Stress.

19.1 The Health and Safety Executive defines stress as *“the adverse reaction people have to excessive pressure or other types of demand placed on them”*. The company recognises that workplace stress can affect the health and safety of all employees and also recognises the need to identify and reduce the potential for workplace stressors occurring as a result of workplace and other influences. All employees are encouraged to raise issues of concern about stress with their line manager who will take all such matters seriously and arrange for the appropriate support as circumstances dictate.

## 20. Company vehicles.

20.1 The Company will maintain company vehicles at intervals recommended by the manufacturers. Drivers are responsible for reporting any defects that are hazardous to passengers or could render the vehicle un-roadworthy. It is the driver's responsibility to ensure that loads are properly secured and the vehicle is not overloaded. Drivers of company vehicles are expected to drive in a safe and considerate manner. Drivers who fail to comply with the provisions of the Road Traffic Act will be subject to disciplinary action.

20.2 Under no circumstances must mobile telephones be used whilst driving a vehicle unless hands-free equipment is available.

## 21. Smoking

21.1 In accordance with The Health Act 2006, it is the policy of this company that all our employees have a right to work in a smoke-free environment.

21.2 Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace and in company vehicles.

21.3 It is expected that other employers or persons controlling premises where company employees may be working will comply with their duty in enforcing this legal requirement. Employees should contact Line Manager responsible for the work in a situation where the prohibition is not being observed.

## **22. Environmental impact.**

22.1 The Company recognises that its activities may have environmental implications, and therefore pursues a policy designed to minimise environmental damage. The Company's operations will be managed and organised so as to reduce so far as is reasonably practicable environmental damage caused by noise, dust and damage to groundwater and drainage systems. In pursuance of this policy, environmental considerations will be taken into account in tendering.

## **23. Information for employees, sub-contractors and others.**

23.1 Other contractors and clients will be given a copy of this Policy Statement on request.

23.2 Sub-contractors are bound by the conditions set out in this Policy and it shall be considered as part of their contract to comply with it. Copies of their Health and Safety Policy, relevant insurances, and site-specific risk assessments and method statements are to be provided to Icom Holdings prior to work starting.

23.3 Employees will be asked to read this Policy Statement on joining the Company as part of their induction training. Their attention will also be drawn to the risk assessment system.

23.4 Employees will be advised by the Site Foreman or Project Manager, Foreman or Nominated Engineer responsible for the work of risks drawn to the Company's attention by other employers sharing a particular workplace.

## **24. CDM compliance and Design safety.**

24.1 It will be our practice to co-operate fully with the CDM Co-ordinator and Principal Contractor when appropriate, and with other designers involved in projects to make the maximum contribution to design and general site safety.

24.2 The Project Manager, Foreman or Nominated Engineer responsible for the site will take all reasonable steps to ensure the health and safety competence of all employees and subcontractors carrying out work for the Company.

24.3 Those preparing designs on our behalf will alert clients to the duties they may have under the Construction (Design and Management) Regulations 2007, and follow the designer's duties as defined within the Approved Code of Practice to the Regulations.

24.4 The guiding principles for all designs prepared by us will be to design to avoid risks to health and safety so far as is reasonably practicable, to reduce risks at source where avoidance is not possible, and to include relevant information with the design. Only persons competent to produce designs will be permitted to do so.

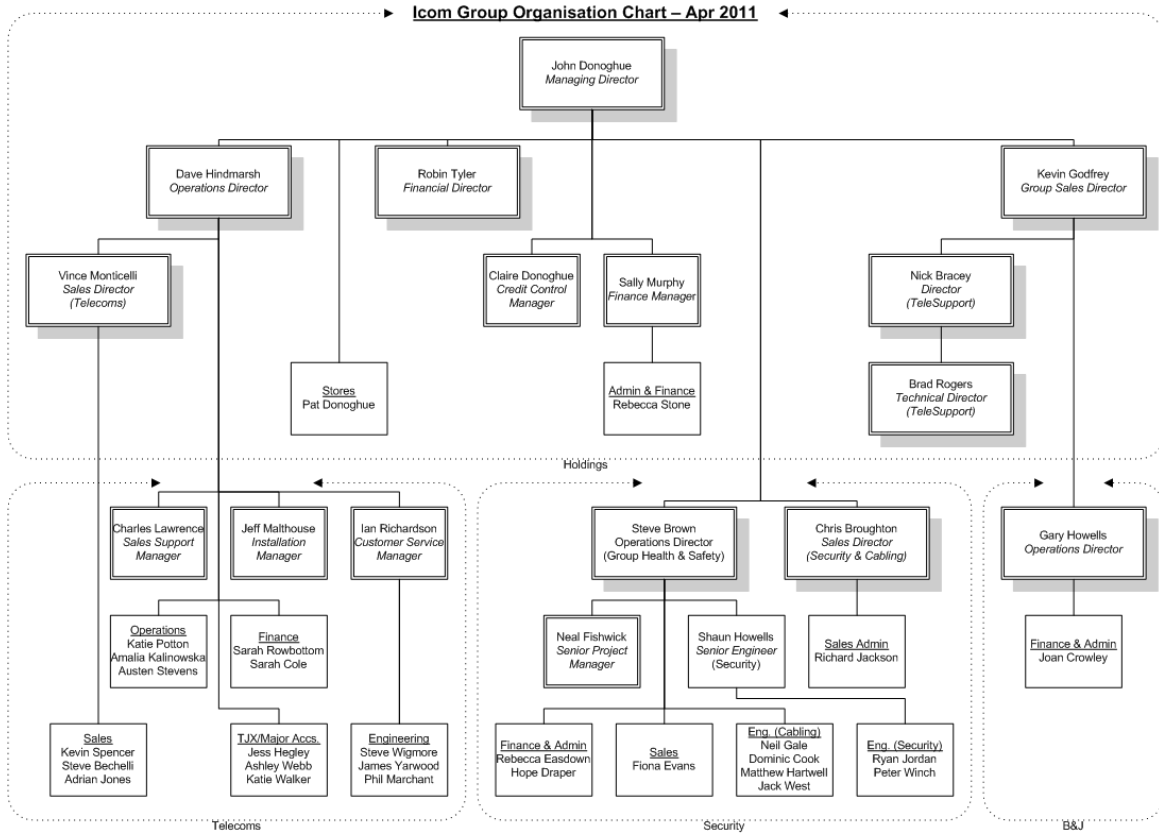
24.5 The Health and Safety Co-ordinator has the final responsibility for design safety matters and he is to ensure the competence of any external designer used and of any subcontractor to whom work is passed.

**ICOM HOLDINGS LTD**

**SAFETY POLICY STATEMENT**

**APPENDIX 1**

**HEALTH & SAFETY MANAGEMENT STRUCTURE**



## ICOM HOLDINGS LTD

### SAFETY POLICY STATEMENT

#### APPENDIX 2

### RESPONSIBILITIES

This Appendix to the Safety Policy details the responsibilities for safety at all levels of management and operatives. In all cases where responsibility is felt to be unclear, the advice of the Managing Director or the Health and safety Co-ordinator should be obtained.

a) **John Donoghue the Managing Director who has overall responsibility for health and safety will:**

- i. Initiate, administer and interpret the effective implementation of the Company Health and Safety Policy.
- ii. Arrange for funds and facilities to meet the requirements of the Policy.
- iii. Have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant legislation to the Company's operations, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2007, the Construction Regulations, the Work at Height Regulations 2005, and relevant Regulations and Codes of Practice.
- iv. Be aware of changes in legislation which affect the Company.
- v. Promote the safe conduct of work generally, and review the performance of the Company in relation to its health and safety objectives and safety policy arrangements annually.
- vi. Ensure that the Company safety policy and all generic risk assessments including COSHH assessments are reviewed at annual intervals, or following receipt of information indicating that a review may be needed after a shorter period.
- vii. Ensure that new employees and apprentices are provided with suitable induction training covering the company's health and safety policy and procedures.
- viii. Ensure adequate levels of supervision and training for young persons.
- ix. Specifically authorise any live electrical working which may prove necessary, ensuring that a method statement has been completed and that any permit requirements are known and complied with.

x. Set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site visits.

b) **Steve Brown, as the Health and Safety Co-ordinator will:**

i. Have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant legislation to the Company's operations, and a general knowledge of the Electricity at Work Regulations 1989, the Construction (Design and Management) Regulations 2007, the Construction Regulations, the Work at Height Regulations 2005. and relevant Regulations and Codes of Practice.

ii. Be aware of changes in legislation which affect the Company.

iii. In liaison with the appointed Company health and safety consultants co-ordinate health and safety information and disseminate such information both throughout the Company, in his position as appointed competent person under the Management of Health and Safety at Work Regulations 1999.

iv. Respond to suggestions or comments on ways in which Company health and safety performance can be improved.

v. Review training needs at all levels within the Company at regular intervals.

vi. Hold all the company's health and safety documentation including those concerned with accidents, dangerous occurrences and identifiable diseases and conditions.

vii. Be responsible for making direct telephone and written notifications as above, and retaining copies on file.

viii. Investigate serious accidents and dangerous occurrences.

ix. Ensure that the Office, vehicles and when necessary sites are supplied with necessary first-aid equipment and facilities.

x. Ensure that all work equipment is properly maintained and appropriate records kept. review the Company safety policy and all generic risk assessments including COSHH assessments at annual intervals, or following receipt of information indicating that a review may be needed after a shorter period and

xi. Report to the Managing Director ways in which the Company's safety performance can be improved.

xii. Be responsible for making risk assessments of work in the Office, including those for fire precautions and display screen equipment in the Office.

xiii. Carry out COSHH risk assessments as required by Regulations for products used by or generated as a result of Company work.

xiv. Ensure that when appointed Principal Contractor the Company complies with its duties under the CDM Regulations.

xv. Take responsibility for the design function within the Company as it relates to health and safety issues and compliance with the Construction (Design and Management) Regulations 2007.

c) **Managers, when responsible for contracts will:**

- i. Have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant legislation to the Company's operations, and a general knowledge of the Electricity at Work Regulations 1989, the Construction Regulations, the Construction (Design and Management) Regulations 2007, the Work at Height Regulations 2005, and relevant Regulations and Codes of Practice.
- ii. Attend site meetings where health and safety matters are discussed, and organise sites so that work is carried out to the required standard of health and safety with minimum risk to persons, equipment and materials.
- iii. determine at the project planning stage and establish at the commencement of work:
  - the most appropriate order and method of working
  - the provision of welfare and sanitation facilities
  - hazards which might arise, and complete risk assessments as required
  - allocation of responsibilities
  - necessary fire precautions
  - adequate first-aid facilities
- iv. Monitor health and safety standards on our sites including those of our sub-contractors where appointed to ensure compliance with the policy, current legislation and guidance.
- v. Carry out site induction training for new employees and apprentices, and those transferring from job to job or site to site, covering specific hazards and rules relating to the work to be done.
- vi. Arrange for the availability of necessary first-aid facilities, including making appropriate arrangements with the client or main contractor.
- vii. Ensure that all work equipment hired or purchased is suitable for the purpose intended.
- viii. Carry out site specific risk assessments as required by Regulations for general and specific risks to which Regulations apply.
- ix. Identify and record assessments of manual handling operations that have a risk of injury to company employees.
- x. Identify personal protective equipment needs and ensure that suitable equipment is provided and used as required by risk assessments.
- xi. Ensure that suitable arrangements are provided for the storage of any PPE that may be necessary.
- xii. Carry out site specific COSHH risk assessments as required by Regulations for products used by or generated as a result of Company work.
- xiii. Ensure that specific enquiries are made to the client at the pre-tender stage of the contract as to the presence of asbestos.
- xiv. Ensure that all users of products and articles supplied or hired for use at work shall be made aware of any relevant information and instructions which may be provided by a manufacturer or supplier.

- xv. Advise employees on site of any risks drawn to the Company's attention by other employers sharing a particular workplace, and distribute information contained in the site's safety plan where this is applicable under the Construction (Design and Management) Regulations 2007.
  - xvi. Take steps to ensure the competence in health and safety of any persons or contractors to whom work is subcontracted.
  - xvii. Ensure that tenders are adequate to cover sound methods of working and the provision of the required welfare facilities.
  - xviii. Set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site visits.
- d) **Foreman or Nominated Engineer in charge of work on site will:**
- i. Have an understanding of the application of the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999 and other relevant legislation to the Company's operations, and a general knowledge of the Electricity at Work Regulations 1989, the Construction Regulations, the Construction (Design and Management) Regulations 2007, the Work at Height Regulations 2005, and other relevant Regulations and Codes of Practice.
  - ii. Report all injury accidents or dangerous occurrences to the Health and Safety Co-ordinator.
  - iii. Carry out necessary statutory inspections of fixed or mobile scaffolding and record results where appropriate.
  - iv. Issue instructions to employees in their charge concerning identified needs for personal protective equipment to be worn, and ensure that suitable equipment is provided and training given in use, maintenance and storage.
  - v. Ensure that hazards from material stacking, positioning of plant and installation of electricity supply are eliminated.
  - vi. Plan and maintain tidy work areas.
  - vii. Ensure that working methods established do not require or allow persons to take unnecessary risks.
  - viii. Ensure that only competent and, where necessary certificated, persons are employed.
  - ix. Ensure that all machinery and plant, including power and hand tools, is checked, that it is in good and safe condition, and that any defects are reported to the Plant Hire Company or owner.
  - x. Ensure that appropriate fire-fighting appliances are available on site as necessary.
  - xi. Ensure that adequate first-aid facilities are available during working hours.
  - xii. Accompany Enforcement Officers on site visits.
  - xiii. Review work hazards and methods with new or transferred employees.

- xiv. Reprimand any employee failing to exercise their safety responsibilities.
  - xv. Set a personal example, including the wearing or use of protective clothing or equipment as appropriate on site.
- e) **Employees will:**
- i. Use the correct tools and equipment for the job, including safety equipment and protective clothing as necessary.
  - ii. Keep tools in good condition.
  - iii. Report to the person in charge of the work any defects in plant or equipment of which they become aware.
  - iv. Develop a personal concern for safety for themselves and for others, particularly newcomers and young people.
  - v. Avoid improvising which entails unnecessary risks.
  - vi. Refrain from horseplay and the abuse of welfare facilities.
  - vii. Report incidents which have led or may lead to injury.
  - viii. Suggest ways of eliminating hazards.
  - ix. Co-operate in the investigation of any accidents.
  - x. Comply with any health and safety rules imposed by the Client or Principal Contractor.
  - xi. Set a personal example.

**ICOM HOLDINGS LTD****SAFETY POLICY STATEMENT****APPENDIX 3****COMPANY SAFETY RULES**

This Appendix to the Company Safety Policy is the Company Safety Rules as described in Section 10 of the Safety Policy. Wilful disregard by any employee of any Company safety rules may be considered sufficient cause for immediate dismissal.

1. Personal protective equipment shall be worn wherever necessary, as identified by risk assessments. The person in charge of the site will give instructions to operatives where this rule applies.
2. Safety helmets will be worn in accordance with the Construction (Head Protection) Regulations 1989 on sites or in work areas, which are designated as "hard hat" sites, or areas, or wherever else there are risks of head injury.
3. Safety boots or shoes must be worn at all times. No person may wear plimsolls, trainers or other soft-soled footwear, except within domestic premises.
4. Fire-fighting equipment is provided in all places of work. All employees must be aware of the location of fire extinguishers and of their method of operation.
5. All access equipment including ladders and stepladders must be kept in good repair. Mobile towers must only be erected by those trained to do so, and in accordance with the maker or supplier's instructions.
6. All injuries, no matter how slight, must be reported immediately.
7. Untidy areas and methods of working create unacceptable risks and must be avoided at all times.
8. Anyone known to be under the influence of alcohol and/or drugs shall not be allowed on the job while in that condition. Persons found to be displaying symptoms of alcohol or drug abuse will be dismissed immediately.
9. The Company will comply with the requirements of the Working Time Regulations 1998. No one shall knowingly be permitted or required to work while his or her ability or alertness is impaired by fatigue, illness, temperature or other cause that might expose the individual or others to injury.
10. Horseplay, scuffling, and other acts which tend to endanger the safety or well being of employees are prohibited.
11. Portable tools must be kept and maintained in good condition for the tasks for which they will be used. Worn or broken tools must be replaced immediately, and it is the personal responsibility of each employee to ensure that this is done. The Company maintains records of the electrical testing of all portable electrical appliances.
12. Only persons who have been trained and appointed in writing by the Company may change abrasive wheels and cutting discs.

**ICOM HOLDINGS LTD****SAFETY POLICY STATEMENT****APPENDIX 4****OFFICE SAFETY RULES**

This Appendix to the Company Safety Policy, which is a supplement to the Safety Rules set out in Section 10 of the main Safety Policy document, sets out the safety rules which must be observed by all employees working in our offices. These have been derived from our risk assessment.

1. Furniture and equipment must be arranged so as to avoid injury from sharp corners.
2. Upper drawers of filing cabinets must not be overloaded, causing them to become top-heavy.
3. Only one drawer of a filing cabinet must be open at a time, so as to avoid a tipping hazard.
4. Wall storage racks must be securely anchored to prevent their movement or tipping, and must not be overloaded.
5. Access to high upper storage shelves must only be gained by using the steps or safe access provided.
6. Cables from electric fires, telephones and leads to office electrical equipment are not to be laid across the floors so as to cause a tripping hazard.
7. Floor coverings must be held down securely and kept flat and free from wear in places where a person could trip.
8. At the end of each working day or shift, non-essential electrical appliances are to be switched off and their wall socket plugs removed.
9. Any electrical faults must be reported to the Health and Safety Co-ordinator.
10. Paper guillotines are not to be operated with their guards removed.
11. Any simple adjustments to electrical equipment must be made with the power switched off.
12. Electrical heaters or fires may only be used if properly guarded in accordance with British Standards.
13. Only properly trained and authorised personnel are permitted to operate specialised machinery and equipment.

14. Good housekeeping must be maintained by keeping floors and working areas tidy, ensuring that fire exits and passageways are not blocked, and taking care when using extension cables so that they do not cause an obstruction.
15. Fire exits must be kept clear at all times.
16. Fire extinguishers are to be kept readily accessible and where possible are to be positioned on wall brackets. All employees must be aware of these locations, of the methods of operation of fire extinguishers, and of the fire drill procedure for evacuation. The Health and Safety Co-ordinator is responsible for ensuring all fire-fighting equipment is regularly serviced.
17. Persons handling chemicals must be made aware of the hazards associated with the handling, storage and use of such chemicals, together with the precautions to be observed and the first-aid measures to be adopted.